



Penn Medicine
Lancaster General Health

Code of Conduct

*Doing the right thing,
the right way,
each and every time.*





Guided by what is right

Personal Integrity, one of Penn Medicine Lancaster General Health's five Values, requires us to be transparent, truthful, responsible and accountable for all we do. By being accountable every time, we reinforce our obligation to be "guided by what is right" in our interactions with patients, their families, our colleagues and our community.

Being accountable goes beyond providing high quality healthcare and superior service. It also governs our business dealings, helping us achieve our Mission. LG Health requires all of us to maintain a high level of ethics, as well as comply with the laws, rules and regulations that govern healthcare.

This booklet was designed to help you understand the principles and standards expected of employees, volunteers, vendors, medical staff members representing LG Health, residents, students, trustees and officers of all LG Health organizations.

Living our Personal Integrity Value does not mean we will never make mistakes. It does mean when we identify mistakes we will analyze how to do things better and change the organization accordingly – coming out stronger than before. It is our shared responsibilities to ask questions and raise concerns.

We are committed to identifying and investigating concerns of individuals who believe we may not be in compliance with our standards. The LG Health Corporate Compliance Program, including the Corporate Compliance Officer, is here to review and correct concerns.

Should you have any questions, please call the Compliance Office at 717-544-5866, the LG Health Compliance Hotline at 1-215-726-6759 or submit your question to the Compliance Office through the Compliance Ethicspoint Hotline website on the LG Health Intranet.

Together we can assure we are *guided by what is right*

Jan Bergen
President & Chief Executive Officer
Penn Medicine Lancaster General Health

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PURPOSE

The Lancaster General Health (LG Health) Board of Trustees has adopted a Compliance Program which requires all dealings of LG Health and its affiliates be conducted in a lawful and ethical manner. This Code of Conduct provides standards by which all Individuals (as defined below) should conduct themselves in order to protect and promote organization-wide integrity in achieving our mission.

INTRODUCTION

This Code of Conduct contains standards which are intended to provide guidance to all Individuals functioning as employees or agents of LG Health, its affiliates, and to vendors providing goods and services to LG Health. These standards do not supercede any existing LG Health policy. Rather, they are meant to: (i) establish policies and standards where none currently exist; and (ii) amplify existing policies and serve as summaries of their major points. This Code of Conduct will be distributed to all Individuals associated with LG Health. All Individuals are responsible to ensure that their actions are consistent with the Code of Conduct.

As used in this Code of Conduct, “LG Health” means Lancaster General Health, which includes Lancaster General Hospital and each of its divisions, subsidiaries, affiliates and operating and business units.

When acting on behalf of or as an agent of LG Health or its affiliates, “Individual” means each trustee, officer, employee, resident, student and Medical and Dental staff member. This is further defined in the LG Health Compliance Program policy.

The following standards are intended to provide guidance to Individuals to assist them in their obligation to comply with applicable laws. Individuals are required to comply with all applicable laws, whether or not specifically addressed in the Compliance Program Policy or this Code of Conduct. LG Health encourages all Individuals to seek advice from the Compliance Officer or the LG Health Legal Department if questions regarding the existence, interpretation or application of any law arise.

It is the policy of LG Health that all activities by or on behalf of the organization must be in compliance with all applicable laws and regulations.

OUR MISSION

The mission of Lancaster General Health is to advance the health and well being of the communities we serve.

OUR VISION

Lancaster General Health’s vision is to deliver on the promise of a healthier future.

OUR VALUES

Personal Integrity

Is demonstrated through being transparent, truthful, responsible and accountable for all we do.

Quality

Reflects our commitment to providing exceptional experiences and best possible outcomes for all.

Respect for the Individual

Requires that our behaviors and actions insure the dignity of those we serve.

Service

Reflects the giving of our talents and knowledge for the benefit of others.

Teamwork & Trust

Requires working together and trusting each other so we can achieve our goals.

