

Code of Conduct

Building the culture of trust and integrity
as we redefine care – for you, for us, for all.



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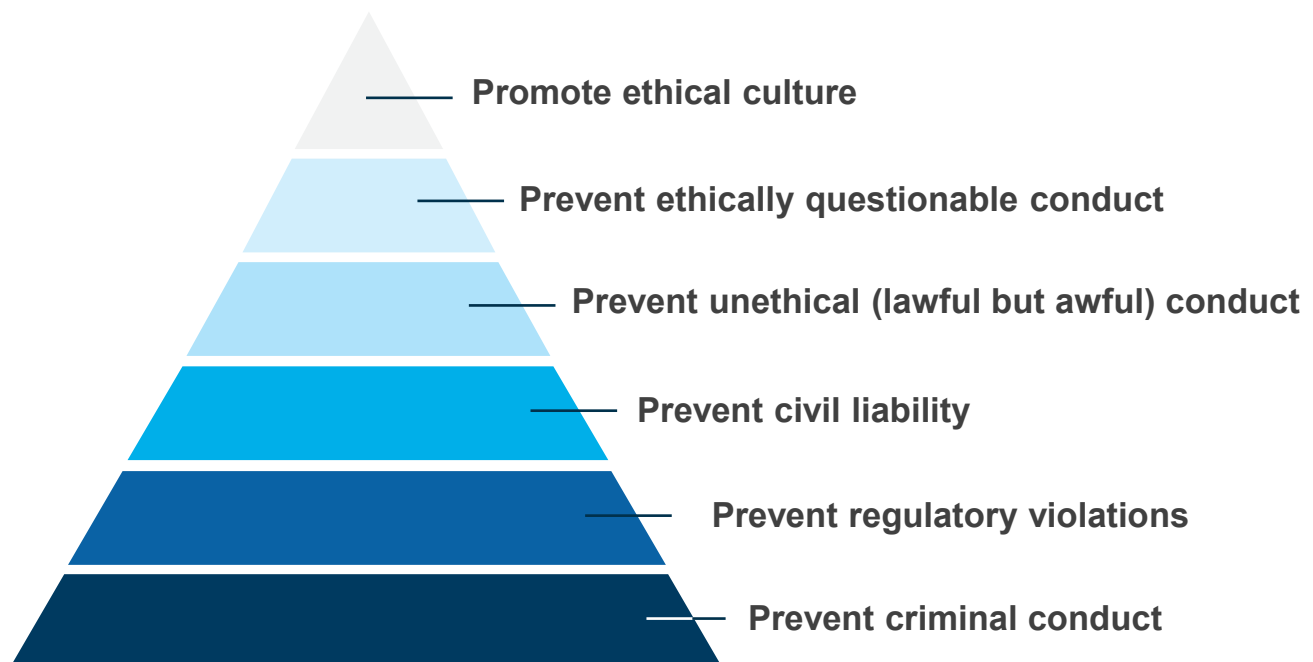
Introduction

Code of conduct

At Advocate Health, we are driven by our Purpose & Commitments and to uphold our ethical – and legal – responsibility to act in ways that protect the best interests of our patients, including following health care laws, rules and regulations. Adhering to our Code of Conduct is critical to our Commitments to Lift Everyone Up and Lead the Way, which guide ethical behavior and enable decision making across all levels of the organization.

This Code of Conduct (“Code”) establishes standards of integrity for all board members, teammates, physicians, APPs, medical staff, residents and faculty, students, learners, leaders, volunteers, contractors, vendors, consultants and others who do business with us (collectively referred to throughout as “Stakeholders”). The Code is meant to be used in conjunction with and complement Advocate Health policies, procedures and guidelines. Its purpose is to provide our Stakeholders with clear expectations and the resources needed to build an ethical culture of compliance and integrity at Advocate Health.

COMPLIANCE CENTERED HIERARCHY OF OBJECTIVES



Compliance & Integrity Program

The Advocate Health Compliance & Integrity Program (“Program”), overseen by the Chief Compliance and Privacy Officer, provides a team of experts and resources to help us navigate a complex industry. The main objectives of the Program are to prevent, detect and correct any violations of this Code, organizational policies or applicable law and regulations. It is the responsibility of us all to make sure our choices are in the best interest of our patients. The decisions we make can positively or negatively impact people’s lives in direct and indirect ways. By choosing actions that are in the best interests of our patients, we remain true to our Purpose & Commitments.

Department members act as lifeguards and will:

- Inform you of the rules.
- Continually observe what is going on.
- Establish a psychologically safe environment, where you feel safe to express ideas and concerns.
- Alert you when things may be getting dangerous.
- Prevent you from wandering into areas that may cause harm.
- Jump in to help when you are in trouble.
- Ensure leader and teammate awareness of resources (Code, policies, guidelines, education, etc.).

Keys to integrity

If you are doing the right thing, you should be able to answer “yes” to these questions:

- Am I being honest and truthful?
- Are my actions legal?
- Do my actions align with this Code, Advocate Health policies and our Purpose & Commitments?
- Am I acting fairly?
- Am I acting in the best interest of Advocate Health, its teammates and our patients?
- Would I be comfortable if my actions were described for the public on social media, TV, in a blog or other media?
- Would I feel comfortable explaining my actions to my family?

Responsibilities

Stakeholders are responsible for:

- Building and maintaining the trust of others by acting with integrity.
- Reviewing and following the Code and paying attention to those areas that apply to your daily work.
- Asking questions and seeking guidance when you're uncertain about what to do.
- Speaking up and reporting concerns about actions or behaviors you encounter at Advocate Health that may be inconsistent with the Code.
- Participating in mandatory annual training to further our understanding of our responsibilities.
- Modeling the Advocate Health Purpose & Commitments.

