



CODE OF CONDUCT

Integrity in Action

OUR MISSION

Our Mission is to extend the compassionate ministry of Jesus by improving the health and well-being of our communities and bring good help to those in need, especially people who are poor, dying and underserved.

OUR VISION

Inspired by God's hope for the world, we will be a ministry where associates want to work, clinicians want to practice, people seek wellness and communities thrive.

OUR VALUES

Human Dignity

We commit to upholding the sacredness of life and being respectful and inclusive of everyone.

Integrity

We commit to acting ethically and modeling right relationships in all of our individual and organizational encounters.

Compassion

We commit to accompanying those we serve with mercy and tenderness, recognizing that “being with” is as important as “doing for.”

Stewardship

We commit to promoting the responsible use of all human and financial resources, including Earth itself.

Service

We commit to providing the highest quality in every dimension of our ministry.

Dear Bon Secours Mercy Health Associate,

At Bon Secours Mercy Health (BSMH), we are blessed to be part of extending the compassionate ministry of Jesus. The foundations of our ministry go back nearly 200 years.

The legacy of BSMH began with women religious from France and Ireland who committed their lives to serving others, especially those who were poor, dying and underserved. They courageously set forth from the safety of their motherhouses and responded to the needs of the people, a calling which eventually brought them across the Atlantic Ocean to the United States.

In time, both lay women and men embraced the work of improving the health and well-being of their communities, bringing mercy, humility and good help to those in need. Inspired by the examples of these selfless visionaries, we have established our Mission, Vision and Values, which collectively serve as BSMH’s “north star,” guiding and orienting all that we do.

Our Mission describes what we hold ourselves accountable to as a ministry of the Catholic Church. It links us to our past and guides our efforts in the present. Our Vision boldly inspires our direction into the future. And our Values are the foundational commitments guiding our relationships and interactions with patients, residents, associates and partners.

Our Mission and Values also call us to safeguard the earth and its resources and to help people and communities thrive. Through our environmental, social and governance (ESG) activities, we are demonstrating our commitment to being of service, honoring human dignity and serving as stewards of the earth’s limited resources. We act with integrity and hold ourselves accountable for promoting the common good.

This Code of Conduct is a natural and appropriate extension of our Mission, Vision and Values. It provides greater specificity for our actions in the increasingly complex and ever-changing world of health and health care. At the center of this Code, and permeating its pages, is an enduring commitment to ethical behavior. It is a manual for “integrity in action.” Our Board of Directors and Executive Leadership Council urge you to read it and keep it close by as a reference for you in your daily work.

Thank you for choosing to be part of the incredibly important and exciting ministry of Bon Secours Mercy Health! God bless you.



John M. Starcher, Jr.
Chief Executive Officer
BSMH

A handwritten signature in black ink that reads "John M. Starcher, Jr." in a cursive script.



Jennifer O'Brien
Chair, BSMH
Board of Directors

A handwritten signature in black ink that reads "Jennifer M. O'Brien" in a cursive script.



Donna M. Abbondandolo
Chief Compliance
Officer

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Purpose

Every Bon Secours Mercy Health (BSMH) associate has an important role to play in advancing the ministry and supporting this Code by honoring the dignity of each person, acting with integrity, demonstrating compassion, promoting stewardship and being of service to others. The Code applies to all who have a relationship with BSMH, including, but not limited to associates, officers, board members and volunteers.

Given its importance, the Code of Conduct is reviewed and approved by both the Executive Leadership Council and the ministry's Board of Directors. All policies across BSMH should be consistent with this document. For details and procedures associated with areas governed by various policies, please refer to the policies themselves. Some Compliance policies are referenced in this Code, others may be reviewed and downloaded from BSMH's intranet site.

Thank you for all you do to advance the Mission of Bon Secours Mercy Health!

Culture

Guided by our Mission, Vision and Values, we aim to build and strengthen our core culture behaviors across BSMH. We are focused on being an **empowered, unified** and **agile** team of people who are passionately **committed to the mission**. We expect all associates to display these core culture behaviors every day:

- **Be empowered** — we are leaders in Catholic health care, acting with integrity, transparency and accountability.
- **Be unified** — we are one team, acting with inclusion, collaboration and respect.
- **Be agile** — we are open to smart risk-taking in a dynamically changing industry.
- **Be committed** — we are dedicated to our Mission, our communities and our Catholic identity.