ADMINISTRATION AND APPLICATION OF CODE OF CONDUCT

Responsibility to Report Violations

LG Health expects each Individual to whom this Code of Conduct applies to abide by the principles and standards set forth herein and to conduct the business and affairs of LG Health in a manner consistent with these statements and principles. *Each employee has an individual responsibility for reporting any activity by a colleague, physician, subcontractor, or vendor who appears to violate applicable laws, rules, regulations, or this Code of*

Conduct to their supervisor, manager, administration or the Compliance Officer. We expect all employees to cooperate with investigation efforts.

Retaliation Prohibited

LG Health will not tolerate retaliation in any form against an Individual acting in good faith to bring suspected Code of Conduct violations, or any other violations to the attention of management. Any Individual who feels they have been retaliated against should immediately contact the Compliance Officer. *(Please refer to the Non-Retaliation Policy for further guidance.)*

Violations

Failure to abide by this Code of Conduct, or the policies and procedures which the Code of Conduct represents, may lead to disciplinary action. In investigating alleged violations of the Code of Conduct, LG Health will weigh relevant facts and circumstances, including, but not limited to, the extent to which the behavior was contrary to the express language or general intent of the Code of Conduct, the egregiousness of the behavior, the Individual's history with the organization and other factors that LG Health deems relevant. Discipline for failure to abide by the Code of Conduct may, in accordance with LG Health's policies, range from verbal correction to termination. In the case of Medical and Dental staff members, disciplinary action may include contract termination *(where*

applicable), referral to the Medical and Dental Staff for action pursuant to the Medical and Dental Staff Bylaws, the Medical and Dental Staff Code of Conduct, or other action deemed appropriate by the Board of Trustees.

No Contract

While LG Health will generally attempt to communicate changes concurrent with or prior to the implementation of such changes, LG Health reserves the right to modify, amend or alter the Code of Conduct without notice. This Code of Conduct does not constitute an employment agreement, or a promise of employment for any specified terms and conditions.

PATIENT CARE

Patient's Rights

We treat all patients with respect and dignity, and provide care that is both necessary and appropriate. We make no distinction in the admission, treatment, transfer or discharge of patients based on race, color, national origin, sex, sexual preference, physical and/or mental disability, religious affiliation, creed, age, ability to pay or any other classification prohibited by law. Clinical care is based solely on identified patient healthcare need. *(Please refer to the General Admissions Policy for further guidance.)* Patients will be informed about the availability of the Patient's Bill of Rights and the Patient's Responsibilities to LG Health by signs posted in various key locations at Lancaster General Hospital including

Women & Babies Hospital. Copies of the Patient's Bill of Rights and the Patient's Responsibilities to LG Health will be given to patients or their families upon admission by the patient care unit. Ambulatory Services patients may request a copy from the department staff. Patients or their families who have questions about the content of the Patient's Bill of Rights and the Patient's Responsibilities to LG Health should be directed to the patient representative's office. *(Please refer to the Patient's Bill of Rights and Patient's Responsibility to the Hospital for further guidance.)*

We encourage patients' involvement in all aspects of their care and obtain informed consent for treatment. As applicable, each patient or patient representative is provided with a clear explanation of care including, but not limited to, diagnosis, treatment plan, right to refuse or accept care, care decision dilemmas, advanced directive options, estimates of treatment costs, organ donation and procurement, an explanation of the risks and benefits associated with available treatment options and discharge plans. Patients have the right to request and receive assistance in obtaining a consultation by another physician. This consultation will be obtained at the patient's expense. Patients have the right to request transfers to other facilities. In such cases, the patient will be given an explanation of the requirements and alternatives.

Patients are treated in a manner that preserves their dignity, autonomy, self-esteem, civil rights, and involvement in their own care. Compassion and care are part of our commitment to the community we serve. We strive to provide health education, health and wellness promotion, and illness-prevention programs as part of our efforts to improve the quality of life of our patients and our community.

