

Aspirus Code of Conduct



Message from our President and CEO



A key principle to Aspirus' success has been our steadfast commitment to integrity and ethical business dealings. We value the tradition of caring for our patients, health plan members, communities we serve, providers, suppliers, payors, and our colleagues. Nothing is more important to the organization than making sure we do what is right, and nothing puts us at risk more than failure to do so.

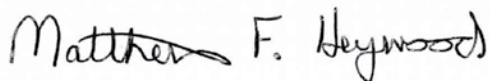
This Code of Conduct further demonstrates our commitment, and should guide our behavior and remind us of the tremendous responsibility we have to the people who trust us with their health and well-being. Inasmuch as our mission and values are the foundation of the Code of Conduct, these principles define how each of us must act to ensure that Aspirus sustains its reputation and continues to earn the trust that allows us to excel as an organization.

Our success begins with personal accountability. We will always be challenged with deadlines, metrics, and “an easier way” and we must be strong enough to withstand these pressures. If you encounter a situation or an individual whose actions you feel violate any of these guiding principles, we expect you to speak up. You can do so by talking to your supervisor or another member of management, your Human Resources Business Partner, the Chief Compliance Officer, or any member of the Aspirus corporate team.

If you are unsure about whom to contact or if you prefer to speak up without revealing your identity, you can call the Compliance Helpline at 800-450-2339. Any retaliation or retribution for reporting conduct that could be judged as improper will not be tolerated.

Extraordinary teams act with integrity. By following our Code of Conduct and demanding the highest level of integrity from ourselves and our fellow colleagues, we will maintain a culture that will embody the pride we feel in what we do.

Thank you for your partnership and commitment to always doing the right thing.

A handwritten signature in black ink that reads "Matthew F. Heywood".

Matthew F. Heywood
President and CEO



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Our Mission

We heal people, promote health and strengthen communities.



Our Vision

Aspirus is a catalyst for creating healthy, thriving communities, trusted and engaged above all others.



Our Values



Compassion

We demonstrate caring in all we do, and cherish the honor of improving lives.

- We strive to heal, soothe suffering, and alleviate stress.
- We are generous, and serve others before ourselves.
- We listen to understand, rather than to respond.
- We are kind and courteous, we warmly greet people, and help when we can.
- We respect all people and treat them with dignity and worth.
- We protect privacy and confidentiality.



Accountability

We commit to our work, recognize our power to make a difference, and embrace the responsibility to advocate for each person we serve.

- We always do what we say we will do.
- We care intensely about Aspirus' success, because our communities need us.
- We call out actions that are not consistent with our values.
- We admit mistakes, and eagerly learn and improve.
- We take care of ourselves, so we can care for others.
- We give our best and drive quality, not matter the circumstances.



Collaboration

As a team, we improve our patients' lives; through partnerships we improve the health of our communities.

- We welcome newcomers and are positive teachers and role models.
- We inform and engage patients, families and each other.
- We support each other by making time to help.
- We believe every member of the Aspirus family has a valuable role.
- When we disagree, we do it with respect and good intentions.
- We inspire others with our drive for excellence.



Foresight

We plan and act today to impact the future, and sustain and grow vital resources for those who need us.

- We use resources wisely because the affordability of health care is important to those we serve.
- We act with courage to drive change for the benefit of those we serve.
- We explore choices and consequences to make good decisions.
- We take smart risks.
- We encourage new ideas and recognize that processes must evolve.
- We challenge the current state if we think there is a better approach.



Joy

We work with happiness and enthusiasm; we celebrate successes and build a positive environment.

- We choose a positive outlook.
- We seek out and celebrate wins.
- We praise others for progress and outcomes.
- We have fun and laugh when we can.
- We assume positive intent in others.
- We experience happiness in service.



Aspirus Code of Conduct

Purpose

We are obligated to comply with the laws and regulations that govern the health care industry as well as Aspirus' policies and procedures. This Code of Conduct ("Code") serves as a formal statement of Aspirus' commitment to ethical behavior and business practice, details the mission and values of Aspirus, explains the standards of conduct expected of you, and describes procedures for reporting ethical and legal issues. It also governs our relationships with patients, health plan members ("member(s)"), providers, payors, subcontractors, independent contractors, vendors, consultants, government agencies and one another.

To the extent that all individuals associated with Aspirus act responsibly, Aspirus' reputation as a leader in health care will be protected. Acting responsibly means that, at all times, you will 1) perform your duties in a manner that upholds and complies with the principles set forth in this Code and applicable Aspirus policies and procedures; 2) ensure your conduct meets the requirements of all relevant federal, state, and local laws and regulations; 3) take responsibility for your behavior (including both acts and omissions); and 4) immediately report anything that you believe to be inconsistent with the principles of this Code.

No set of policies can substitute for good judgment and common sense, nor can a single set of policies address every situation that might be encountered. The complexity of the health care environment can sometimes make it difficult to recognize behavior or practices that may be illegal or improper. At Aspirus, maintaining a culture of compliance means, in part, that if you have a question about something, if you are uncertain as to what the right course of action might be in any situation, or you observe any potential compliance issue, you are obligated to seek guidance and direction.

Special Responsibilities of Leadership

While Aspirus expects all employees to follow our Code, we emphasize that our leaders are to set the example and be in every respect a role model for appropriate conduct. Our leaders must also ensure that those on their teams have sufficient information to comply with the relevant laws, regulations and policies as well as the resources to resolve ethical dilemmas. They must help to create a culture within Aspirus that promotes the highest standards of ethics and compliance. Our culture must encourage everyone in the organization to raise concerns as they arise. We must never sacrifice ethical and compliant behavior in the pursuit of business objectives.

Mandatory Code Compliance

Compliance with this Code is a condition of continued employment that all employees comply with the standards of conduct and other provisions set forth in this Code. In addition, Aspirus has adopted many policies and procedures governing the affairs of the organization, and this Code provides that compliance with such policies and procedures is mandatory.