Leadership responsibilities

Stakeholders must follow the terms of the Code, and leaders are expected to set the example and be role models of integrity. They are expected to foster a culture that promotes the highest standards of ethics and compliance, while maintaining an environment in which all Stakeholders feel free to raise concerns and propose ideas for improvement. Finally, we expect our leaders to ensure they, as well as those Stakeholders they are responsible for, have the necessary information to do the right thing.

Leaders set a good example by:

- Showing what it means to act with integrity.
- Earning and fostering the trust of Stakeholders, patients and the community.
- Operating in an honest and candid manner.
- Soliciting ideas and feedback of teammates.
- Creating an open and psychologically safe environment that encourages teammate engagement. Creating an open and psychologically safe environment that encourages teammates to express ideas and concerns without embarrassment or fear.
- Ensuring the teammates in their area understand the Code and related policies.
- Holding teammates accountable for acting in compliance with the Code.
- Being knowledgeable about available resources.
- Supporting teammates who, in good faith, ask questions or raise concerns.
- Reporting suspected instances of non-compliance.

Reporting concerns

Step up! Speak up!

Advocate Health expects a commitment from its Stakeholders to do the right thing. Doing the right thing is part of maintaining the integrity and trust that Advocate Health stands for. This includes reporting any activity or conduct that we believe violates this Code or related policies, applicable laws or regulations. If you become aware of an activity or behavior that you believe may be a problem, step up and speak up. Your concern will be investigated thoroughly, and appropriate actions will be taken. It is always the right thing to do, even if you're not entirely sure if misconduct or a violation has occurred.

Reporting concerns: Who to contact

Human Resources

- Discrimination
- Harassment
- Inappropriate workplace behavior
- Concerns regarding your job (wages, hours, etc.)
- Disciplinary actions
- Issues with a coworker or supervisor
- Retaliation for raising an HR related concern

Compliance & Integrity

- Retaliation for raising a compliance concern
- Fraud, waste or abuse
- Inappropriate offering or receiving of gifts
- Confidentiality and privacy concerns
- Billing and coding issues
- Research misconduct (fabrication, falsification or plagiarism in proposing, performing or reviewing research, or in reporting research results)
- Other issues related to health care laws and regulations

At Advocate Health, psychological safety is a shared belief that it is safe to **speak up, propose new ideas and learn from mistakes**, which fosters our culture by creating a **sense of belonging** for all.

How to speak up

Discuss your concern with your leader. If you're uncomfortable doing so or unsatisfied with your leader's response, other options include:

- Continue to raise the issue through your leadership reporting hierarchy.
- Discuss your concern with a Compliance Officer. A listing with contact information can be found on the Compliance & Integrity intranet page.
- Contact Human Resources by going to Create a Case in Workday and select Compliance as the case type.
- Report your concern using the Compliance & Integrity page or by calling the Compliance Hotline. If desired, you may choose to report anonymously. The hotline is answered 24 hours a day, 7 days a week, by an unbiased third party. Find more information at advocatehealth.org/speakup.

Useful information to have when reporting concerns

- Details of the concern, situation or incident, including who, where, when, how and why (if known).
- The reason you're concerned and how you came to know about the situation or incident.
- Name(s) of any individual(s) who also may have observed or have knowledge of the situation or incident.
- The potential impact of the concern, situation or incident.
- The existence of any documents or other items of evidence that support your statements.
- Details of prior efforts, if any, to resolve the concern.

Investigation

If you are called upon to cooperate in any investigation regarding a reported concern, you are required to participate truthfully and not interfere with the investigation.

Non-retaliation

Advocate Health prohibits retaliation for reporting, in good faith, a suspected compliance or HR-related concern. Forms of retaliation could include being terminated, demoted, suspended, reprimanded, harassed or discriminated against because you reported a concern. If you believe retaliation has occurred, contact Human Resources or the Compliance & Integrity Department.

Good faith means you actually believe the information you are reporting is true.

Q

I'm concerned that I'm the only person who witnessed a coworker's misconduct. If I report it, they will know it was me. Should I call the Compliance Hotline anyway?

A

Yes, retaliation against anyone for making a report in good faith is prohibited. Do the right thing, speak up!

Q

Will I be informed of the status of my reported concern, and the outcome of the investigation?

A

There may be aspects about the investigation that must be kept confidential, but an update can be given about the status and other non-confidential information. Even if you choose to report anonymously, you will be given a code to communicate anonymously about the case.

Q

As a leader, what should I do when a Stakeholder raises a compliance concern?

A

Remain objective, open and responsive. Do not think of the report as bad news, but rather as a positive, because a Stakeholder has decided to do the right thing and speak up. If you cannot resolve the problem, or are unsure of what to do, contact the Compliance & Integrity Department, using the Compliance hotline or by reaching out directly.

Our focus

Advocate Health lives out our Purpose by doing what's right for our patients, teammates and communities by focusing:



On our patients and communities



On compliance with laws and regulations



On ethical business relationships



On our teammates



On protecting our assets

We focus on our patients & our communities

Patient rights

Each patient has certain rights, including the right to be treated with dignity and respect at all times. Patients also have the right to participate in, and make decisions about, their health care, including the right to refuse medical treatment to the extent permitted by law.

- We provide all patients with a copy of their rights and responsibilities.
- We provide all patients treatment without discrimination and without regard to gender identity, race, color, religion, national origin, ancestry, sex, political belief or affiliation, marital status, age, sexual orientation, physical or mental disability or association with a person with a disability, order of protection status, military status or pregnancy.
- We inform patients and their families and others, when permission is given, about care, treatment and service options, as well as therapeutic alternatives and the risks associated with the care they are receiving.
- We involve patients and families in decisions regarding care to the extent practicable, including discharge planning, advance directives and end-of-life decisions.
- We inform patients of the availability of financial assistance.
- We provide language interpretation services free of charge to assist all patients in understanding and participating in their care.
- We comply with laws that govern how we care for patients including the Emergency Medical Treatment and Labor Act (EMTALA).