If you have specific questions about our culture and these core culture behaviors, please reach out to Human Resources (HR).



Code of Conduct

Our Mission, Vision and Values provide guidance as we deliver quality care, make sound, ethical decisions, meet our ministry goals and bring good help to those in need. The BSMH Code of Conduct is intended to be a simple, impactful summary of the standards of behavior we expect from all associates, board members and vendors. To emphasize our full commitment to compliance with all federal health care programs' requirements, and applicable laws and regulations, the Code of Conduct makes it easier to remember and apply everyday workplace situations. The Code of Conduct may not address every situation; however, each standard is supplemented by policies and Standard Operating Procedures (SOPs) that provide more detailed guidance. As workforce members, we are accountable for the integrity of our decisions and actions. The Code of Conduct provides the foundation of expectations as we do our work each day.



Integrity in Patient Care and Supporting the Communities We Serve

- Honor the rights of patients and treat patients with dignity and respect.
- Provide compassionate care and exceed standards for quality care and patient safety.



Integrity in Financial and Billing Information

- Exercise good faith and honesty in all dealings and transactions.



Integrity in the Workplace

- Respect diversity and promote inclusion.
- Protect the confidentiality of patient, resident, associate and organizational information.
- Avoid conflicts of interest and/or the appearance of conflicts.
- Use our resources responsibly.



Legal and Regulatory Compliance

- Abide by all laws, regulations, and policies that govern what we do.



Ethical Responsibility

- Report any suspected or actual violation of the Code of Conduct, law, regulation or policy.



Follow our Code

BSMH associates, officers, board members and volunteers are expected to:

- Be familiar with and **follow the Code!**
- **Speak up! Ask for help** when you're not sure about something and **report concerns.** There is no retaliation for asking questions or making reports in good faith.
 - If you have HR-related questions or concerns, please reach out directly to **HR Advice and Counsel** at 1-877-692-7780, or your designated **HR Partner**.
 - If you have questions or concerns relating to clinical matters, enter them in SafeCARE.
 - Concerns about the safety or quality of care provided may be reported to The Joint Commission.
 - If you see or hear anything else that seems inconsistent with the Code, applicable law, regulation or internal policy:
 - Speak to your supervisor or another member of management.
 - Contact Compliance at emailCompliance@BSMHealth.org or Privacy@BSMHealth.org.
 - Use the 24/7 BSMH Ethics Help Line by calling 1-888-302-9224 toll-free or submit an on-line report at www.bsmhethicshelpline.org. You may remain anonymous.
- All questions and concerns reported to BSMH will be reviewed by the appropriate department.
- Cooperate with internal and government investigations. Respect requests for confidentiality within the limits of the law.

Ethical Responsibility

Reporting Suspected or Actual Violations

Associates have an obligation to report all potential or actual violations of federal and state regulation or law, BSMH policy or the Code of Conduct. For those who wish to remain anonymous, reports can be submitted using the BSMH Ethics Help Line. The BSMH Ethics Help Line supplements other avenues of communications within the organization for raising questions or concerns. BSMH values and encourages honest discussion about ethical and compliance concerns that relate to the Code of Conduct and BSMH policies.

No Tolerance for Retaliation

Retaliation occurs when an individual (or a group of individuals, to include members of management) attempt to cause harm, intimidate or cause otherwise negative consequence to an individual for reporting or assisting in an investigation of a suspected or actual violation of federal or state law, BSMH policy or the Code of Conduct. Report any form of retaliation to your manager, the Compliance Office or to the Ethics Help Line. BSMH Compliance will investigate any allegation of retaliation.



BSMH has a policy of no tolerance for any form of retaliation against someone who reports a concern in good faith.



Management Responsibility

Leaders must set an example and take action when compliance and ethical issues are raised. They are responsible for ensuring that associates know the content of the Code of Conduct and any applicable policies. Managers are responsible for seeking assistance from the Compliance Office for themselves and their staff when the right action is not clear and when questions arise.

Discipline

Any associate who violates the Code or related policies and procedures will be subject to disciplinary action. The specific discipline will be based on the facts and circumstances, including the nature, severity and frequency of the violation.



