

# CODE OF ETHICS AND CONDUCT

July 2022



**Excelsa**Health



# ***“DOING THE RIGHT THING BECAUSE IT IS THE RIGHT THING TO DO”***

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Dear Colleague,

At Excela Health our mission is, “To improve health and well-being of every life we touch. In order to achieve that mission, we must first and foremost be a people of integrity and honesty. To assure this ongoing commitment to integrity and honesty, we are pleased to introduce the Excela Health Code of Conduct.

The Excela Health Code of Conduct is part of our overall Compliance Program. It serves as a guide for each of us – board members, employees, volunteers and service providers – as we strive to conduct all of our business dealings with a high degree of honesty and integrity. Medical and business decisions can be complex. The Code of Conduct is a guide to using good judgment and making the right choices. We expect all of us to know and follow it. We all have a role to play and every one of us can make a real difference. Everyone has individual responsibility and accountability to follow our legal and regulatory compliance policies, and to conduct activities in an ethical manner. To help you, our Code of Conduct sets out our standards on how we should behave with our stakeholders, patients, fellow employees, community, physicians and regulators. However, no code of conduct can spell out appropriate behavior for every situation. Excela Health relies on each of us to use good judgment of what is right and proper in any particular situation. If there is any doubt, ask yourself:

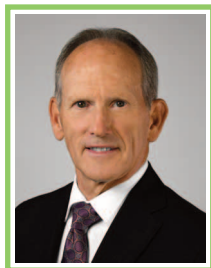
- 1. Does it comply with Excela Health standards, including this code and our policies and procedures?*
- 2. How would my action look as a headline in tomorrow’s newspaper?*
- 3. How would my family or friends view my behavior?*
- 4. Does it follow the letter and spirit of the law and regulation?*

You are a critical member of our team and play an important role in our future. Thank you for your commitment to Excela Health.

Sincerely,



John M. Sphon  
Chief Executive Officer



## SUMMARY STATEMENT

We belong to a health care organization that has shared values and the common mission of *improving the health and well-being of every life we touch.*

‘Doing the right thing because it is the right thing to do’ is inherent in our business values and impacts our conduct. The Code of Ethics and Conduct is based on this concept and includes eight basic principles that shall guide us in our daily work at Excela Health. These principles are:



- Quality of Care
- Legal Compliance
- Integrity of Coding, Billing and Medical Documentation
- Confidentiality and Information Security
- Conflicts of Interest
- Human Resources
- Protection of Excela Health Resources and Assets
- Health and Safety

It is the expectation that employees, volunteers, medical staff and other applicable parties (i.e., vendors, contractors, etc.) will demonstrate their commitment to our Corporate Compliance Program, and respect the principles and standards included within the Code of Ethics and Conduct in performing work responsibilities for or conducting business with the organization. Disciplinary or other adverse action, as appropriate, will be taken to establish accountability for those who fail to comply with the Corporate Compliance Program and to consistently enforce the principles and standards set forth in the Code of Ethics and Conduct.

Our reward for adherence to the Code is in our outcomes – being a leader for integrity as a health care organization with high ethical standards and practices in every aspect of patient care provided to our community.

*This Code is intended to be a summary of standards. Further detail can be found in the policies, protocols and procedures of Excela Health and its affiliates*

## PURPOSE

The purpose of the Code of Ethics and Conduct is to promote and protect our organization-wide integrity and ethical standards. It serves as a guide to members and business affiliates of Excela Health including all employees, trustees, volunteers, medical staff and vendors/contractors. The Code of Ethics and Conduct includes principles and standards of conduct and provides general guidance for many situations. Specific Excela Health administrative and departmental policies and procedures should be consulted, as needed, to address specific procedures or concerns. If there should be any questions, you should always seek guidance from management, administration, the Corporate Compliance Officer or General Counsel.

The Excela Health Code of Ethics and Conduct has been adopted by the Excela Health Board of Trustees and is also the foundation for our Corporate Compliance Program and mission of **“Doing the Right Thing Because it is the Right Thing to Do.”** This commitment to integrity and high ethical standards permeates all levels of the organization, not just the Board of Trustees, but also applies to each individual who acts on behalf of Excela Health.