Preliminary Notes:

1. All references to "Aspirus", or the "organization" in this Code refer to Aspirus, Inc. and its subsidiaries and affiliated entities, unless the context clearly indicates otherwise.
2. Wherever the terms Aspirus employees, we, us, or our are used in this Code, such terms refer to all providers; clinical and non-clinical full-time employees, part-time employees, temporary employees; health plan employees; and contractors employed by or providing services on behalf of Aspirus and report to an Aspirus manager, unless the context clearly indicates otherwise.
3. This Code is an integral part of Aspirus' company-wide compliance program ("Compliance Program"). Information regarding the Compliance Program is in this Code, and further information may be obtained from your supervisor, the Chief Compliance Officer, or a member of the Compliance team at Aspirus' corporate offices at compliance@aspirus.org.
4. Aspirus' Compliance Helpline is available 24 hours a day, seven days a week to take anonymous calls from employees regarding possible compliance violations or compliance concerns. The toll-free Compliance Helpline number is 800-450-2339.
5. Aspirus' Code is not and may not be construed as a contract of employment or any other type of contract or an assurance of continued employment.
6. This Code is effective as of July 1, 2019.

Patient Safety and Quality of Care

We are committed to providing high-quality compassionate health care to all of our patients and delivering health services in an ethical, professional, and cost-effective manner. We provide care in a safe environment, as to avoid patient harm from the care that is intended to help them. We treat all patients with respect and dignity and provide care that is both clinically necessary and appropriate. We adhere to the domains of quality to ensure that care provision is: safe, timely, efficient, effective, and patient-centered. We make no distinction in the admission, transfer, or discharge of patients or in the care we provide based on race, color, religion or national origin. Clinical care is based on individually identified health care needs of each patient.

Patient Rights

Upon admission, each patient is provided with a written statement of patient rights. We uphold patient rights to make decisions regarding medical care and other patient rights in accordance with applicable state and federal laws. Aspirus employees receive training about patient rights in order to understand their role in supporting such rights.

We ensure patients' involvement in all aspects of their care and obtain informed consent for treatment. Patients are treated in a manner that preserves their dignity, autonomy, self-esteem, civil rights and involvement in their own care. We are fair and open in our dealings with patients. Patients, or their representatives, are provided a clear explanation of their care, including diagnosis, treatment plan, their right to refuse or accept care, care decision dilemmas, estimates of treatment costs, organ donation and procurement, and an explanation of the risks and benefits associated with available treatment options. Patients have the right to request transfers to other facilities. In such cases, the patient will be given an explanation of the benefits, risks, and alternatives.

Patients are informed of their right to execute advance directives. Patients' advance directives will be honored within the limits of the law and the organization's mission, philosophy, and capabilities.

Patients and their representatives will be given appropriate confidentiality, privacy, security and protective services, opportunity for resolution of complaints, and opportunity for pastoral counseling.

We are culturally competent. This means that we are sensitive to the ethnic, religious, language and cultural differences of our patients at all times.

Emergency Treatment

We follow the Emergency Medical Treatment and Active Labor Act (EMTALA) in providing emergency medical treatment to all patients, regardless of ability to pay. Anyone with an emergency medical condition is evaluated, treated and admitted based on medical necessity.

In an emergency situation, financial and demographic information will be obtained only after the immediate needs of the patient are met. We do not admit or discharge patients based simply on their ability to pay or other discriminatory factor. Patients will only be transferred to another facility upon their request or if their medical needs cannot be met at the Aspirus facility and the appropriate level of care is known to be available at another facility. Patients may be transferred only after they have been stabilized and are formally accepted by the alternate facility and its admitting physician.

Patient and Health Plan Information and Confidentiality

The Health Insurance Portability and Accountability Act (“HIPAA”), and other federal and state laws, prohibit the use or disclosure of Protected Health Information (“PHI”) unless it is for treatment, payment, or health care operations or is otherwise allowed by law. These rules apply to Aspirus patients and health plan members, including Aspirus employees, family members and acquaintances who are receiving care at Aspirus.

We collect information about the patient or member’s medical condition, history, medication, and family illnesses to provide the best possible care. We realize the sensitive nature of this information and are committed to maintaining its confidentiality. Every patient or member can expect that his or her privacy will be protected and that patient- or member-specific information will be released only to persons as permitted or required by law or when the patient or member has authorized such disclosure.

We must never use or disclose confidential information in a manner that violates the privacy rights of our patients and members. No Aspirus employee, independent provider, or other health care professional has a right to any patient or member information other than the minimum necessary to perform his or her job.

To protect confidentiality and security of PHI, we

- Never access, use or disclose PHI except to perform and complete Aspirus work (e.g., for treatment, payment or hospital operations), or as permitted by law and Aspirus policy;
- Do not gain access to or obtain PHI other than the minimum information necessary to do our jobs;
- Never discuss PHI in public areas or other locations where we may be overheard by others;
- Release PHI only to persons who have the patient or member’s written authorization or who are authorized by law to receive it;
- Never discuss Aspirus patients or post PHI or patient photos on social media websites, even if the patient authorizes it;
- Recognize that Aspirus’ Marketing Department is solely authorized and responsible for developing Aspirus’ social media sites and content;
- Acknowledge our obligation to protect PHI;
- Contact the Chief Compliance Officer if we have a question about releasing PHI prior to authorizing its release; and
- Report to your supervisor or manager or the Chief Compliance Officer any actual or suspected unauthorized use, access or disclosure of PHI.

Identity theft is a developing issue for health care organizations. It occurs when a individual’s personal and financial information is illegally obtained and then used to open credit accounts or obtain goods and services. We follow the requirements of the Aspirus Identify Theft Prevention Program and ensure that patient or member information is not used for improper or illegal purposes.

Employment Practices and Workplace Conduct

Aspirus values its employees. Our employees provide a wide complement of talents that contribute greatly to our success. We strive to create and maintain an environment in which all employees are treated with respect, dignity, and fairness; where diversity is valued; and where opportunities to grow, develop professionally, and work in a collaborative manner are provided to all.

Conflicts of Interest

Employees are obligated to remain free of actual or apparent conflicts of interest in the performance of their Aspirus responsibilities. A conflict of interest may occur if outside activities or personal interests influence or appear to influence your ability to make objective decisions in the course of your job responsibilities. A conflict of interest may also exist if your private interests hinder or distract you, or appear to hinder or distract you, from the performance of your job or the interests of Aspirus as a whole or cause you to use company resources for other than Aspirus purposes. A conflict of interest may also occur when an employee or member of his or her family receives an improper personal benefit as a result of his or her position with the organization.

