



Chapters Health System

Code of Conduct

This Code of Conduct (the “Code”) provides a framework to guide us in meeting our obligations as employees and volunteers of Chapters Health System, Inc., and its current and future affiliates (collectively referred to in this Code as the “Company” or “Chapters Health System”). These obligations apply to our relationships with patients, physicians, other health care providers, third-party payers, vendors and one another.

This Code is an essential component of the Chapters Health System Corporate Compliance Program. It was developed to assure all employees and volunteers at Chapters Health System is dedicated to conducting business with honesty and integrity. We strive to maintain high ethical standards and comply with our policies and procedures, applicable laws and regulations, as well as applicable standards of professional and accreditation organizations.

This Code is intended to be a summary statement that is easily understandable. Because most of the subjects highlighted here are complex, it is necessary that Chapters Health System's policies and procedures, protocols, Corporate Compliance Program and other relevant practice guidelines also be reviewed.

Although autonomy is generally promoted at Chapters Health System, compliance with this Code by all employees and volunteers is mandatory. Contractors are also required to follow this Code.

This Code is intended to clarify the Company's rights and expectations as an employer, but does not in any way create any contractual employment rights for employees of Chapters Health System. Employment by Chapters Health System is employment at will. This means that you have the right to terminate your employment at any time and for any reason, and Chapters Health System may exercise the same right, subject to applicable law or existing contract rights.

Mission and Core Values

The mission of Chapters Health System is to provide support and care for people in our community with or affected by advanced illness by offering a wide variety of compassionate healthcare choices.

The core values that we regard as essential to our achieving this mission include the following:

- Patients and families come first
- Honesty and integrity
- Work together to meet common goals
- Find new and better ways to care for our communities
- Stewards of all our resources

Our Commitments to Patients and Families

We are committed to provide quality health care services that meet the needs of our patients and their families. We do not discriminate in the delivery of care or services based on race, color, religion, gender, pregnancy, national origin, age, physical or mental disability, marital status, sexual orientation, genetic information, veteran status or for hospice patients, the ability to pay.

We recognize and support the rights of our patients, including, without limitation: the right to receive effective pain management and symptom control for conditions related to their terminal, advanced or chronic illness; the right to participate in their own care, including the right to be involved in developing their own plan of care; the right to choose their own attending physician; the right to have a confidential clinical record and the right to access or release their patient information in accordance with the requirements of applicable law; the right to formulate advance

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directives; the right to accept or reject treatment; the right to be free from mistreatment, neglect, or verbal mental, sexual, and physical abuse, including injuries of unknown source, and misappropriation of their property; the right to receive information about the services covered by Medicare or Medicaid; and, the right to receive information about the scope of services that we provide and specific limitations, if any, on those services. Patients and their families or caregivers have the right to voice their concerns or complaints and receive prompt and reasonable resolution of them. We believe that each patient is entitled to dignity, autonomy, courtesy, privacy and respect and that all of our patients and their families and caregivers are entitled to be informed about the care and services that we provide, as well as the outcomes that we expect.

Honesty and Integrity

Community Physicians and Other Health Care Providers

We value our relationships with community physicians and other health care providers. We collaborate with community physicians to enhance the care of our patients. All referred patients, who are appropriate for service, are accepted into our programs based on their clinical needs and our ability to provide the needed care. We do not provide incentives to community physicians, other health care providers or anyone else in exchange for referrals. Violation of this policy may have grave consequences for the Company and any individuals involved.

Financial Practices

Our financial documents must be accurate and complete. We must follow all applicable legal requirements, established financial standards and generally accepted accounting practices in preparing financial records. If we discover that the accuracy or reliability of our financial information is unclear or doubtful, we will make appropriate corrections or clarifications.

Clinical documentation must accurately represent the care and services provided, and billing must be based on this documentation.

Compliance with Laws and Practice Standards

We must comply with all laws and regulations applicable to each Chapters Health System entity, the care and services we provide, and the practice of our profession. In addition, we must adhere to the standards of any body from which Chapters Health System seeks accreditation, such as The Joint Commission. We must also meet the standards of practice for our respective health care professions.

Conflict of Interest

A conflict of interest occurs in a situation where the individual's regard for his or her own private interests might tend to cause, or might tend to appear to cause, the individual to disregard Chapters Health System's interests and such individual's duties as an employee or volunteer of Chapters Health System. Participation by an employee or volunteer in any activity that conflicts with his or her responsibilities as an employee or volunteer of Chapters Health System is not acceptable. If there is any question about whether an outside activity might constitute a conflict of interest, the employee or volunteer must obtain the approval of his or her supervisor before engaging in the activity.

The Boards of Directors of Chapters Health System has adopted a conflict of interest policy that is applicable to officers, directors and key management personnel of each Chapters Health System entity. If an employee or volunteer becomes aware that an officer, director or member of management has or appears to have a conflict of interest, he or she should report the conflict of interest or apparent conflict of interest to the President/CEO or Chief Compliance and Clinical Officer of Chapters Health System.