The Compliance Program supports our mission, vision and values at Excelsa Health and guides our individual, team and corporate behavior. It provides a process to ensure that we do the right thing, the right way, on an ongoing basis. The key elements of the Compliance Program include:

- Designation of a Compliance Officer with program oversight and reporting at the administrative and board levels
- Specific compliance policies and procedures
- Provision of communication channels to report potential compliance issues
- Compliance training and education
- Compliance monitoring and auditing
- Responding promptly to address problems and take corrective actions
- Enforcing compliance standards through well publicized disciplinary guidelines

The Code of Ethics and Conduct will be initially provided and redistributed, as updates are made, to members of the Excelsa Health community. Key principles of the Code will also be shared with our business affiliates. It is the responsibility of all Excelsa Health community members and business affiliates to understand their ethical responsibilities and act or do business with integrity and in a manner consistent with our Code of Ethics and Conduct. Additionally, there is an affirmative duty for individuals to report any known or suspected violations of the Code as outlined at the end of this document and in accordance with our Administrative Policies. Individuals who report known or suspected violations of the Code or other compliance or patient safety concerns are protected from any form of retaliation.

## QUALITY OF CARE

Excelsa Health is dedicated to meeting the health care needs of the communities we serve by providing high quality care and a comprehensive range of services to patients. We strive towards the highest professional standards in the provision of care and services while respecting patients' rights. The patient rights we adhere to include those described fully in 28 Pa. Code §103.22(b) in addition to other principles of patient rights. For purposes of the Code of Ethics and Conduct, these general principles have been summarized as follows:

### ***Patient Rights:***

- All patients will be treated with compassion, dignity, respect and courtesy.
- We will not discriminate against any patient for any reason including race, color, national origin, religion, sex, sex preference, disability, age or source of payment. We will demonstrate respect for every patient's background, culture, religion and/or heritage where practically and legally possible.
- We respect patients' rights to be involved in making informed health care decisions and we encourage open and honest communication with patients. We strive to inform all patients about the risks associated with the care they are seeking as well as any therapeutic alternatives or nonpursuit of care.
- Patients have the right to full information concerning their diagnosis, treatment and prognosis, including information on alternative treatments and possible complications in layman's terms.

- Patients who do not speak English as their primary language have the right, as required by law, to an interpreter at no cost.
- Deaf patients being treated at Excelsa Health are routinely informed of the availability of Interpreter services through the admitting health care professional as part of the routine admission process.

***Admission/Transfer/Discharge:***

- Any person who presents to one of our dedicated emergency departments will be provided an appropriate initial medical screening and stabilizing treatment, if needed, to anyone requesting it without regard to their financial situation or insurance coverage. Excelsa Health and its affiliates are committed to maintaining compliance with all federal and state laws governing the provision of emergency medical services.
- Treatment for medical conditions at our hospitals will not be denied based on a patient’s ability to pay for services rendered.
- Patients will receive the most appropriate care provided within the scope of services available through Excelsa Health. A patient will be transferred only if the appropriate services are not available here and once the patient’s family, next of kin or legal representative has received complete information and an explanation concerning the needs for and alternatives to such transfer, or upon request of the patient or family if the patient lacks decision-making capacity.
- All discharges will be based upon sound discharge planning and all efforts will be made to involve the patient and the patient’s family.
- On a very limited basis, certain aspects of this policy will not apply to disruptive or other individuals who have been denied access to Excelsa Health facilities, with the sole exception of emergency care, which shall remain available to all.

***Employee/Caregiver Qualifications:***

- Employees and caregivers are appropriately licensed or credentialed and have the expertise to provide care and services to patients competently.
- We will provide ongoing educational opportunities for employees and caregivers so that they may enhance their knowledge and skills specific to their job responsibilities.

***Performance Improvement:***

- We will evaluate and monitor patient care services and functions, support processes and system activities to continually improve overall patient care experience and outcomes.





## LEGAL COMPLIANCE

Excela Health will strive to ensure that all activity by or on behalf of the organization is in compliance with applicable laws, regulations and professional standards.