Q

I'm a nurse, and one of my patients on the floor has asked that his partner be included in his discharge planning. How should I respond?

A

Ask the partner to participate. The patient has given permission for the partner to be involved in discussions and decisions regarding care.

Q

On admission, we ask patients if they have an advance directive. One of my patients said "No," but they would like to sign one. Is this something we can assist with?

A

Yes, Advocate Health provides patients with information regarding their right to have an advance directive, and provides patients with statutory forms, if requested. You should refer to the system policies on advance directives.

Q

What happens if a patient is in an emergency situation, but we have not yet gone through the proper procedures to assess their insurance information?

A

The patient's care comes first. In an emergency situation, we will not withhold or delay care while verifying insurance, nor will we deny care for insurance reasons or the inability to pay for care.

Privacy of patient information

Patient information is protected under state and federal laws, including the Health Insurance Portability and Accountability Act (HIPAA). We all have a duty to protect the confidentiality and security of patient information, and adhering to the following requirements:

- Only access and use PHI that you need for your official job duties related to treatment, payment or healthcare operations purposes; never share PHI with anyone that is not authorized to see or use it.
- Never post PHI or stories about patients on social media. Personal social media use is prohibited in patient care areas.
- Always get a patient's permission before sharing PHI, or speaking about it in the presence of others, including the patient's family or friends.
- Safeguard PHI from unauthorized viewing on paper, a computer screen, a whiteboard or any other media.
- Be aware of your surroundings when discussing PHI, and avoid having confidential conversations in public areas, such as elevators or the cafeteria, to prevent others from overhearing.
- PHI should never be emailed to personal email accounts, or saved to unauthorized, personal electronic devices. Never remove PHI from your facility without prior approval.
- Immediately report the loss, misplacement and theft of devices or possible cybersecurity issues to the IT Service Center.
- Any suspected privacy incident or concern (including when PHI is accessed, used, given out or received by someone who isn't authorized to have it), must be reported to Privacy or the Compliance Hotline.

See the **Confidential and Proprietary Information** section of this Code for more information on protecting confidential information.

Q

I saw my neighbor was scheduled to see one of the doctors at my clinic. I asked my neighbor's wife later that week, when I ran into her, how he was doing because I was worried, but she had no idea that he was being treated. Was this a HIPAA violation?

A

Yes. You should not have shared the patient's information without authorization, even if you had good intentions.

Q

A teammate had a medical emergency while on shift and is admitted to the ED. Their leader heard that the teammate was admitted, is concerned about the teammate being out of work and needs to verify timecards. Can the leader use their work credentials to access the teammate's medical record?

A

No. The leader should not access a teammate/patient's health record unless it is for treatment, payment or health care operations reasons. In this case, the leader is in the role of an employer, and accessing or using the teammate's protected health information, without authorization, for employment purposes is a HIPAA violation.

Safe environment for care

Advocate Health is a high reliability organization that encourages all who work in our organization to report patient safety issues, incidents and near misses so they can be addressed timely through changes to systems and processes without fear or blame.

We recognize human error is inevitable, and we learn from our mistakes. To promote a safe and reliable work environment, all teammates should:

- Inform a leader if we find our team using shortcuts to complete a work process.
- Inform a leader if we find it difficult to comply with a policy or standard of work.

Leaders have the responsibility to:

- Address our concerns and process issues that impact our work.
- Create an atmosphere of psychological safety in which all are encouraged to address essential safety, compliance and job performance-related issues in a fair and just manner.
- Take situational factors into consideration when determining disciplinary or corrective action.

We can create a safe environment within Advocate Health by:

- Completing required safety training.
 - Complying with all laws, regulations, accreditation standards, Occupational Safety and Health Administration (OSHA) requirements and departmental and area safety requirements.
 - Knowing how health and safety policies apply to our specific job responsibilities.
 - Notifying a leader about safety hazards, broken pieces of equipment, any workplace injury or any situation presenting a danger of injury, so timely corrective action may be taken.
 - Reporting any safety issues, incidents and near misses.
-

Q

What should I do if I see a patient is not being treated with proper respect and courtesy by a teammate?

A

If the patient is in danger, immediately act to remove them from harm's way. Then notify your supervisor or a higher-level manager. Be sure to submit an incident report. While under our care, every patient must be treated with respect and courtesy.

Q

I noticed an ice and water machine leaking on the floor of a nursing unit. I do not routinely work on this unit. Do I need to report it?

A

Yes, the puddle on the floor could create a safety issue for those walking in the area. Inform someone working on the unit immediately.

Environmental responsibility & climate resilience

Advocate Health understands the connection between human and environmental health and is committed to advancing a sustainable and healthy environment for the communities we serve, which supports our Purpose to redefine care for all. As responsible stewards, we engage at all levels to build climate resilience and mitigate environmental risks to preserve resources and protect assets. As an organization, we will:

- Expand and strengthen environmental stewardship with our teammates and our community.
- Drive down the greenhouse gas emissions of our health care delivery.
- Remain mindful of our environmental impacts in the way we serve our patients, care for our teammates, purchase products and services, operate our facilities and minimize our waste.

Research & scientific integrity

Research is an important part of how we advance health care for all patients and communities. Advocate Health is committed to conducting research to enhance the quality of care we provide and improve the health outcomes of our patients, their families and our communities. We expect scientific excellence and integrity, both in the conduct of research and the dissemination of research findings.

Stakeholders shall conduct clinical research and scientific studies in accordance with Advocate Health's and Institutional Review Board's policies, ethical standards and applicable state and federal regulations. Advocate Health emphasizes the protection of human subjects, accurate accounting of grants and sponsored awards.

We respect the right of individuals to refuse to participate in clinical studies without compromising their care. All investigators and research staff are expected to be familiar with policies, laws and regulations, and any additional requirements of their funding sponsors.

