

Beaumont HEALTH

CODE OF CONDUCT

TRUST LINE: 800-805-2283



A MESSAGE FROM THE CEO



Beaumont Health is committed to excellence and quality when caring for our patients, families and each other. We do this by adhering to the principles of integrity and ethical behavior as stated in the Code of Conduct, thus ensuring our success and maintaining our reputation for providing quality care to our patients and a highly desirable environment for all of our employees and physicians. Every day we make choices as to how to behave and conduct our business and each of us is accountable for the decisions we make.

The purpose of Beaumont Health's Code of Conduct is to provide you with the guidelines you need to meet the responsibilities of your position and to ensure our commitment to ethical and compliant conduct. Your role is critical in that you are actively engaged in and promote compliance every day.

While the Beaumont Health Code of Conduct may not be inclusive of every situation that we may face, each of us must always exercise good judgment and be committed to upholding Beaumont Health's standards of integrity and business ethics. Should you have questions or believe a problem exists, talk to your supervisor or contact the Compliance Office or Human Resources.

Thank you for taking an active role in making honesty and ethical behavior a part of our culture.

A stylized, handwritten signature in black ink, appearing to read "John Fox".

John Fox
President & Chief Executive Officer
Beaumont Health

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HEALTH

PURPOSE

We at Beaumont Health are committed to conducting business ethically, morally, legally, with honesty and integrity. Our Code of Conduct has been developed to meet this commitment. It supports a Just Culture in a learning environment: creating and sustaining a culture of safety. Our Code supports the Beaumont Health Mission of compassionate, extraordinary care every day; the Beaumont Health Vision to be the leading value-based health care network focused on innovation, compassion and extraordinary clinical outcomes; and, the Beaumont Health Values of Compassion, Respect, Integrity, Teamwork, and Excellence. Our Code of Conduct communicates the standards of ethical conduct to employees, physicians (*employed and non-employed*), volunteers in Volunteer Services and all who do business with or on behalf of Beaumont Health.

This Code or the policies in support of this Code are not intended to prevent any of us engaging in or declining to engage in lawful conduct, protected by the National Labor Relations Board.

All of us who conduct business in any way as part of Beaumont Health are held to the standards of this Code of Conduct. This includes employees, admitting physicians, volunteers, students, contracted personnel and our Board of Directors. Violations of this Code of Conduct will result in sanctions, up to and including termination of employment, hospital privileges, and business relationships.

COMMITMENT TO PATIENTS AND COMMUNITY

Our patients and families are the center of all we do.

We use Beaumont Health's resources to benefit our patients and the commitment we have to provide medically necessary care at the highest levels of quality, safety and service.

BUSINESS ETHICS

We strive to be honest and forthright in all we do. Our commitment to integrity demands more than legal

obligations. It is imperative that we understand our responsibilities and take ownership for these responsibilities and our actions. We adhere to the Beaumont Health Code of Conduct and by doing so; we actively participate and promote this Code. It is incumbent upon all of us to report behavior inconsistent with this Code. Beaumont Health policies exist to guide ethical and lawful conduct and behavior in support of this Code.

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ACCURACY AND HONESTY IN BUSINESS & FINANCIAL INFORMATION & REPORTING

Acting with integrity requires us to ensure that all our patient records, financial records, coding, billing, cost and financial reporting must reflect the true nature of the services provided. We will not condone the participation in the creation of any records or documents, as defined in this section of the Code of Conduct, that are intended to mislead, misguide or conceal.

USE OF ASSETS

We have a responsibility to protect Beaumont Health assets, including physical assets, name, image and

reputation. Our assets are to be used for the benefit of Beaumont Health, our patients and the community. Assets are more than equipment, inventory, funds and office supplies. They include medical records, concepts, intellectual property, research data, strategic entrepreneurial plans regarding acquisitions, expansion and similar business planning related to Beaumont Health's core business of patient care, research, medical and business innovation.

POLITICAL ACTIVITIES & CONTRIBUTIONS

Beaumont Health is a nonprofit health system and is prohibited by federal law from directly or indirectly participating or intervening in any political campaign on behalf of or in opposition to any candidate for elected public office. Personal political activity is allowable but must not reference Beaumont Health or any of our positions with Beaumont Health. Such activity must be conducted on our own personal time and with our own personal expense.

Beaumont

HEALTH

This Code is not intended to prevent the communication of Beaumont Health views to legislators or governmental agencies with respect to existing or proposed legislation or governmental policies or practices affecting business operations.

