



# Code of Conduct



Dear Teammate:

Atrium Health is guided by a strong dedication to our mission and vision. In fact, we're unique in how we use these guiding principles to motivate behaviors and drive decision-making. That's as it should be, given the importance of trust in the work we do and the relationships we build. It's our reputation, based on a strong commitment to the highest standards of clinical, ethical and legal conduct, that allows us to care for patients and the communities we're privileged to serve.

With that in mind, I hope you'll take the time to review and learn the information in this Code of Conduct. Understanding our legal and ethical obligations will help you know what's expected of every Atrium Health teammate.

Atrium Health will be successful in meeting our goals when we inspire the full confidence of patients, vendors, payers, government oversight agencies and many other important groups. All of us have an important role to play in ensuring that public confidence remains strong, so that together we can fulfill our mission of providing health, hope and healing – for all.

**sincerely**



EUGENE A. WOODS

PRESIDENT AND CEO



**Eugene A. Woods**

*President and CEO*

# Compliance 101

## What is compliance?

As an organization, we're continually focused on operational excellence. Compliance is a foundational part of the everyday work we do to make sure our patients get the care they need.

### In the simplest terms, compliance is:

- ☐ **Doing the right thing, and**
- ☐ **Knowing what to do if you think something isn't quite right.**

The healthcare industry is both the same as and different from other industries. Every organization needs to behave ethically. All employees, at any organization, should be following the law. But healthcare organizations have a special – and legal – responsibility to act in ways that protect the best interests of our patients. We have a formal corporate compliance program, overseen by the Chief Compliance Officer and implemented by the Corporate Compliance Division. This program provides a comprehensive, well-structured system for monitoring ourselves in a complex industry with numerous rules and regulations enforced by multiple federal, state and private agencies. It's specifically designed to detect, prevent and correct violations of law or company policies.

## Why does it matter?

The decisions we make impact people's lives in direct and indirect ways. The laws, rules and regulations about healthcare are aimed at making sure our patients are protected. It's our job to follow those rules because it's in the best interests of our patients. In many cases, making the right decision is the difference between life and death, health and sickness – our patient's most fundamental needs.

By choosing actions that are in the best interests of our patients, we ensure that we can remain true to our mission and will achieve our vision in partnership with all Atrium Health teammates in the pursuit of operational excellence.

## What is my responsibility?

As an organization, and as individuals, we're responsible for acting in an ethical and legal manner.

### All Atrium Health teammates should:

- ☐ **In all things, follow our core values: Caring, Commitment, Integrity and Teamwork**
- ☐ **Have a basic understanding of the rules and follow them**
- ☐ **Understand the difference between right and wrong and choose to do the right thing**
- ☐ **Know what to do when help is needed to determine if there is a problem**
- ☐ **Report any known or suspected violations of this Code of Conduct**

This requires all our teammates to understand that each of our choices, and our character, impacts our patients and our fellow teammates.

Leaders have extra responsibilities, including keeping their teams informed of compliance policies and monitoring the activities of their teammates to ensure compliance.

It's impossible to include every situation a teammate may encounter in one place, but this booklet provides the information and resources needed to get help addressing any situation.



***Mission: To improve health, elevate hope and advance healing – for all.***

***Vision: To be the first and best choice for care.***



# Our Commitment to Integrity

## We will...

Treat our patients with dignity and respect at all times.

Protect our patients' rights throughout their care and treatment.

Protect our patients' privacy.

Provide a work environment that respects the rights, dignity and cultural differences of our teammates, contractors and agents.

Be mindful of and avoid potential conflicts of interest.

Select suppliers on the basis of price, quality, performance, customer service and reputation.

Compete in an ethical and legitimate manner.

Provide a healthy and safe workplace for our teammates.

Maintain the integrity of our record systems by entering information accurately, reliably, honestly and in accordance with established finance and accounting procedures.

Bill only for care and services we provide that are properly authorized and documented as medically necessary.

## We will not...

Tolerate harassment or abuse of any form.

Tolerate discrimination or harassment of any sort, against any teammate or applicant for employment, on the basis of race, color, national origin, age, disability or gender.

Conduct business through improper use of business courtesies, gifts or relationships.

Knowingly submit false claims to payers, including insurance companies and programs funded by federal or state governments, such as Medicare and Medicaid.