In furtherance of Aspirus' commitment to avoid or manage actual or potential conflicts of interest, you are expected to:

- Maintain unbiased relationships with actual and potential vendors;
- Exercise the duties of loyalty, good faith, honesty, and fair dealing in all activities and transactions related to Aspirus;
- Not accept any outside employment or contracting arrangements that conflict with the interest of Aspirus; and
- Not offer, accept, or provide gifts or favors in violation of Aspirus' Gifting Policy.

If you have any question about whether an activity might constitute a conflict of interest, you should seek guidance or discuss the activity with your supervisor, a Human Resources Business Partner, and/or the Chief Compliance Officer. Any employee having a material relationship that reasonably could be expected to give rise to an actual or apparent conflict of interest is required to disclose that relationship to his or her supervisor, Human Resources Business Partner, and/or the Chief Compliance Officer.

Diversity and Equal Employment Opportunity

We are committed to a work environment, in which all individuals are treated with respect, fairness, and dignity. It is our policy to provide equal employment opportunity without discrimination or harassment on the basis of race, gender, religion, age, disability, sexual orientation, or any other characteristic protected by state, federal, or local law. We will comply with all laws, regulations, and policies related to non-discrimination in all of our personnel actions including hiring, staff reductions, transfers, terminations, evaluations, recruiting, compensation, corrective action, and promotions. We will make reasonable accommodations to the known physical and mental limitations of otherwise qualified individuals with disabilities according to all laws, regulations and Aspirus policies.

Harassment

We expressly prohibit any form of unlawful employee harassment on the basis of race, gender, color, religion, age, disability, sexual orientation, or any other characteristic protected by state, federal, or local law. We also prohibit conduct that, although not necessarily rising to the level of unlawful harassment, could be perceived as inappropriate conduct, sexual or otherwise. We do not permit retaliation against or intimidation of anyone who makes a good-faith complaint of harassment or discrimination.

Workplace Violence

Aspirus is concerned about the well-being and personal safety of its employees and anyone doing business with Aspirus. Workplace violence is strictly prohibited. Violent acts may include, among other things, robbery and other commercial crimes, stalking, violence directed at the employer or employees, terrorism, and hate crimes committed by current or former employees. As part of our commitment to a safe workplace for our employees, we prohibit employees from possessing firearms, other weapons, explosive devices or any other dangerous materials on Aspirus' premises.

Professional Conduct

We must be able to collaborate, communicate, and cooperate at all times and can achieve this only if we treat each other with respect, courtesy, dignity, and understanding.

Behaviors that undermine the culture of safety and inclusion include, but are not limited to:

- Inappropriate physical contact or invasion of personal space;
- Sexual, religious, racial or other unlawful harassment;
- Bullying;
- Using profanity or personal insults directed at colleagues;
- Throwing objects and other unsafe conduct;
- Destroying Aspirus property; and
- Refusing to speak to colleagues or refusing to respond to them.

We encourage the reporting of all perceived incidents of discrimination, unprofessional conduct, harassment, or violence, regardless of the offender's identity or position. Individuals who believe that they have been the victim of such conduct should discuss their concerns with at least one of the following:

- Human Resources Business Partner
- Business Unit Leader: President, Chief Administrative Officer (CAO), Chief Financial Officer (CFO), Chief Nursing Officer (CNO), or Supervisor/Manager
- Chief Compliance Officer
- Compliance Helpline



License and Certification Renewals

Aspirus verifies the qualifications of health care professionals who treat our patients and will not allow them to work without the valid, current licenses or credentials required for their professional duties. Persons retained as independent contractors in positions that require professional licenses, certifications, or other credentials are responsible for maintaining the current status of their credentials and shall comply at all times with federal, state, and local requirements applicable to their respective disciplines. To assure compliance, Aspirus will require evidence of the individual's having a current license or credential status.

Health care professionals are required to advise their supervisor, Provider Services representative, Human Resources Business Partner, or the Chief Compliance Officer if any action is taken that suspends, adversely impacts, or limits their licenses or credentials.

Hiring or Retention of Excluded Individuals or Entities

We will not knowingly employ, retain, credential, contract, or continue to conduct business with any individuals or entities that have been excluded from participation in any government program or has been convicted of a criminal offense related to the provision of health care items or services and has not yet been reinstated after a period of exclusion or ineligibility.

An appropriate background search as required by Aspirus policies is performed for each new employee, provider, independent contractor, vendor, and/or other business partner. We regularly review published information to check for excluded individuals and entities.

You are required to advise your Human Resources Business Partner and the Chief Compliance Officer immediately if any action is taken that impacts or limits your eligibility to participate in government programs.

Substance Abuse

A safe working environment is necessary for the benefit of our employees, our volunteers, and our patients. Accordingly, we subscribe to an alcohol- and drug-free workplace. All employees, volunteers, and providers, must be free of the influence of alcohol and illegal drugs when performing their duties in or on Aspirus property. Performing duties while under the influence of alcohol or illegal drugs; having such substances in your system; or using, possessing, or selling such substances while on Aspirus property may result in immediate termination. Drug testing may be used to enforce this policy.

It is also recognized that individuals may be taking appropriately prescribed drugs that could impair judgment or other skills required in job performance. If you have questions about the effect of such medications on your performance, you should consult with your doctor, your supervisor, Employee Health or your Human Resources Business Partner.

Controlled Substances

As part of their normal work duties and responsibilities, a number of Aspirus employees routinely have access to prescription drugs, controlled substances, and other medical supplies. Many of these items are governed and monitored by specific regulatory organizations and must only be administered by a provider order. In order to minimize risks to patients and to Aspirus, it is extremely important that these items be handled properly and only by authorized persons. If you are suspicious of or become aware of the unauthorized diversion of any prescription drugs, controlled substances or other medical supplies, you should immediately report the incident to your supervisor, Human Resources Business Partner, or the Chief Compliance Officer.

Gifts and Fundraising Among Employees

No employee is compelled to give a gift to another employee, and any gifts offered or received should be appropriate to the circumstances. A lavish gift to anyone in a supervisory role would not be appropriate.