We also follow all laws, policies and procedures relating to the care, transport and use of animal subjects in research.

To promote compliance with federal regulations and best practices for dealing with research misconduct, and to protect the integrity and reputation of the institution, and its scholars from false or unproven allegations, we uphold standards of integrity that applies to all research and scholarship activities conducted within Advocate Health.

Research misconduct includes:

- **Fabrication** – making up data or results and recording or reporting them.
- **Falsification** – manipulating research materials, equipment or processes, or changing or omitting data or results such that the research is not accurately presented in the research record.
- **Plagiarism** – the appropriation of another person’s ideas, processes, results or words without giving appropriate credit.

Research misconduct does not include honest error or differences of opinion.

Any suspected research misconduct must be reported to the Compliance Hotline or to the Research Integrity Officer. Following a reported concern, an assessment will be conducted to determine whether an inquiry is warranted. Any inquiry will follow prescriptive procedures to ensure consistent and fair treatment and to ensure the protection of both the individual accused of engaging in misconduct and the individual bringing forth the allegation.



You may also report issues involving federal funds to government officials, but you are urged to first work through the options listed above so Advocate Health can identify and address concerns identified by its Stakeholders.

Q

I am considering conducting a research project that will only involve reviewing and analyzing my patients' data, which I will pull from the medical record. Would this require Institutional Review Board (IRB) approval?

A

Yes. The definition of a human subject includes, but is not limited to, intervention or interaction with a living individual and the use of a living individual's identifiable private information or identifiable biospecimens. If you are uncertain about whether your activity meets the definition of human subject research, it is best to obtain an opinion from the IRB office before moving forward.

Q

When should I report concerns about possible research misconduct and how can I report it?

A

If you suspect that research misconduct may have occurred, you should report it right away to the Enterprise Research Integrity Officer, or to Compliance at 888-847-6331 or advocatehealth.org/speakup.

Professional licensure & credentials

Advocate Health requires that its teammates maintain licensure, certification and registration as required by law to provide services applicable to their roles in the organization. Teammates must:

- Maintain appropriate licenses and credentials required to perform their job.
- Not provide care to patients when their credentials are lapsed or revoked.
- Understand the scope of practice that their licensure or credentials permit them to perform and stay within those
- Provide a copy of their current license, certification or other required credentials and when requested.
- Teammates are expected to notify their leaders within 24 hours if their license, certification, and/or registration expires.

Ineligible persons

Upon hire and monthly thereafter, Advocate Health screens all Board of Director members, teammates, physicians, APPs, medical staff, vendors and contractors against federal and state databases to ensure all are qualified to participate in providing services to a federal health care program. Advocate Health does not hire, contract with, or bill for services rendered by an individual or entity that:

- Has been convicted of a criminal offense related to their position or that disqualifies the individual from employment.
 - Is excluded from participating in federally funded health care programs.
 - Is a suspected terrorist, as determined by the federal government.
-

Q

Is it acceptable for an RN to perform a procedure, normally only performed by a physician, if the physician has requested the RN to do it?

A

No, a physician may not delegate a procedure to someone who is not appropriately licensed to perform such task. As professionals, we understand the scope of practice that our license or credentials permits us to perform, and we stay within those boundaries.

Q

What if my license expires?

A

Notify your leader immediately.

We focus on complying with laws & regulations

At Advocate Health, everyone is responsible for making sure the care we provide is safe, compliant and that billing and coding are done right. When we provide safe and compliant services and accurately document and bill for those services, patients get the best care and trust us. By working together, we make sure our claims to government and commercial payers are accurate, timely and follow all rules. This teamwork not only keeps our business ethical, but also ensures we give the best care to our patients.

We are committed to billing for care and services that are properly authorized and documented as medically necessary. We take reasonable precautions to produce billing and coding that is accurate, timely, relevant and in compliance with our policies as well as federal and state laws and regulations. Certain government regulations and many insurance payer contracts require patients to pay co-insurance, copayments and deductibles. We comply with these requirements. Those working in areas impacting billing or coding – including teammates, research and clinical trial billers, medical staff members and contractors – are expected to understand and comply with all billing and coding laws, regulations and policies, procedures and documentation requirements established by Advocate Health and third-party payers.

Fraud, waste & abuse

At Advocate Health, everyone has a role in stopping fraud, waste and abuse. This means all teammates, contractors and medical staff must carefully record the services they provide and make sure all bills are correct and follow the law and our policies. We comply with the Federal False Claims Act and state laws that prohibit us from knowingly submitting, presenting or causing another person or entity to submit or present false or fraudulent claims for payment of government funds. We also need to avoid doing unnecessary tests or procedures that don't help patients. Teammates are expected to report concerns with the way that care is provided and billed so they can be properly addressed. By being honest and careful in our work, we protect our organization, save money and build trust with our patients and community.



“Knowingly” means:

- Knowing a claim is false and submitting it anyway.
- Deliberately ignoring whether a claim is true or false.
- Recklessly disregarding whether a claim is true or false.

False claims include:

- Submitting a claim for services that were never rendered or were worthless.
- Misrepresenting a diagnosis to justify services or inappropriately increase reimbursement.
- Filing a claim for services that were not medically necessary.
- Billing for a single service multiple times (double billing).
- Making a false statement (e.g., forging a physician signature or using a physician's computer signature) to obtain payment for a service rendered.
- Misrepresenting data or other information on federal grant applications or progress reports.
- Unbundling charges to enhance reimbursement.
- Filing a claim for a service that was the result of a payment for a patient referral.

To ensure the accuracy of our claims we:

- Document diagnosis, treatment and all other components of the patient's record in a timely and accurate manner.
- Bill only for medically necessary services that were provided.
- Follow current coding procedures and standards.
- Generate accurate and truthful bills.
- Correct any billing errors or refund money received in error (e.g., overpayments) in a timely manner.
- Submit accurate cost reports as defined by applicable laws and regulations.
- Submit accurate research grant proposals and progress reports.