Emergency Treatment

We comply with the Emergency Medical Treatment and Active Labor Act (“EMTALA”) by providing a medical screening exam by qualified personnel to all individuals who come to Lancaster General Hospital including Women & Babies Hospital seeking medical treatment, regardless of their ability to pay. Anyone who is determined to have an emergency medical condition will be provided stabilizing treatment within the capabilities of Lancaster General Hospital including Women & Babies Hospital. The medical screening exam and stabilizing treatment will not be delayed in order to collect financial or demographic information.

Patients will be transferred to another facility only if the patient’s medical needs cannot be met and appropriate care is knowingly available at another facility or at the patient’s request. Patients may be transferred only when another facility has accepted the patient, a physician certifies the benefits of transfer outweigh the risks of transfer, and the patient

agrees to the transfer. *(Please refer to Emergency Medical Treatment and Active Labor Act Compliance Policy, the Patient’s Bill of Rights, and Patient’s Responsibility to the Hospital for further guidance.)*

Medical Necessity

LG Health and its affiliates shall submit claims for payment to governmental, private or other payers only for those services or items that are medically necessary and appropriate.

When ordering or providing services or items, physicians (or other health care professionals authorized by law to order items or services) shall only order those services and items consistent with generally accepted medical standards for diagnosis or treatment of disease and are determined to be medically necessary and appropriate.

In some cases, a health care professional may determine that services are medically necessary or appropriate, but the patient’s health plan may not cover those services. In those cases, a patient should refer to his or her health plan administrator to receive information about the process for disallowed claims or covered benefits.

Confidentiality

Each Individual will maintain the confidentiality of patient and other confidential information in accordance with applicable legal and ethical standards.

Individuals may come into possession of and have access to a broad variety of confidential, sensitive and proprietary information. The inappropriate release of such information could be injurious to patients, other Individuals, LG Health's business partners and LG Health itself. All Individuals have the responsibility and obligation to actively protect and safeguard confidential, sensitive and proprietary information in a manner designed to prevent the unauthorized disclosure of information. Confidentiality requirements extend to the use and access of LG Health information services systems, including telephone and voice mail systems.

All medical information created in the course of clinical treatment by an LG Health affiliate is considered confidential. Medical records are maintained for the benefit of the patient, the physician, and the LG Health affiliate. The medical record should be safeguarded against loss, tampering and unauthorized disclosure or use. LG Health affiliates are legally and ethically obligated to protect the information contained within patient medical records. The release of medical records is to be coordinated through the Medical Record Services area of the Health Information Management Department, or other appropriate department depending upon the site of service. *(Please refer to the Safeguarding Confidential Information Policy and*

Use and Disclosure of Protected Health Information (PHI) for Patient Care Policy for further guidance.)

Patient Information

All Individuals have an obligation to maintain the confidentiality of patient information as required by all applicable laws and regulations. Individuals may not reveal any personal or confidential information concerning patients unless supported by legitimate business or patient care purposes. Information obtained as a participant in any educational or research program is only to be revealed as required by those programs. Individuals with access to patient information shall review and use that information only when required to carry out their job function. Requests for disclosures of the patient's designated record set will be directed to Medical Record Services. If questions arise regarding an obligation to maintain the confidentiality of information or the appropriateness of releasing information, Individuals should seek guidance from their manager, the manager of Medical Record Services, the Compliance Officer, the Privacy Officer or the LG Health Legal Department. *(Please refer to the Safeguarding Confidential Information Policy and Use and Disclosure of Protected Health Information (PHI) for Patient Care for further guidance.)*

EMPLOYEES RIGHTS AND RESPONSIBILITIES

No Sexual or Other Harassment

LG Health is committed to providing a work environment that is free of harassment. Actions, words, jokes or comments based on an Individual's sex, sexual preference, pregnancy, race, ethnic background, age, religion, disability, or any other legally-protected characteristic, or other abusive, harassing, intimidating behavior which would be offensive to a reasonable person will not be tolerated.