# Our Code of Conduct

## Business Practices

### Accounting and Record Keeping

All records are prepared accurately, reliably, honestly and in accordance with established finance, accounting and medical record-keeping procedures. All records are stored in a safe and secure location for the period of time required by law or our policy, whichever is longer. Old or unneeded records, either in electronic or paper form, are properly disposed of or purged in accordance with applicable document retention schedules. Records and documents are never destroyed or altered in anticipation of, or in response to, a request for those documents by any government agency or court.

**Integrity Tip:** You are responsible for accurate and honest record keeping.

### Anti-Corruption

We do not give, promise, offer or authorize the giving of “anything of value”, either directly or indirectly through a third party to a foreign government official for the purpose of influencing any act or decision of such person to secure an improper advantage or to otherwise obtain or retain business for Atrium Health. “Anything of value” is interpreted broadly and includes cash, gifts, meals, entertainment, travel, provision of services and intangible benefits. Similarly, we do not solicit, accept or attempt to accept – directly or indirectly – a bribe, kickback or other improper benefit in connection with transactions contemplated or entered into by Atrium Health.

**Integrity Tip:** You should comply with all applicable anti-corruption laws and regulations in the countries in which Atrium Health does business.

### Antitrust

We compete in an ethical and legitimate manner. We avoid all actions that are anti-competitive or otherwise conflict with laws that govern competitive practices in the marketplace. Unlawful practices include:

- ❑ Agreements with a competitor(s) to divide territories or customer lists
- ❑ Any arrangement with a competitor(s) that artificially raises the price of services or improperly reduces competition

Never discuss or disclose price or market information with or to someone from another company unless you first consult with Atrium Health’s legal counsel.

**Integrity Tip:** You should compete ethically and legitimately.

### Billing and Coding

We only bill for care and services we provide that are properly authorized and documented as medically necessary. We take every reasonable precaution to ensure that our billing and coding work is accurate, timely and in compliance with our policies, as well as federal and state laws and regulations.

Teammates working in areas related to billing or coding are expected to understand and comply with all billing and coding policies and procedures established by Atrium Health and third-party payers.

Certain government regulations and many insurance payer contracts require patients to pay co-insurance, co-payments and deductibles. Routinely waiving co-insurance, co-payments and deductibles violates legal and contractual obligations, and is, therefore, prohibited.

**Integrity Tip:** You have an important role in helping Atrium Health bill for services that have been properly authorized and documented.

## Business Courtesies and Gifts

We do not conduct business through the improper use of business courtesies, gifts or relationships. It is against the law and our policy to give or receive any “remuneration” either in return for or to induce: a patient referral or the purchase or lease of a service or item. “Remuneration” is defined as anything of economic value, including kickbacks, bribes and rebates (whether in cash or cash equivalent). Even the opportunity to earn money may be considered remuneration.

This policy is not intended to prohibit the acceptance or giving of common, non-cash courtesies, provided the value of the gratuity is nominal in relation to the circumstances in which it was offered and accepted and it is not intended to influence a business transaction or a teammate’s performance of job duties. Gifts provided to physicians are subject to additional restrictions and reporting requirements as set forth in Atrium Health policies.

Gifts provided to or received from foreign government officials are subject to additional restrictions and reporting requirements as set forth in Atrium Health’s anti-corruption policy.

**Integrity Tip:** *You should avoid actions or associations that could be perceived as improper or a potential conflict of interest.*

## Compliance Education and Training

Atrium Health teammates receive compliance education and training upon hire and at least annually thereafter that emphasizes areas of special concern such as proper billing, medical necessity and appropriate coding. Atrium Health teammates working in certain areas receive specialized compliance training. Your managers should provide additional education about compliance issues affecting your areas of responsibility.

**Integrity Tip:** *You receive compliance education to help you understand the rules governing our organization.*

## Confidentiality

Any information learned of or created by teammates must be treated confidentially, even after termination of employment. This includes business, patient, employment and financial information.

**Integrity Tip:** *You are responsible for protecting patient and business-sensitive information.*

## Marketing and Media Relations

Our advertising is truthful and not misleading. All claims about our services are clearly supported by evidence. All price advertising must accurately reflect the true charges for services. False or misleading representations should not be made.

**Integrity Tip:** *You should send any media requests for information to the Corporate Communications, Marketing and Outreach department.*

## Safeguarding System Property and Technology

Atrium Health assets, which are assigned or made available to teammates, may be used only for authorized business purposes. Any other use, such as for after-hours charitable work, must receive prior approval from your supervisor.

All assets are to be returned in an acceptable condition upon request or when the teammate leaves Atrium Health.

Atrium Health intends to fully comply with all copyright and software licensing laws. A teammate may not make copies of Atrium Health Information Services resources.