Accuracy, Retention and Disposal of Documents and Records

We are responsible for the integrity and accuracy of our organization's documents and records. We must not falsify information that we place in any record or document. We may make changes to records and documents only in accordance with the law and our policies.

Our medical records and business documents, whether on paper, in electronic form or in any other medium, must be retained in accordance with the law and our record retention policies. Destruction of documents or records must be in accordance with the law and our record destruction policies.

Confidential Information

We do not violate the privacy rights of our patients. We collect information about a patient's medical condition, finances and family history in order to provide quality care and services. Consistent with the Health Insurance Portability and Accountability Act ("HIPAA") and applicable federal and state law and regulations, we do not use or disclose to others protected health information of any patient unless it is necessary to treat the patient, bill for our services, conduct health care operations or comply with the law or appropriate judicial order or subpoena.

Research

We follow high ethical standards in any research conducted by our physicians and professional staff. Patients must be fully informed of potential risks prior to their participation in any research activity. Patients have the right to refuse to participate without any concerns about consequences to their care.

Marketing Practices

All communications designed to market our services will represent Chapters Health System fairly and accurately. Marketing and advertising informs the community of the availability and benefits of our care and services, and provides educational information about palliative care and end-of-life issues. It may also inform the public about Chapters Health System's perspectives on health care policy issues. We will present only accurate, non-deceptive information in all marketing materials, advertisements and announcements.

Workplace Conduct and Employment Practices

Substance Abuse

To protect the interests of our employees, volunteers and patients, we are committed to an environment free of alcohol and illegal drugs. All employees must be free of the influence of alcohol and illegal drugs at the workplace.

Some of our employees routinely have access to prescription and controlled substances. These substances are controlled by federal and state laws and regulations and must be handled in accordance with such laws and only by authorized individuals.

Diversity, Equal Employment Opportunity and Workplace Ethics

We are committed to a work environment that promotes fairness, respect, individual dignity and professional growth. We support teamwork and interdisciplinary care. We disapprove of workplace gossip and other unprofessional or unethical actions that detract from our reputation for integrity and a solid commitment to excellence.

It is a right of all Chapters Health System employees to be treated fairly and with respect. Disruptive or inappropriate behavior such as bullying, intimidation, and/or making threats directed at Chapters Health System employees or volunteers, whether by peers, supervisors, or perceived

“higher level” individuals, in order to coerce them to do or not do something is not tolerated. An employee or volunteer who experiences any of these behaviors should immediately report it to the appropriate management employee. The issue will be escalated to the level of department management, Compliance or Human Resources as is necessary for resolution.

Our employees and volunteers demonstrate a wide array of talents that contribute to our success. We do not engage in illegal discrimination against or harassment of any employee or volunteer on the basis of race, color, religion, gender, pregnancy, national origin, age, physical or mental disability, genetic information, marital status, sexual orientation, veteran status or any other characteristic protected by law. We will make reasonable accommodations for employees and volunteers with known disabilities.

Sexual Abuse and Sexual Harassment

Chapters Health System does not tolerate sexual abuse in the workplace. Sexual abuse is sexual contact of a criminal nature or inappropriate sexual interaction for gratification of the abuser.

Any form of sexual harassment is strictly prohibited. Sexual harassment includes unwelcome sexual advances, requests for sexual favors and other offensive verbal or physical conduct of a sexual nature, especially where such conduct creates an unfavorable work environment or where submission to or rejection of such conduct serves as the basis of employment decisions. For additional details, please see Chapters Health System's Anti-Harassment policy and Personal Relationship Reporting Requirement.

Health and Safety/Risk

All of Chapters Health System's sites must comply with the requirements of applicable laws, regulations, standards and policies pertaining to workplace health and safety. We must understand how these requirements apply to our specific job responsibilities and seek advice from an appropriate manager or our Employee Health and/or Safety/Risk Nurse if any question arises. We must immediately report to the appropriate manager any workplace injury or dangerous situation.

We must utilize appropriate methods to safely and lawfully handle and dispose of chemotherapeutic, hazardous and biomedical wastes.

Workplace violence directed at Chapters Health System or any of its employees or volunteers is prohibited. Firearms, other weapons, explosive devices and other dangerous materials may not be brought into our workplace. Any employee or volunteer who observes or experiences any form of workplace violence, or who observes or hears about a firearm or other weapon in the workplace, must report the incident immediately to a member of senior management.

Communication Systems, Computers and Other Property of Chapters Health System

All communications systems, including, but not limited to, computers, tablets, personal digital assistants (PDAs), smartphones, mobile phones, flash drives, wireless network cards, facsimile machines and telephones, as well as intranet and internet access, provided to us as employees or volunteers of Chapters Health System, together with the electronic mail, voice mail and text messages created or received by us as employees or volunteers of Chapters Health System, are the property of Chapters Health System and are to be used primarily for business purposes.