LG Health is committed to providing a safe and secure work environment. LG Health does not tolerate conduct which creates an intimidating, hostile or offensive work environment. This includes all types of threats, harassment, intimidation, and physical attacks. This prohibition applies to all persons, including, but not limited to patients, visitors, employees, volunteers, and subcontracted staff. Violations of this policy by any Individual while conducting business on LG Health property or on behalf of LG Health shall be considered misconduct and will lead to disciplinary and/or legal action as appropriate.

LG Health believes that anyone should feel free to report harassment of whatever nature at any time without fear of reprisal. Anyone who believes they are the victim of impermissible harassment, sexual or otherwise, or who has observed

another person subject to such harassment, is required to report the behavior promptly to their immediate supervisor, a member of the Human Resources Department, or the Compliance Officer. An unbiased third party will conduct an investigation of the complaint. *(Please refer to the Policy against Sexual and Other Harassment for further guidance.)*

Drug Free Workplace

LG Health is committed to maintaining a drug free workplace. The unlawful manufacture, distribution, dispensation, possession or use of a controlled substance is prohibited at any workplace or educational campus of LG Health. The unauthorized possession, use or distribution of alcoholic beverages on LG Health property or as part of any of its activities is also prohibited. *(Please refer to the Drug Free Workplace Policy for further guidance.)*

Electronic Media Services

LG Health maintains systems for and encourages the use of electronic media and associated services to make clinical care and business communications more efficient and effective. All communications must be consistent with conventional standards of ethical and proper conduct, behavior and manners. Electronic media and associated services are not to be used to access, create, forward or display any offensive or disruptive messages, including photographs, graphics and audio materials. LG Health

management reserves the right to monitor systems (*computers, e-mail, telephones, voice mail, fax, electronic bulletin boards, wire and wireless services, and on-line services*), and inspect files at any time to ensure appropriate use. The access codes and passwords assigned to protect the confidentiality of information on systems are not intended to protect individual privacy.

Individuals are responsible for maintaining the security of electronic media, including not revealing passwords or sharing access with others. Individuals must use only the access privileges they have been authorized to use. (*Please refer to the Electronic Media Services and Confidentiality Policy for further guidance.*)

Conflicts of Interest

Trustees, officers, committee members and employees owe a duty of undivided and unqualified loyalty to LG Health. Individuals holding such positions may not use their positions to profit personally or to assist others in profiting in any way at the expense of the organization. (*Please refer to the Conflict of Interest Policy, for further guidance.*)

In order to ascertain and evaluate actual or potential conflicts, certain individuals will be required to fill out a Conflict of Interest statement upon entering employment or becoming a trustee of LG Health or an affiliate. Others will be required to fill out such

a Statement on an annual basis. In addition to this requirement, all officers and trustees, regardless of whether or not they have filled out or have been asked to fill out a Conflict of Interest statement, have an ongoing affirmative duty to bring to the attention of LG Health, situations which may give rise to an actual or potential conflict of interest as described in this policy.

Any employee who is in doubt regarding whether a situation creates an actual or potential conflict should bring the situation to the attention of his or her manager, who will consult with the Human Resource Department or the Legal Services Department. In the case of officers and trustees, such situations should be brought to the attention of the Chairman of the Board, the Chief Executive Officer, or the General Counsel. When, in the opinion of LG Health, a conflict or an unacceptable perception of conflict has been identified, the individual will be expected to terminate the business relationship or practice giving rise to the conflict, sever their relationship with LG Health, or take such other action as may be recommended by LG Health.