The disciplinary policy will be firmly and fairly enforced with respect to all associates.

Integrity in Patient Care and Supporting the Communities We Serve

Patient Rights

As a Catholic health care ministry, BSMH is committed to respecting the inherent dignity of every person. We honor the right of individuals to receive compassionate, safe and high-quality care. Together we will:

- Not make a distinction in the availability of services or the care we provide based on:
 - Age, gender, disability, race, color, religion, national origin, actual or perceived sexual orientation, marital status, veteran status or other protected class.
 - The source of payment or the patient's ability to pay.
- Respect the rights of patients including, but not limited to, the following:
 - Respond promptly and courteously to patient inquiries and requests.
 - Respect patient wishes through advance directives and care planning.
 - Follow the process for disclosing medical errors and adverse events.
 - Ensure that patient visitation policies are applied fairly. Do not restrict, limit or deny visitation based on classes that are protected by law.
 - Notify immediately the next in charge if you do not clearly understand the needs of patients, residents and/or their family members.
 - Involve patients and their designees in decision making regarding their care and when discussing available options.
 - Respect the patient's right to privacy and adhere to HIPAA policies and law.

Quality Care

BSMH is committed to the dignity, health and well-being of our patients. All associates will treat patients, residents and clients with compassion, understanding and respect. We will provide medically necessary and appropriate care, make clinical decisions based on identified health care needs, regardless of payment source or how BSMH shares risk, and involve individuals in decisions about their care, as they are able. We are committed to the delivery of care that is safe, effective, patient-centered, timely, efficient and equitable.

Emergency Treatment

BSMH is committed to providing a medical screening exam and, if appropriate, providing stabilizing treatment to all patients who present at a BSMH Emergency Department, regardless of their ability to pay, and in compliance with federal and state requirements and BSMH policies.

Ethical and Religious Directives

As a Catholic health care ministry, BSMH is committed to complying with the Ethical and Religious Directives for Catholic Health Care Services (ERDs). The ERDs provide guidance on all aspects of our ministry. BSMH will provide patients, residents, family members, associates or providers with the option of requesting an ethics consultation if they have questions or concerns about the ERDs or other ethical matters. Reach out to your market mission leader if you have questions about how to initiate a consultation.



To find out more about the ERDs, follow this link:
<http://www.usccb.org>

Research

BSMH is committed to the highest ethical standards and full compliance with federal and state laws and regulations when conducting clinical trials, investigations and research. BSMH will protect the safety

of research participants and respect their rights as required by law. BSMH is committed to integrity in disseminating accurate, valid scientific results and submitting appropriate costs related to research grants, in accordance with applicable regulations and guidelines.

Integrity in Financial and Billing Information



Business and Financial Information

BSMH is committed to protecting the confidentiality of information that is proprietary to our ministry as well as preparing complete and accurate documents. If your role allows you to have insight into proprietary ministry information, you must protect the confidentiality of this information. If your role requires you to prepare documents, you must do so in a truthful, complete, legible and timely manner. This includes, but is not limited to: personal information of our associates, including when they receive care in a BSMH setting; cost reports; accounting records; clinical data and outcomes; management discussion and analysis to bondholders; expense accounts and time sheets.

Record Retention and Destruction

BSMH is committed to retaining information that may be necessary for continuity of care, billing and for compliance with regulatory, tax and financial reporting requirements. BSMH is also committed to destroying such records when they are no longer needed in accordance with the BSMH Record Retention Policy.

Enter information into the medical record, business records or regulatory or financial reports in a truthful, complete, legible and timely manner. Retain and destroy records (paper or electronic) as required by law and BSMH policy. If you aren't sure how long to retain or when to destroy certain records, talk to your supervisor. Never destroy records that you believe may be requested or that have been requested by a regulator or investigator.



If anyone tells you to destroy records related to an investigation, contact the Compliance Office or Legal department before you do anything.