The following highlights Excela Health standards related to certain specific laws and regulations. These standards are neither exclusive nor complete. It is your responsibility to follow the laws and regulations that apply to Excela Health operations and to your particular duties and responsibilities. If you have questions regarding the existence, interpretation or application of any laws or regulations specific to your area, please direct them to the Excela Health Sr. Vice President and General Counsel, Corporate Compliance Officer or your manager/compliance coordinator.

### ***Fraud and Abuse:***

- We will represent Excela Health accurately and honestly and will not engage in any activity or scheme intended to deceive another person, organization, or government agency with the intent of receiving an unauthorized benefit for Excela Health, some other person or ourselves.
- We will not knowingly submit false, fraudulent or misleading claims to any government entity or third party payer, including claims for services not rendered, claims that characterize the service differently than the service actually provided, or claims that do not otherwise comply with applicable program or contractual requirements.
- We will avoid making false representations to any person or entity in order to gain or retain participation in a payment program or to obtain payment for any service.
- We will avoid involvement in any activity that is not consistent with prudent medical, business or fiscal practices and that may result in over utilization of, excessive costs or overpayment for medical services.
- We will not knowingly or intentionally provide services that do not meet professionally recognized standards of care.

### ***Bribes, Kickbacks and Rebates:***

- We will not knowingly and willfully offer, pay, solicit or receive payment or anything else of value, either directly or indirectly, in exchange for:
  - Referral of patients
  - Influencing decisions on the purchase, lease or arranging of any goods or services paid for by federal or state health care programs.

### ***Marketing/Antitrust Laws:***

- All marketing and advertising will be accurate and truthful in the representation of Excela Health.
- Prior to referring a patient to any entity that provides health-related services in which the hospital has a financial interest, the appropriate hospital staff will notify the patient or patient's representative of such affiliation, and provided such service is available from other suppliers, allow the decision-maker to choose the service provider he/she wishes.

- We will comply with antitrust laws that promote fair competition by avoiding discussion of sensitive Excelsa Health business matters with or arranging certain agreements with health care competitors in our market area.
- We will not engage in anti-competitive conduct that could produce an unreasonable restraint or a substantial lessening of competition. Examples of inappropriate behavior include, but are not limited to: participating in price fixing arrangements or price sharing; disclosing vendor/supplier contract terms, or agreeing with a competitor to refuse to deal with a supplier.

***Non-Profit Status/Taxes:***

- We will avoid compensation arrangements in excess of fair market value, will accurately report payments to appropriate tax authorities and will file all tax and information returns in a manner consistent with applicable laws.

***Lobbying/Political Activity:***

- We may personally participate in and contribute to political organizations or campaigns on an individual basis using personal funds, not as representatives of or at the expense of Excelsa Health.
- Excelsa Health may analyze and/or publicly offer recommendations concerning legislation or regulations being considered that have a relationship to health care operations when our experience contributes to the understanding of such issues.
- Excelsa Health contacts and transactions with governmental bodies and officials must be conducted in an honest and ethical manner. Any attempt to influence the decision-making process of governmental bodies or officials by an improper offer of any benefit is prohibited.

**INTEGRITY OF CODING, BILLING AND MEDICAL DOCUMENTATION**

Excelsa Health is committed to maintaining a high level of financial responsibility. Part of this responsibility lies in ensuring that we adhere to accurate and honest coding and billing practices to the best of our ability. The basis for compliance will be derived from all applicable federal and state laws and regulations concerning these practices. We will ensure, within our capabilities, that all patients and/or payers are charged uniformly for the same service, but reserve the right to offer and provide financial assistance to those who qualify through our charitable discount policy.

- We will strive to submit claims for services within specific payer requirements and that contain diagnosis, procedure and other billing codes that most accurately reflect the services and items that were ordered, provided and documented.
- Upcoding, unbundling or any other inappropriate attempts at enhancing reimbursement is unlawful and prohibited.
- We will bill payers only for services that to the best of our knowledge are medically necessary.
- Medical documentation should be made promptly and accurately reflect the care and services provided to the patient.