Q

My supervisor asked me to change the date on a physician's note so that the visit will be covered by the patient's insurer. May I do this?

A

No. Documentation must accurately reflect when the service was provided. If the date was recorded incorrectly, the physician can make an addendum to the record to correct it. It is never appropriate to falsify a date or other information related to a service that was provided.

Q

While reviewing Medicare claims, I believe I found some charges that are incorrect or inappropriate. Should I allow the claims to be submitted and let Medicare sort it out?

A

No. We only submit claims we believe are accurate and appropriate. Inform your supervisor or the department responsible for the claim. Contact the Compliance & Integrity Department Hotline if you remain concerned.

Accurate record keeping & document retention

At Advocate Health, we are committed to maintaining records that are accurate, reliable, timely and honest. All records must comply with established financial, accounting and medical documentation standards.

Proper record keeping is essential to protecting our patients and clinical research participants, supporting effective business operations and ensuring compliance with legal and regulatory requirements. Records may include, but are not limited to:

- Financial statements
- Billing claims
- Expense reports
- Invoices
- Payroll records
- Benefit claims
- Research reports
- Medical records

All teammates are expected to be familiar with the Record Retention, Storage, and Destruction Policy (enterprise). Falsifying or altering records is strictly prohibited. If you suspect or are aware of any record that has been tampered with or intentionally misrepresented, you must report it immediately to your supervisor or the Advocate Health Compliance & Integrity Department.

Various state and federal laws require that records be retained for specific periods. Never destroy a record without first confirming that the required retention period has expired. Records must not be destroyed or altered in anticipation of, or in response to, a request from any government agency or court.

Interactions with government agencies & officials

Advocate Health is committed to cooperating with government representatives, officials or law enforcement officers and agents. Advocate Health will respond to requests for information from government agencies and officials under the direction of Legal, Compliance or Government Relations. We will be truthful in our statements, and we will comply with our legal obligations.

Government officials and law enforcement may make announced and unannounced visits to an Advocate Health facility. It is very important that you let your supervisor, Legal and Compliance know immediately if you are contacted by a government official or law enforcement in connection with an investigation, or request for documents, or receive a subpoena, demand or other official request related to your role or Advocate Health. To see who to contact see Notification for Government Inquiries (Enterprise) in Policy Tech.

It is our policy that we:

- Treat government officials and law enforcement with courtesy and respect.
 - Find a private area or room for the government officials and law enforcement when at an Advocate Health facility and contact the Legal Department for direction.
 - Not volunteer any information, answer any questions or hand over any documents or requested items without first contacting the Legal Department.
 - If you are approached outside of an Advocate Health facility about something related to Advocate Health, immediately notify the Legal Department. As individuals, we have the legal right not to speak to an investigator.
-

Q

A government investigator tried to contact me at my home. They left a voice mail asking me to call to discuss Advocate Health billing practices. What should I do?

A

Immediately notify the Legal Department.

Anti-trust

We are committed to complying with anti-trust laws. These laws protect individuals and organizations from unfair trade practices, promote competition and preserve the free enterprise system. To comply, we do not:

- Enter into agreements with competitors to fix wages, prices, rig bids or divide markets.
- Enter into “no-poach” or “non-solicit” agreements with other health systems that are not reasonably necessary to any separate, legitimate business collaboration.
- Conduct boycotts.
- Make price discrimination agreements.
- Steal trade secrets.
- Offer bribes or use deceit, intimidation or other similar practices.

Except when approved by executive leadership – and to protect our competitive, financial, ethical and reputational interests, in accordance with parameters provided by the Legal Department – we do not communicate with a competitor, directly or indirectly, about prices charged or costs of goods, supplies, equipment or services, including physician services. All contracts negotiated with a competitor, contractor or supplier must be competitive and at fair market value. Contracts must be based primarily on price, quality and service.

Questions regarding anti-trust matters should be directed to the Legal Department.

We focus on ethical business relationships

The Stark Law (or the Physician Self-Referral Law) prohibits physicians from referring patients to receive designated health services payable by Medicare or Medicaid from entities with which the physician or an immediate family member has a financial relationship, unless an exception applies.

The Anti-Kickback Statute prohibits payment of anything of value to induce or reward referrals or the generation of business involving any item or service payable by Medicare, Medicaid or other federal health care programs.

Physician relationships

Advocate Health is committed to ensuring all its interactions with physicians are ethical and comply with the Stark Law and the Anti-Kickback Statute. We adhere to the following principles in our interactions with physicians:

- We will not pay for referrals. We will accept patient referrals and admissions based on the patient's medical needs and our ability to render the needed services. We will not offer to pay or reward anyone for the referral of patients.
- We will refrain from offering any gifts or business courtesies to any physician or health care provider to induce or encourage the referral of business to Advocate Health. Reasonable meals and gifts of nominal value may be offered under certain circumstances but must satisfy Stark requirements and be tracked.
- We will not accept payments for referrals we make. No Stakeholder acting on behalf of Advocate Health is permitted to solicit or receive anything of value, directly or indirectly, in exchange for the referral of patients. When making patient referrals to another health care provider, we will not consider the volume or value of referrals the provider has made, or may make in the future, to our organization.
- We will appropriately document our financial relationships with physicians in accordance with the law and standard business practice. Advocate Health will not make payments to physicians unless an appropriately documented employment arrangement or contractual agreement is in place.

Q

A non-employed physician on our medical staff offered to assist with a quality improvement project I am working on. We have budgeted funds to pay for their services. Is it OK to provide payment to this physician?

A

Yes, but only if there is an appropriate contract in place documenting the services to be provided and the amount of the fair market value payment to be made. Contracts must be signed before commencing the agreement. The Legal Department must prepare or approve any written agreement.