Outside Financial Interest

While not all inclusive, the following will serve as a guide to the types of activities by Individuals, or household members of Individuals, which might cause actual conflicts of interest, the appearance of conflicts of interest,

or the appearance of impropriety. These potential conflicts should be disclosed, either on the annual Conflict of Interest Disclosure Statement and/or before participating in any discussion or decision as a manager or board member of LG Health. Any exceptions to the standards described below must be approved by an appropriate officer, board chairperson or committee.

Ownership in, employment by, or control of any outside organization that does business with LG Health. This does not apply to stock or other investments held in a publicly held corporation, provided the value of the stock or other investments does not exceed 5% of the corporation's stock. LG Health may, following a review of the relevant facts, permit ownership interest that exceed these amounts if management concludes such ownership interests will not adversely impact LG Health's business interest or the judgment of the Individual.

Representing LG Health in any transaction in which the Individual or a household member has a substantial personal interest.

Disclosure or use of confidential, proprietor or inside information of or about LG Health, particularly for personal profit or advantage of the Individual or a member of their household.

Competition with LG Health by an Individual, directly or indirectly, in the purchase, sale or ownership of property or property rights or interests, or business opportunities.

Solicitation of other employees, vendors or other Individuals for personal business or fund raising activities. Only solicitation/fundraising efforts approved by LG Health may be conducted on LG Health premises. Display of advertising media, distribution of literature or cards, or other promotion for personal business or fund raising is also prohibited. *(Please refer to the Solicitation, Distribution and Access Policy, for further guidance.)*

Transactions between a trustee (including an entity owned by or employing a director) and LG Health. Such transactions must be reviewed annually by an appropriate board committee.

Business Relationships

The selection of vendors for all products and services purchased by LG Health should be based on the criteria of superior quality, service, and price. These decisions may not be influenced, or be perceived to be influenced, by gifts, favors, or entertainment received from vendor representatives by those in a position to make selection recommendations of decisions.

The standards set forth below are intended to guide Individuals in determining the appropriateness of the listed activities or behaviors within the context of LG Health business relationships, including relationships with vendors, providers, contractors, third party payers, and government entities. It is the intent of LG Health, that this policy be construed broadly to avoid even the appearance of improper activity. If there is any doubt or concern about whether specific conduct or activities are ethical or otherwise appropriate, you should contact your supervisor, the Compliance Officer, or the LG Health Legal Department.

Gifts, Gratuities, and Entertainment

It is LG Health's desire to at all times preserve and protect its reputation and to avoid the appearance of impropriety. Consequently, all gifts and entertainment that exceed standard business courtesy, such as travel expenses, accommodations, excessive meals or entertainment, are prohibited. *(Please refer to the Vendor Relationships Policy for further guidance.)* In any situation where an Individual is unsure of the appropriateness of accepting a specific gift or invitation for entertainment, it is the Individual's responsibility to disclose the gift or entertainment, or offer of a gift or entertainment, to their supervisor for approval.

Gifts from Patients

Individuals are prohibited from soliciting tips, personal gratuities or gifts from patients, and from accepting monetary tips or gratuities. Individuals may accept gifts of a nominal value from patients and families of patients, such as baked goods. If a patient or family member wishes to present a monetary gift, he/she should be referred to LG Health Development Office or the appropriate business unit development office. *(Please refer to the Gratuities Policy for further guidance.)*

Gifts to Physicians

The giving of gifts to physicians on the Lancaster General Hospital Medical and Dental Staff by LG Health or their employees may be perceived as unduly influencing the referral patterns of the physicians resulting in over utilization of health care services. The value of gifts or other non-monetary compensation received are subject to a maximum annual amount established by federal regulations. *(Please refer to the Gifts to Physicians policy for further guidance.)*

Gifts Influencing Decision-making

Individuals shall not accept gifts, favors, services, entertainment or other things of value to the extent that decision-making or actions affecting LG Health might be influenced or reasonably perceived to be influenced. In addition, the appearance of impropriety must

always be avoided. Similarly, the offer or giving of 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 by LG Health is absolutely prohibited. Any such conduct must be reported immediately to the Compliance Officer or the LG Health Legal Department.