Personal Use of Aspirus Resources

Theft, carelessness, and waste have a direct impact on our organization's success. It is the responsibility of each Aspirus employee to preserve our assets including time, materials, supplies, equipment and information and to ensure their efficient use. Aspirus assets are to be maintained for legitimate business-related purposes. As a general rule, you should not conduct personal business during work time and the personal use of any Aspirus asset without the prior approval of your supervisor is prohibited. Occasional or incidental use of items, such as copying equipment or telephones, where the cost to Aspirus is insignificant, is permissible. Aspirus reserves the right to monitor and obtain your communication usage and content and to impose disciplinary action when usage violates Aspirus policy. Any Aspirus resources used for personal financial gain unrelated to Aspirus business is prohibited. Similarly, competing with the company or taking advantage of personal opportunities that are discovered through the use of organization property or position is prohibited as well. Employees owe a duty to Aspirus to advance its legitimate interests when the opportunity to do so arises.

Health and Safety

Aspirus facilities must comply with all government regulations and rules and with Aspirus policies or required facility practices that promote the protection of the workplace health and safety. Aspirus has developed policies to protect employees from potential workplace hazards. You should become familiar with these policies and understand how they apply to your specific job responsibilities. Seek advice from your supervisor whenever you have a question or concern. It is important for you to advise your supervisor of any serious workplace injury or any situation presenting a danger of injury so that timely corrective action may be taken to resolve the issue.

Social Media Use

Aspirus recognizes that social media platforms provide a powerful and immediate way to share information and many of our employees use social media in their personal lives. Examples of social media include Facebook, Twitter, YouTube, Instagram, LinkedIn, media sites, health pages and blogs, or other similar online forums. Our organization has implemented a social networking policy to establish guidelines and to clarify the personal responsibilities and legal implications of employees' personal use of social media while at work or while posting information about Aspirus. Because our employees can be powerful ambassadors for Aspirus, we encourage them to be active social media users, as appropriate. When doing so, they must always protect patients' privacy.



Compliance with Laws and Regulations

Aspirus provides health care services in multiple states. These services may be provided only pursuant to appropriate federal, state and local laws and regulations. Such laws and regulations may include subjects such as certificates of need, licenses, permits, accreditation, access and consent to treatment, medical record-keeping, access to medical records and confidentiality, privacy of patient-specific information, patients' rights, terminal care decision making, medical staff membership and clinical privileges, corporate practice of medicine restrictions, Federally Facilitated Marketplace (FFM) regulations and guidance, and Medicare and Medicaid regulations. In addition to these health care regulations, there are numerous other laws with which Aspirus must abide if it is to maintain regulatory compliance.

- We comply with all applicable rules and regulations, policies, and procedures. We conduct business with honesty, fairness, and integrity.
- All employees, providers, other health care and contract service providers must be knowledgeable about and ensure compliance with the laws and regulations that are applicable to their professional duties. We understand that this familiarity is a requirement of our jobs and a regular part of performance evaluation.
- All employees, providers, other health care and contract service providers should immediately report concerns about patient safety or quality of care and possible or suspected compliance violations to a supervisor or member of management, a member of the Compliance Team, or the Compliance Helpline at 800-450-2339.
- We do not pursue any business opportunity that requires engagement in any illegal activity or that we believe may be in violation of any law, rule, regulation, or Aspirus policy.
- We do not solicit, accept, offer, or give anything of value to employees, providers, or others for referrals of patients, kickbacks, bribes, rebates, or any other benefits intended to induce referrals are strictly forbidden.
- We provide payments or other benefits to providers and potential or actual referral sources only for the fair market value of services actually rendered.
- We ensure that our contracts conform to applicable laws and regulations by having them reviewed in accordance with Aspirus applicable policies and directives.
- We ensure that all drugs and/or other controlled substances used in treatment of patients are maintained, dispensed, and transported in conformance with all applicable laws and regulations.
- We ensure all accounting, reimbursement or financial reporting functions are performed accurately and in conformance with all applicable laws, regulations, organization policy, and professional standards.
- We adhere to sound environmental and safety practices as well as the proper handling of medical or hazardous waste.

Billing and Coding

We take great care to ensure that all billings to government and private insurance payors and patients are true, accurate, and in conformance with applicable federal and state laws and regulations. We prohibit any employee or agent of Aspirus from knowingly presenting or causing to be presented claims for payment or approval that are false, fictitious, or fraudulent.

- We operate oversight systems designed to verify that claims are submitted only for services actually provided and that services are billed as provided. These systems will emphasize the critical nature of complete and accurate documentation of services provided.
- As part of our documentation effort, we strive to maintain current, complete, and accurate documentation.
- Any subcontractors engaged to perform billing or coding services must have the necessary skills, quality assurance processes, systems, and appropriate procedures to ensure that all billings for government and commercial insurance programs are accurate and complete.
- Aspirus may contract with such entities that have adopted their own ethics and compliance programs. Third-party billing entities, contractors, and preferred vendors must be approved in accordance with Aspirus policies.
- If a billing or coding error is detected, immediate notification to your supervisor is mandatory. Overpayments must be promptly refunded.
- For coding questions, contact your Health Information Management representative for assistance. For questions concerning billing issues, contact your Revenue Cycle representative.
- Aspirus will be forthright in dealing with any billing inquires. Requests for information from duly authorized individuals or non-government entities will be answered with complete, factual, and accurate information. We will cooperate with and be courteous to all authorized requestors and provide them with the information to which they are entitled during an authorized inquiry or inspection.



Fraud, Waste and Abuse and False Claims

We work diligently to ensure that our patient bills and the claims we submit to payors, including all government entities, are accurate and truthful. It is illegal to submit claims for payment to government programs that we know or should know are false or fraudulent. The federal False Claims Act (“FCA”) allows the federal government to recover money received through fraud, whether intentional or by deliberate ignorance/reckless disregard, by government contractors, subcontractors or those participating in a government program. The FCA may also be triggered by entities who retain identified overpayments beyond the regulatory guidelines. Under the FCA, individuals and entities are liable for up to three times the loss to the government, plus civil fines for each occurrence.