Integrity in the Workplace

Safeguarding Patient Information

BSMH is committed to protecting the confidentiality of the information patients share with us for the purpose of receiving care. All associates and providers are required to safeguard Protected Health Information (PHI). PHI identifies an individual and relates to their past, present or future physical or mental health or condition, health care services and payment for those services. It includes health information (such as diagnosis and treatment plans) as well as demographic information (patients' names, addresses, phone numbers, Social Security numbers, date of birth, patient ID, payment information and other personal information). BSMH associates who are patients in our facilities also must be given the highest level of confidentiality with respect to their medical records and the PHI contained in them.

The confidentiality of PHI is protected by federal and state laws. The Health Insurance Portability and Accountability Act (HIPAA), combined with state laws, prevents the release of any PHI except for treatment, payment and health care operations. Subject to emergency exceptions, patient privacy should be protected, and PHI should be released only to persons authorized by law or with the patient's written authorization.

Examples:

- Do not permit or provide access to a patient record by individuals who are not directly involved as members of the patient's care team.
- Do not give or remove PHI in any format to anyone without proper written authorization.
- Do not leave PHI in any form (paper or electronic) unattended or easily accessible to individuals unauthorized to view the information.
- Do not discuss patient cases in a public area where conversation may be overheard by others or in an electronic forum that is open to the public.
- Do not access associates' medical records when they are receiving medical care at our facilities, unless it is for treatment, payment or health care operations.

Associates who engage in unauthorized access or disclosure of PHI will be subject to disciplinary action up to and including termination of employment. Individuals may also be subject to civil or criminal penalties under HIPAA.

Many countries have rules about the collection and use of personal data. Some are stricter than others. In the European Union (EU) the General Data Protection Regulation (GDPR) provides regulations on data protection and privacy for all individuals within the EU. GDPR also addresses the export of data outside the EU. PHI may not be defined the same way in every country, so ask questions!

Associates must obey all applicable privacy laws, so handle personal data responsibly and for legitimate business purposes only. Immediately report suspected violations of the handling of personal data to a supervisor, the Compliance Office, Privacy Officer or General Counsel.

Human and Worker Rights

BSMH is committed to ensuring compliance with labor standards to protect and enhance the welfare of the workforce and to ensuring that child and forced labor are considered when selecting a third-party supply chain source.

Conflicts of Interest

BSMH is committed to assuring that business decisions are free of any potential conflicts, are unbiased and are in the best interests of the ministry. The existence of a potential conflict of interest or conflict of commitment may occur if your family relationships, outside activities or personal interests influence, or appear to influence, your ability to make objective decisions associated with your workplace responsibilities. BSMH associates and board members are required to disclose potential conflicts per the BSMH Conflict of Interest Policy. Insider trading by directors, officers, or employees based on knowledge of participating vendors or their prospects gained through their employment or board appointment is prohibited. All potential conflicts will be appropriately managed to ensure parties act in the best interest of the ministry. If you have any questions about potential conflicts or commitments, please contact the Compliance Office.

Participation on Outside Boards

BSMH is committed to encouraging associates to contribute their time to their communities. Many of our associates serve on the boards of various charitable, civic or fraternal organizations. You must speak to your supervisor and obtain any necessary approvals before serving on the board of directors of any organization that may have interests that conflict with BSMH or related organizations. You shall not discuss or vote on any matter that might affect the interests of BSMH. If applicable, reimbursement must comply with BSMH policies.

Appropriate Use of Resources

BSMH is committed to fostering good stewardship of its resources. All associates shall be responsible when using BSMH's assets, including time, material, supplies, equipment and information. Use all BSMH communications devices primarily for

ministry purposes in accordance with BSMH policies. This includes, but is not limited to telephones, computers, electronic mail, intranet, Internet access and voice mail, all of which are the property of BSMH. Remember that you do not have a right to privacy with respect to anything you create, store, send or receive on BSMH computer and telephonic systems. NOTE: BSMH reserves the right to monitor and/or access all communications usage and content.

Travel and Business Expenses

BSMH is committed to reimbursing associates for appropriate travel and business-related expenses. If travel and other expenses are required for your job, you shall fully understand BSMH travel and expense policies and submit requests for reimbursement in accordance with them.