Vendor relationships & interactions

Relationships with external parties are an important aspect of daily business operations. It is our policy to select suppliers based on impartial factors such as price, quality, diversity, performance, customer service, patient safety and reputation. All Stakeholders have a responsibility to make decisions and maintain vendor relationships that affect Advocate Health based on our health care mission and in the best interests of our patients, not personal gain. We also are committed to complying with the Anti-Kickback Statute in all interactions and to eliminating situations where inappropriate vendor influence would result in increased costs, unfair competition or treatment decisions that are not based solely on patient care interests. Our selection of consultants, contractors, suppliers and vendors will be made based on objective criteria, including but not limited to quality, technical experience, price, delivery, service and maintenance of adequate supply sources.

- We do not offer or accept kickbacks in exchange for doing business.
- Any fundraising or donation requests on behalf of Advocate Health must go through the Advocate Health foundations. Please contact the appropriate foundation for guidelines.
- Interactions with vendors must be reviewed and approved prior to engaging in an activity. The Pre-Approval Request (PAR) process ensures that interactions between teammates and vendors align with our organizational Purpose & Commitments. PARs are part of the enterprise Interactions with Vendors program, which provides the guardrails for Advocate Health to maintain compliance with laws, regulations and rules regarding vendors.
- All vendors and contractors, regardless of where they are located, must adhere to our compliance standards, policies, federal requirements and the law while upholding Advocate Health integrity expectations.
- The acceptance of gifts from vendors is prohibited, with limited exceptions as outlined in the enterprise Gifts and Hospitality Policy. Certain federal and state laws and industry guidelines, including the federal Anti-Kickback Statute, prohibit the acceptance of any gift that may induce or appear to induce the purchase or referral of any kind of health care goods, services or items. Accepting, giving or soliciting gifts from, or to, a Vendor also may create an appearance that decisions are made or influenced based on personal benefit rather than what is in the best interest of the patients we serve.

Q

One of our vendors has offered to purchase several iPads to improve the efficiency of our clinical research. This will reduce time for data entry and is a benefit to the organization. May we accept the offer?

A

Yes, as long as the item is gifted directly to the respective Advocate Health Foundation. If approved for use, the item would be forwarded to the correct department. If there is no Advocate Health use, the respective foundation will determine if the gift is within policy guidelines.

Q

A medical device supplier offered to take me to their sky box at a baseball game to discuss how we might increase the volume of our business with them. May I accept this offer?

A

No. Gifts, such as sporting event tickets, can be considered a kickback.

Q

On my unit, we refer many patients to local skilled nursing facilities. One facility offered to give us gift certificates in appreciation for our referrals. May we accept the gift certificates?

A

No. This is an example of accepting gifts in return for referrals.

Conflict of interest refers to a situation in which financial or other personal interests may compromise, or have the appearance of compromising, an individual's ability to make objective decisions while performing one's job responsibilities.

Advocate Health teammates and board members are prohibited from:

- Participating in decision-making when a conflict of interest exists. When in doubt if there is a conflict of interest, speak to your leader or contact the Compliance & Integrity department for guidance.
- Misusing their position for personal gain or to benefit friends or family.
- Engaging in activities that compete with or compromise the organization's interests
- Using confidential company information for personal benefit is prohibited. This includes, but is not limited to, leveraging proprietary research, intellectual property or influencing business decisions for personal advantage.

Disclosure of conflicts of interest

Advocate Health teammates and board members (1) must exercise good judgment and engage in ethical behavior to protect themselves and the organization from inappropriate actions resulting from conflicts of interest, and (2) may not use their positions to solicit benefits directly or indirectly for themselves, immediate family members or any other person with whom they have a personal relationship.

Conflicts of interest, whether financial or involving personal connections, such as family, close friends or business associations, may arise. If that happens at any point during the year, promptly and fully disclose the situation to your leader or to the Compliance & Integrity Department so they can help determine the best course of action. Remember, having a conflict is not necessarily a problem; but failing to report it is. Do not wait for the annual disclosure to report a financial relationship or a personal connection that may create a conflict of interest.

Most conflicts can be managed; the Compliance & Integrity Department will work with your leader to create a management plan when necessary.

Q

My husband is a sales representative for a drug manufacturer, and his territory includes Advocate Health facilities. Is it OK for me to place orders through him for a drug dispensed in our pharmacies?

A

No. This conflict should be disclosed as part of the annual conflict of interest disclosure. You should not be involved in purchasing decisions that may involve your husband's company. It is possible Advocate Health will choose to do business with your husband and his company, but you should not be involved in any purchasing decisions that may also benefit him.

Patient relationships

Gifts & free items for patients

The Beneficiary Inducement Statute prohibits offering gifts, free or discounted services and anything else of value to patients or potential patients to influence an individual to seek services at your facility or entity.

- We will not offer any item of value or service, even if nominal, to patients if the **intent** is to steer them to use Advocate Health services.
- We may offer select, free preventive services. Contact the Compliance & Integrity Department to determine what is permissible.
- Donations to Advocate Health foundations are permissible, as these benefit our calling to serve our patients.
- Discounts provided as part of the formal patient financial assistance program are permissible.

There may be circumstances when an Advocate Health Stakeholder would like to provide a gift to a patient as part of a service recovery effort or in recognition of a patient's volunteer efforts. This is permitted, as long as:

- The value of the gift is nominal in value.
- The gift is not cash or a cash equivalent (such as a gift card or certificate) except as specifically approved by the Compliance & Integrity Department in advance.
- The gift is an approved stipend to offset basic costs incurred by a research participant.