**Integrity Tip:** *You should refer to the Atrium Health acceptable use policy for guidelines and rules for appropriately using electronic communication resources.*

## Vendor Relationships

Relationships with external parties are an important aspect of daily business operations. It is our policy to select suppliers based on factors such as price, quality, performance, customer service and reputation. Teammates should not require a supplier to give up trade with our competitors or purchase our products or services to obtain, or to retain, their supply agreement with us. Teammates must also respect and protect any confidential or proprietary information shared by a supplier.

Third parties retained for any business outside of the United States are subject to additional restrictions as set forth in Atrium Health’s anti-corruption policy.

**Integrity Tip:** *Atrium Health maintains guidelines to help you appropriately obtain services from vendors and to protect confidential or proprietary information.*

# Legal and Regulatory Requirements

## Conflicts of Interest

A conflict of interest occurs when a relationship, influence or activity impairs, or even gives the appearance of impairing, your ability to make objective and fair decisions in the performance of your job. You should not place yourself in any situation that might force you to put your personal or financial interests ahead of the interests of Atrium Health. In certain instances, conflicts of interest may arise despite your best efforts to avoid them. If such a situation arises, you should promptly and fully disclose it to your supervisor or the Corporate Compliance Division.

**Integrity Tip:** *You should not place yourself in any situation that might force you to put your personal or financial interests ahead of the organization.*

## Protection

Atrium Health is committed to taking all reasonable steps to minimize the use and discharge of hazardous substances. We comply, at a minimum, with legal standards and establish our own standards where regulations are inadequate or do not exist.

**Integrity Tip:** *You should take a proactive approach to protect our natural resources.*

## Equal Employment Opportunity

Atrium Health recruits, hires and promotes qualified candidates for employment opportunities without regard to race, color, age, religion, gender, sexual orientation, gender identity, national origin, veteran status, disability, genetic information or any factor prohibited by law. As such, we affirm our policy and practice to support and promote the concepts of equal employment opportunity and affirmative action in accordance with all federal, state and municipal laws.

**Integrity Tip:** *You should consistently respect the rights of patients and coworkers.*

## False Claims Act

It is against the law for a healthcare provider to submit fraudulent or false claims for payment to programs funded by federal or state governments, such as Medicare and Medicaid. Teammates are required to report known or suspected false claim violations immediately, following the procedures outlined in this document.

Atrium Health is committed to following all laws and regulations and conducting business in a legal and ethical manner. If errors or occurrences of noncompliance are discovered, Atrium Health will promptly correct the issue and, if indicated, notify the appropriate agencies.

**Integrity Tip:** *Atrium Health will refund any monies received in error.*

## Political and Community Activities

Teammates are encouraged to participate, as private citizens, in the political process and as advocates for religious and charitable organizations, as long as this participation does not:

- Interfere with the satisfactory performance of our official duties
- Bring discredit or embarrassment to Atrium Health
- Create a conflict of interest

The use of Atrium Health funds for political or charitable contributions is subject to restrictions as outlined in Atrium Health's anti-corruption policy.

**Integrity Tip:** *You should not express political or religious views in the workplace in a way that makes other teammates feel uncomfortable.*





## Patient and Teammate Safety

Atrium Health seeks to provide a healthy and safe workplace for its teammates. Supervisors are responsible for ensuring all teammates are properly trained in health and safety practices and precautions.

Atrium Health has an obligation to its patients, and to the people of its communities, to ensure teammates are fit for duty when they report for work. The illegal use, sale or transfer of drugs is not permitted. In addition, teammates should not possess or drink alcoholic beverages in the workplace or report to work under the influence of alcohol. Violations in this area will be dealt with in a fair and consistent manner in accordance with our policies.

Atrium Health teammates should be aware of the signs and symptoms of abuse, neglect and exploitation, especially among certain vulnerable populations, such as the elderly, people with disabilities and children. Reports of suspected abuse, neglect and exploitation should be made to appropriate law enforcement officials in accordance with our policies.

**Integrity Tip:** You should consistently respect the rights of patients and coworkers.

## Working with Government Officials and Regulatory Agencies

Dealing with government officials is not the same as dealing with private parties, whether the government is acting as a customer, payer, supplier or regulator. Always secure advice from the Office of the General Counsel before entering into a contract with a government entity.

Under the direction of the Corporate Compliance Division and the Office of General Counsel, Atrium Health will cooperate with requests for information from government auditors, investigators or other officials.

