



Code of Conduct



Code of Conduct

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¹ Throughout the Code of Conduct the terms “Network,” “Inspira” or “Inspira Health Network” shall refer to the entire health care system comprising Inspira Health Network.

A Message from John DiAngelo

A Message to all Employees, Health Care Providers, Officers, Board Members, Volunteers, Students, and Vendors:

This Code of Conduct provides guidance that will help ensure that we conduct our business in an ethical and legal manner. It emphasizes the shared common values that must guide our actions. These include partnership, integrity, compassion and excellence. The Code of Conduct is a resource to help resolve any questions or concerns you may have about appropriate conduct in the workplace. Your adherence to its spirit, as well as its specific provisions, is absolutely critical to our future. Please make time to review it thoroughly.

If you have any questions regarding this Code or encounter any situation that you believe violates any of its provisions, you should immediately contact your supervisor, a member of management, your site administrator or the Corporate Compliance Officer. You may also report your concerns by calling the Compliance Hotline at (888) 413-4313. You have my personal assurance there will be no retribution for asking questions, raising concerns or reporting possible improper conduct.

Our commitment to the ideals reflected in our mission, vision and values complements the standards presented in this Code of Conduct. Thank you for upholding them as we work together to improve the lives of all we serve.

Sincerely,



John A. DiAngelo
President and Chief Executive Officer
Inspira Health Network



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INTRODUCTION

At Inspira Health Network, our Code of Conduct is a critical component of our overall compliance program. It provides guidance and helps us carry out daily activities within appropriate ethical and legal standards. The Code of Conduct applies to every person who represents Inspira Health Network: this includes but is not limited to employees, healthcare providers, officers, Board members, volunteers, students and vendors. We all work together toward the Inspira Mission—to provide high quality health services that improve the lives of all we serve. **It is important that we abide by this Code of Conduct** and that you report any concerns or raise questions about what to do or how to act in a difficult situation. Inspira supports you by maintaining a policy of non-retribution, protecting anyone who reports an issue or raises a concern.

There are several ways you can raise questions or voice concerns:

- Talk to your immediate supervisor or your Human Resources business partner
- Contact the Corporate Compliance Officer or any member of the Compliance team
- Call the Corporate Compliance Hotline at 1-888-413-4313 or file a report online at <https://app.mycompliancereport.com/report.aspx?cid=ihn>

You will see these resources listed throughout the Code of Conduct. Also, there are other places you can bring your questions and concerns, depending on the nature of the issue. Those additional resources are also referenced in the Code of Conduct.

STANDARDS OF CONDUCT

“Integrity” is defined as an “adherence to moral and ethical principles.” In this section, we discuss how integrity is critical to Inspira’s mission.

The Standards of Conduct are divided into four parts:

1. Integrity in Our Business Relationships
2. Integrity in Our Community Relationships
3. Integrity in Our Care and Service Relationships
4. Integrity in Our Workplace Relationships

INTEGRITY IN OUR BUSINESS RELATIONSHIPS

Inspira is recognized as a leader in health care. As a leader, Inspira relies on, and must continually demonstrate, that we conduct our business relationships with personal and professional integrity. We must follow the legal, professional, personal and ethical standards that are described in the following business functions.

BILLING, CODING AND DOCUMENTATION

Inspira is committed to full compliance with all state and federal laws and third-party payer requirements that govern billing, coding, documenting and submitting claims for payment. These laws and requirements are intended to prevent health care fraud and false claims. Claims for the services we provide or bill for must be supported by documentation that is:

- Accurate
- Timely
- Legible
- Accessible

All information supporting claims must reflect the services provided, and be appropriate and consistent with Inspira's policies and procedures. Employees must be absolutely certain that services performed are appropriate for the care of our patients, properly documented and that the billing codes accurately reflect the services performed.

What exactly is a false claim?

A "false claim" can be defined in several ways, but in basic terms: If a provider or plan is asking for – or planning to keep – payment from the government that it knows it is not entitled to, then it most likely is a false claim. There are many examples of situations that can lead to a "false claim," but some of the most commonly reported are:

- Making duplicate claims for services
- Up-coding to more complex procedures
- Billing for services that were not provided
- Billing for services that were not medically necessary
- Billing for services of providers who were not present
- Inappropriate bundling and unbundling of claims

There are significant criminal and civil monetary penalties for violating the False Claims Act. Federal penalties can total three times the amount of the claim plus additional fines per claim. State laws include possible imprisonment in addition to additional fines per claim.

