

CODE OF CONDUCT



UnityPoint Health



Although we cannot address in this guide all the laws, regulations and policies that govern our organization, this booklet outlines many issues that will be important to you when working for UnityPoint Health® or its affiliates*.

This booklet does not replace any existing policies. It should be used to supplement and clarify our standards of conduct. Please consult with management or refer to our formal policies and procedures for more detail on specific issues.

*NOTE: The legal name of UnityPoint Health is its "legacy" name, Iowa Health System.

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OUR MISSION

Improve the health of the people and communities we serve.



OUR VISION

Best outcome, every patient, every time.



BRAND PROMISE

Know how much you matter to this world.



OUR VALUES

Foster Unity | **O**wn the Moment

Champion Excellence | **S**eize Opportunities

Dear UnityPoint Health Team Members and Business Partners,

At UnityPoint Health, we're committed to showing our patients how much they matter to this world through experiences that are both easier and more personal, while improving the health of those we serve. As one team, we also live a set of core values: Foster Unity, Own the Moment, Champion Excellence and Seize Opportunities. These values allow us to be the best version of ourselves as individuals and as a collective health system.

Our Code of Conduct reinforces these values and is a key component in our compliance program, created to educate team members, directors, officers, and agents of UnityPoint Health about the laws, regulations and standards governing the delivery of quality health care.

Please familiarize yourself with this guide. It should support your decision-making around all daily activities. If any aspect of this guide is unclear, or if you have questions or concerns about a situation you are facing, please seek assistance immediately from your supervisor, compliance officer or senior management. You may also call the Compliance Helpline at 1 (800) 548-8778.

By living our values and complying with the Code of Conduct, you're contributing to our strong reputation in health care and in our communities. We take care of each other, so we can take care of those who count on us to keep their care on point. Everyone has a valuable job to do here, and this guide can help achieve patient care and business objectives consistent with our commitment to ethical behavior and compliance with laws and regulations.

Please help us deliver on our pledge to assure our patients and communities that UnityPoint Health has uncompromising values. Thank you for being part of the team.

Scott Kizer
President & CEO

CODE OF CONDUCT

The UnityPoint Health Board of Directors has adopted a Code of Conduct (see Policy 1.CE.02, Code of Conduct) to help us achieve excellence in our workplace. This Code of Conduct provides standards of conduct and sets expectations for workplace behaviors. It also protects and promotes organization-wide integrity and enhances our ability to achieve our mission and vision.

This booklet summarizes the standards outlined in the Code of Conduct. Please take time to familiarize yourself with the information in this booklet.

Our patients and their families, physicians, employees, business partners, suppliers, and our communities are the cornerstone of UnityPoint Health. Our relationships must be built upon honesty, credibility, and mutual respect.

It is our responsibility to observe all laws and regulations. We must be honest and forthright in our business dealings. Our integrity, both personal and professional, is our most important attribute.



STATEMENT OF RISK TOLERANCE

Risk tolerance means the amount of risk that an organization is prepared to accept in pursuit of its objectives. A low level of risk tolerance means that the organization wishes to take very little risk. A higher level of risk tolerance means that the organization is prepared to accept more risk to achieve its objectives.

UnityPoint Health operates within a variable risk range, depending on the area and type of risk. UnityPoint Health's lowest risk tolerance relates to patient and employee safety and the quality of clinical care. Compliance risk evaluation requires a balancing of risk and cost. A higher risk tolerance may apply to financial and clinical data reporting objectives, and the greatest risk-taking tolerance may apply to the organization's strategic and operational objectives. This means that reducing to reasonably practicable levels the risks relating to the provision of healthcare services, our work environment, and material compliance risks, will normally take priority over other business objectives.



This statement of risk tolerance should be applied consistently at all levels of UnityPoint Health.

QUALITY OF CARE & CLINICAL VALUES

UnityPoint Health is judged by your performance, the attention and care you give, the courtesies you extend, the problems you solve and the quality of service you deliver. We will:

- 1 Strive to provide high-quality medical services that are appropriate, safe and in compliance with all applicable laws, regulations, and professional standards.
- 2 Treat patients with consideration and respect, recognizing their dignity and right to privacy. We will protect and keep confidential patient medical records and information as required by law.
- 3 Meet the health care needs of all our patients. UnityPoint Health complies with applicable Federal civil rights laws and does not discriminate on the basis of race, color, national origin, religion, age, disability, or sex (including sex characteristics, including intersex traits; pregnancy or related conditions; sexual orientation; gender identity, and sex stereotypes). UPH does not exclude people or treat them less favorably because of race, color, national origin, religion, age, disability, or sex. UPH does not discriminate in the provision of services based on an individual's inability to pay or whether payment for services would be made under Medicare, Medicaid, or the Children's Health Insurance Program.
- 4 Employ personnel with proper credentials, experience, and expertise in meeting the needs of our patients and the communities we serve.
- 5 Strive to ensure that admissions, transfers, and discharges are medically appropriate and in accordance with legal requirements.
- 6 Take reasonable precautions to ensure our safety, as well as the safety of our patients, visitors, and co-workers.