Discrimination and Harassment

BSMH is committed to providing a professional work environment free from any form of discrimination or harassment. BSMH forbids all forms of discrimination and/or harassment based on race, color, creed, religion, gender, national origin, actual or perceived sexual orientation, gender identity or expression, veteran or military status, marital status, age, pregnancy, disability or any other class protected by law. All workplace violence or threats of violence against anyone is prohibited, and reporting is supported and encouraged. Do not engage in or tolerate any form of discrimination or harassment.

Gifts

BSMH is committed to conducting business with integrity. Giving and accepting gifts, entertainment or meals to or from outside sources can create an appearance of impropriety and potentially violate BSMH policy. This includes cash, cash equivalents (e.g., gift cards, checks, grants, scholarships), meals, lodging, transportation, tickets to sporting or other

paid events, discounts on goods or services, loans, works of art, recreational equipment, prizes and sponsorships. Do not ask any person or organization for money, rewards, gifts or other items of value for BSMH unless your job requires you to do so as a member of the BSMH Foundation staff.

NOTE: While the ministry discourages giving and receiving gifts of any kind, individually you may give/accept non-cash gifts of nominal value (e.g., pens, mugs, note pads, etc.) to/from vendors. You may accept edible or perishable items (e.g., fruit, candies, flowers, etc.) that are given to an entire department or shift. The gifts must be infrequent, reasonable and not in exchange for favors or other gifts. See BSMH Vendor Relations and Gifts Policy and the Pharmacy Vendor Policy for additional restrictions and further details.

Social Media

BSMH is committed to the responsible use of social media and ensuring that the use of social media communications uphold our ethical values, our dedication to promoting a positive and respectful work environment and our commitment to providing excellent care to our patients and communities. Language posted on social media can affect patients and the community's perception of BSMH. Associates shall not post any form of protected health information, associate personal information or confidential ministry information on Facebook, Twitter or any other social media site. BSMH Marketing determines when, where and how the BSMH name and brand may be used on social media platforms.

Political & Lobbying Activity

BSMH is committed to advancing its religious and charitable purposes. As a non-profit organization, BSMH does not engage in political activity and limits lobbying efforts consistent with the law. Individuals may participate in political activity that is strictly unrelated to BSMH and performed during personal time.

A few examples of things **we may** and **may NOT** do:

- **We may** conduct a limited amount of lobbying by contacting or urging the public to contact members or employees of a legislative body for the purpose of proposing, supporting or opposing legislation. This type of activity is organized/conducted through the Advocacy and Governmental Relations department.
- **We may NOT:**
 - Use BSMH revenues directly or indirectly for political activities or in support of political campaigns.
 - Seek or approve reimbursement for personal expenses related to any political activities including money spent in support of any political candidate or political action committee.
 - Solicit political contributions from BSMH associates.

Substance Abuse and Impairment in the Workplace

BSMH is committed to providing a safe, drug-and alcohol-free environment for our patients, visitors and associates. Associates, providers, contractors and vendors may not be under the influence during work time. Associates are required to report any unsafe situation to their manager or Human Resources.

Diversity and Inclusion

BSMH is committed to diversity and inclusion in the workplace. All associates shall respect diversity, which is the existence of the gifts, talents and attributes of people, processes and functions, both the differences and the similarities. They will promote inclusion, which means creating and fostering an environment in which all are included, respected and supported so that we may advance and accelerate our Mission, Vision and Values.

Intellectual Property

BSMH is committed to following all applicable intellectual property laws. You shall respect the intellectual property and copyright laws regarding books, trade journals and other applicable resources that you use for your job and assure that the software you use to conduct BSMH business is properly licensed and used in accordance with that license.

Legal and Regulatory Compliance

Screening of Excluded Individuals and Entities

BSMH will not knowingly employ, appoint, elect, contract or bill for any individual or entity that has been listed as debarred, excluded or ineligible for participation in federal or state health care programs. BSMH routinely searches the lists of excluded, sanctioned and ineligible persons that are maintained by the U.S. Department of Health and Human Services, U.S. Department of the Treasury, Office of the Inspector General, General Services Administration, Office of Foreign Assets Control and various other federal and/or states' departments of health exclusion lists.

All associates who are excluded, debarred or ineligible to participate in federal or state health care programs, or are convicted of criminal offenses related to the provision of health care items or services during employment, must immediately report the action to the Compliance Office.