Health care is extremely competitive; and our success depends on the unique nature of our programs, systems and information. Inspira's proprietary and business information must be kept confidential at all times.

This means that you must never share confidential business information with anyone – even friends and family members. There may also be times that you will be asked to limit the information you share with people who work here at Inspira.

Accuracy is very important to our work at Inspira. Paying strict attention to detail ensures that business-sensitive information and protected health information in the form of records, mailings and other documentation, both paper and electronic, are both accurate and complete.

If you are unsure if you should be sharing information related to Inspira with others, either within or outside the organization, ask your supervisor or contact the Corporate Compliance Officer. It is very important that we all protect the confidentiality of vital business information.

What kinds of business information must be kept confidential?

Proprietary and confidential information includes, but is not limited to, non-public information related to:

- Pricing and costs
- Acquisitions, divestitures and other strategic relationships
- Business and marketing plans
- Clinical services plans
- Staffing level plans
- Employee and customer lists
- Financial information
- Research and quality data
- Product/program planning
- Privileged information, such as attorney-client communications or peer review information, and
- Many other things that are important to the organization and our strategic or competitive position

CONFLICTS OF INTEREST

Conflicts of interest may occur if personal activities or interests would influence your ability to make decisions that are in the best interests of Inspira. As a representative of Inspira, you have a duty to act solely in the best interests of the organization. This means that you should not engage in activities that result in gain or profit for yourself or others at the expense of the organization, or that interfere with your work duties or business judgment.

The test for whether there is a conflict of interest is an objective test; that is, whether a conflict exists “in the eyes of a reasonable person,” not whether you think there might be a conflict. Inspira maintains a **Conflict of Interest Policy** that provides detailed information regarding conflicts of interest.

Inspira is legally obligated to protect its property and ensure its facilities and equipment are used appropriately. Resources such as materials, equipment, time and space should be used only for your work, unless your supervisor has specifically made an exception according to company policy.

“How do you know when a potential conflict of interest may exist?”

It’s important to look at the facts and circumstances in order to determine if a conflict of interest exists. A friendship with someone who works for a competitor is fine, but you should avoid talking about Inspira with them so that you don’t inadvertently disclose confidential information or put yourself or the organization in an inappropriate, or even illegal, situation. Some activities *automatically* create a conflict — such as being on the board of a competitor — while other activities may raise the *possibility* of a conflict — such as having a financial relationship with a vendor that does business with Inspira. That’s why it’s important to let your supervisor know if you are involved in any activities that may even remotely raise the possibility of a conflict of interest. Even the appearance of a conflict may have negative effects on both you and the organization.

CONTRACTING, PROCUREMENT AND PURCHASING

Our goal is to buy quality goods and services at the best price through an objective selection process. This process includes several protections:

We make purchasing decisions based on objective criteria such as price, quality, technical expertise, timely delivery, service standards and adequate supply.

- Contractors and vendors are expected to comply with relevant Inspira policies.
- We do not do business with individuals and organizations that have been excluded from or sanctioned under federal or state health care programs or who have other restrictions on their eligibility to work with government contractors. Therefore, the Inspira Health Network vendor selection process includes an inquiry as to whether the applicant has been excluded from participation in federal health care programs, or disqualified or sanctioned as a government contractor. Our Corporate Compliance Department routinely monitors the list of excluded individuals to assure that we do not inadvertently contract with or employ someone who has been excluded from participation in a government program. If you learn that someone with whom we do business is excluded, please call the Corporate Compliance Officer immediately.

- People who make purchasing and contracting decisions on behalf of Inspira should pay specific attention to the Conflict of Interest Policy. Anyone involved in such a decision must act with integrity in negotiating and awarding contracts in all purchasing and service transactions. These decisions must be based on objective criteria and not on personal relationships or friendships. If necessary you may have to recuse yourself from a purchasing or contracting decision if there is the appearance of a potential conflict.
- We are also committed to ensure that we meet appropriate diversity supplier standards in our purchasing practices.