- An appropriate process will be available for auditing and monitoring the accuracy of billing claims, or responding to potential compliance issues regarding coding, billing or medical documentation. This process will be the shared responsibility of the Compliance Office, Patient Accounting, the Compliance Coordinator of the clinical department, and other departments/designees as deemed necessary.
- Billing claims may only be adjusted by authorized individuals for legitimate purposes only, including accurately reporting billing information to a third party payer or patient. Knowingly presenting or causing to be presented false, fictitious or fraudulent claims for payment is prohibited.
- Patient accounts will be reviewed for credit balances and any overpayments will be promptly refunded to the appropriate third party.
- We will provide assistance to patients and their families to clarify any questions they may have regarding costs relative to their care and will attempt to resolve questions and/or objections to the patient's satisfaction.
- Insurance co-payments and deductibles will not be waived routinely. Waiver requests are subject to objective review.

## CONFIDENTIALITY AND INFORMATION SECURITY

Excelsa Health shall properly protect, manage and maintain information related to our patients and business operations. This includes information of all media types including electronic (e.g., voicemail, e-mail, computer-based) and paper.

### ***Confidentiality:***

- Excelsa Health and its employees are in possession of and have access to a broad variety of confidential, sensitive and proprietary information. The unauthorized access, disclosure or release of such information could be injurious to individuals or Excelsa Health. Every employee has an obligation to actively protect confidential, sensitive or proprietary information to prevent the unauthorized disclosure of information, and to report any known or potential violations of a breach of privacy or confidentiality.
- Confidential or sensitive information related to patients, personnel, physicians and/or Excelsa Health business and operations will be maintained in strictest confidence. This information should be discussed or released on a strict need-to-know basis, that is minimally needed to execute the task, and only by and to those who are authorized to review and act upon such information in accordance with applicable laws and regulations, job responsibilities and/or Excelsa Health specific policies and procedures. Examples of such information include but are not limited to: patient/medical records, personnel files, salary and benefit information, disciplinary actions, medical staff credentialing information, Excelsa Health strategic plans or other proprietary information.
- The Health Insurance Portability and Accountability Act (HIPAA) federal guidelines provide a framework for our practices to ensure that patient information is kept private, confidential and secure.

***Security of Information Systems:***

- Excela Health information system users will take appropriate steps to properly utilize and maintain electronic information systems in a manner that ensures accuracy, integrity and protection of data in accordance with the HIPAA Security Rule and our policies and procedures. Examples include: obtaining appropriate authorization for system use; protecting user codes and passwords; signing off systems when not in use and refraining from improper or unauthorized access or use of information.

***Accuracy, Retention and Disposal of Documents and Records:***

- Business and medical records are to be physically maintained and retained in accordance with policies and procedures specific to our health system, as well as legal and regulatory requirements.
- Any sensitive or confidential information that needs to be discarded should be disposed of securely and properly to avoid unintended disclosure or misuse by another party.
- Altering or falsifying any information on records or documents is prohibited.

***Intellectual Property Rights/Proprietary Information:***

- We will exercise care to ensure that intellectual property rights, including patents, trademarks, copyrights and software licensing agreements, are properly maintained and managed to preserve and protect their value. Copyrighted material should not be photocopied or reprinted and disseminated without first obtaining approval from the copyright holder. Computer software should not be copied or redistributed except as allowed by the software license agreement between Excela Health and the vendor.
- Confidential business information obtained from competitors will not be utilized in any manner likely to create an unfair competitive advantage for Excela Health. Examples of such information include, but are not limited to: customer lists, price lists, contracts, employment agreements, etc.



## CONFIDENTIALITY AND INFORMATION SECURITY

We will ensure Excela Health activities and operations are conducted with integrity. To ensure this standard is maintained, any known or potential conflicts of interest are to be disclosed promptly through your immediate supervisor, the Corporate Compliance Officer, the Sr. Vice President and General Counsel and/or any other appropriate parties for review and evaluation. Excela Health transactions with customers, patients, vendors, contractors or other third parties will be conducted free from offers or solicitation of gifts, favors or other improper inducements in exchange for influencing decision-making relative to the transaction or situation.