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- 7 Communicate effectively with patients and families and respond to patients' treatment needs, requests, and concerns. We will address any adverse outcome of care, including unanticipated ones, by reporting these to a supervisor who can assess the problem and take appropriate action.
 - 8 In the event of a medical emergency, not deny care and services on any other grounds unrelated to the individual's need for the service or the availability of the needed service.
 - 9 Comply with all regulations governing the use, management, and distribution of drugs. Report to work without being subject to the influence of alcohol, illegal drugs, prescription drugs used outside the scope of a prescription, or other substances that may hinder job performance or judgment.
 - 10 Act in the best interests of our patients and maintain appropriate distance and involvement in our relationships with our patients.



LEGAL COMPLIANCE

UnityPoint Health will strive to ensure all activity by or on behalf of the organization follows applicable laws.

Violations may result in severe penalties and significant fines. Any concerns regarding non-compliance shall be reported to an appropriate supervisor, manager, Affiliate Compliance Officer, the UnityPoint Health Chief Compliance Officer, or to the Compliance Helpline. We will:

- 1 Operate in accordance with all applicable legal requirements.
- 2 Submit for reimbursement only those claims for services that were (a) rendered; (b) medically necessary; and (c) appropriately documented.
- 3 Use billing codes that accurately describe the services provided when submitting claims for payment.
- 4 Not provide discounts on charges for health care services provided to patients other than discounts that are permitted under UnityPoint Health policies.
- 5 Comply with Medicare and Medicaid billing and claims guidelines.
- 6 Take immediate steps to alert management if inaccuracies are discovered in claims that have been submitted for payment and reimbursement.
- 7 Comply with all IRS codes and regulations governing tax exempt organizations generally requiring transactions to be arm's length, fair market value transactions. Refrain from activities that may generate private inurement (inappropriate benefit to individuals, such as providing below market interest rate loans to individuals, or paying physicians above market rates for services, or providing professional courtesy for hospital or physician services) and excess benefit (such as excessive compensation) issues.

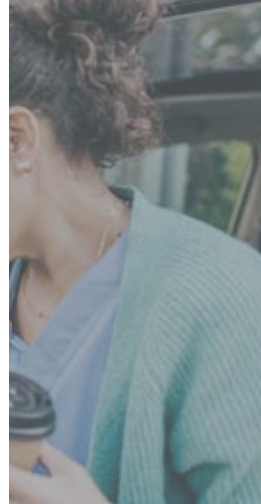
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- 8 Be truthful and straightforward in all advertising and marketing activities.
 - 9 Never make any false or intentionally misleading statements to a government agency or a payor.
 - 10 Ensure that all required company data, reports, and records are completely, accurately, and truthfully filed with appropriate agencies.
 - 11 Never solicit, receive, offer to give, or give anything of value to physicians, any health care provider or any other person for the referral of patients or services unless permitted by law and approved in advance by the UnityPoint Health Law Department.
 - 12 Abide by all Medicare fraud and abuse laws.
 - 13 Pursue business opportunities or relationships that meet our ethical standards and comply with applicable laws and regulations.
 - 14 Never accept or give bribes or kickbacks (i.e., cash or other consideration such as subsidies, discounts, medical directorships, supplies, or gifts) in connection with the referral of patients or acquisition of items for services unless permitted by law and approved in advance by the UnityPoint Health Law Department.
 - 15 Never take actions that violate federal or state antitrust laws or are otherwise contrary to the laws that govern competitive practices in the marketplace. Employees should never discuss price or market information with anyone outside of UnityPoint Health unless they first consult with the UnityPoint Health Law Department.
 - 16 Respect the rights and dignity of our employees and business partners. UnityPoint Health will not tolerate any form of abuse, harassment or intimidation in the workplace. Employees and business partners will be hired, promoted and compensated according to their qualifications, performance and potential. Harassment or illegal discrimination of any kind is unacceptable in our workplace.