**If you're contacted by a government agent in connection with an investigation or request for documents, you should immediately take these actions:**

- 1) Ask to see photo identification.**
- 2) Write down the agent's name and the name of the agency.**
- 3) Notify your supervisor, who will then contact the Administrator on Call, Corporate Compliance Division and Office of the General Counsel.**
- 4) Request a copy of any legal documents.**
- 5) Maintain a written inventory of any documents taken by the agent.**

Never destroy or alter any record requested by a government agency or court. Never provide misleading or untruthful information to a government agent or prompt anyone else to do so.

In many instances, government officials are not allowed to accept anything of value (such as a gift, hospitality or entertainment). You can refer to Atrium Health's anti-corruption policy for additional guidelines related to interactions with government officials.

**Integrity Tip:** When working with government agents, you should provide truthful information and should not destroy or alter any requested records.

## Workplace Behavior

Atrium Health is committed to providing a work environment that respects the rights, dignity and cultural differences of its teammates, contractors and agents. Harassment or abuse of any form (e.g., physical, mental or verbal) is inappropriate and will not be tolerated.

**Integrity Tip:** You can receive help with questions about workplace behavior from your supervisor or the Human Resources department.

# Patient Care and Privacy

All teammates – in both clinical and non-clinical environments – contribute to a patient’s healthcare experience. The experience of patients and their families is a crucial component of the healing process. As a teammate, patient experience should be at the center of everything you do. Providing patient-centered care keeps our patients safe, promotes their healing, and includes, informs and inspires them. This should be the experience for Every Person, Every Encounter, Every Time.

## Patient Care

Each patient will be treated as an individual and with dignity and respect at all times. Patients are entitled to prompt and courteous responses to their requests and to their need for treatment and services. Patients have the right to participate in, and make decisions about, their healthcare, including the right to refuse medical treatment to the extent permitted by law. Only those patients who need and will benefit from our services will be admitted or accepted for care and treatment.

**Integrity Tip:** *Atrium Health provides patients with information about their rights and responsibilities and strives to protect those rights throughout care and treatment.*

## Privacy

Patients have a right to personal privacy, as protected by the Health Insurance Portability and Accountability Act, and all teammates, volunteers and students protect the confidentiality and security of patient information. Accessing patient information for non-job-related use is strictly prohibited. Atrium Health maintains policies and procedures to specifically address privacy and security matters, including how to appropriately use and share patient information.

**Integrity Tip:** *You should review the Atrium Health privacy and security policies to ensure patient information is protected.*



## Getting Help

You can find detailed information on the various policies mentioned in this booklet by visiting the Corporate Compliance section of the Administrative Policy and Procedure manual on PeopleConnect. You are not, however, on your own to interpret those policies.

If you think there may be a problem, you have options.

### You can:

- Follow your chain of command
- Contact your location's compliance officer
- Contact the Corporate Compliance Division at 704-512-5900 or CorporateComplianceReporting@AtriumHealth.org
- Contact the Compliance HelpLine at 888-540-7247

You can raise your concerns without fear that you will be disciplined or terminated for doing the right thing. Just tell the truth as you understand it. Atrium Health policies prohibit disciplinary or retaliatory actions against teammates who make good faith reports.

Swift action is taken to investigate good faith reports of non-compliance. If errors are identified, corrective actions will be taken. Teammates found in violation of compliance policy may be subject to disciplinary action, up to and including termination. Serious compliance violations may also result in criminal or monetary penalties.

***Integrity Tip:*** There are multiple options for getting assistance with compliance questions or concerns. If you're making a good faith report of a compliance concern, you're protected.



# Contacting the Compliance HelpLine

Because ethical behavior and compliance with laws and regulations are vital, we have created a Compliance HelpLine.

The HelpLine is available to any teammate who has a compliance, legal or ethical question or concern. It's also available to teammates who observe violations of the standards of conduct, laws or regulations.

The HelpLine is not intended to replace other procedures and processes for communicating information and resolving conflicts. Continue to use established policies and procedures, including the employee grievance process and risk management concern process.

When you contact the HelpLine, you can remain anonymous. Callers can also receive instructions to provide supporting documentation via confidential fax or email.

The HelpLine is run by an independent contractor and is available 24/7. HelpLine calls are forwarded to the Corporate Compliance Division within 24 hours. Emergency calls are forwarded immediately. Atrium Health will investigate and respond to all HelpLine inquiries. You will be able to follow up on the status of your inquiry, if you wish.

**Compliance HelpLine:  
888-540-7247**