The FCA also contains provisions for individuals who are referred to as relators, or “whistleblowers.” Relators are protected under the law against retaliation from the covered entities or persons upon which a whistleblower lawsuit is filed.

Our non-retaliation policy protects Aspirus employees from retaliation, retribution or intimidation for making reports to the Compliance Department of known or suspected misconduct.

Physician Relationships

All business arrangements with physicians and advance practice clinicians must be structured to ensure precise compliance with legal requirements. Such arrangements must be in writing and approved by the Aspirus Legal Department prior to execution of the contract or performance or payment thereunder. In order to meet all ethical and legal standards regarding referrals and admissions, we will adhere strictly to two primary rules:

1. We do not pay for referrals (directly or indirectly). We accept patient referrals and admissions based solely on the patient’s clinical needs and our ability to render the needed services. We do not pay or offer to pay anyone – employees, providers, or any other person or entities – for referral of patients. Violation of this policy may have grave consequences for Aspirus and individuals involved, including civil and criminal penalties, and possible exclusion from participation in federally funded health care programs.
2. We do not accept payments for referrals that we make (directly or indirectly). No Aspirus employee or any other person acting on behalf of the organization is permitted to solicit or receive anything of value, directly or indirectly in exchange for the referral of patients. Similarly, when making patient referrals to another health care provider, we do not take into account the volume or value of referrals that the provider has made (or may make) to us.

You should immediately report any known or suspected violations of these two primary rules to a Senior Leader of the Aspirus business unit or the Chief Compliance Officer.

From time to time, Aspirus may offer a gift to a physician or immediate family member. Such gifts must be in strict compliance with Aspirus Policy and applicable laws and regulations that govern health care. No Aspirus employee should offer or provide a gift to a physician or any other referral source without the prior approval of the hospital President or the Chief Compliance Officer.

Cost Reports

We comply with federal and state laws relating to all cost reports. These laws and regulations define what costs are allowable and outline the appropriate methodologies to claim reimbursement for the cost of services provided to program beneficiaries. Given their complexity, all issues related to the completion and settlement of cost reports must be communicated through or coordinated with Aspirus Finance Department.

Conduct with Respect to Regulatory Agencies

Inquiries and Requests for Information

Aspirus will be forthright in dealing with any inquiries. We will respond to requests for information with complete, factual, and accurate information. We will cooperate with and be courteous to all government entities and provide them with the information to which they are entitled.

During a government or regulatory inspection, we must never lie, make misleading statements, or conceal, destroy, or alter any documents. We will not attempt to cause another employee to fail to provide accurate information or obstruct, mislead, or delay the communication of information or records relating to a possible violation of law.

In order to ensure that we fully meet all regulatory obligations, Aspirus employees must be informed about stated areas of potential compliance concern. The Department of Health and Human Services, and particularly its Inspector General, has routinely notified health care providers of areas in which these government representatives believe that insufficient attention is being devoted to government regulations. We will be diligent in the face of such guidance about reviewing these elements of our organization to ensure their correctness. Aspirus employees should immediately advise their supervisors and the Aspirus Legal and Compliance Departments of governmental inspections and requests for information.

Accrediting Bodies

We will deal with all accrediting bodies in a direct, open, and honest manner. No action should ever be taken in relationships with accrediting bodies that would mislead the accrediting body or its survey teams, either directly or indirectly.

Hiring of Former and Current Government Employees

The recruitment and employment of former or current U.S. government employees is subject to complex rules that change frequently and vary by employee. Similar rules may also apply to current or former state or local government employees or legislators and members of their immediate families. If a former government employee or consultant wishes to become employed by or a consultant to Aspirus, care should be exercised to ensure that the requirements of conflict of interest laws are not violated. Each situation should be considered on an individual basis, and you should consult with the Human Resources Department or the Legal Department on issues related to recruitment and hiring of former or current government employees.

Business Information and Information Systems

Each Aspirus employee is responsible for the integrity and accuracy of our organization's documents and records, not only to comply with regulatory and legal requirements but also to ensure that records are available for our business purposes.

Accuracy, Retention and Disposal of Documents and Records

Medical and business documents include paper documents such as letters and memos, computer-based information such as e-mail or computer files on disk or tape, and any other medium that contains information about the organization or its business activities. No one may alter or falsify information on any record or document.

Medical and business documents and records must be retained in compliance with all federal or state laws and regulations, and with all applicable Aspirus record retention policies. It is important to retain and destroy records appropriately according to applicable policies. We must not tamper with records nor remove or destroy them prior to the specified date.

Confidential Information

Confidential information about our organization's strategies and operations is a valuable asset. Confidential information includes patient lists and clinical information, pricing data, and cost data. It also includes, but is not limited to, information pertaining to acquisitions, divestitures, affiliations, and mergers; financial data; research data; strategic plans; marketing strategies; techniques; supplier and contractor information; training materials; and proprietary computer software.

Although you may use confidential information to perform your job, you must not disclose this information to others outside Aspirus or your department unless you are doing so within the scope of your job responsibilities and the person whom you intend to disclose the information has a legitimate business reason to know this information.

As an employee or contractor of Aspirus, you must not seek to benefit personally or permit others to benefit through the use or disclosure of our confidential information. This obligation is not limited to documents and materials that are specifically marked as "confidential". If you have any doubt as to whether or not information you wish to disclose is confidential, you should consult with your supervisor, the hospital President or CFO, or the Chief Compliance Officer.



Electronic Communications

Aspirus' electronic communications and information systems, including but not limited to software and hardware for clinical and financial systems, e-mail, intranet, internet, and voice systems made available to Aspirus employees are provided for the efficient completion of work-related assignments and remain company property. With the exception of e-mail, internet, and voice systems, such communications and information systems are to be used exclusively to conduct Aspirus business. The very limited or incidental use of e-mail, internet, or voice systems for personal reasons is permitted where the cost to Aspirus is insignificant.

Although users may be assigned individual passwords, all e-mail messages, voicemail messages, internet access, computer files, or other electronic communications are Aspirus records. The contents of all electronic communications properly obtained for legitimate business purposes may be disclosed without the permission of the employee. Therefore, users have no reasonable expectation of privacy with respect to communications transmitted by Aspirus-owned electronic communications systems, and all such messages remains Aspirus property. Electronic communications are accessible at all times by Aspirus and may be monitored at any time for any business purpose.

