



HonorCode

HONORHEALTH[®]

Code of Conduct

MISSION

HonorHealth's mission defines why the organization exists:

To improve the health and well-being of those we serve.

VISION

HonorHealth's vision sets our sights on what we strive to become and accomplish:

**To be the partner of choice as we
transform healthcare for our communities.**

VALUES

*Our values are the behaviors that guide how we accomplish our mission and vision
and how we treat each other and those we serve:*



Innovation

ICARE about keeping an open mind, embracing change, taking risks and maintaining a creative mindset as we work to continuously improve the care we provide.

Collaboration

ICARE about building trust and partnering with others, within and across boundaries, so we can offer best care and drive excellent outcomes.

Accountability

ICARE about driving a spirit of excellence, stewardship and integrity in all that I do for others.

Respect

ICARE about treating others the way I want to be treated.

Empathy

ICARE about being vulnerable and seeking first to understand others so I can best meet their needs.

Letter from the CEO



Todd LaPorte

At HonorHealth we know firsthand the trust and confidence our patients place in us. That's why we're committed to integrity and to continually improving our ability to provide the best healthcare possible. We're honored and humbled to be able to serve our community in this way.

HonorHealth is a combination of two rich legacies, John C. Lincoln Health Network and Scottsdale Healthcare:

- In the 1920s, John C. Lincoln and his wife Helen migrated from Ohio in search of a cure for Helen's tuberculosis. The journey resulted in a recovery for Helen and ultimately the establishment of **John C. Lincoln Health Network**.
- **Scottsdale Healthcare** started in 1962 with a single-story hospital serving a small population of 10,000. Fifty years later, one hospital had grown into a state-of-the-art health network with three hospitals, a Level I trauma center and one of the nation's largest military trauma training programs.

This Code of Conduct embodies the rich history of our organization and our commitment to the community we serve. The Code of Conduct:

- Reflects our long history of caring and provides guidance to ensure our work is done in an ethical and legal manner.
- Emphasizes the shared common values and culture that guide our actions.
- Features valuable resources to help resolve questions about appropriate conduct in the workplace.

HonorHealth's mission is to improve the health and well-being of those we serve. To achieve this mission, we must earn and maintain the trust of our patients, employees, physicians and business partners every single day. Earning this trust means more than just following a handful of organizational rules. It means we must be committed to doing our work with complete integrity.

Please take the time to read our Code of Conduct and make a point to understand how it can help guide you individually and collectively as a team. Thank you for your enduring commitment to HonorHealth's ethical values.

Todd LaPorte
Chief Executive Officer
HonorHealth

The HonorHealth promise

The brand promise of making healthy personal reflects HonorHealth's mission – to improve the health and well-being of our community.

HonorHealth provides the right care at the right time at the right place by:

- Communicating and collaborating across the health system to ensure that the patient always gets the best care.
- Working efficiently to provide care and reduce repeated questions and procedures.
- Explaining what we're doing and clearly defining steps to take to get healthier.
- Earning Magnet status for nursing care at all five hospitals. This prestigious designation ensures you receive the gold standard for nursing care, an honor earned by only 6 percent of the nation's hospitals.

HonorHealth focuses on the patient, "making healthy personal" by:

- Taking the time to understand each patient's unique needs.
- Engaging the patient in conversations about his/her health because that input is valuable.
- Never being too busy to go beyond what's expected to offer a helping hand.

HonorHealth is both a name and call to action. It emphasizes trustworthiness and integrity while demonstrating respect and dedication to delivering the highest quality care in a personal and easy manner.

HonorHealth engages its communities in wellness by:

- Focusing on wellness to help individuals live their best life.
- Being proactive about an individual's health.
- Offering support and guidance regardless of where each person is on their health journey.

HonorHealth makes it easier than ever to get the personalized care needed by:

- Transforming access to care by providing the right care in the right places.
- Providing more access points to quality care than ever and changing the way people get the care they need.

HonorHealth continues to strengthen its communities, making sure that everyone has access to quality healthcare:

- Many thousands of donors have supported HonorHealth programs and projects.
- The health system serves our communities through outreach programs and the HonorHealth Foundation.



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HonorHealth is committed to the practice and promotion of ethical conduct and integrity. HonorHealth's Board of Directors and leadership are committed to compliance with all laws and regulations that govern our organization. This Code of Conduct sets forth the standards by which HonorHealth conducts itself as a leader in the healthcare industry.

