



Piedmont Healthcare, Inc.
Code of Conduct



You are part of the Piedmont Healthcare Family, a group of talented and dedicated people who take pride in what you do and are committed to our patients and our communities. Each one of you, regardless of the role you perform, shares a common belief in providing quality care to each patient in any of our hospitals, clinics or physician practices. Together, we are dedicated to the Piedmont Promise and providing a superior healthcare experience for all those who seek care here.

This booklet further describes how our Piedmont Healthcare Vision, Mission and Values link closely with the Piedmont Healthcare Code of Conduct. The Code of Conduct defines the level of ethical behavior expected from each one of us, our staff, managers, volunteers, physicians and members of our governing boards. These expectations also apply to our business affiliates, associates and vendors, whose support is necessary in the work we do.

Every one of us has a responsibility to monitor and ensure that we consistently perform in accordance with this Code, and to seek help or advice if we feel any compromise or threat to its fulfillment by consulting with management, human resources, the compliance office, or the compliance hotline at **1-800-466-0462**. We must never assume that someone else has already identified and addressed a question that concerns you; we appreciate and ask that you take action to ensure we can thoroughly review any concerns you have and take appropriate steps to resolve an issue.

It is my commitment to you that we will not endorse or condone unethical or illegal behavior, and that we will take every step needed to identify and resolve threats to the integrity of our healthcare system.

Kevin Brown

A handwritten signature in black ink, appearing to read 'Kevin Brown', with a long horizontal flourish extending to the right.

President and Chief Executive Officer
Piedmont Healthcare, Inc.

PIEDMONT PROMISE

At Piedmont Healthcare, we've made a promise.

A promise that we will make your safety our priority.
A promise to recognize that this sterile environment can still be warm.
That "hospital" and "hospitality" are not similar just by coincidence.
And that world-class healthcare is even better when it's down to earth.

The promise means that, even though we love working here,
we understand you may not want to be here.

It means knowing patients are more informed than ever,
but realizing that "endoscope," "laparoscope" and "colonoscope"
all sound equally intimidating.

Our promise is to be respectful of your time.

We promise to alleviate your fear. By hearing your concerns.

To do everything in our power to make you well. And keep you well.

So we'll remind you to: Get your colonoscopies, get your mammograms,
exercise at least three times a week, and eat your vegetables.

We promise to empower you to take charge of your healthcare.
By providing you with some of the world's best doctors, nurses
and specialists. The latest in medical technology. Information you
can understand. And lots of genuine, heartfelt concern.

The perfect balance between health and care. That's our promise.





PIEDMONT HEALTHCARE CODE OF CONDUCT

Piedmont Healthcare, Inc. ("PHC") is committed to providing compassionate, world class care to our patients and conducting business in an ethical and honest manner and within the bounds of the law. This Code of Conduct is intended to provide employees, physicians, volunteers, vendors, governing board members and other agents of PHC with guidelines for conducting business in a manner which satisfies this standard. The Code of Conduct compliments the mission, vision and values of PHC; integrates the "Piedmont Promise;" and applies to all who provide services under the auspices of PHC or its affiliates.

The standards contained in this Code of Conduct are important, and therefore any violation will be handled in accordance with the Progressive Disciplinary Policy, as outlined in Human Resources policies or other applicable policies and procedures of PHC and its Medical Staff. In addition, referral of certain matters will be made to government and regulatory agencies as appropriate.

The Corporate Compliance Program

The Corporate Compliance Program has been established to identify, prevent and correct the occurrence of illegal or unethical behavior. We understand that only as a collaborative team can we make the best decisions and provide a safe and supportive environment for patient care. Our Code of Conduct demonstrates that we have strong values, that we can be relied upon to do the right thing, and that we will act to correct any inappropriate behavior. Violations to the Code of Conduct and/or PHC policies and procedures will be addressed in accordance with our policies and as required by law.

Leadership Responsibilities

While all are expected to abide by our Code of Conduct, PHC leaders are held to an even higher standard. Supervisors and managers are responsible for ensuring their departments operate in a manner consistent with this Code. PHC leaders are expected to be open to your concerns about ethics and compliance, with a commitment to transparency without fear of retaliation. Leaders are also responsible for ensuring that they provide you with sufficient information and resources about relevant laws, guidelines and PHC policies to comply with this Code.

How to Report Concerns or Violations

It is your obligation to report any instance of a known or suspected violation of this Code of Conduct. If you encounter any situation or problem that may violate the Code of Conduct, please contact your manager, the Chief Compliance Officer or Human Resources representative. You may also report a concern through the Compliance Hotline at **1-800-466-0462**. All calls to the hotline are confidential, and the caller may remain anonymous. To ensure confidentiality, the Hotline is operated by an organization not affiliated with PHC, and calls are

answered 24 hours a day, seven days a week. Follow-up on all calls is available by a return call to the Hotline. Callers, or anyone who reports compliance issues, will not be retaliated against in any manner for making reports, as long as the information being reported is, to the best of their knowledge, truthful.