ENTERTAINMENT, GIFTS AND FAVORS

Occasionally, we might be offered gifts or other tokens of appreciation from vendors, patients, their families, customers, competitors and others. In many industries, entertaining customers and exchanging gifts are customary practices, but in health care, we are in a unique position of trust. We are also governed by unique laws that prohibit or discourage gifts and gratuities. Most importantly, our patients and co-workers need to know that the work we do is not inappropriately influenced by gifts from the people with whom we do business.

The receipt of gifts, gratuities or the sponsoring of entertainment from those seeking to influence business decisions of Inspira Health Network should be politely declined. You should recognize that even if you believe that the acceptance of such a gift, gratuity, or participation in entertainment will not influence your decision, the person making the gesture may have the perception that the action will have such influence.

Courtesies such as meals, beverages, and/or other entertainment should be scrutinized. When meals or refreshments are provided as part of a business meeting or part of an agenda at a third party, accredited professional meeting where continuing education credit is awarded, and where it is normal business courtesy to accept the meal or refreshment, it is permissible. Where entertainment is provided, as an adjunct to a business meeting or accredited professional gathering as described above, and the value of the entertainment is consistent with Inspira policy, participation is permissible. These exceptions do not permit any gifts or other benefits that are understood to be offered or provided as an inducement to refer business or as a reward for such referrals.

Inspira has a **Business Gifts and Courtesies Policy** to help you answer questions about entertainment, gifts and other items you may be considering. The Policy contains guidelines for third party interactions.

Example of a business gift or courtesy scenario: A software vendor invites an employee to an educational forum where training will be provided on the vendor's product. The vendor offers to cover travel, lodging, and registration fees associated with the conference. Is this appropriate?

Inspira's **Business Gifts and Courtesies Policy** states that on occasion, a business associate will extend training and educational opportunities that include travel and overnight lodging at no cost to associates or to Inspira. Similarly, there are some circumstances where there is an invitation to an event at a vendor's expense to receive information about new products or services. Prior to accepting any such invitation, approval to attend these opportunities will need to be obtained by the senior leader of the department.

If you have any doubt about whether it would be appropriate to accept or give a gift, entertainment offer, meal or other item or service, you must consult with your supervisor or the Corporate Compliance Department before accepting or giving a gift.

FAIR COMPETITION AND ANTITRUST LAWS

At Inspira we believe that a healthy competitive marketplace is good for patients and members. Antitrust laws are designed to encourage fair trade and competition in the marketplace. We will not behave in a way that is anti-competitive or violates antitrust laws.

All Inspira employees must comply with applicable antitrust laws and other similar laws which regulate competition. Examples of conduct prohibited by such laws include (a) agreements to fix prices, bid rigging, or collusion with competitors (including price sharing); (b) boycotts, certain exclusive dealings, and price discrimination agreements; and (c) unfair trade practices, including bribery, deception, intimidation and similar unfair practices.

Whenever we are considering entering into an arrangement with another organization or person in the same line of business that we are in whether it is a health plan, hospital, care delivery or clinical research arrangement it is important to consult with the Legal Department to make sure that the arrangement complies with applicable antitrust laws. Inspira employees are expected to seek advice from our Legal Department when confronted with business decisions involving a risk of violation of antitrust laws or other similar laws.

RECRUITING AND COMPENSATION

There are special laws that relate to recruiting and compensating our employees, especially physicians and executives. These laws include the Anti-kickback, Stark and tax laws discussed in other places in this Code of Conduct. Our recruiting and compensation activities must adhere to Inspira's requirements, which include:

- Compensation and recruiting packages must be at fair market value

- Compensation and recruiting packages must not include incentives to induce patient referrals
- Executive compensation must be established in accordance with board-approved processes
- The Legal Department should review any unique recruitment or compensation packages

REFERRALS OF CARE AND SERVICE

There are several laws that regulate patient and member referrals to other providers, facilities, suppliers and plans. These laws, some of which are known as the Anti-kickback, Stark and Patient Freedom of Choice laws, are complicated, so it is important to consult with the Legal or Compliance Department if you are considering an arrangement that might impact patient referral patterns.

What are inappropriate “arrangements that might impact referrals?”

- A hospital providing free or discounted space or equipment to a physician to encourage the physician to admit patients to its facility.
- A supplier giving gifts to employees as a “thank you” for increasing their supply orders.

INTEGRITY IN OUR COMMUNITY RELATIONSHIPS

Creating successful relationships throughout the community has been a vital part of Inspira's success. We act with integrity in our dealings with regulators, public officials and candidates, contributors and the community. The following standards are critical to upholding our community commitments.