Excela Health recognizes that the potential for conflicts of interest exist at all levels within the organization, including the governing board, administration, medical staff and all other employees. It is the policy of Excela Health that a conflict of interest exists when an individual is involved in an activity in which they may benefit or profit personally, or assist others to benefit or profit at the expense of or against the best interests of Excela Health. A conflict of interest may exist even if there are no improper actions as a result of it. The potential for conflicts may arise from personal or business relationships with outside entities, vendors, suppliers, contractors or other third parties that compete with or do business with Excela Health. Any known or potential conflict of interest situations should be promptly disclosed to your supervisor who will be responsible for seeking the opinion of the Vice President, Corporate Compliance Officer, and/or the Sr. Vice President and General Counsel, as appropriate depending on the nature of the situation, for further review and evaluation. These situations will be evaluated with respect to protecting and preserving the interests of Excela Health. It is the intent that this principle be interpreted broadly to avoid even the appearance of improper activity.

### **Standards of General Conduct:**

- We should not engage in business arrangements with Excela Health vendors, suppliers, contractors or agencies in which a conflict of interest exists.
- We are expected to disclose any personal relationships and business activities with outside entities (e.g., Excela Health competitors or business partners) that may be construed by an impartial observer as influencing your performance or duties with Excela Health or potentially creating a conflict of interest. Examples of required disclosures include:
  - Ownership in or employment by any outside entity that competes against or does business with Excela Health. This excludes ownership in publicly traded stocks or investments;
  - Family ties to outside entities that compete against or do business with Excela Health;
  - Serving on the board of directors/trustees of any organization whose interest may impact or conflict with Excela Health.
- We have the responsibility to consult with management to obtain clarification on questionable issues related to a conflict of interest.
- We will ensure our vendors and other business associates, as appropriate, are aware of our position regarding conflicts of interest.

***Standards of Business Relationships:***

- We will not offer or give money, services or other things of value with the expectation of influencing the judgment or decision-making process of any purchaser, supplier, customer, government official or other person or business.
- We shall not seek to gain any advantage through the improper use of payments, business courtesies, and charitable care for our patients, or other inducements. Offering, giving, soliciting or receiving any form of bribe or other improper payment is prohibited.
- Appropriate commissions, rebates, discounts and allowances are customary and acceptable business transactions provided that Excelsa Health management approves them and that they do not constitute illegal or unethical payments. Any such payments must be reasonable in value, competitively justified, properly documented, and made to the business entity to which the original agreement or invoice was made or issued. Such payments should not be made to individual employees or agents of business entities.
- We may provide gifts, entertainment and meals of nominal value to Excelsa Health customers, current and prospective business partners, and other persons when such activities have a legitimate business purpose, and are reasonable and consistent with all applicable laws and Excelsa Health policies.

***Standards for Gifts and Gratuities:***

Vendors and other potential business associates who seek to do business with Excelsa Health or our patients may not offer gifts and gratuities (e.g., food, gift cards, entertainment or other marketing devices) to trustees, officers, or other employees (including employed physicians). Likewise, Excelsa Health may not solicit or accept gifts offered in this context without consulting the Vendor Solicitation policy and receiving approval from your direct supervisor. The provision of gifts typically serves a marketing purpose, yet does not add any clinical or patient benefit to the information exchange. Gifts, no matter how small, create a conflict of interest and the costs associated with them are ultimately passed along to the health care consumer. If an employee has any concern whether a gift should be accepted, they should consult with their supervisor or the Compliance Officer.

- Individuals may not ask for nor accept monetary tips or gifts from a patient. If a patient or other individual wishes to present a monetary gift, they should be referred to the Frick Hospital Foundation, Latrobe Area Hospital Charitable Foundation or Westmoreland Hospital Foundation.
- The Excelsa Health trustees and employees shall not accept gifts, favors, services, entertainment or other things of value that could influence decisions or actions affecting Excelsa Health.
- Employees are prohibited from soliciting gifts from vendors, suppliers, contractors or other persons for personal gain.
- Gifts and gratuities, if accepted, must be disclosed and/or approved in accordance with Excelsa Health policies.