LEGAL COMPLIANCE

All of us are expected to know and follow this Code of Conduct. Beaumont Health prohibits adverse action against any employee for reporting any violation of this Code or supporting policies or cooperating in any investigation related to this Code or supporting policies.

CONFLICTS OF INTEREST

At all times we must avoid situations in which our personal interests in any way conflict or appear to conflict with the interest of Beaumont Health, our patients or our mission. We encourage positive relationships with business entities and those persons who perform professional and business services for Beaumont Health that benefit our patients and community. Business relationships are not to be affected or influenced by improper acts such as those that would violate Anti-Kickback, Stark or other laws. We do not pay for or accept payment for referrals. Such acts are illegal in health care. Personal gifts are not solicited by us and the receipt of gifts is subject to our Beaumont Health policies. Services, supplies and equipment are acquired through objective evaluations and consistent with good business practices and fair market analysis. The appearance of impropriety is avoided in our relations with our professional and business colleagues.

Examples of conflicts of interest may include:

- vendor and payor relationships
- endorsements
- business courtesies
- business meals
- entertainment
- honoraria
- advisory boards
- consulting
- royalties
- stocks & bonds
- real estate
- other financial interests

All of us conducting business on behalf of or with Beaumont Health are required to disclose to the Beaumont Health Compliance Office any relationship they or immediate family members may have that could be perceived to be a conflict of interest as defined by the Beaumont Health Code of Compliance, Integrity and Business Ethics Policy. Reasonable gifts of gratitude received from patients that are consumable and of minimal value (e.g., flowers, cakes, candy, etc.) are acceptable. Under no

circumstances can gifts of cash (*including gift cards*) be accepted.

Gifts from Patients

Q – In gratitude for the excellent level of care, a patient has offered me a week's stay at a resort condominium owned by the patient. Can I accept?

A – No. You may accept reasonable gifts of gratitude (*cologne, flowers, cakes, candy, etc.*) from patients and families of patients. Under no circumstances can gifts of cash be accepted. Gifts of cash (*cash, checks, gift cards, etc.*) can be accepted through the Beaumont Foundation, Botsford Foundation, Oakwood Foundation for designated use by the receiving department. Any and all gifts must be disclosed to the department manager or administrator.

Gifts and Entertainment from Vendors

Q – A vendor has offered to take me to dinner and sporting event to discuss business. Is this acceptable?

A – Invitation to local entertainment and events sponsored by a vendor may be accepted only if authorized in advance in writing by your administrator and the expense is paid for by Beaumont Health. Participation in such events must further a legitimate business purpose for Beaumont Health and the vendor does not expressly expect to receive anything in return. These invitations must be disclosed in the annual Conflict of Interest/ Disclosure of Remuneration Questionnaire.

Consulting

Q – I am often approached to provide consulting services to companies and organizations because of my expertise. Is this acceptable and what is the process for approval if allowed?

A – Maybe. Consulting services to external entities may be acceptable provided the nature and details for the consulting engagement are fully disclosed to the Corporate Compliance Officer and qualify for approval via the Conflict of Interest link on the Corporate Compliance web page in advance of the engagement.

WORKPLACE CONDUCT & ENVIRONMENT

We treat each other with dignity and respect and we do not engage in violence or other similar conduct as defined in the harassment policy. We do not discriminate on the basis of any status or condition protected by applicable federal or state law.

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HEALTH

Conduct on the part of any of us that is inappropriate or detrimental to patient care will not be tolerated. We also conduct our business with a commitment to diversity consistent with applicable law.

Beaumont Health strives to create a Just Culture environment by proactively managing risks and behavioral choices affecting patient care and outcomes, designing safe systems, responding in a fair and consistent manner to adverse events and learning through transparent dialogue about risks and safety expectations.

To provide great service and excellent care to our patients, Beaumont Health is committed to a tobacco, alcohol and drug-free work environment. Employees reporting to work under the influence of any illegal drug or alcohol, possessing, or selling illegal drugs while on Beaumont Health time or property; may experience immediate termination.

COMPLIANCE PROGRAM

The Compliance Office is a resource for concerns and questions regarding the current regulatory environment, Code of Conduct and other policies to guide our activities. The goal of the Compliance program is to foster open communication, encourage respect and empower us to detect problems and solve them collectively. Compliance policies exist to provide detailed guidance to all of us.