ENVIRONMENTAL STEWARDSHIP

Inspira is committed to responsible, safe disposal of waste products. Inspira complies with all laws governing the handling of waste and hazardous materials—including storage, treatment, incineration, disposal and discharge and other environmental safety requirements. We expect employees and providers to follow all safety and industrial hygiene, waste management and environmental guidelines adopted by the organization.

FINANCIAL REPORTING

Inspira is committed to fair, accurate, complete and timely financial and other data reporting. Our statements about significant financial and other data reporting matters must be made fully and truthfully. We must not be misleading to others receiving or using that information. Inspira's officers and management must maintain a system of internal controls designed to provide reasonable assurance that the organization meets financial and other data reporting obligations and objectives.

FRAUD, WASTE AND ABUSE

Inspira is committed to preventing, detecting and correcting fraud, waste and abuse related to all health care transactions, regardless of whether those transactions are paid by a commercial health plan, an employer, or the government. Every member of the Inspira community is responsible for reporting suspected health care fraud to any of the following resources:

- Your supervisor
- The Corporate Compliance Officer at 856-507-7857
- The Compliance Hotline at 1-888-413-4313
- E-Mail at compliance@ihn.org
- Online <https://app.mycompliancereport.com/report.aspx?cid=ihn>

FUNDRAISING, CONTRIBUTIONS AND SOLICITATIONS

Charitable fundraising events and solicitations sponsored by Inspira or an Inspira department must comply with all federal, state and local laws as well as the organization's reporting, record-keeping and registration procedures.

POLITICAL CONTRIBUTIONS AND POLICY ADVOCACY

The tax-exempt organizations of Inspira:

- Are prohibited from making political contributions; and
- Must observe restrictions on its public policy advocacy activities.

Tax-exempt organizations are prohibited from making direct or indirect contributions to candidates running for federal, state or local office, or to political parties, organizations, or committees, except as permitted by federal or state law. Individuals in a position to influence the activities of Inspira Health Network must not personally benefit from our non-profit activities. As a result, it is inappropriate to provide gifts or subsidize travel or lodging for government or public officials. However, it is permissible to provide meals or refreshments as part of a business meeting, or as a normal business courtesy. If you have any questions about providing meals or refreshments, please consult your supervisor or department director, or contact the Corporate Compliance Officer.

As private individuals we can make personal contributions, but we may not contribute to candidates, political parties or political action committees on behalf of the tax-exempt affiliates of Inspira, except as permitted by law. Check with the Legal Department if you have any questions about political contributions or the organization's lobbying and advocacy activities.

RECORD KEEPING, RECORD RETENTION AND RECORD DESTRUCTION

You must be thorough, timely and truthful with medical and business records, whether paper or electronic. Records must be kept for the appropriate retention period, consistent with Inspira policy and state law, and then destroyed in the appropriate manner.

Records are kept across Inspira Health Network within a variety of care settings so it is not possible to list all of the applicable rules. However, you must learn the rules that apply to any medical record documentation or other records with which you are required to work as part of your job responsibilities. As a guiding principle, please remember that:

- False facts and false records are not permissible.
- Records are only provided to people who have a legal "need to know" or those who are authorized by a patient or someone else who has the authority to provide such an authorization.
- Records are maintained for as long as legally required.
- Patient confidentiality must be preserved.
- Records are disposed of only in accordance with established policies and procedures.
- Alteration of records is strictly prohibited.

Guidance for record retention can be found in the electronic policy database.

Business documents and records are retained in accordance with federal and state law and Inspira Health Network policies and procedures. Business documents include paper documents such as letters and memos, claims, enrollment applications, computer-based information such as e-mail or computer files and any other medium that contains information about the organization or its business activities. It is important to retain and destroy records appropriately according to the applicable policy. You must not tamper with records, nor remove or destroy them prior to the specified date.

TAX-EXEMPT AND NONPROFIT STATUS

Many Inspira entities are nonprofit and tax-exempt. This means that Inspira's nonprofit and tax-exempt assets must only be used to further the organization's mission and nonprofit purpose, and not serve the personal interests of any individual.