***Standards for Sponsored Entertainment, Workshops, Seminars and Training Sessions:***

It may be in the organization's best interest to permit trustees, officers and employees to attend events sponsored by established vendors and business associates in order to maintain good relationships with such parties. Additionally, many activities within this classification provide an educational benefit to the individual or the organization that outweighs the personal benefit to the attendee.

Trustees, officers, or employees who desire to attend activities sponsored by vendors and other healthcare industry representatives or business associates at offsite locations must disclose the offer and seek authorization through their manager as required by Excelsa Health policies. All EH leadership must report potential conflicts in the COIDS (Conflict of Interest Disclosure Statement) system.

Employees may participate, with the permission of their supervisor, as faculty and speakers at educational programs and functions. However, any honoraria in excess of \$100 must be turned over to the Foundation of the Organization unless the employee used paid time off to attend the program.

***Standards for Gifts to Physicians from Industry:***

Physicians in independent practice should follow guidelines provided by The American Medical Association in Opinion 8.061, "Gifts to Physicians from Industry" when in situations of uncertainty.

Employed physicians (excluding EHMGM employed physicians) shall adhere to the Vendor Solicitation policy 4-I-320 in its entirety when contemplating acceptance of gifts, gratuities, entertainment, or educational/training sessions. Approval through Senior Leadership and Compliance Office is required prior to acceptance. All EHMGM employed physicians are to refer to the EHMGM vendor solicitation policy.

**HUMAN RESOURCES**

Excelsa Health recognizes that our employees are our most valuable asset and contribute to our ability to fulfill our mission as a health care provider. Excelsa Health is committed to the fair and equitable treatment of its employees and seeks to protect, support and develop all employees to their fullest potential.

- We follow a strict policy of fair treatment and nondiscrimination in our employment policies and practices. We hire the most qualified applicants available based on job-related requirements and ability to perform. No distinctions are made on the basis of color, religious belief, sex, gender, age, race, national origin, non-job related physical impairments, disability or other prohibited criteria under applicable law.
- We promote open lines of communication, both upward and downward within the organization. Employees are encouraged to offer constructive suggestions and ideas, convey information of interest, and express their opinions to their supervisors and/or senior management.

- Excelsa Health is dedicated to providing education and training to all employees to assist them in maintaining the competencies and expertise needed for them to function at the highest levels within the realm of their job responsibilities.
- We recognize and protect the right of every employee to express complaints and grievances fully without jeopardizing work status or employment record.
- We will provide a professional and safe work environment for all employees, free from drugs, threats and any acts of harassment, including sexual harassment.
- We recognize our colleagues as important members of a team and will work collaboratively with them to provide high quality care and services.
- We will treat our colleagues with courtesy, honesty, respect and dignity.
- We will strive to resolve all occasions of conflict fairly and objectively, regardless of whether such conflict is between members of administration, medical staff, employees or the trustees, or between caregivers and the patient.
- We recognize that there may be certain aspects of care or treatment that may conflict with an employee’s personal cultural values, ethics and beliefs. We will make all reasonable attempts to accommodate an employee’s request to be excused from such aspects of care provided it can be done in a way that does not compromise or diminish the care or treatment of the patient.

## PROTECTION OF EXCELA HEALTH RESOURCES AND ASSETS

All employees are responsible for the proper use of Excelsa Health property, facilities and equipment. These assets should be used with care and respect while guarding against waste and abuse. Employees must act as good stewards of these assets.

### *Internal Controls:*

- Excelsa Health has various internal controls (e.g., policies and procedures, performance measures, etc.) established to ensure that assets are protected and properly used, and that financial records and reports are accurate and reliable. All employees of Excelsa Health share the responsibility for maintaining and complying with required internal controls.

### *Personal Use of Corporate Assets:*

- All employees are expected to refrain from converting Excelsa Health assets to personal use. All property and business of Excelsa Health shall be treated and conducted, respectively, in a manner designed to further the interest of our system rather than the personal interest of an individual employee.
- Employees are prohibited from the unauthorized use or taking of Excelsa Health equipment, supplies, materials or services. Prior to engaging in any activity on Excelsa Health time that will result in payment or compensation to the employee or the use of Excelsa Health equipment, supplies, materials or services for personal or non-work related purposes, employees shall obtain the approval of the appropriate supervisor or other upper management of Excelsa Health.