SOCIAL MEDIA

UnityPoint Health employees are encouraged to visit and interact with UnityPoint Health's hosted social media sites. Social media may be used by UnityPoint Health employees subject to the restrictions set forth in Policy 2.HR.25, Social Media, which is available on the intranet. These restrictions are intended to ensure compliance with legal and regulatory restrictions, privacy and confidentiality agreements and UnityPoint Health's Values and Standards of Behavior.

Whether using social media networks for personal or professional reasons, employees and business partners need to follow guidelines for responsible and safe social media activities. Employees and business partners:

- › May not let social media activities interfere with work unless social media activities are part of your job duties.
- › May not provide unauthorized endorsements of people, products, or vendors on behalf of UnityPoint Health.
- › Should not initiate or accept friend requests with patients unless an in-person friendship pre-dates the treatment relationship.
- › May not use or disclose any patient identifiable information or protected health information of any kind on any social media sites without the express written permission of the patient. Even if an individual and/or patient is not identified by name within the information, if there is a reasonable basis to believe that the person could still be identified from that information, you may not disclose it.



- › May not use social media to speak on behalf of UnityPoint Health in an official capacity unless you have been officially designated as someone who can. Employees and business partners may not say or do anything that might reasonably create the impression that they are communicating on behalf of or as a representative of UnityPoint Health without the express permission of their manager, supervisor, UnityPoint Health Communications/Marketing Department and/or Human Resources Department.
- › The social media policy does not apply to content that is personal in nature to employees and business partners and non-business related to UnityPoint Health **except or unless** (1) the content is being accessed during an employee's working time or on UnityPoint Health equipment; or (2) it is obscene, defamatory, profane, threatening, libelous, or otherwise violates federal or state law (e.g., employment discrimination statutes) or our non-harassment policies and the content impacts UnityPoint Health.

BUSINESS ETHICS

Integrity is a key principle for the selection and retention of those who represent UnityPoint Health. Physicians, agents, representatives, business partners, and consultants must be informed of and comply with our policies and procedures. We will:

- 1 Make business decisions (a) in an objective, unbiased manner; (b) free from improper influence or inappropriate conflicts of interest; and (c) that are in the best interests of UnityPoint Health.
- 2 Not offer any bribes, kickbacks or other inducements to any governmental or political official in return for political favors.
- 3 Not offer or accept any bribes, kickbacks or inducements in connection with performing duties for UnityPoint Health.
- 4 Comply with all relevant government requirements regarding record, document, and data retention, including the confidentiality of medical records and other proprietary information. Never destroy any information that is the subject of a governmental investigation.
- 5 Maintain all company business data, records, and reports completely, accurately and truthfully.
- 6 Properly and responsibly handle and dispose of hazardous substances and infectious waste in accordance with applicable laws and regulations.
- 7 Report personal relationships, romantic or otherwise, between two UnityPoint Health workforce members to supervisors and the appropriate Human Resources department to avoid the appearance of or an actual conflict of interest.
- 8 Ensure that all controlled substances and pharmaceuticals are properly stored, secured and inventoried. Missing supplies or drugs should be promptly reported to management.
- 9 Conform to the standards of our professions and exercise reasonable judgment and objectivity in the performance of our duties.

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- 10 Treat all patients, employees and business partners fairly and with dignity and respect.
 - 11 Provide a safe and healthy work environment. We are all responsible for compliance with environmental, health and safety laws and regulations.
 - 12 Report suspected violations of any law, regulation, or policy to management. Retaliation against anyone who, in good faith, reports such violations will not be permitted.
 - 13 Immediately inform a supervisor or the UnityPoint Health Law Department about any investigation, lawsuit, or unusual request for information, especially if the contact occurs at home or after business hours. Do not respond to any subpoena or other such request for UnityPoint Health information without first obtaining the approval of the appropriate supervisor or the UnityPoint Health Law Department.

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Compliance is about people doing things right and doing the right things.

BUSINESS RELATIONSHIPS

We expect our employees and agents to pursue the best interests of UnityPoint Health and its affiliate hospitals, clinics, other related organizations, and the patients and communities we serve. We will not permit employees to engage in or pursue any personal interest that might conflict with the interests of UnityPoint Health. We will:

- 1 Not enter into any business arrangement on behalf of UnityPoint Health with any family member, or any organization with which a family member is associated or has an ownership interest, without first informing your supervisor of the relationship in writing, consulting with the Affiliate Compliance Officer or UnityPoint Health Chief Compliance Officer and, if requested, completing a Conflict of Interest Questionnaire.
- 2 Not use any information obtained as an employee or agent of UnityPoint Health for personal gain.
- 3 Accurately and truthfully present all statements, communications and representations to prospective partners or suppliers. All partners and suppliers will be treated uniformly and fairly.
- 4 Objectively and impartially weigh all facts and avoid the appearance of impropriety or favoritism when reviewing competing bids.
- 5 Not accept cash or cash equivalents from a non-UnityPoint Health person or entity.
- 6 Not accept from individuals, companies or representatives of companies having or seeking business relationships with UnityPoint Health, anything tangible (such as apparel or meals) if the value is more than \$100 per item or \$300 per year; or intangible items (like golfing fees or attendance at a special event) at reduced or no cost if the value is more than \$100. The receipt of these gifts or business courtesies must be reported to your supervisor and will be reviewed for appropriateness by management. Refer to UnityPoint Health Compliance Policy 1.CE.14, Gifts and Business Courtesies, which can be found on the intranet.

Note: UnityPoint Clinic (UPC) employees should consult UPC policies governing relationships with industry representatives. UPC may have different or additional requirements applicable in clinic space.

PROTECTION OF ASSETS

UnityPoint Health, its employees and its agents will protect company assets and not use such assets for personal gain. They will:

- 1 Be accountable for the proper expenditure of UnityPoint Health funds and for the proper use of its property.
- 2 Exercise reasonable judgment in the use of UnityPoint Health assets and funds relating to travel and entertainment expenses.
- 3 Use equipment in a safe manner and in conformance with operating instructions.
- 4 Protect the physical and intellectual property of UnityPoint Health and any assets entrusted to our care by others against loss, theft, destruction, misappropriation, and misuse.
- 5 Safeguard the property of employees, patients, and their visitors.
- 6 Dispose of surplus, obsolete, or unusable property only in accordance with established policies and procedures.
- 7 Never permit any unauthorized or inappropriate use of computer systems, software, office equipment, telephones, or other UnityPoint Health property.



RESPONSIBILITIES OF LEADERS

UnityPoint Health expects that its leaders will be models for others within the organization in exhibiting behavior and ethics that comply with the standards set forth for all UnityPoint Health employees. Leaders at UnityPoint Health include board members, senior executives, medical staff leaders, directors, managers, and supervisors. Leaders at UnityPoint Health will:

- 1 Lead change proactively.
- 2 Drive sustainable results by supporting and promoting financial viability through a culture of financial discipline and adoption of best practices in both critical patient care and business processes.
- 3 Use patient/customer-centered decision making and problem solving.
- 4 Be engaging and inspiring.
- 5 Manage talent and establish a working environment in which all workforce members are encouraged to raise concerns and contribute ideas to achieve the organization's goals.
- 6 Focus on the team.
- 7 Conduct professional activities with honesty, integrity, respect, fairness, and good faith in a manner that will reflect well on the organization.
- 8 Create a culture within the organization of high ethical standards.
- 9 Respect the importance of compliance with legal requirements.
- 10 Not permit any abuse of power that compromises our patients, or any other persons served.
- 11 Hold those who report to them accountable for any behavior that does not meet UnityPoint Health principles and standards.
- 12 Avoid improper exploitation of professional relationships for personal gain.
- 13 Properly disclose financial and other conflicts of interest.
- 14 Avoid participating in any activity that damages or demeans the credibility and reputation of UnityPoint Health in the communities it serves.
- 15 Demonstrate support and fiduciary duty for the organization's mission as a tax-exempt organization to provide community benefit through programs or activities that provide treatment and/or promote health and healing as a response to identified community needs.

MAKING THE RIGHT DECISION

Integrity, common sense, and sound judgment are your best guides in determining the appropriateness of behavior and necessary course of action. However, if you find yourself in a situation where you are unsure, ask yourself a few simple questions:

- 1 Are my actions legal?
- 2 Am I being fair and honest?
- 3 Is this in the best interest of UnityPoint Health and the patients we serve?
- 4 Will my action stand the test of time?
- 5 How will I feel about myself afterward?
- 6 How would my words and actions look if reported in the newspaper?
- 7 Will I sleep soundly tonight?
- 8 What would I tell my child to do?



You should carefully examine your conscience when you think or hear ...

- › It can't hurt just this once.
- › No one will ever find out.
- › No one will care.
- › It sounds too good to be true.
- › Everyone does it.
- › We can bury it.
- › No one will get hurt.
- › What's in it for me?
- › We never had this conversation.
- › You never heard me say that.

VIOLATION OF LAWS, REGULATIONS OR POLICY

UnityPoint Health attaches the utmost importance to obeying the law and behaving correctly. UnityPoint Health will take disciplinary action, up to and including termination of employment, against any employee or business partner who engages in, causes, tolerates or condones any form of illegal or unethical conduct. Disciplinary action likewise will be taken against any employee or business partner who negligently fails to detect illegal or unethical conduct, whether by action or inaction, or who fails to report known wrongdoing.

