Atmore Community Hospital

In keeping with our commitment to enforce an effective Compliance Program, we have adopted the

Business & Professional Standards of Conduct

These Standards of Conduct apply to all of us and serve as the foundation for our Compliance Program

The Atmore Community Hospital Business and Professional Standards of Conduct provide guidance for us in the workplace. If you are faced with an uncomfortable situation not described within this document, you should contact your immediate supervisor and let fairness and respect for others guide your actions. The Compliance Department is always available to respond to issues that you may have and the hotline is available in the event that anonymity is desired.

These Standards apply to every person associated with Atmore Community Hospital ,including officers, employees, board members, physicians, non-physician practitioners, volunteers, vendors, contractors, subcontractors, and agents. These standards also apply to anyone who provides patient care items or services or performs billing or coding functions on behalf of ACH. These persons are referred to throughout these Standards as "Covered Persons." ACH and all Covered Persons are obligated to understand and comply with these Business and Professional Standards of Conduct and must also commit to full compliance with all Federal health care program requirements and ACH' Policies and Procedures. An environment that promotes integrity is a healthy one that will help to bring out the best in each of us.

BUSINESS STANDARDS

Regulatory Compliance

ACH will not tolerate activities of fraud and abuse related to its operations and relationships with outside third parties. ACH is committed to providing all Covered Persons with the proper education and information needed for compliance with federal and state laws. These laws impose strong fines and penalties for dishonest behavior. Some examples of activity that are considered fraud or abuse are:

- Illegal patient referrals
- Filing claims for services not rendered
- Duplicate billings
- Billing the wrong codes
- Providing unnecessary services
- Improper business relationships with third parties
- Noncompliant arrangements and contracts with potential or actual referral sources of health care business

Compliance with federal and state laws requiring accurate submission of bills, statements, and reports, and other information to the government is a condition of employment. Through the ACH Corporate Compliance Plan, ACH commits to a comprehensive program of detection and prevention of health care fraud, waste, and abuse. All Covered Persons are required to make good faith reports of any identified issues or questions associated with ACH's policies, conduct, practices, or procedures with respect to Federal or State health care programs believed by the individual to be a potential violation of criminal, civil, or administrative law to the Compliance Officer, Compliance Hotline, or any member of Executive Leadership. We also require all Covered Persons to recognize and adhere to all federal and state laws that prohibit the

submission of false claims and statements and to acknowledge the commitment of ACH to be compliant with federal and state laws.

We will continuously monitor our business activities to ensure that we are in compliance with applicable federal and state laws and regulations. If we become the subject of a review by a regulatory agency, we will cooperate fully. Any information to which an authorized reviewing agency is legally entitled will be made available. Medical and financial records will be stored according to federal and state statutes and regulations. The records will also not be altered, removed or destroyed, except in accordance with ACH's document retention policies.

Conflicts of Interest

Everyone is expected to devote their full time and energy to ACH during scheduled working hours. A “conflict of interest” happens when personal interests come before the interests of ACH. We are not allowed to use our jobs for personal gain at the System’s expense. If you are not sure about a situation that may seem like a conflict of interest, ask your manager or contact the ACH Compliance Department. Some examples of conflicts of interest are:

- Accepting anything of value that may be looked upon as an attempt by the offering party to receive special treatment. Any small gifts, favors, or modest refreshments must be unsolicited from other parties and happen only rarely. Accepting expensive gifts, lodging, meals, or entertainment because of your position with ACH may be perceived as a bribe.

- Creating business relationships on behalf of ACH with Covered Persons for personal reasons. Business decisions should be made on the ability of the Covered Person to meet the needs of ACH.

- Acting on behalf of ACH to lobby or become involved in political activities without prior approval. Unless approved, participation with government organizations must be done on your time with your money.

- Involvement in outside employment or other activities that may affect your job performance at ACH. Outside employment should be approved, in advance, by your supervisor.

- Working with outside boards or committees that have a relationship with ACH. Although we encourage Covered Persons to be active in their communities, that service should not conflict with the mission of ACH.

Provider Qualifications

ACH staff members providing direct patient care are required to be properly licensed and credentialed. Their duties will be limited to those defined by their licensure.

Contracts

Agreements between ACH and any actual or potential source of health care business or referrals or any actual or potential recipient of health care business or referrals from ACH or any physician or

physician's immediate family member must be in writing, impartial and meet the requirements of the Anti-Kickback Statute, Stark Law, and other applicable requirements.