Our Code of Conduct is designed to be a guide for employees individually and for the organization as a whole, but it's not intended to be a comprehensive rulebook and cannot address every situation. HonorHealth has numerous internal policies that support the overall Code of Conduct and provide guidance on a more detailed level.

Although this Code of Conduct is directed to employees, the principles, practices and ethical standards apply to all who work with or for HonorHealth including physicians, volunteers, researchers, contractors and suppliers. All individuals who work with or for HonorHealth should uphold these ethical standards.

HonorPatients



HonorHealth staff members strive for excellence when treating and caring for patients. This means their safety, privacy and dignity are our top priorities.

Quality patient care

We're committed to providing quality care that's convenient, cost-effective and accessible. We treat everyone we serve with compassion and honor the privilege of serving them. Our commitment to quality healthcare involves making sure that all services are medically necessary, safely delivered and provided by appropriate licensed professionals. Keeping our patients safe is a top priority. We strive to maintain standards of excellence that ensure the safety of our patients.

Protecting patient information

In the course of providing healthcare services, HonorHealth collects personal and health information from those we serve. Information such as current and past medical conditions, medications and family history are collected and used to allow the highest quality treatment possible. We also collect personal information like address, phone numbers, email addresses and financial and insurance information.

Patient information is protected under the Health Insurance Portability and Accountability Act (HIPAA), the Health Information Technology for Economic and Clinical Health Act (HITECH) as well as state laws and regulations. HonorHealth is fully committed to maintaining the privacy and security of patient information. It should only be accessed by those who have the right to obtain it and should only be used or disclosed to perform one's job duties. Any access, use or disclosure of patient information for any purpose other than to fulfill one's job duties is inappropriate and comes with strict disciplinary action.

Q I have access to patient information at HonorHealth. I'm curious about a family member or friend's health. Can I look at his health record?

A No, you may not access any individual's information to satisfy your curiosity. Any access to patient information should be made only if it is required to perform your specific job duties. Accessing patient information to satisfy one's curiosity could result in disciplinary action including termination.

Most patient information is entered and stored in computer systems. Employees, physicians and volunteers are given access to these computer systems through the use of a username and password unique to the user. The sharing of usernames and passwords is not allowed. Users are responsible for any access to patient information made using their username and password.

Q My supervisor asked me to share my username and password with a new employee until that employee receives her own username. Is that OK?

A No, your username and password should never be shared with anyone. You should talk with your supervisor about this request and indicate that you're uncomfortable sharing this information. If you feel you cannot approach your supervisor, contact your compliance officer for guidance.

Care should be taken whenever patient information is given to someone whether in person, by mail, fax or email. We must ensure that patient information is protected and only given to the patient or those they have

allowed access to that information. If you believe patient information may have been given or sent to the wrong person, contact the Compliance Services Department immediately to assist in addressing the concern. It is possible a breach of the patient's privacy has occurred and may need to be reported to the patient or appropriate government authorities.

Q I accidentally provided a patient with someone else's discharge instructions. What should I do?

A You need to tell your manager or your compliance officer. Or use the Compliance Line, 844-732-6241, any time you give information to the wrong patient so it can be determined whether the disclosure has resulted in a breach of patient privacy.

When disposing of patient information, always be sure to place it in a confidential shredding bin and not in a recycle or trash bin. Patient information must be protected even when you're discarding it.

Q I accidentally faxed a document that contained patient information to the wrong person. What should I do?

A You need to tell your manager, your compliance officer or use the Compliance Line, 844-732-6241, any time you fax information to the wrong location so it can be determined whether the disclosure has resulted in a breach of patient privacy.

Emergency Medical Treatment and Labor Act (EMTALA)

HonorHealth complies with the Emergency Medical Treatment and Labor Act (EMTALA) by providing emergency treatment to all individuals coming to our facilities regardless of their ability to pay.

Every patient seeking emergency medical care at an HonorHealth hospital receives a medical screening examination. This exam determines whether the patient has an emergency medical condition or, if female, is in active labor. If an emergency medical condition exists, the patient receives stabilizing treatment within the capability of the hospital. HonorHealth will not delay the medical screening and necessary stabilizing treatment in order to seek financial and personal information. For more information related to compliance with the EMTALA regulations, please see HonorHealth's "EMTALA" (AD1403) policy and procedure.