- 1 A federal law, the False Claims Act, provides serious penalties for health care providers who knowingly present a false or fraudulent claim to the government for payment, or knowingly use a false record or statement to get a claim paid by the government. Additionally, this law permits people to bring a claim against the provider, or wrongdoer, on behalf of the government. This law protects people who bring such a claim from discharge, demotion, suspension, threats, harassment, and discrimination. The person may be entitled to reinstatement with seniority, double back pay, interest on back pay, compensation for discriminatory treatment, reasonable attorneys' fees, and other litigation costs.
- 2 Under Iowa law, an intentional false statement or misrepresentation of a material fact or omission of a material fact in an application for payment of services or merchandise rendered by a health care provider participating in the state medical assistance program constitutes a fraudulent practice. Any fraudulent practice, regardless of the amount of money or value of property or services involved, violates state law.



- 3 Illinois law also stipulates liability for false health care claims made to a contractor, grantee, or other recipient if the state provides any portion of the money/property requested. The Whistleblower Reward and Protection Act applies in the same circumstances as the federal False Claims Act, with additional provisions that apply when a provider or individual knowingly takes adverse employment action against an employee for the disclosure of information reasonably believed to indicate a violation of state or federal law, rule or regulation; or when a provider or individual knowingly retaliates against an employee for the disclosure of information in court or during a hearing that is reasonably believed to indicate a violation of state or federal law, rule or regulation.
- 4 Similar to Iowa and Illinois, Wisconsin law also provides serious penalties for false claims against the Wisconsin Medicaid program, referred to as the Medical Assistance program, including knowingly presenting, or causing to be presented to the state a false claim for medical assistance, as well as knowingly making, using or causing to be made or used a false record or statement to obtain approval or payment of a false claim for medical assistance.

Protection for Reporting of Workplace Concerns

UnityPoint Health encourages employees and business partners to report any concerns about their work environment. Employee and business partners safety, patient safety, our health care operations, the employee or business partner's work area and safety, staffing, or other concerns related to safety or compliance are encouraged to be reported using the methods described under "Compliance Helpline" in this brochure.

No retaliation or disciplinary action of any kind will be taken against any employee for the good faith reporting of concerns about their work environment. If any retaliation occurs, that is a separate wrong, and the employee is requested to report the retaliation.

COMPLIANCE HELPLINE

UnityPoint Health will not take disciplinary action or otherwise retaliate against any employee or business partner who, in good faith, reports a concern to management either directly or through the Compliance Helpline. Any and all forms of retaliation are prohibited, regardless of the source or type of retaliation. Further, some federal laws impose strict criminal penalties upon entities or persons who illegally retaliate against those who, in good faith, report wrongdoing. "Good faith" means that you reasonably believe that wrongdoing may have occurred.

Employees are expected to report: (1) suspected illegal activity or fraud, waste and abuse; or (2) any retaliation for the reporting of suspected illegal activity or fraud, waste and abuse, through any of the following means:

- › Your local supervisor or management
- › Your local Compliance Officer
- › UnityPoint Health Compliance Officer: (515) 440-5100
- › Compliance Helpline: 1 (800) 548-8778 (anonymous reporting available)
- › [Web Reporting Tool](#) (anonymous reporting available) Access Code: UPHT

The Web Reporting Tool is operated by an independent, outside service that permits your report to be anonymous - that is, you do not need to identify yourself.

IOWA EMPLOYEES

Employees or business partners may also disclose information about suspected wrongdoing in the administration of a service contract to an Iowa state agency that is administering a service contract that is the subject of the report to the State of Iowa Office of Ombudsman at (515) 281-3592; to the Auditor of the State of Iowa at (515) 281-5834; or to the Iowa Attorney General at (515) 281-5164.

ILLINOIS EMPLOYEES

To report Medicaid fraud, abuse or neglect, Illinois employees may call 1 (888) 557-9503. To report health care abuse, Illinois employees may call the Department of Public Health at (800) 252-4343.

WISCONSIN EMPLOYEES

To report Medicaid fraud and abuse, Wisconsin employees or business partners may call the Department of Health and Human Services Office of Inspector General's fraud hotline at (877) 865-3432. To report health care fraud and abuse, Wisconsin employees or business partners may call the Wisconsin Department of Justice at (608) 266-1221.

No disciplinary or adverse employment action will be taken against any employee or business partner who makes such a report.

For more information about our compliance program or to view our compliance policies, visit our [intranet](#).