We should assume that all communications made by means of any of these devices or systems are not private.

Other items of Chapters Health System's property, including, but not limited to, supplies, documents and records, are made available to employees and volunteers for the authorized business of the organization and should not be used for personal reasons.

We must use Chapters Health System's electronic resources responsibly and in compliance with applicable laws, regulations, policies and license agreements. Patient information and other confidential information must be sent or otherwise communicated only in compliance with our policies. We may not use personal computers or other personal electronic devices to store a patient's personal health information, except in compliance with our policies.

We must properly care for Chapters Health System's property. We must not remove any of Chapters Health System's property from the organization's premises, except as necessary to perform our job and in compliance with Chapters Health System's policies. We must return the property as soon as it is no longer needed for business purposes.

Outside Activities

Because conflicts of interest may not be readily apparent to Company employees, the Company has an Outside Activities Policy that requires all employees to notify the Company and obtain approval in writing before engaging in or commencing Outside Activities. Outside Activities include, but are not limited to second jobs, consulting engagements, self-employment or outside business ventures and volunteer activities. Outside Activities can also include forming a business with, investing in the business interests of, borrowing money from, or selling to or purchasing from, any employee, vendor, suppliers, retailer or competitor of the Company. The Outside Activities Policy applies to the formation of any outside partnership or business arrangement between or among two or more employees of the Company, conducting business on behalf of the Company with the employee's family member, or providing services to patients or patients' family members for which private payment is made to the employee for services that could otherwise be provided by the Company.

Outside activities that constitute a conflict of interest or otherwise compete with the Company are prohibited. Employees may not receive any payments, income or property, material or otherwise (excluding *de minimus* gifts permitted under the Organization's Gift Acceptance Policy), from individuals inside or outside of the Company, including patients and patient families, for materials produced or services rendered while performing their jobs. Many factors are considered in determining whether a conflict situation exists, including the size and nature of the investment; the employee's ability to influence the Company's decisions; access to the confidential information of the Company or of the other company; and the nature of the relationship between the Company and the other business. This list is not exhaustive.

Reporting Violations of this Code of Conduct

Personal Obligation to Report

Compliance with this Code is the responsibility of every employee, volunteer and contractor. Chapters Health System's leaders must be role models and must create a work environment that promotes high ethical practices and compliance with the Company's policies and this Code. Moreover, our leaders must never violate, and must never permit nor condone any violation of any applicable law or regulation or any of our policies or ethical practices in order to achieve business objectives. Managers or supervisors who become aware of violations of Company policies or this Code are required to promptly report the incident as set forth below. Failure by a manager or supervisor to report violations may result in disciplinary action up to and including termination of employment.

Each and every employee, volunteer and contractor also has a responsibility to report any act or failure to act that violates or appears to violate this Code, Company policies, or federal or state statutes or regulations. When in doubt, if you see something, say something.

We operate in an environment of complex, ever-changing laws, regulations, accrediting standards and organizational policies. We recognize that this situation may create uncertainty for employees and volunteers as they perform their duties on behalf of Chapters Health System. Concerns and

questions about how to correctly handle situations frequently arise.

Employees, volunteers and any contractors should make themselves aware of policies regarding detection and prevention of fraud and abuse. Employees and volunteers may find these policies and procedures on the electronic policy and procedure system, and contractors may review them on CHS' website at www.chaptershealth.org or request them from the Compliance Department.

Reporting

The ways in which an employee or volunteer can raise questions or meet his or her obligation to report actual or potential violations of this Code of Conduct appear below:

- ▶ The question or issue should be discussed with the employee's or volunteer's manager or supervisor.
- ▶ If a discussion with the manager or supervisor is likely to be uncomfortable, the question or issue should be discussed with an appropriate organizational resource such as the VP of Human Resources, the Chief Compliance and Clinical Officer, or another manager.
- ▶ Reports may be submitted:
 1. Online by using the electronic reporting system. Directions for submitting reports using this option can be viewed at the following link:
<https://secure.ethicspoint.com/domain/media/en/gui/21294/index.html>
 2. Calling the telephone number shown in the box below (this can be anonymous if desired):

**Citrus, Hardee, Hernando, Highlands, Hillsborough,
Pasco, Pinellas, Polk and Okeechobee Counties**
1-888-749-7343

- ▶ There is no retaliation against an employee or volunteer for reporting actual or potential violations of the Code of Conduct.

Compliance Department's Follow-up to Reports

The Chief Compliance and Clinical Officer will initiate an investigation into all matters reported. Issues will be monitored until a resolution is reached. If a violation is found, an action plan will be developed to prevent future occurrences.