Aspirus has taken steps to protect its electronic communications systems as outlined in its policies.

Security of Information

To protect the security of information Aspirus employees will:

- Keep your computer and voice system passwords private and secure. Never share your password and change your password if you feel it has been compromised;
- Lock your computer anytime it is unattended;
- Install privacy guards or use automated timeout to prevent others from viewing the computer screen;
- Maintain physical control of laptops and other portable devices at all times when outside of a secure Aspirus entity;
- Shut down your computer so that encryption can protect confidential data if your laptop is lost or stolen;
- Use secure email or File Transfer Protocols when sending confidential information, including PHI, to an external email address;
- Beware of phishing campaigns and review emails prior to responding or clicking on embedded links.



Financial Reporting and Records

We have established and maintained a high standard of accuracy and completeness in the documentation and reporting of all financial records. These records serve as a basis for managing our business and are important in meeting our obligations to patients, health plan members, employees, shareholders, suppliers, and others. They are also necessary for compliance with tax and financial reporting requirements.

All financial information must reflect actual transactions and conform to Generally Accepted Accounting Principles (GAAP) and associated Financial Accounting Standards Board (FASB) rules and regulations. All assets and transactions must be properly recorded and disclosed.

Aspirus is committed to the full, fair, accurate, timely, and understandable disclosure of financial and other information contained in reports and documents that the organization files with the various regulatory agencies and in other public communications made by Aspirus.

Aspirus maintains a system of internal controls to provide reasonable assurances that all transactions are executed in accordance with management's authorization and are recorded in a proper manner so as to maintain accountability of the organizations assets.

Contractors and Suppliers

We will employ the highest ethical standards in business practices with respect to contractors, suppliers, and vendors and in source selection, negotiation, determination of contract awards, and the administration of such activities.

Any relationships entered into with individuals or entities must be conditioned upon their eligibility to participate in government programs. We will not knowingly hire, retain, employ, or contract with individuals or entities that have been excluded from participation in any government program. Similarly, we will not knowingly conduct business or continue to conduct business with individuals or entities, whether independent contractors, subcontractors, suppliers, or vendors, who have been excluded from participation in any government program.

Any determination or finding that an individual or entity is excluded from participation in a government program shall be cause for immediate termination of the business relationship. All contracts entered into with contractors and suppliers shall comply with Aspirus policies.

We are fair and open in our dealings with vendors, suppliers, and subcontractors. Employees may not take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other unfair dealing practice. Our decisions and selections with respect to contractors, suppliers, and vendors will be made on the basis of appropriate objective criteria and not on personal relationships or friendships.

We will not communicate to any third party confidential information given to us by our suppliers unless directed in writing to do so by the supplier.

Gifts and entertainment that might be offered by contractors or suppliers and intended to influence the decision making of Aspirus and its employees will not be accepted.

Marketing Practices

We may use marketing and advertising activities to educate the public, provide information to the community, increase awareness of our services, and recruit employees. We will present only truthful, fully informative, and non-deceptive information in these materials and announcements. All marketing materials will be consistent with services available and the level of licensure and certification. We will not engage in marketing activities that are in violation of any federal and/or state regulation. Any questions about Aspirus' advertising and marketing initiatives should be directed to a member of the Marketing team.

Antitrust

Antitrust laws are designed to create a level playing field in the marketplace and to promote fair competition. Aspirus is committed to fair dealing with its customers and competitors in compliance with antitrust laws and regulations.

Antitrust laws could be violated by discussing Aspirus business with a competitor, such as how or the level at which our prices are set, disclosing the terms of supplier relationships, allocating markets among competitors, or agreeing with a competitor to refuse to deal with a supplier. Our competitors are other health systems, providers, payors, and facilities in markets where we operate.

At trade association meetings, be alert to potential situations where it may not be appropriate for you to participate in discussions regarding prohibited subjects with our competitors. Prohibited subjects include any aspect of pricing, our services in the market, key costs such as labor costs and wages, and marketing plans. If a competitor raises a prohibited subject, end the conversation immediately. Document your refusal to participate in the conversation by requesting that your objection be reflected in the meeting minutes, and notify the Legal Department of the incident.

In general, avoid discussing sensitive topics with competitors or suppliers, unless you are proceeding with the advice of the Legal Department. Also, do not provide any information in response to an oral or written inquiry concerning an antitrust matter without first consulting the Legal Department.

Obtaining Information about Competitors

We obtain information about other organizations, including our competitors, only through legal and ethical means such as public documents, public presentation, journal and magazine articles, and other published and spoken information.

We do not obtain proprietary or confidential information about a competitor through illegal means, nor do we seek proprietary or confidential information when doing so would require anyone to violate a contractual agreement such as a confidentiality agreement with a prior employer.



Environmental Compliance

We comply with all applicable environmental laws and regulations. We operate each of our facilities with the necessary permits, approvals, and controls. We employ the proper procedures with respect to handling and disposal of hazardous and bio-hazardous waste, including medical waste. Any Aspirus employee should immediately alert his or her supervisor about any situation of which he or she becomes aware regarding the discharge of a hazardous substance, improper disposal of medical waste, or other situation that may be damaging to the environment.

Gifts and Other Business Courtesies

Aspirus employees shall comply with all applicable laws, regulations, and Aspirus policies and procedures relating to the extension or receipt of gifts or other business courtesies.

Relationships with contractors, vendors, and other business partners should be established based solely on the quality of products and services available to Aspirus.

Giving or receiving cash gifts, tips, or cash substitutes in any amount from any source is strictly prohibited. If there is any question about the application of the related policies or the propriety of a given or proposed course of action, consult with your supervisor or the Chief Compliance Officer.

Political Activities and Contributions

As a tax exempt organization, Aspirus follows current legal and regulatory requirements for all lobbying and political activities.

It is important to separate personal and organizational political activities in order to comply with the appropriate rules and regulations relating to lobbying or attempting to influence government officials. Employees may of course, participate in the political process on their own time and at their own expense. While doing so, however, it is important not to give the impression that they are speaking on behalf of or representing Aspirus in these activities. Employees cannot seek to be reimbursed by Aspirus for any personal contributions for such purposes.