Gifts from patients

We are committed to providing high quality care and service to all our patients, and we do not expect tips, gratuities or personal gifts from patients. Whenever feasible, patients wishing to show their appreciation should be directed to donate to one of the Advocate Health foundations. At times, however, it can be difficult to refuse a well-intended gift from a patient. A gift may be accepted when:

- It is a reasonable token of nominal value or handmade and is not intended to influence behavior.
- It is not cash or a cash equivalent like a gift card or certificate.
- The circumstances are such that refusal of the gift could be counterproductive to the patient-caretaker relationship.

Q

A patient gave me a thank you card with a \$100 bill in it. May I keep it?

A

No. Thank the patient and explain that our policy does not allow a teammate to accept a cash gift. If it seems appropriate, inform the patient about the option to show appreciation by donating to our foundation so that their gift will help others.

We focus on our teammates

Advocate Health is committed to providing equal employment opportunities to qualified individuals in accordance with federal and state laws. We live our Purpose, Commitments & Behaviors by maintaining a work environment that respects the rights, dignity and cultural differences of teammates and others with whom we interact. We expect teammates to maintain professionalism and treat each other with mutual respect, courtesy and fairness. We build transparency and trust through frequent and direct communications with teammates. We encourage collaboration and teamwork by sharing best practices and supporting each other. We encourage teammates to exhibit courage and adopt innovative practices. Discrimination, retaliation, harassment, incivility, bullying, threats, violence or abuse of any form (e.g., physical, mental or verbal) and at any level are inappropriate and will not be tolerated.

Equal employment opportunity

Advocate Health does not discriminate with regard to race, color, religion, sex, sexual orientation, gender-related identity, genetic information, pregnancy, marital status, age, national origin, ethnicity, disability, military service or any other characteristic prohibited by law.

General & sexual harassment

Advocate Health prohibits harassment of its teammates by any person including but not limited to another teammate, leader, physician, patient, or visitor and prohibits any conduct that creates an intimidating, hostile or offensive work environment.

Examples of prohibited verbal, physical, auditory and visual conduct include, but are not limited to:

- Derogatory comments
- Sexual advances
- Threats or intimidating remarks
- Racial or ethnic jokes or slurs
- Uninvited touching
- Cyber harassment

If a teammate feels they are the target of these prohibited behaviors and feels comfortable doing so, the teammate should inform the offending person the behavior is unwelcome and offensive. The teammate also should promptly report any such incident to their leader or to the Teammate Relations Department.

Q

I frequently overhear another teammate in my department telling jokes about people of certain ethnic backgrounds. It makes me uncomfortable; what can I do?

A

Discuss your concerns with your supervisor or other leader in your area or enter a case with Teammate Relations. It is not permissible to tell jokes at work at the expense of others based upon race, color, religion, sex, national origin, pregnancy, genetic information, ethnicity, marital status, age, sexual orientation, including gender related identity, disability, military service or other characteristic prohibited by law.

Teammate confidentiality

Advocate Health values the privacy of its teammates' information. Access to employee records is permitted for legitimate business purposes, such as payroll, benefits administration and other employment-related activities. Information is not disclosed to third parties, except as specifically permitted by our policies, with teammate consent or as required by law. Teammate information obtained during or as a result of one's work duties must not be shared with anyone not authorized by Advocate Health to receive such private information.

Email messages are considered company records, and Advocate Health reserves the right to monitor its email system for proper business conduct and possible inappropriate behavior. Teammates have no expectation of privacy relative to the use of Advocate Health's email system. Similarly, access to the internet is a privilege; thus, Advocate Health reserves the right to monitor internet activities on its business devices.

Learning institutions

We are proud to be an academic learning health system where we train both our own students and learners, as well as those who come to do clinical rotations with our excellent faculty, providers and preceptors in a variety of disciplines and specialties. To do so, we maintain a professional environment that supports the skills development and success of our trainees, students and learners. We will be fair and impartial in grading, evaluations, promotions and grievances and follow our policies and procedures for addressing concerns. We will support all students and learners by demonstrating respect, inclusion and professionalism in interactions we have with learners. In addition to this Code of Conduct, students and learners are held to the specific policies, guidelines and resources of their respective learning institutions and programs.

Workplace safety

Advocate Health is committed to providing a safe and secure environment for Stakeholders and visitors.

Stakeholders have the responsibility to maintain a safe workplace by:

- Refraining from violent behavior, neither tolerating nor making threats, and immediately reporting all violence or threats of violence.
- Not possessing weapons or ammunition while on the premises of an Advocate Health facility except secured in a locked personal vehicle or carried by a Public Safety Officer..
- Not willfully destroying Advocate Health property or the property of others.
- Refraining from the use of alcohol or any illicit or prescription drugs that may impair the ability to perform one's job duties.
- Promptly reporting any incident, practice or condition that may pose a safety threat or any violation of our safety policies.

Q

One of my coworkers has just returned from lunch and smells of alcohol. What should I do?

A

It depends on the situation. If you work in a non-clinical area, immediately notify your supervisor. If you work in a clinical area, quickly act to secure the safety of patients as needed. Then immediately notify your supervisor or a higher-level leader of the situation.

Tax-exemption status

As a tax-exempt organization, Advocate Health operates for the benefit of the communities we serve. Surplus funds are typically reinvested to further our charitable and social welfare endeavors. In exchange for these charitable activities, Advocate Health is exempted from paying many federal, state and local taxes. To retain the tax exemptions, we must satisfy rigorous standards established by the government. As an organization, we do not:

- Pay more than fair market value for goods, services or in compensation arrangements.
- Re-sell supplies purchased using Advocate Health's tax-exempt status.
- Use Advocate Health assets for the private benefit of an individual, such as meeting space, preparation of mailings, etc.

Political and Charitable Activities

Our teammates have many passions and interests, and we support your right as private citizens to participate in the political process and serve as advocates for religious and charitable organizations, provided that your participation is kept separate from Advocate Health responsibilities.