The laws that govern our tax-exempt and nonprofit status are very complicated—and very important. If you have any questions about whether Inspira is putting its assets and other resources to proper use, you should voice those concerns with your supervisor or manager. You can also raise these concerns to the Legal Department, the Corporate Compliance Officer, the Compliance Hotline (1-888-413-4313) or make a report on-line at

<https://app.mycompliancereport.com/report.aspx?cid=ihn>.

Inspira has several taxable entities. Inspira employees shall timely and accurately report payments to appropriate taxing authorities and file all tax and information returns in a manner consistent with applicable laws for such taxable entities.

TRUTHFULNESS AND COOPERATION

Health care is a highly regulated industry, so Inspira is subject to regular and extensive oversight by government agencies, law enforcement authorities and external auditors. You must be truthful and accurate whenever submitting a regulatory filing or certification, or responding to an external inquiry on behalf of Inspira. You should consult with Inspira's Legal or Compliance Department for assistance with the submission. Likewise, you are required to be truthful and cooperative whenever we are involved in an inquiry or investigation led by someone in the organization, such as Legal or Corporate Compliance.

INTEGRITY IN OUR CARE AND SERVICE RELATIONSHIPS

The relationships we build with our patients and the community are the foundation of everything we do at Inspira: no one depends on our integrity more than they do. Each of the following standards are vital to ensuring that we earn and maintain their trust every day.

INFORMATION SECURITY

In addition to protecting our patients' privacy, we are also required to keep their information secure. This means that not only must Inspira maintain confidentiality; we must also ensure the integrity and availability of patient information. We do this by complying with Information Security policies and procedures and by reporting any suspected information security concerns.

“Information Security” seems like such a big and scary issue. Can I really do anything to stop hackers and others who want to steal information?

With just a few simple precautions, each of us can reduce threats to information security:

1. Don't share your computer passwords with anyone—ever.
2. Lock your computer work station and/or use password-protected screensavers that automatically kick in when you are away from your work station.
3. Secure personal computing devices, such as laptops, hand-held devices, and cell phones.
4. Do not open email attachments that are suspicious or come from unknown senders.

PATIENT PRIVACY

Each one of us is expected to respect patient privacy at all times, even after our employment or other association with Inspira has ended. You may use and disclose the protected health information (“PHI”) of patients only as allowed by Inspira's policies and procedures governing privacy and confidentiality, including:

- We use Private Health Information (PHI) only when we have a clinical or business need.
- We share PHI with co-workers only when they have a clinical or business need for the PHI.
- For purposes of payment or health care operations, we use and disclose only the minimum necessary PHI.
- We may not disclose PHI to anyone outside the organization except as authorized by the patient or patient representative as otherwise permitted by law.
- We safeguard all PHI that is within our possession or control and take appropriate steps to make sure that PHI is not lost or accessible to people who do not have the right to access it.

- Accuracy in sharing information with others is very important to our work at Inspira. Paying strict attention to detail ensures that when we release information in the form of records, faxes, emails, mailings and other means it is both accurate and secure.

My coworker/friend/family member is in the hospital. Can I use my system access to find out how she is doing?

No—absolutely not! Your coworker/friend/family member is a patient first and foremost, and therefore she is entitled to the same privacy protections as all of our other patients. Patient PHI should never be accessed for personal reasons—even if your job allows system access and even if you just want to check on a friend, coworker, or family member.

Can I access my own medical record?

No—not in your capacity as an employee of Inspira. If you wish to view your own medical record you must request a copy from Health Information Management or access the patient portal.

I just received a call that I faxed patient information to the wrong location, what should I do?

Call the Office of Compliance immediately at 856-507-7857 and secure the records.

PATIENT RIGHTS

Patients and other individuals in our care have the right to expect that we will be respectful of individual and cultural differences. We treat all patients and others with respect, dignity and fairness, and we provide care and access to care that is medically necessary and appropriate. We provide care and access to care equally, without regard to race, marital status, gender, sexual orientation, national origin, age, disability, religion or ability to pay. We listen to our patients' wishes about their care, and we respect the choices they express in advance directives. We encourage patients to participate in medical and ethical decisions concerning their care. We also do not discriminate against patients who have chosen not to adopt advance directives for their care.

PROFESSIONAL ELIGIBILITY, DEBARMENT AND EXCLUSION

Inspira expects that all employed and contracted health care providers maintain appropriate professional relationships with their patients, within and outside the clinical setting by following all standards of professionalism established by their respective licensing boards.