The Beaumont Health Compliance Program includes: Compliance education; training; communication; auditing and monitoring; investigation of potential compliance concerns; up to date compliance policies and procedures and enforcement.

Beaumont Health encourages everyone to contribute to the continuous improvement of the organization. You can do this by expressing, in good faith, issues, concerns, opinions and problems related to this Code, our policies and our compliance with laws. We protect and do not retaliate against anyone when they make a report in good faith.

We all have an obligation to uphold our Code of Conduct. If you observe behavior that concerns you, or that may represent a violation of our Code of Conduct, raise the issue promptly.

You have several options. You may speak directly to your manager or others in your department, or call your Compliance or Privacy Representative directly. You may

make an anonymous report if you choose. Our Trust Line is available for you. You can report your concerns by calling **800-805-2283** any time, day or night. Your concern will be forwarded to a compliance professional to investigate. You may choose to leave your name or report concerns anonymously.

How you report a concern is up to you. It is your responsibility to do the right thing and report any concern you have.

PRIVACY

As individuals and as a team, we are committed to treating people with dignity, honor and respect. This includes our pledge to protect our patients' information. Our patients' trust is central to everything we do. Without that trust, our patients may not share all of their medical information, which may negatively impact the care that we provide.

One way that we honor our commitment is to treat the information our patients share with us with the same respect that we treat our patients. We respect our patients' privacy by only accessing or sharing our patients' health and financial information to do our job. We can access our patients' information to treat them or to share the information with another health care provider who is directly treating them. We can also access or share our patients' information to conduct our business or obtain payment. Unless we are accessing the patients' information for treatment, we only access or share the least amount of information necessary. If our patient is a friend, family member, or someone we just met today, we will treat their health information with the respect that we treat our patients.

As employees, volunteers, and health care providers we share Personally Identifiable Information with Beaumont Health, that will be treated in a secure and private manner.

We prove to our patients and each other that we are worthy of their trust when we protect their information.

We also create an environment whereby our patients feel comfortable sharing the information we need to provide the best quality of care available and our team feels respected as well.

HIPAA

Q – A patient would like to receive medical care without her insurance company receiving the medical information. Can she pay cash for that visit or health care service?

Beaumont

HEALTH

A – Yes. A patient has the right to ask us to bill him or her directly for the service instead of his or her health insurance company.

Q – What happens if Protected Health Information (PHI) is lost, stolen, or accessed inappropriately?

A – Report the concern to the Privacy Department immediately at **877-471-2422** if you suspect or know that PHI has been lost, stolen, or accessed inappropriately. We may need to notify the patient as soon as possible.

Q – My co-worker has been sick. I know that she was at a Beaumont Health hospital last week. May I take a look at her medial record? I know that she would give me permission because she has shared her medical care with me before and asking her about it will just upset her.

A – You may not access your co-worker's medical information or other protected health information unless you are using your access to do your job. Respecting your co-worker's privacy is how we build strong relationships with each other and our patients.

HUMAN RESOURCES

Beaumont Health employs a staff of employee relations specialists that are available to assist all of us with any employee relations issue. For more information or assistance, please contact a Human Resource office at any Beaumont Health facility.

Media/PHI

Q – I was contacted by a local newspaper to get my opinion about a patient I treated. May I respond?

A – Refer all media questions about patients to the Media Relations department or to your manager.

Record Retention

Q – I just came across a binder of old meeting minutes. Can I throw these in the trash?

A – Federal and state laws, accreditation organizations, and regulatory agencies have specific requirements regarding retaining specific documents. Our Records Retention Policy guides us as to what we need to keep and for how long. When the time comes to destroy the documents, follow the record destruction policy. Remember that good record retention doesn't mean that we keep everything forever. Good record retention is keeping the right documents for the time period that we need to keep them and then destroying them in a way that keeps confidential information confidential.

RESOURCES

- *Your manager – usually the best place to start in getting answers to your questions and concerns.*
- *Trust Line – 800-805-2283*
- *General compliance concerns – 248-551-0224*
- *Post Acute, physician, research and joint venture compliance – 313-791-4762*
- *Privacy issues – 877-471-2422*
- *Human Resources – contact site specific HR department*
- *Patient Safety and Quality – contact site specific administration office*
- *Patient rights (Questions, Complaints, etc.) – 313-586-5847*
- *Environmental Safety – 313-586-5799*