Advocate Health is prohibited by law from participating in political activities and must always remain politically neutral and non-partisan. Any appearance that Advocate Health is supporting a political candidate or party could jeopardize our tax-exempt status.

- Our charitable work for outside organizations and political activities may not interfere with our work schedule or responsibilities.
- We do not use Advocate Health's or any of its affiliated companies' name, logo or resources, such as computers, phones or printers, to support our own charitable or political activities.
- We do not distribute political literature at work.
- We do not contribute or direct the contribution of Advocate Health funds to any political candidate, political party or political campaign.
- We do not campaign directly or indirectly, for or against the election of any candidate for public office during any Advocate Health function or at Advocate Health facilities.
- We do not allow candidates for public office to participate in any Advocate Health function or in any event at Advocate Health facilities, except for events coordinated and approved in advance by Government Relations.
- If we, as individuals, decide to volunteer for a political cause, we do not make any statements or take any action in the name of Advocate Health.

You should not express your political or religious views in the workplace in a way that conflicts with your ability to do your job. Your personal beliefs and activities should be conducted on your own time and in a way that makes clear you do not represent Advocate Health's views in those activities or statements.



I support a local political candidate who I believe will help the health care industry. May I use my Advocate Health email to share this candidate's message?



No. Your Advocate Health email is considered an organizational asset and using it for personal purposes is prohibited.

Check out [Contact with Government Officials Policy \(Enterprise\)](#) in [Policy Tech](#) to learn more about engagement with government officials for advocacy purposes.

We focus on protecting our systems & our assets

We take the security of our systems and the confidentiality of information seriously, and it is important that our assets, property and technology be safeguarded from threats, including cyberattacks. Advocate Health assets that are assigned or made available to teammates may be used only for authorized business purposes and not for personal gain or enrichment. You must safeguard all assets, follow applicable policies and comply with copyright and software licensing laws.

You must return all assets, equipment, credentials, records, confidential information and technology upon request or at the end of your tenure with Advocate Health. If you still have any of these after you leave, we have the right to ask you to return them in person or ship them to us.

Examples of assets include, but are not limited to:

- Equipment
- Supplies and inventory
- Access cards
- Funds
- Confidential and proprietary information
- Our reputation

To ensure Advocate Health assets are protected, we will:

- Maintain accurate business records, free of any false or misleading information.
- Not use Advocate Health funds or assets for personal use, unapproved business expenses or for any improper or illegal use.
- Handle business transactions transparently, price them at fair market value and structure them to comply with applicable federal and state laws.

Interaction with the media

Only the Advocate Health Communications department is authorized to speak to the media on behalf of Advocate Health. “Media” includes reporters, editors, photographers, producers or any other representatives of newspapers, magazines, trade publications, radio, television, internet periodicals, websites and blogs.

Communications will:

- Respond to inquiries and requests from the media.
- Contact the media about a story or news item regarding Advocate Health.
- Conduct interviews with members of the media where the subject matter relates to Advocate Health.
- Not reveal to a member of the media an individual’s PHI, which includes whether or not a person has sought or is seeking care at an Advocate Health facility (unless authorized to do so).

Refer all requests and inquiries from the media to the Communications department.

Confidential & restricted information

All Advocate Health Stakeholders are responsible for safeguarding our confidential data and information, regardless if the data has been de-identified or is shared as a summary or total. This includes information that is not generally available to the public, or information that would be useful to a competitor.

Confidential and restricted information includes, but is not limited to:

- Clinical, quality and patient information.
- Financial data, including reports and projections.
- Personnel files, wage and salary data and any Human Resources files (except your own wage data).
- Billing and pricing figures, cost data and projected earnings and losses.
- Strategic business plans, policies and marketing strategies.
- Intellectual property (for example, patents, trademarks, copyrights, as well as work created using Advocate Health resources while an Advocate Health teammate).
- Legal advice and opinions and information regarding legal actions involving Advocate Health and our contractual agreements.
- IT system configurations, network mappings, system credentials such as usernames and passwords.
- Vendor information.

Stakeholders should not discuss confidential information outside the scope of their duties at Advocate Health, including for research purposes. Information should be discussed with others on a need-to-know basis, even in social or business relationships. We are prohibited from posting Advocate Health confidential or information on any social media platform or website. This includes posting on **any** social network, discussion blog, forum or news group, as well as traditional forms of mass media. Media requests should be routed through Communications. Additionally, we are prohibited from utilizing unapproved generative AI tools to interact with confidential or restricted data. Advocate Health may, in its discretion, require teammates who it reasonably believes have input confidential or proprietary information into unapproved artificial intelligence (AI) sites or tools to delete all or portions of their AI site or tool account history.

Q

A coworker posted a notice on my department's bulletin board offering his services as a personal trainer. Is this allowed?

A

No. While it is OK to engage in a personal business on your own time (as long as there is no conflict of interest), you may not use Advocate Health's assets (facility, time, bulletin board, etc.) to conduct that business.

Q

I see some very unusual cases in my job in the Emergency Department. If I do not mention patient names, can I post these stories to Facebook?

A

No, it is never acceptable to post details about patients to whom we provide care.

Q

A teammate in my department is leaving the organization. I noticed they were printing information related to Advocate Health's strategic business plans while cleaning out their office. Can they take this information with them when they leave?

A

No. This is an example of confidential and restricted information, and the information may not be used or disclosed by the teammate outside of the teammate's work for Advocate Health, even after the teammate leaves. You should report this to your supervisor or another leader. While printing is an issue, this also includes data via USBs, by emailing or other electronic methods. For more information, see the enterprise policy Governance Termination and Departure and Data.

Are you still unsure of what action(s) to take? Talk to an Advocate Health leader (your supervisor or another member of the management team at Advocate Health) or contact the Compliance & Integrity Department.

Acknowledgment

All Advocate Health teammates are required to acknowledge understanding of this Code by signing the annual Attestation.