You may only perform your work duties within the scope of your licensure, certifications or other professional standing.

You may only provide services to Inspira within the scope of your current active license, certification or other professional standing. You must report immediately to the Office of Compliance any adverse action that has been taken against you including, without limitation, suspension, revocation, expiration or lapse of licensure. Likewise, you must immediately tell your supervisor if you have been debarred or excluded from a government-sponsored health care entity.

QUALITY OF CARE

Inspira is committed to providing quality care delivered with respect, skill and empathy. Each of us is responsible for maintaining and contributing to the quality of care we provide to each patient. At Inspira, we are all expected to achieve our safety and quality goals and strive to eliminate preventable harm.

INTEGRITY IN OUR WORKPLACE RELATIONSHIPS

We rely on each other to exercise good judgment, to be accountable for our commitments, and to help create a safe and respectful work environment. That is why it is so important that we build our work relationships on integrity. We create and maintain a productive, safe and respectful workplace by fulfilling the following expectations.

ACCOUNTABILITY AND DISCIPLINE

We are confident that employees, providers, Board members, volunteers, residents and others who represent Inspira are directed by the organization's Mission and a sense of what is right. Please use this Code of Conduct and other resources made available to you by the organization to help you make the right decisions.

A violation of the standards described in this Code of Conduct—or of any Inspira policy—can result in disciplinary action, up to and including discharge from employment or termination of your contract. Disciplinary action taken by the organization to uphold this Code of Conduct will be imposed fairly and consistently, commensurate with the violation in question and Inspira discipline guidelines and, if applicable, with terms of employment and collectively bargained labor agreements.

ALCOHOL, FIREARMS AND CONTROLLED SUBSTANCES

Inspira maintains a safe and healthy work environment. You may not work while impaired by alcohol or drugs. You may not possess weapons or other contraband while on Inspira property (including in your vehicles while parked in an Inspira lot or garage) or conducting Inspira business. Access to and dispensing of controlled substances is limited to licensed individuals specifically authorized to handle them.

COMPLIANCE EDUCATION

Compliance education—whether formal group presentations, computer-based training, self-study materials, broadcast communications, department-specific or one-to-one focused training sessions—is an important part of our professional development and commitment to Inspira and its Mission. Because we must all act in compliance with relevant laws, regulations and rules, Inspira expects everyone to participate in required compliance education.

ORGANIZATIONAL POLICIES AND PROCEDURES

All policies and procedures adopted by Inspira should be aligned and consistent with the Code of Conduct. The organization or your department may adopt more detailed or more restrictive policies and procedures relating to the standards addressed in the Code of Conduct, and may adopt policies and procedures that are not specifically addressed in the Code of Conduct, so long as they do not conflict with the Code of Conduct. Be sure to check with your supervisor to see if there are additional policies or procedures that apply to you and the work you do.

ORGANIZATIONAL RESOURCES AND EQUIPMENT

Inspira is legally obligated to protect its property and ensure its facilities and equipment are used appropriately. Resources such as materials, equipment, time and space should be used only for your work, unless your supervisor has specifically made an exception according to Inspira policy. All equipment and supplies provided to you by Inspira are the property of Inspira and theft thereof is strictly prohibited. Any equipment and supplies must be returned to Inspira if your employment ends for any reason whatsoever.

PERSONAL COMMUNICATIONS

One of Inspira's greatest assets is its reputation, and we are all responsible for maintaining that reputation. You must not publish, post or otherwise communicate negatively or make disparaging statements about Inspira or your coworkers. This applies to communications in any form—verbal, written, electronic, visual or otherwise. It is up to each of us to bring concerns about the organization to the organization itself, rather than to air our concerns in a public forum. If you, as an individual, choose to discuss your work in a public setting, such as at a conference, personal blog, social media, etc. you must comply with organizational policies on privacy, business confidentiality and conflicts of interest.

There are many resources for information and information sharing, such as email and the internet. If you have access to these resources as part of your work, you must comply with applicable organizational policies.