Billing and coding integrity

When a patient is discharged from HonorHealth, the coding department reviews information about the patient's visit and assigns clinical codes based on the services the patient received. The coding department sends this information, along with the charges for products and services provided, to the billing office, which produces a bill for the patient and/or his/her insurance to pay.

HonorHealth maintains strict compliance with all coding and billing requirements. Staff handle the billing of patient care with the highest integrity and in compliance with all federal, state and private health plan requirements.

Q I'm concerned about the way we're billing patients for the care they receive. What should I do?

A Tell your manager of your concern or contact your Compliance Officer or the Compliance Line service. Billing rules and processes can be complex, but it is always good to have concerns reviewed to ensure we are billing our patients according to payer and regulatory requirements.

HonorEmployees



We honor our employees by providing an engaging, productive, safe and drug- and alcohol-free work environment.

Maintaining a respectful work environment

You have the right to work in an environment that is productive and free from harassment, violence or extreme interpersonal behavior. HonorHealth does not tolerate violence or threats of violence in any form.

Behavior that creates an intimidating, hostile or offensive work environment or that is harassing – including comments or actions of a sexual nature – are not acceptable. For more information related to maintaining a respectful work environment, please see HonorHealth’s “Harassment in the Workplace” (HR1326) policy and procedure.

Q An employee in my department frequently makes inappropriate jokes including references of a sexual nature. What should I do?

A Immediately tell your manager or Human Resources representative. Or use the Compliance Line, 844-732-6241. HonorHealth strongly supports an environment free from inappropriate workplace conduct, including sexual harassment.

Maintaining a safe work environment

HonorHealth strives to promote a work environment free from health or safety hazards. This includes providing you with training, education and information to prevent injury or illness. You should immediately notify your supervisor and complete the appropriate reports about any workplace injury, or risk of injury, so that timely action may be taken to resolve the issue. For more information related to maintaining a safe work environment, please refer to HonorHealth's "Safety Management System" (SP1001) policy and procedure.

Use and management of controlled substances

HonorHealth is a drug and alcohol-free workplace. The use of illegal drugs and abuse of controlled substances in the workplace is not allowed. As a condition of employment, any involvement in the unlawful use, sale, manufacture, distribution or possession of controlled substances, illicit drugs or use of alcohol in the workplace, or working under the influence of such substances, is not allowed and may result in disciplinary action.

In addition, many employees have access to prescription drugs and controlled substances. Prescriptions and controlled substances must be handled properly and only by authorized individuals. If you become aware of inadequate security or unlawful behavior, report this immediately. HonorHealth strictly enforces the reporting of any misuse of medications by staff or privileged practitioners.

For more information related to the use of substances while in the workplace, please refer to HonorHealth's "Substance Abuse" (HR1333) policy and procedure. If you're aware of any concerns related to the improper use and handling of drugs while in the job setting, please contact the Human Resources Department, your compliance officer or the Compliance Line, 844-732-6241.

Employee Assistance Program (EAP)

HonorHealth has established a confidential Employee Assistance Program (EAP) to provide help for everyday issues that may affect you or your family. Situations may include job pressures, relationship or marital conflicts, stress, anxiety and depression, work or school disagreements or substance abuse. Contact the Human Resources Department for more information on the benefits this program can offer. Services provided by the EAP program are free and referrals to other behavioral health programs may be covered under medical insurance plans.

HonorPhysicians



We honor our physicians by ensuring our partnership with them is consistent with all rules and regulations.

The Stark Law and the Anti-Kickback Statute

Physicians play an important role in patients' healthcare by diagnosing medical conditions and providing care plans and services. Because the physician acts as the gatekeeper for all patient care, it's important that HonorHealth maintains appropriate relations with all physicians.

Healthcare providers must never offer or give a physician any good or service, including payment, in exchange for the referral of patients to their service. Two important laws, the Stark Law and the Anti-Kickback Statute, provide the legal guidelines around appropriate relations between physicians and the healthcare providers to whom they refer patients.

The Stark Law is the common industry name used to refer to the Federal laws that do not allow physician self-referrals of Medicare patients. The Stark Law addresses the inherent conflicts of interest that can exist when a physician gains financially from making patient care referrals.