Gifts and Entertainment from Existing Vendors

In general, gifts from Vendors are not to be encouraged or solicited. In addition, gifts offered by Vendors in excess of a nominal value or in excess of common business courtesies may not be accepted. Entertainment in excess of standard business courtesies should not be accepted, and even where entertainment is appropriate, should not be repetitive. The cost to the Vendor of such an event must be reasonable and appropriate. Employees are to use reasonable judgment in deciding the appropriateness of gifts and entertainment. Furthermore, entertainment not directly associated with a valid business purpose or charitable event should not be accepted. The receipt of gifts and entertainment is to be disclosed to the employee's Vice-President or next level of management, and on the annual Conflict of Interest Disclosure Statement when applicable.

Cash and Cash Equivalents

Acceptance of cash (or cash equivalents such as gift certificates) from Vendors for any purpose is prohibited. Vendors who wish to make "contributions" are to be directed to the Lancaster General Health Development Office. Any contributions accepted by the Lancaster General Health Development Office will be acknowledged as not being in exchange for any promise of current or future business.

Vendor Sponsored Conferences

Informational presentations, seminars, and discussions by industry representatives (*or others speaking on behalf of a Vendor*) may provide valuable scientific and educational benefits. In connection with such presentations, seminars, or discussions, occasional meals may be offered so long as they: (i) are modest as judged by local standards; (ii) occur in a venue and manner conducive to informational communication; and (iii) provide scientific or educational value. Inclusion of spouses or other guests paid for in any way by the Vendor is not appropriate. Employees may not accept airfare or lodging paid by a Vendor to attend a conference or seminar. If the conference or seminar presents legitimate continuing education, scientific or other educational opportunity, such expense may be paid by LG Health after the normal approval processes are complete.

Nothing in this policy shall prohibit a business unit or supervisor from establishing stricter rules relating to the acceptance of gifts, gratuities or other things of value from vendors.

Services for Competitors/Vendors

No Individual shall perform work or render services for any competitor of LG Health or for any organization with which LG Health does business or which seeks to do business with LG Health outside of the normal course of his/her employment with LG Health without the approval of an officer of LG Health. In addition, no Individual shall be a director, officer, or consultant of such an organization, nor permit his/her name to be used in any fashion that would tend to indicate a business connection with such organization without the approval of an officer of LG Health.

Honoraria

Employees are, with permission of their supervisor, encouraged to participate as faculty and speakers at educational programs and functions. However, any honoraria in excess of one hundred dollars (\$100) shall be turned over to LG Health unless the employee used paid time off to attend the program or that portion of the program for which the honoraria is paid.

Workshops, Seminars and Training Sessions

Attendance at local, vendor-sponsored workshops, seminars and training sessions for leased or

purchased products is permitted. Individuals should not solicit or receive money to attend workshops, seminars or training sessions that are provided for continuing education credits.

Travel and Entertainment

Travel and entertainment expenses should be consistent with the Individuals' responsibility and the organization's needs and resources. It is LG Health's policy that an employee should neither suffer a financial loss nor receive a financial benefit as a result of business travel and entertainment. Individuals are expected to exercise reasonable judgment in the use of LG Health's funds and to spend them as carefully as they would spend their own. Individuals must also comply with LG Health policies relating to travel and entertainment expense documentation and reimbursement. *(Please refer to the Reimbursement of Business Expenses for further guidance.)*

Contracting

Individuals may not utilize "insider" information for any business activity conducted by or on behalf of LG Health to the detriment of LG Health. All business relations with contractors must be conducted at arm's length both in fact and in appearance, and in compliance with LG Health policies and procedures. Individuals must disclose personal relationships and business activities with contractor personnel which may be construed by

an impartial observer as influencing the Individuals' performance or duties. Individuals have a responsibility to obtain clarification from management on questionable issues, and to comply, where applicable, with the LG Health Conflict of Interest Policy.