PROTECTION OF PERSONNEL – NON-RETRIBUTION

Retribution against anyone who reports suspected non-compliance with this Code of Conduct, the Corporate Compliance Program, or any organizational policy, is strictly forbidden. You will not suffer any penalty or retribution for reporting any known or suspected concern. Inspira will take appropriate disciplinary action against anyone who penalizes, ostracizes or harasses someone who has reported concerns in good faith. However, this non-retribution policy does not allow people to avoid discipline if they are engaged in improper behavior. Anyone who has been involved in inappropriate activity will be subject to appropriate discipline.

If you believe you have experienced retribution for reporting a concern in good faith, contact your supervisor or Human Resources business partner. Alternatively, you can contact the Corporate Compliance Officer, the Compliance Hotline (1-888-413-4313) or make a report on-line at <https://app.mycomplianceport.com/report.aspx?cid=ihn>.

REPORTING CODE OF CONDUCT VIOLATIONS AND OTHER COMPLIANCE CONCERNS

If you think a business practice or relationship is or could be illegal or improper, then it is your responsibility to tell the organization about your concern. There are many ways to do this:

- The best place to start is with your supervisor. He or she will be able to identify the policies and procedures we have in place to guide our conduct.

- If you are not comfortable talking to your supervisor then contact your Human Resources Business Partner or the Corporate Compliance Officer.
- You may also call the Corporate Compliance Hotline at 1-888-413-4313 or make a report on-line at <https://app.mycompliancereport.com/report.aspx?cid=ihn>. Hotline callers and web reporters remain anonymous unless they voluntarily disclose their identity. All reports to the Hotline must include enough information to investigate concerns raised.

RESPONSIBILITIES OF SUPERVISORS AND MANAGERS

Everyone who represents Inspira is responsible for doing his/her work with integrity and in accordance with the Code of Conduct. Supervisor and managers have additional responsibilities. For example:

- When an employee comes to you with a compliance concern, you must report it to the Office of Compliance. You must listen to their concerns with an open mind and follow up appropriately.
- When the organization identifies mandatory compliance-related training, you must ensure that your staff receives that training.
- When compiling an employee's performance review, you should consider whether the employee's behavior has been consistent with the Code of Conduct.
- Never retaliate against or ostracize an employee for raising a compliance concern in good faith.

HARASSMENT AND DISRUPTIVE BEHAVIOR

Everyone deserves to work in an environment where they are treated with respect, dignity and fairness. Inspira supports equal opportunity employment and complies with federal, state, and local equal opportunity and affirmative action laws. Inspira does not tolerate discrimination based on:

- Race
- Color
- Religion
- Ancestry
- Gender
- National origin
- Pregnancy
- Sexual orientation
- Age
- Disability
- Marital status
- Veteran status

We expect you to treat your coworkers with respect, dignity and fairness. Inspira does not tolerate any form of harassment, sexual or otherwise, or any form of workplace violence or threats of violence. Intimidating and disruptive behaviors can foster medical errors, contribute to poor patient satisfaction and preventable adverse outcomes, increase the cost of care and cause qualified

clinicians, administrators, managers and affected employees to seek new positions in more professional environments. Intimidating and disruptive behaviors include, but are not limited to, the following: overt actions such as verbal outbursts and physical threats; passive activities such as refusing to perform assigned tasks or quietly exhibiting uncooperative attitudes during routine activities; reluctance or refusal to answer questions, return phone calls or pages; condescending language or voice intonation; and impatience with questions. Overt and passive behaviors undermine team effectiveness and can compromise the safety of patients. All intimidating and disruptive behaviors are unprofessional and should not be tolerated.

Employees are urged to report any such activities to supervisors and/or Human Resources business partners. The Compliance Hotline is also available at 1-888-413-4313 or you can file a report on-line at <https://app.mycompliancereport.com/report.aspx?cid=ihn>.

CONCLUSION

In conclusion, Inspira Health Network supports a compliance program that helps to prevent, detect and correct violations of the legal, professional and ethical standards we are committed to upholding. The program is designed to support sound decision-making by everyone in the organization.

If you have a question about the Code of Conduct, organizational policies, or have a compliance or privacy concern, it is important for you to voice your questions or concerns. You can:

- Discuss the issue with your immediate supervisor;
- Notify the Office of Compliance at 856-507-7857 or email compliance@ihn.org; or
- Report anonymously by calling the Corporate Compliance Hotline at 1-888-413-4313 or filing a report on-line at <https://app.mycompliancereport.com/report.aspx?cid=ihn>.

Corporate Compliance Hotline

1-888-413-4313

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