The federal Anti-Kickback Statute is a criminal statute that does not allow the exchange (or offer to exchange), of anything of value, in return for referral of patients to HonorHealth.

Physician gifts or awards

The Stark Law and federal Anti-Kickback Statute also guide how we provide any item or value to a physician such as a gift or award. There's a limit on the value of gifts or other non-monetary items that can be given to a physician by HonorHealth or its employees under these laws.

Before giving a gift to a physician, check with your manager to make sure it's appropriate to give the gift and that the physician has not already reached his/her limit for receiving such items. For more information related to providing physicians with gifts, please refer to HonorHealth's "Physician Non-Monetary Compensation" (AD1415) policy and procedure.

Q I work closely with a physician in our department. His wife recently had a baby and we would like to give him a gift. Can we do that?

A Maybe. There are limits to the value of gifts HonorHealth or its employees can give to physicians without creating legal risk. Check with your manager first who can confirm with the appropriate authorities whether the physician has already reached their legal limit.

There are numerous criminal and financial penalties for violating the Stark Law and the Anti-Kickback Statute. For more information, contact the Legal Services or Compliance Services Departments.



Honor Business Partners

We work with our business partners in a way that honors our obligations. During our partnership, we make every effort to ensure all applicable laws governing the relationship are followed.

Conflicts of interest

A conflict of interest can arise any time an employee's personal interests conflict, or may appear to conflict, with the best interests of HonorHealth.

As HonorHealth employees, each of us has a duty and obligation to be loyal to our employer. Because our primary focus is our patients' care and well-being, HonorHealth employees must be able to make decisions that are free from bias, personal interests, and actual or perceived conflicts of interest. Following are some examples of potential conflicts of interest:

Relations with vendors, suppliers, and consultants

HonorHealth works with many vendors, suppliers and consultants. Sometimes these outside organizations will offer gifts to employees as a means of promoting their business with HonorHealth. Certain substantial gifts may pose ethical issues.

You should not accept substantial gifts, business courtesies or favors from vendors, suppliers or contractors. Receiving or offering gifts, including meals and entertainment, could violate state or federal law, including the Anti-Kickback Statute, and present a conflict of interest.

Q I work closely with the vendor of some equipment used in my department. The vendor invited me to attend a professional sporting event with them. Can I attend?

A There are limits on the types and value of gifts employees can receive from vendors, suppliers or contractors because it may create a conflict of interest. Refer to HonorHealth's Gifts & Gratuities policy for more guidance on the value and types of items you can accept from vendors, suppliers and contractors.

You should also avoid accepting marketing items such as pens, sticky notes, calendars, mugs or other items that contain a vendor's logo or information. Such items are designed to market the vendor's products or services and should not be used or displayed in an HonorHealth setting. Most vendors are for-profit organizations, and using or displaying such items is inappropriate in HonorHealth's non-profit environment.

For more information on accepting gifts from outside organizations, refer to HonorHealth's "Gifts & Gratuities" (AD1404) policy and procedure.

Q An ambulance company representative dropped off a number of calendars with its name and logo on them. Can we accept these?

A No, you should not accept items that are designed to market an outside organization's business in HonorHealth's non-profit environment.

Relations with post-acute care providers

When patients leave the care of HonorHealth, they are sometimes referred to other post-acute care providers such as home health, hospice, skilled nursing, or ambulance transport. Employees must ensure that these providers are not offering gifts, entertainment or food to HonorHealth employees to avoid the appearance of inappropriately referring patients to these providers.

Patients have the right to choose their healthcare provider without undue influence from HonorHealth or other caregivers. If you ever encounter a situation where a vendor or post-acute care provider is pressuring you or another HonorHealth employee to accept a gift, contact your compliance officer for assistance.

Q A representative from a home health company dropped off lunch for our department as an expression of gratitude for referring patients to their service. Can we accept this?

A No, employees should not accept gifts from healthcare providers to whom HonorHealth refers patients as it could create a conflict of interest. Politely thank the home health representative but ask them not to give lunch to the department.

Outside business ventures

Some employees may be involved in personal outside business ventures such as acting as a sales representative for a consumable product, selling items as part of a hobby, or involvement in civic or political groups.