**Financial Reporting:**

- All financial reports, accounting records, research reports, expense accounts, time sheets and other documents must accurately and clearly represent the relevant facts or the true nature of a transaction.
- An auditing and monitoring process will be in place to ensure the accuracy and integrity of all financial transactions that, if in error, would jeopardize the organization's health or standing in the health care community.
- Improper or fraudulent accounting, documentation or financial reporting is strictly prohibited and may be in violation of applicable laws.

**Travel and Entertainment:**

- Travel and entertainment expenses should be consistent with the employee's job responsibility and Excelsa Health needs and resources. Employees will exercise reasonable judgment in the use of Excelsa Health's assets and to spend the organization's assets as carefully as they would spend their own. It is expected that an employee should not suffer a financial loss or a financial gain as a result of business travel and entertainment.

**HEALTH AND SAFETY**

Excelsa Health will manage and operate its business in a manner that respects the environment and conserves natural resources. We will strive to maintain an environment that is safe for all individuals who work within or visit any of our Excelsa Health entities.

- We will make all attempts to provide a workplace environment free of hazards and manage activities to reduce the risk of injuries.
- We will work safely and obey the safety policies, rules and regulations that exist within or otherwise apply to Excelsa Health and our work areas to protect ourselves, patients, co-workers and others.
- We will promptly report to a supervisor or manager any unsafe conditions or accidents that are observed within any Excelsa Health entity.
- We will strive to utilize resources appropriately and efficiently, and otherwise dispose of all hazardous and infectious waste in accordance with applicable laws and regulations.
- Employee involvement in the possession or use of illegal drugs or alcohol on Excelsa Health premises or on the job is strictly prohibited.
- All employees should wear name badges while working. Non-employee visitors such as consultants, auditors, contracted services, and vendors should wear visitor badges when working within any Excelsa Health entity, as appropriate.



## REPORTING YOUR ISSUES AND CONCERNS

The success of our Corporate Compliance Program is strongly dependent upon each individual and his or her ability to access and utilize effective communication channels without fear of retribution. All employees, volunteers, medical staff and the board are encouraged and should feel obliged to utilize any of the following communication channels to report observances of potential compliance concerns or issues.

<p><b>Chain of Command</b></p>	<p>Immediate supervisor/manager, compliance coordinator for your area/department, director, senior management</p>
<p><b>In House Counsel</b></p>	<p><b>Pam Hepp, Esq., General Counsel</b>                  Telephone: 724-832-4012                  Email: phepp@excelahealth.org</p>
<p><b>Corporate Compliance Hotline</b></p>	<p><b>1-844-774-0215 or</b>  <b><a href="http://www.excelahealth.ethicspoint.com">www.excelahealth.ethicspoint.com</a></b></p> <ul style="list-style-type: none"> <li>■ Dedicated independent hotline service 24 hours/day, 7 days/week</li> <li>■ Enables anonymous or open communication of compliance issues</li> <li>■ Resolution call back feature</li> </ul>

The chain of command should be the initial route of communication. However, the Compliance and Privacy Officer and Corporate Compliance Hotline are alternative communication mechanisms available if the chain of command is not appropriate or not addressing your needs. For more information on the reporting of potential compliance concerns, please see our Administrative Policy #305 Compliance Hotline Protocols.

Excela Health administration and management supports an environment of open communication. Excela Health community members are not permitted to retaliate or take any form of retribution against another individual for reporting compliance concerns. Any incidence of retaliation or retribution should be brought to the attention of the Compliance and Privacy Officer, or a member of the senior management team. Anyone determined to be responsible for substantiated instances of retaliation or retribution will be subject to disciplinary action in accordance with our Administrative Policy #324 *Disciplinary Action for Non-Compliance with the Corporate Compliance Program*.

**ExcelaHealth**  
Expert Care. Here.