The PHC Code of Conduct is designed to provide overall guidance and it does not address every situation. More specific guidance is provided in PHC policies and procedures. If you have questions or need additional information, please ask any PHC leader or contact our Compliance Department. You will be required to sign an acknowledgement confirming that you received this Code of Conduct; that you understand that it represents mandatory policies of PHC; and that you agree to abide by its terms.

Code of Conduct

The PHC Code of Conduct provides evidence of the organizational commitment to recognize and establish standards of compliance and ethics, while providing quality care to our patients and our communities. Your fulfillment of these standards supports the PHC Compliance Program, our policies and procedures, as well as laws that govern our operations, including federal healthcare programs, such as Medicare and Medicaid. In accordance with this Code, we all have the responsibilities to:

1. **Ensure Quality of Care:** PHC is committed to providing high quality care and delivering services that are appropriate, safe and cost-effective. We treat our patients at all of our locations with respect and dignity. Steps shall be taken so that each patient understands his or her treatment needs and options, treatment methods used, and outcomes. Competent and qualified individuals will provide appropriate care, while considering the safety and well-being of the patients. Please be aware that we all have a duty to report any actual or perceived quality of care concerns to management, the Compliance Office, Risk Management, Human Resources or the Compliance Hotline at **1-800-466-0462**.
2. **Ensure Fair Treatment:** PHC extends courtesy and respect to all persons affiliated with the system, and we support PHC's equal opportunity employment and the diversity of our co-workers. It is our policy not to discriminate on the basis of race, religion, gender, national origin, age, disability, sexual orientation, or socioeconomic standing in providing services to patients or the public, nor in relation to employment practices. Furthermore, PHC prohibits harassment or discrimination of its employees in any form by supervisors, co-workers, customers or vendors.
3. **Comply with the Law:** PHC is subject to numerous local, state and federal laws pertaining to all aspects of operations. All are required to understand and abide by the laws which apply to their duties. PHC follows appropriate procedures for proper cost reporting. PHC complies with the regulations governing conditions of participation, certificates of need, licensure, permits and accreditation. PHC will not contract with, employ or bill for services rendered by an individual or entity that is excluded or ineligible to participate in health programs.

4. **Maintain Confidentiality:** PHC is committed to maintaining the confidentiality of patient, personnel, and other proprietary information in accordance with applicable legal and ethical standards. Consistent with HIPAA (the Health Insurance Portability and Accountability Act of 1996), we do not use, disclose, or discuss patient specific information with others unless it is necessary to serve the patient or otherwise required by law. We do not access patient information or share it with others unless authorized to do so.
5. **Protect Access to Information Systems:** PHC is committed to protecting its information systems. All employees and other associates with access to PHC's computerized information system shall sign the PHC Confidentiality Agreement and abide by PHC's information security policies, including the protection of confidential passwords and other access information.
6. **Maintain Accurate and Complete Records:** PHC must report accurate information to governmental entities and other third parties. In order to meet this obligation, it is essential that everyone accurately and clearly reports the relevant facts or the true nature of a transaction. No employee should knowingly or with reckless disregard for the truth make any false or misleading statements either verbally or in writing regarding PHC operations. PHC must document our care in patient records to satisfy quality, reimbursement and any applicable legal standard. Any individual who contributes to the medical record must provide accurate documentation and not alter or destroy anything that is part of the official medical record. Medical records and other business documents will be retained in accordance with state and federal law and PHC record retention policies. Employee travel and entertainment-related expenses must be accurately documented and supported when seeking reimbursement from PHC.
7. **Bill Appropriately:** PHC provides and bills for medically necessary care. All applicable laws and regulations shall be followed regarding the provision of services, coding, billing and reimbursement.
8. **Adhere to Anti-Referral and Healthcare Fraud and Abuse Legislation:** All employees of PHC are required to comply with laws which prohibit healthcare fraud and abuse. The False Claims Act (FCA) imposes liability on any person who submits a claim to the federal government that he or she knows (or should know) is false, also on an individual who may knowingly submit false information in order to obtain payment from the government, or instances in which someone may obtain money from the federal government to which he may not be entitled and then uses false statements to retain the money. Any person may bring an action under this law (called a qui tam relator or whistleblower suit) in federal court and may share in a percentage of the proceeds from an FCA action or settlement. The FCA provides protection to relators and PHC prohibits retaliation of any sort against those who report compliance concerns or issues.