You should make sure that your non-work activities do not conflict with your role at HonorHealth. You should never spend time in your role at HonorHealth or use HonorHealth resources engaging in activities that support your personal outside business ventures or interests. For more information on appropriate workplace activities, refer to HonorHealth's "Non-Solicitation and Distribution" (HR1320) policy and procedure.

Q I work as a nurse in an HonorHealth hospital. I also work as a sales representative for a health food company on the side. Can I share information about the health products I sell at HonorHealth?

A No, you may not conduct personal business on HonorHealth time or in HonorHealth locations.

Relations with patients and their families

HonorHealth ensures that patients are treated fairly, equitably and with the highest quality of care. Employees must ensure their relationship with a patient or their family member is maintained at an appropriate distance.

On occasion, patients or their family members may want to express their appreciation by giving employees gifts. You must not accept gifts that may create a conflict in the manner in which you fairly and equitably provide care to all patients. You must never accept monetary gifts (including gift cards) from patients or their family members. Gifts that are of low dollar value, perishable and are shared with the entire department, such as food items or flowers, are acceptable.

Q A patient gave me a box of chocolates as an expression of thanks for the care I provided. Can I accept this gift?

A Yes, it can be accepted if the gift has a low dollar value, is perishable, and you share it with the entire department.

If you have any questions as to whether an outside activity or private interest might create a conflict of interest, contact the Compliance Services Department for guidance.



Honor Promises

HonorHealth is committed to honoring the promises we make to those we serve. We uphold our non-profit status by giving back to the community and strive to be a leader in healthcare within the community we serve.

Marketing and advertising

We have a responsibility to our patients to represent HonorHealth's products and services to the public in a manner that is true, fair and understandable. HonorHealth will market and advertise its services in compliance with applicable law. HonorHealth will not use or disclose protected health information for the purposes of marketing communications without written authorization from the patient. For more information on how HonorHealth uses patient information for marketing, refer to HonorHealth's "Using Protected Health Information for Fundraising and Marketing" (AD1540) policy and procedure.

Media requests for information regarding a patient's condition, interviews with staff members, visitors, or patients should be referred to management and the Marketing Department.

Q A reporter and cameraman from a local television station approached me while leaving work to ask about the organization. Is it OK to respond?

A Only authorized representatives of HonorHealth may respond to media questions and requests. If you are ever approached by a reporter, politely decline the request and direct them to the Marketing Department where an HonorHealth representative will respond.

Use of social media

When using social media sites such as Facebook, Twitter, and LinkedIn, during non-work hours, HonorHealth expects employees to behave responsibly. Employees may not post proprietary, patient or confidential information on social media sites. It is inappropriate to associate HonorHealth in social media posts to solicit or endorse a personal business venture, political candidate or religious cause. For more information on guidelines around social media use, please see HonorHealth's "Social Media" (HR1332) policy and procedure.

Tax exempt status

HonorHealth is a tax-exempt, non-profit organization according to the Internal Revenue Code. HonorHealth is not organized or operated for the benefit of private interests. HonorHealth must comply with all state and federal laws regarding tax-exempt status and engage in activities that further its charitable tax-exempt purpose.

You must not use HonorHealth resources to support political candidates or lobbying activities unrelated to HonorHealth's primary business. You must not engage in any activities that could put HonorHealth's non-profit status at risk.

Honor The Law



At HonorHealth we value integrity and are committed to doing what is right. We honor the law and work to serve the community being mindful of the rules and regulations that govern healthcare.

False Claims Act

A false claim is any attempt to obtain money from the federal government by knowingly presenting false or misleading information relating to payment from the government. We should never submit a claim for payment to the government that is not accurate, complete and truthful. HonorHealth receives a significant amount of revenues from government-funded healthcare programs.

The following are some approaches HonorHealth will take to ensure it does not violate the False Claims Act:

- A patient should never be charged or billed for a service or product they did not receive.
- A patient should only receive those services, products and procedures that are medically necessary for their care.
- All procedures performed should be correctly coded.

- Patients should be properly diagnosed for their condition. This diagnosis should then be correctly applied to any billing for patient care.
- Care provided to the patient should be documented comprehensively and accurately in the patient's medical record to justify the services provided and the payment received.