Environmental Compliance and Safety

BSMH is committed to the care of the environment and the safety of our associates. Associates shall comply with environmental laws in all aspects of our health care operations. Follow BSMH procedures for the handling, storing, labeling, using, transporting and disposing of solid and liquid wastes that are hazardous or infectious including, but not limited to, the use of personal protective equipment (PPE). File all required environment reports in a truthful, complete, legible and timely manner. Cooperate fully with governmental authorities in the event of an environmental incident or inquiry.

Fraud, Waste and Abuse and False Claims

BSMH policies and various federal and state laws prohibit fraudulent claims activity. The Federal False Claims Act and state fraud and abuse prevention laws prohibit conduct such as knowingly submitting a false or fraudulent claim or using or making a false statement to get a false or fraudulent claim paid. Other laws governing Medicaid program integrity also look for

ways to reduce fraud and abuse. BSMH and its associates and providers can be prosecuted for filing inaccurate claims for reimbursement and can be subject to civil fines, criminal penalties or both. Compliance's performance of routine audits or reviews and monitoring, along with internal controls, help BSMH prevent and detect fraud, waste and abuse.

BSMH will comply with all state and federal health care program requirements relating to overpayments. Follow BSMH policies and procedures for refunding overpayments, provided you are authorized to do so. If you are not so authorized, refer the matter to someone who is.

BSMH expects associates to report known or suspected activity of this type to the Compliance Office. Associates who report false claims or other fraudulent conduct or who otherwise assist in an investigation or action are protected from retaliation to the furthest extent possible under both federal and state laws.

Examples of actions that could trigger the False Claims Act include, but are not limited to, the following:

- Knowingly billing for services that were not provided.
- Knowingly billing for services that were not ordered by a physician.
- Double-billing for items or services.
- Submitting bills for services never performed or items never furnished.
- Billing for services that are not necessary for the treatment of a patient.
- Billing for services that are more complex and at a higher reimbursement than the actual service provided (i.e., up coding).
- Billing for services separately instead of billing the code that includes multiple services (i.e., unbundling).

Not-For-Profit Tax-Exempt Status

BSMH is a not-for-profit, tax-exempt entity which is organized and operated for religious and charitable purposes. BSMH is committed to maintaining its charitable status and being a good steward of our resources. BSMH resources are used in a manner that improve the health and well-being of our communities rather than the private or personal interests of any individual or entity.

Fair Competition and Antitrust

BSMH is committed to complying with state and federal antitrust laws. The general purpose of these laws is to support competition and commerce among organizations. Associates should not enter into agreements on behalf of BSMH to fix prices or reduce competition. They should not share information with competitors or potential competitors relating to current or future fees, bids or negotiations, compensation or benefits, costs or financial projections, marketing or strategic plans, markets and market share plans, and plans to discontinue services or offer new services.

Anti-Kickback and Stark

BSMH is committed to complying with all federal and state laws governing its relationships with providers, such as the Anti-Kickback and Stark laws. BSMH prohibits remuneration of any kind in exchange for patient referrals purchases or leases. All contracts and interactions with other referral sources are to follow all applicable laws and regulations.

Foreign and Domestic Financial Crimes

BSMH is incorporated in the United States, and also has activities in other countries. Thus, BSMH is committed to complying with all laws governing foreign and domestic financial crimes including, but not limited to, the Foreign Corrupt Practices Act (FCPA) and other laws and regulations pertaining to the issuance of public debt and related financial activities. These laws and regulations prohibit the bribery of officials (foreign or domestic), political corruption, conflicts of interest, money laundering, terrorist financing and other financial crimes. This means that if your job requires you to make decisions, develop or submit reports, or otherwise be involved in any activities that could implicate these laws and regulations, you must complete the required BSMH training on these topics.

Response to Government Inquiries and Investigations

BSMH is committed to complying with government inquiries, as required by law. All government requests for documents or subpoenas shall be referred to the Legal Department, which coordinates BSMH's responses, ensuring they are appropriate and complete. Do not destroy, alter or change BSMH records requested by or related to a government investigation. Preserve all related records and cooperate with the Legal Department when BSMH receives notice of a government investigation or lawsuit, a request for documents or a subpoena.

Inform the Compliance Office, Legal department or other leaders if you learn that the organization is being investigated.