At times, Aspirus may ask employees to make personal contact with government officials or write letters to present our position on specific issues, but you shall always be free to determine whether or not to do so. In addition, it is a part of the role of some members of Aspirus leadership to interface on regular basis with government officials.

If you are making these communications on behalf of the organization, be certain that you are familiar with any regulatory constraints and observe them. Guidance is always available from the Aspirus Legal Department, Compliance Department, or Marketing Department as necessary.

Our Compliance Program

The Aspirus Compliance Program is intended to emphasize Aspirus' commitment to the highest standards of conduct and compliance with all applicable laws, regulations, and Aspirus policies and procedures. The Compliance Program is designed to:

- Prevent, detect, and correct violations of the laws and regulations relating to applicable health care programs.

We partner with Aspirus' leadership, Business Units, and Service Lines to promote an ethical workplace through adherence to this Code and Aspirus policies. The Compliance Program is a vehicle for preventing violations of the law and enabling Aspirus to rectify a situation before it becomes a problem or legal violation.



Structure

Aspirus Board of Directors, the Audit and Compliance Committee of the Board of Directors, the Chief Compliance Officer, the Compliance Program Executive Committee, as well as the Compliance Team provide oversight for the Compliance Program. All of these individuals or groups are prepared to support you in meeting the standards set forth in this Code.

We cannot implement an effective compliance program without the support from our employees. Remember "*Compliance is everyone's responsibility.*" When you are confronted with a difficult decision, consider the following questions:

- Are my actions and decisions consistent with Aspirus' mission?
- Is this legal?
- Does it comply with the Code and Aspirus policies?
- Is it fair and the honest thing to do?
- Is it in the best interest of our patients, health plan member, and Aspirus?
- Would it be OK to see my decision on the front page of the newspaper?

If your response to all of the above questions is "yes," you are likely making the right decision.



Standards of Conduct and Compliance Policies

We have established standards through this Code and Aspirus policies. The Code is a guide to the overall conduct of the organization. Aspirus policies provide guidance on specific areas and business activities and are located in the Aspirus policy management system. It is the responsibility of each employee to be aware of those policies that pertain to his or her work and to follow those policies.



Compliance Training and Education

Compliance training and education is a requirement for all Aspirus employees, providers, and contractors employed by or providing services on behalf of Aspirus and report to an Aspirus manager. In addition, specialized training in areas of higher risk (e.g., quality, billing, coding, cost reporting, physician arrangements) may be required of certain individuals based upon their role in the organization.



Reporting Compliance Concerns

Each employee has an individual responsibility for reporting any activity by any employee, provider, contractor, vendor, or other person who appears to violate applicable laws, rules, regulations, Aspirus policies, or this Code. This is not just encouraged—it is expected.

We encourage and expect our employees to report safety or quality of care concerns without fear of retaliatory disciplinary action.

Several options are available to you to obtain guidance on a compliance issue or to report suspected violations.

Whenever appropriate, bring your concerns to your supervisor first. However, if this is uncomfortable for you, if you feel it is inappropriate, or if you have done so and your concerns still have not been addressed, another option is to discuss the situation with another member of management or your Human Resources Business Partner. If you still feel uncomfortable reporting your concerns to anyone at your facility, there are still further options available. You may contact the Chief Compliance Officer directly or you are always free to contact the **Compliance Helpline at 800-450-2339**, and you may always make such calls anonymously. With respect to reports that are not made anonymously, Aspirus will make all reasonable efforts to maintain, within the limits of the law, the confidentiality of the identity of any individual who reports possible misconduct. You may also reach out to a member of the Compliance Team by sending an email to compliance@aspirus.org.

Retribution or Retaliation

We seek to have an open and supportive environment where Aspirus employees, providers, contractors, and others feel comfortable raising issues and everyone works to resolve them as quickly and thoroughly as possible. Retribution, retaliation, or intimidation against anyone who, in good faith, reports a possible concern or violation is strictly prohibited and will not be tolerated by Aspirus. Any employee who deliberately makes a false accusation with the purpose of harming or retaliating against another employee will be subject to corrective action, up to and including termination of employment. Individuals who believe that they have been the victim of such retaliatory conduct should discuss their concerns with at least one of the following:

- Human Resources Business Partner
- Senior Leader: President, CAO, CFO, or CNO
- Chief Compliance Officer
- Compliance Helpline



Investigations

We are committed to investigating all reported concerns promptly and confidentially to the extent reasonably possible. The Chief Compliance Officer, or designee, will direct the investigation, coordinate any findings from the investigations, and review and recommend corrective actions or changes that need to be made. All employees are required to cooperate with the investigation efforts.

For questions on reporting concerns, feel free to contact the **Compliance Helpline at 800-450-2339**, and you may always make such calls anonymously.



Corrective Actions

Where an internal investigation substantiates a compliance violation, appropriate corrective action shall be promptly initiated. As appropriate, corrective actions may include prompt restitution of any overpayment amounts, notification of the appropriate governmental agency, institution of disciplinary actions in accordance with Aspirus policy, and implementation of system modifications to prevent a similar violation from recurring in the future.

Anyone determined to have violated the Code, Aspirus policies, laws, rules, or regulations is subject to corrective action. Aspirus enforces its standards of conduct through appropriate disciplinary action based on a fair, equitable, and consistent basis, regardless of position. In accordance with Aspirus policy, the precise corrective action utilized will depend on the nature, severity, and frequency of the violation and may result in any of the following:

- Employee coaching
- Documented counseling
- Written warning
- Suspension
- Termination

Regardless of the violation, Aspirus reserves the right to impose any level of corrective action, including immediate separation of employment, based on our assessment of all circumstances of the violation.



Auditing and Monitoring

Aspirus is committed to monitoring compliance with its policies. This monitoring is provided at the direction of the Compliance Department, which routinely conducts a risk assessment and performs internal reviews of issues that have regulatory or compliance implications. The organization also routinely seeks other means of ensuring and demonstrating compliance with laws, regulations, and Aspirus policy.