The False Claims Act offers a financial reward for individuals, known as whistleblowers, to make reports of fraud on behalf of the government. These individuals may be paid a percentage of the recovery for providing the information. In addition, the statute prohibits retaliation against individuals who exercise their rights or obligations under the law. HonorHealth prohibits anyone working for or with the organization from knowingly presenting claims for payment which are false or fraudulent.

Antitrust

HonorHealth abides by all antitrust laws. HonorHealth does not engage in business conduct that interferes with competition, price fixing, divisions of geographic markets, and other activities intended to restrict competition.

Government investigation resolution

Under the direction of the Legal Department, HonorHealth cooperates fully with requests for information from government auditors, investigators or other regulatory agency officials. Any questions, requests for information, documents or interviews from government officials or representatives should be directed to the Legal Department prior to responding.

HonorHealth Resources

Compliance Program

HonorHealth's Compliance Program is designed to establish a culture that promotes prevention, detection and resolution of conduct that is not consistent with this Code of Conduct or which does not conform to federal and state laws and private payer health plan requirements.

HonorHealth's Compliance Program is built upon the United States Federal Sentencing Guidelines' seven elements of an effective compliance program.

They include:

1. Written standards of conduct.
2. Oversight responsibilities including the designation of a compliance officer and a Compliance Committee.
3. Conducting effective education and training.
4. Developing effective lines of communication.
5. Enforcing standards.
6. Auditing and monitoring.
7. Responding to detected offenses and developing corrective action plans.

Reporting an issue

HonorHealth has an open door policy that encourages employees to ask questions or express concerns about suspected violations of federal, state and local laws as well as our Code of Conduct.

You're encouraged to contact your immediate supervisor, your designated compliance officer or HonorHealth's chief audit & compliance officer regarding any question or suspected violation of legal or regulatory requirements. For more information on reporting concerns, please refer to HonorHealth's "Reporting Compliance Concerns (Compliance Line Operation)" (AD1401) policy and procedure.

Non-retaliation policy

Each employee has the responsibility of reporting concerns that are not consistent with this Code of Conduct or all other rules and regulations. On occasion, an employee may hesitate to report suspicious activity for fear of being retaliated against. HonorHealth prohibits any form of retaliation against an employee who reports, in good faith, acts of misconduct or wrongdoing. Retaliating against someone for expressing a concern is subject to disciplinary action. For more information, please refer to HonorHealth's "Non-Retaliation" (AD1200) policy and procedure

The Compliance Line

HonorHealth maintains a Compliance Line service as an alternative reporting mechanism if you observe situations that are not consistent with our Code of Conduct or applicable rules and regulations. The Compliance Line is available 24 hours a day, 365 days a year, and is managed by an external company. This will ensure that information received through the Compliance Line will be confidential.

The Compliance Line service is available by calling 844-732-6241 or online by visiting www.honorhealth.ethicspoint.com and clicking on the "Make a Report" button.

You may also submit an anonymous call or report meaning you do not have to disclose your identity. All reports made on the Compliance Line service are forwarded to HonorHealth's Audit & Compliance Services Department for review, and investigation, where appropriate.

Q I'm concerned about a regulatory or legal requirement that we're not following in my department, but I do not feel comfortable discussing it with my manager. What should I do?

A If you don't feel comfortable bringing an issue to your manager's attention for any reason, you can contact your assigned compliance officer or the chief audit & compliance officer. You may also use the Compliance Line available by phone and on the internet.

Let's talk

If you have questions about, or are aware of, activities that are not consistent with HonorHealth's mission, values, Code of Conduct, policies, or laws and regulations, you're encouraged to report your concerns to:

- Your manager.
- Your compliance officer.
- HonorHealth's chief audit & compliance officer.

You may also ask questions or express concerns by calling the Compliance Line at

844-732-6241
or by visiting
honorhealth.ethicspoint.com

The Compliance Line is available 24 hours a day, 365 days a year for your convenience.



You may also express your concern anonymously if you choose not to reveal your identity. Concerns dealing with inappropriate interpersonal behavior should be referred to your manager or Human Resources representative. HonorHealth policy prohibits retaliation against individuals who report issues and concerns in good faith.

HONORHEALTH

You may also contact the Department of Health and Human Services' Office of Inspector General hotline at 800-485-5775 or 800-485-5877.

Let's talk

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The Compliance Line is available 24 hours a day, 365 days a year for your convenience.