Disclosures

Any Covered Person that is excluded, debarred, suspended or otherwise ineligible to participate in a Federal or State health care program or in a Federal or State procurement or nonprocurement program or has been convicted of a criminal offense that falls within the scope of the exclusionary authority of the Office of Inspector General but has not yet been excluded, debarred, suspended or otherwise declared ineligible will not be allowed to do business with ACH. All Covered Persons are required to immediately disclose any and all such instances or events to the Compliance Department.

Financial Information

ACH is committed to accurately and promptly reflecting financial information. We have created internal accounting controls to make sure financial transactions are properly approved and relate to our business purpose. Our financial information is audited each year by an independent, external auditing firm to ensure conformity with accounting principles. We will not share information or records with anyone who does not have a business or legal need to know.

Marketing & Advertising

We are committed to being accurate and truthful in the advertising and marketing of our hospital. Any ACH information provided to the local media must be cleared with our Marketing Director before its release.

Protection of ACH Assets

We should treat ACH property and equipment with respect. The use of company time, supplies, tools, or facilities for personal use is not allowed. No Covered Person may remove or borrow company property without permission.

Use of Electronic Media

ACH provides e-mail and internet access to its employees for more open and timely communication. These work tools should be used in a professional manner for job-related functions and education. ACH will only use legally licensed software. The use of pirated or unlicensed software is illegal and violates ACH policy.

PROFESSIONAL STANDARDS

Our Mission is to provide our patients and community safe quality CARE and services that exceed all expectations...this requires that we focus our collective efforts toward helping our patients achieve the best quality of life possible. We personally value and actively demonstrate our organization's Core Values and behaviors through:

***Compassion* –** For our community
***Accountability* –** For our actions
***Respect* –** For others and self
Excellence – In everything we do

ACH is committed to preserving the rights of others. All Covered Persons are expected to respect our patients, visitors, staff, physicians, and vendors in all aspects of our daily activities. We are expected to cultivate an environment that promotes respect, dignity, and courtesy for every individual. Through these efforts, our ultimate goal is to make all those who choose to visit or provide services within the System feel welcome and appreciated in their relationship with ACH.

In our efforts to provide the highest quality patient care possible, we encourage and expect patients to participate in health care decisions. It is also understood that with the privilege of providing health care to our community comes the obligation to meet all HIPAA and HITECH requirements to protect all protected health information and provide access to that information upon patient request. All ACH staff must access protected health information only for work-related purposes and in order to perform their respective duties.

We are also committed to the protection of personal, employment, and financial information regarding our employees and the hospital. ACH will take appropriate steps to provide safety and security in order to develop an environment of trust, honesty and fairness.

We all have the right to a harassment-free setting. Our hospital supports a cooperative, professional environment.

As we are faced with our daily tasks, clear communication among us is critical. We must be able to resolve differences and work together as a team to reach our goals. We should appreciate the diversity of our workforce and respect the individuality of each person.

We strive to do things fairly, ethically, and legally. In order to promote fair treatment, ACH will protect each person from punishment or harassment for identifying misconduct. No action will be taken or threatened against an employee for filing a complaint or disclosing information in good faith. Failure to comply with these Business and Professional Standards of Conduct can lead to disciplinary action, including the possible termination of employment or a contractual arrangement, as applicable.

We are obligated to promote a positive, ethical work environment for all Covered Persons and others who come in contact with Atmore Community Hospital. Each individual is responsible for asking

questions, seeking guidance, and expressing concerns related to compliance with these Business and Professional Standards of Conduct. ACH maintains a system to log and address concerns reported to the Compliance Officer, Compliance Department, or through the Compliance Hotline. Each person has the right to use this Compliance Reporting System to report any concerns or issues and can expect ACH to honor its commitment of nonretaliation and to maintain, as appropriate, confidentiality and anonymity when reports are made.

Compliance "Hotline": (251) 368-6945

Your telephone number for reporting potential misconduct relating to:

- Billing fraud/abuse
- Coding fraud/abuse
- Conflicts of interest
- Bribes/excessive gifts
- Misuse of ACH property
- Improper business relationships or contractual arrangements

You do not have to give your name and will be protected against retaliation.

For employee relation issues, please call Human Resources at 251-368-6369