9. **Refrain from Prohibited Solicitation and Accepting Gifts:** PHC prohibits the solicitation of tips, gifts or personal gratuities from patients, visitors and vendors. The acceptance of small tokens of appreciation, such as candy or flowers, is permitted when given to a unit, department or practice. Any solicitation and/or acceptance of gifts or hospitality by vendors or potential vendors must follow the applicable PHC policies and relevant laws. Employees as well as non-employees are prohibited from soliciting any patients or family members for gifts and are prohibited from distributing any marketing or sales materials to patients, guests or family members. This standard does not apply to outreach by the PHC Foundations or PHC corporate-sponsored events.
10. **Avoid Conflicts of Interest:** PHC prohibits its employees and other associates from engaging in any activity, practice, or act which conflicts with, or appears to conflict with, the interests of PHC, its patients or its vendors. Therefore, Employees, Medical Staff members, Board members, and other individuals must disclose to their supervisor and the Compliance Officer any potential conflict of interest they or their immediate family have in any firm which does business with PHC or which competes with PHC in accordance with PHC policies.
11. **Conduct Political Activities According to the Law:** PHC does not participate or intervene in (including the publishing or distributing of statements) any political campaign on behalf of or in opposition to any candidate for public office. While PHC supports employee participation in the political process, employees are not permitted to use positions in PHC to try to influence the personal decisions of others to contribute to or otherwise support political parties or candidates except as lawfully permitted through political action committees. PHC may participate in lobbying activities or advocating the passage or defeat of certain legislation that pertains to issues that affect the healthcare community. Lobbying activities, or advocating the passage or defeat of certain legislation, shall not constitute a substantial part of the activities of PHC.
12. **Provide a Safe Workplace:** PHC complies with applicable state and federal laws designed to improve workplace safety. PHC is committed to training employees to carry out their work in a manner that is safe for them, their coworkers and the patients they serve. PHC does not employ or contract with individuals or entities that are excluded or ineligible to participate in federal healthcare programs, suspended or debarred from federal government contracts, or have been convicted of a criminal offense related to the provision of healthcare items or services and have not yet been reinstated in a federal healthcare program, provided we are aware of such criminal offense.
13. **Appropriately Use its Assets:** PHC's assets and resources must be protected by following procedures to prevent their loss, theft or unauthorized use. We do not use supplies or equipment for personal purposes or remove them from the premises, even just to "borrow" them. Physical assets include vehicles, machinery, supplies (office, medical cleaning, etc.), food, tools, furnishings, electronic or medical devices, etc. Employees must immediately return all PHC property (e.g., keys, documents, ID badges,

Blackberrys, cellular telephones) at the termination of his or her employment. PHC will report the misuse or theft of any PHC information, property or asset.

14. **Research and Clinical Trials:** PHC is committed to following high ethical and legal standards when conducting research and clinical trials involving human research subjects. PHC adheres to local, state and federal rules and regulations pertaining to research and clinical trials involving human subjects conducted by PHC employees and members of the Medical Staff. Patient rights will be respected during all phases of clinical trials. Any research involving human subjects must be done in accordance with the law and in accordance with the policies and procedures of PHC and any institutional review board.
15. **Cooperate with Government Investigations:** PHC employees and contractors are required to give full cooperation with any PHC audit or investigation. Employees and contractors are required to contact the PHC Legal and Compliance Departments when first informed of a pending or actual investigation.
16. **Participate in only Approved Third-Party Relationships, Agreements and Contracts:** PHC employees and contractors shall not accept or offer anything of value in exchange for referrals of business or the referral of patients. Our contracting and purchasing decisions are based on objective criteria and not on personal relationships or self-interest. All business arrangements must be in a written contract and have the prior approval of the Office of the General Counsel. All vendors are required to comply with the PHC Vendor Credentialing and Access Policy and shall acknowledge the existence of and adherence to the PHC Code of Conduct.

YOUR COMPLIANCE RESOURCES AND CONTACT INFORMATION

Piedmont Healthcare Compliance Department	404-425-7350
Piedmont Healthcare Compliance Hotline	800-466-0462

Confidentiality Agreement

I understand in the course of my employment or association with Piedmont Healthcare (PHC) and its affiliates, I am required to maintain the confidentiality of employer, employee, physician and patient information. This information includes, but is not limited to, patient-related information, confidential and proprietary business information including trade secrets and competitive and strategic data, and all related matters. I understand it is my responsibility to follow PHC policies and procedures as they relate to the assurance of patient rights and the confidentiality of all information, both patient and other business information, in any medium (written, electronic, or oral).

As a condition of my employment or other affiliation with PHC I understand I must sign and comply with this Confidentiality Agreement. By signing this Agreement, I understand and agree to the obligations stated herein.