You may also express your concern anonymously if you choose not to reveal your identity. Concerns dealing with inappropriate interpersonal behavior should be referred to your manager or Human Resources representative. HonorHealth policy prohibits retaliation against individuals who report issues and concerns in good faith.

HONORHEALTH

You may also contact the Department of Health and Human Services' Office of Inspector General hotline at 800-485-5775 or 800-485-5877.

Consider calling the Compliance Line if:

- You do not feel comfortable talking with your supervisor about a suspected wrongdoing.
- You notice wrongdoing outside of your supervisor's scope of authority.
- You're more comfortable remaining anonymous.
- You feel you are putting your job at risk by making a report.

Q I want to report a policy violation but don't want to reveal my identity. How can I do this?

A The Compliance Line allows you to ask questions or report concerns anonymously – you don't have to reveal your identity. Just remember, it may be difficult for HonorHealth to follow up on your concern if you don't give enough information to begin a proper investigation.

You may receive follow-up requests asking for more information through the Compliance Line, which will still allow you to remain anonymous. Keep in mind, your identity might be revealed based on the nature of your call or the kind of information you provide. Every effort will be made to protect the anonymity of reports through the Compliance Line.

Environmental, health and safety

Questions, concerns, or suggestions pertaining to HonorHealth's environmental, health and safety program can be directed to 480-587-5039 or emailed at EH&S@honorhealth.com.

Other resources available

You are encouraged to address concerns directly with HonorHealth management or with a member of the Compliance Services Department to facilitate a timely and effective resolution of questions or concerns.

If you still feel your concerns have not been addressed after bringing them to the organization's attention, listed below are some additional resources.

Before using any of these additional resources, it's important to consider that most external government or accrediting bodies expect individuals to bring their concerns to the organization first, before contacting the government agency, to allow the organization the opportunity to address the issue and resolve any concerns.

- **Office of Inspector General (OIG) Department of Health and Human Services (DHHS):** The OIG Hotline accepts tips and complaints from all sources about potential fraud, waste, abuse, and mismanagement in Department of Health and Human Services' programs. The OIG hotline number is (800) HHS-TIPS or (800) 447-8477. For more information refer to <https://oig.hhs.gov/fraud/report-fraud>.
- **The Office for Civil Rights (OCR) Department of Health and Human Services:** The Office for Civil Rights accepts complaints if individuals believe a covered entity or business associate violated their (or someone else's) health information privacy rights or committed another violation of the Privacy, Security or Breach Notification Rules.

OCR privacy or security concerns can be reported via mail, e-mail, fax or electronically at <https://ocrportal.hhs.gov/ocr/smartscreen/main.jsf>. For more information visit www.hhs.gov/civil-rights/filing-a-complaint/complaint-process.

- **The US. Equal Employment Opportunity Commission (EEOC):** The EEOC is responsible for enforcing the federal laws that make it illegal to discriminate against a job applicant or an employee because of a person's race, color, religion, sex (including pregnancy), national origin, age (40 or older), disability or genetic information. It is also illegal to discriminate against a person because the person complained about discrimination, filed a charge of discrimination, or participated in an employment discrimination investigation or lawsuit.

Filing a charge of employment discrimination can be made at www.eeoc.gov/employees/howtofile.cfm

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- **Arizona Health Care Cost Containment System (AHCCCS):** The Office of Inspector General (OIG) is responsible for the integrity of the Arizona Health Care Cost Containment System (AHCCCS), Arizona's Medicaid program. The OIG is also responsible for handling reports of fraud and abuse of the AHCCCS program. The OIG provides a way for members, plans, providers and the public to report all forms of suspected fraud, waste or abuse of the program. Reports may be made by telephone or by email at AHCCCSFraud@azahcccs.gov. For more information about reporting concerns to the AHCCCS program, visit www.azahcccs.gov/Fraud/AboutOIG.
 - **DNV Reporting:** DNV provides accreditation and clinical excellence certifications to hospitals. HonorHealth is accredited by the DNV. DNV maintains an online hospital complaint reporting process when quality of care concerns are identified. Hospital complaints can be reported at dnvglhealthcare.com/patient-complaint-report or by calling 866-496-9647. Patient safety events can also be reported by fax at 513-947-1250.

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HONORHEALTH®

Compliance Line: 844-732-6241

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