Acknowledgement of the Code

Aspirus annually requires all employees to sign an acknowledgment confirming they have received the Code of Conduct and, that they understand its provisions are mandatory. New employees will be required to sign this acknowledgment as a condition of employment. Adherence to and support of Aspirus' Code of Conduct and participation in related activities and training will be considered in decisions regarding hiring, promotion, and compensation for all candidates and employees.





Questions & Answers

The Code of Conduct is not intended to provide answers to every question that you may have about Aspirus' policies, laws, or regulations. The following questions and answers are intended to increase your understanding of how the specific guidelines must be applied.

The Compliance Program

Q: Whom should I contact if I have a question about workplace conduct or observed something that I thought was wrong?

A: We have provided several resources for you to turn to with such concerns. We encourage you to talk to your supervisor first. However, if for any reason you do not feel comfortable talking to your supervisor or if your supervisor did not answer the question or address the problem to your satisfaction, you do have other options. If you wish to speak with someone else in management, reach out to them directly or contact your Human Resources Business Partner. Alternatively, you may contact the Chief Compliance Officer or call the Compliance Helpline at 800-450-2339. We encourage our employees to try to resolve matters locally when possible and appropriate.

Q: If I report something suspicious, will I get in trouble if my suspicion turns out to be wrong?

A: As long as you have a legitimate concern, our policy prohibits your being reprimanded, disciplined, or retaliated against for raising a compliance issue. As an Aspirus employee, you have a responsibility to report suspected problems. In fact, employees may be subject to corrective action if they witness something but do not report it to the organization. The only time someone will receive corrective action for reporting misconduct is when he or she knowingly and intentionally reports something that he or she knows to be false or misleading in order to harm others.

Q: What should I do if my supervisor asks me to do something that I think violates the Code of Conduct, Aspirus policy, or is illegal?

A: Don't do it!!! No matter who asks you to do something, if you know it is wrong, you must refuse. You must also immediately report the request to a level of management above your supervisor, your Human Resources Business Partner, the Chief Compliance Officer or the Compliance Helpline.

Ethical Behavior Generally

Q: How do I know if I am on ethical "thin ice"?

A: If you are worried about whether your actions will be discovered, if you feel a sense of uneasiness about what you are doing, or if you are rationalizing your activities on any basis (such as perhaps the belief that "everyone does it"), you are probably on ethical "thin ice". Stop, step back, consider what you are doing, get advice, and redirect your actions so that you know you are doing the right thing.

Accuracy, Retention, and Disposal of Documents

Q: In preparation for an accreditation visit, my supervisor has asked me to review medical records and to fill in any missing signatures. May I do this?

A: No. It is absolutely wrong to sign another health care provider's name in the medical record. It is part of our basic integrity obligation to provide only complete and accurate information.

Gifts and Business Courtesies

Q: A patient with a chronic health condition is frequently admitted to our facility for treatment. He routinely tips his primary nurse around \$100. May the nurse accept it?

A: No. Cash gifts must never be accepted from anyone with whom we have a business relationship.

Q: May I accept a basket of fruit or flowers that a patient sent?

A: Yes. Provided the gift is not solicited and not intended to influence behavior or decisions, it must be of nominal value and should be shared with an entire department.

Conflicts of Interest

Q: I am planning a dinner meeting at our hospital. My daughter owns a catering service in town. May I choose to use her catering service if the prices are comparable to other restaurants?

A: No. This may seem unfair, but you must avoid even the appearance of favoritism.

Q: Do the conflict of interest policies apply to distant relatives, such as cousins or friends?

A: Depending on the relationship, yes. Any relationship could influence your objectivity or create the appearance of impropriety; therefore, you must abide by the Aspirus policies.

Patient Information and Privacy

Q: We live in a small town, and most of the community knows each other. There is a physician in our hospital who sometimes requests medical records, whether he is taking care of the patient or not. Is he allowed to do this?

A: No. Only those involved in the care of the patient may have access to the medical records. We are obligated to protect the confidentiality and privacy of patient information from interested third parties as well as our staff. Patients are entitled to expect confidentiality, the protection of their privacy, and the release of information only to authorized parties.

Personal Use of Organization Resources

- Q:** I volunteer for a local community foundation. May I copy a fund-raising leaflet on the facility copy machine?
- A:** Aspirus encourages all employees to participate in volunteer activities. Organization equipment, however, must not be used for charitable or other non-business purposes without prior approval from your supervisor.

Billing and Coding

- Q:** I have several patients to see today and oftentimes they return to the clinic for similar reasons. Can I copy the prior visit information and paste it into the current visit in order to save time?
- A:** No. Copy/paste is not encouraged and is a risky behavior that lends itself to compliance and legal risks. It is always challenging to balance efficiency with accurate and complete documentation. We are obligated to document accurately so that the services performed are billed appropriately. Copy/paste may document services that were not provided during the patient encounter or were not physically present when the patient presented for the visit. You must document only the services that were provided and the observations that were present on the patient.

Substance Abuse

- Q:** A colleague/best friend just arrived to relieve you after a night shift. You overhear a conversation in the staff lounge that he came to work directly from a farewell gathering. During report you smell alcohol but he doesn't seem to be physically impaired. Should I just let this pass?
- A:** No. Aspirus subscribes to an alcohol- and drug- free workplace. Patient safety must be your first priority. Regardless of the personal friendship, you must report this to your supervisor or the Human Resources Business Partner immediately.



Code of Conduct Acknowledgement

By my signature below, I certify that:

I have received and agree to read Aspirus Code of Conduct.

I understand the provisions of Aspirus Code of Conduct are mandatory and that compliance with the standards, policies, procedures, and other provisions contained in Aspirus' Code of Conduct is a condition of my continued employment or association with Aspirus.

I also understand that Aspirus reserves the right to occasionally amend, modify, and update Aspirus Code of Conduct and the provisions set forth in Aspirus' Code of Conduct.

I also acknowledge that Aspirus Code of Conduct is only a statement of principles for individual and business conduct and does not, in any way, constitute an employment contract or assurance of continued employment.

Signature

Position

Printed Name

Date

Business Unit

ASPIRUS, INC.
2200 Westwood Drive
Wausau, WI 54401

aspirus.org