Computer Systems: I understand in the course of my employment and/or association with PHC, I may be permitted to utilize online computer systems in order to fulfill my workforce responsibilities. If this is required, I understand personal access code(s), user ID(s), access key(s), and password(s) identify me to the online computer system(s). Accordingly, I will maintain their confidentiality and not reveal them to others. If at any time I feel their integrity has been compromised, I will change their value immediately if I have the authority to do so. If I do not have that authority, I will immediately contact either the Information Services Customer Care Center at 404-605-3000 and request a new code or password. I further understand any information I access from the online computer is strictly confidential and is to be used only in the performance of my duties and responsibilities as an employee or workforce member of PHC. I understand I may not access any PHC system for personal reasons.

I understand that any and all transmissions or data utilizing or stored on any PHC system is subject to review and inspection by PHC at any time and that no employee may claim any right of personal privacy in the use of any PHC system or of data or communications utilizing said system. I hereby waive any and all such rights and consent to any such review or inspection, at any time, with or without cause, and with or without notice.

I will not access or view any information other than what is required to do my job. If I have any question about whether access to certain information is required for me to do my job, I will immediately ask for clarification from a manager, director, Information Security Officer, or the Privacy Officer prior to access.

Employee/Affiliate Conduct and Confidentiality: I understand as an employee, physician, other member of the workforce, and/or volunteer of PHC, I am responsible for assuring confidentiality of any employer, employee, physician or patient information. I understand that release of employer, employee, physician, or patient information of any kind, including any proprietary business or financial information, is dictated by policy; and if I should be unsure as to the policy guidelines, I will obtain approval from a Manager, Director, Privacy Officer or Executive Officer prior to the release of any such information.

Patient Information: I am aware I am not authorized to discuss any information concerning a patient's personal data or medical condition unless specifically identified as a part of my duties, and then discussion may only occur with other professionals specifically involved in that patient's treatment, or payment or healthcare operations. I am also responsible for insuring conversations regarding patient information are held in appropriate locations with the appropriate individuals. I understand the need to be equally cautious when the information to which I have access is that of an employee or person with whom I am acquainted.

I will not make inquiries about information for which I do not have authorization to access or make an inquiry to any individual or party who does have proper authorization to access such information.

I will not make any unauthorized transmissions, copies, disclosures, inquiries, modifications, or deletions of Patient Information or Confidential Information. Such unauthorized transmissions include, but are not limited to, removing and/or transferring Patient Information or Confidential Information from any PHC computer system to unauthorized locations (e.g., home).

I also understand that any protected health information used in preparation for and/or utilized in case presentations, professional lectures, publications or other productions must be de-identified as described in PHC policy 5004

“Protected Health Information/De-identification of Protected Health Information” prior to removal from PHC premises. I further understand any access to PHI for research purposes will have been approved through an Institutional Review Board.

Patient Information and Media Relations:

Certain offices are designated as communication centers for information. Only the Office of Corporate Communications/Public Relations for Piedmont Healthcare, the local Administration or Public Relations offices for Piedmont entities, Information Desk receptionists, and the Patient Information line are authorized to give information concerning a patient’s condition as approved by the patient. Please refer all such inquiries to one of the above. Inquiries from newspapers, radio, television and other media; permission for photographs; and requests for Piedmont Healthcare information should be referred immediately to the local or Corporate Public Relations Office. Should you see a photographer or reporter on the premises unescorted by a Piedmont Healthcare representative, please alert Public Relations.

I agree that my obligations under this agreement regarding patient information will continue after the termination of my employment/assignment/affiliation with PHC. I understand that any confidential information or patient information that I access or view at PHC does not belong to me. I understand that a violation of this Agreement may result in corrective action and/or termination of employment and/or association with PHC. I understand that if any breach of confidentiality of information results in a claim or suit for damages against PHC, or any of its affiliates, PHC may seek indemnification for damages that are related to my actions. I also may be subject to personal civil and criminal legal penalties. I understand that any workforce member suspected of failure to maintain this confidentiality will be carefully reviewed and will, if substantiated, be subject to corrective action and/or termination in accordance with established policies and procedures.

PHC Property: Upon termination of my employment/assignment/affiliation with PHC, I will immediately return all property (e.g., keys, documents, ID badges, cell phones/blackberrys, laptops) to PHC. I acknowledge that I have read and understand the PHC policy 5016 “Confidentiality of Information” and this Confidentiality Agreement and agree to comply with all its terms as a condition of continuing employment or affiliation.

In signing below I acknowledge that I have received, read and understand the Piedmont Healthcare Code of Conduct and the Piedmont Healthcare Confidentiality Agreement. By signing this page, I agree to comply with all terms of the above as a condition of continuing employment or affiliation with Piedmont Healthcare.

Print Name

Signature

Date

Department/Affiliation

Facility/Location