Business Inducements

Individuals shall not seek to gain any advantage through the improper use of payments, excessive business courtesies 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 inducements provided they are approved by LG Health management 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 whom the original agreement or invoice was made or issued. Such payments may not be made to Individuals or agents of business entities.

In addition, Individuals may provide gifts, entertainment and meals of nominal value to LG Health customers, current and prospective business partners and other people when such activities have a legitimate business purpose and are reasonable and consistent with all applicable

laws, and consistent with common business courtesies.

Interactions with Physicians

Federal and State laws and regulations govern the relationship between hospitals and physicians who may refer patients to the facilities. The applicable federal laws include the Anti-Kickback Law and Stark Laws. It is important that those Individuals who interact with physicians, particularly regarding making payments to physicians for services rendered, leasing space, recruiting physicians to the community, and arranging for physicians to serve in leadership positions in facilities, are aware of the requirements of the laws, regulations and policies that address relationships between facilities and physicians.

Any business arrangement with a physician must be structured to ensure compliance with legal requirements, our policies and procedures and with any operational guidance that has been issued. Most arrangements must be in writing and approved by the Legal Department.

Participation on a Board of Directors/Trustees

An employee must obtain approval from his or her Vice President prior to serving as a member of the board of trustees of any organization whose interests may conflict with those of LG Health.

An employee who is asked or seeks to serve on the board of trustees for any organization whose interest would not impact LG Health (*for example, civic (non-government), charitable, and fraternal organizations*) will not be required to obtain such approval, provided that the time commitment is outside of normal working hours. Approval of the employee's manager must be obtained prior to accepting a commitment that requires a time commitment during normal work hours of the employee.

All fees/compensation (*other than reimbursement for expenses arising from board participation*) that are received for board services provided during an employee's normal work time should be paid directly to LG Health.

LG Health retains the right to prohibit an employee's membership on any board of trustees, where such membership might conflict with the best interest of LG Health, or the organization is in direct competition with LG Health.

Lobbying and Political Activity

All Individuals must refrain from engaging in any activity that could jeopardize the tax-exempt status of LG Health or any affiliate, including a variety of lobbying and political activities. It is important to separate personal and corporate political activities to comply with the appropriate rules and regulations relating to lobbying or attempting to

influence government officials. The following guidelines apply:

- No Individual may agree to contribute any money, property, or services of any officer or employee at LG Health's expense or on behalf of LG Health to any political candidate, party, organization, committee or person.
- Individuals may personally participate in and contribute their own funds to political organizations or campaigns, provided it is clear that they are not acting as an agent of or on behalf of LG Health.
- Where its experience may be helpful, LG Health may publicly offer recommendations concerning legislation or regulations being considered. In addition, it may analyze and take public position on issues that have a relationship to the operations of LG Health when LG Health's experience contributes to the understanding of such issues.

LG Health has many contacts and dealings with governmental bodies and officials. All such contacts and transactions shall 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 absolutely prohibited. Any requests or demands by any governmental representative for any improper benefit should

be immediately reported to the Compliance Officer or the LG Health Legal Department.

Protection of Assets

All Individuals will strive to preserve and protect LG Health's assets by making prudent and effective use of LG Health resources and properly and accurately reporting its financial condition.

The standards set forth below are intended to guide Individuals by articulating LG Health's expectation as they relate to activities or behaviors which may impact LG Health's financial health or which reflect a reasonable and appropriate use of the assets of a not-for-profit entity.

ORGANIZATIONAL RESPONSIBILITIES

Business Ethics

As part of LG Health's commitment to the highest standards of business ethics and integrity, Individuals will accurately and honestly represent LG Health in all business dealings, and will not engage in any activity intended to defraud any person, organization or governmental entity of money, property or honest services.

The standards set forth below are designed to provide guidance to ensure that LG Health's business activities consistently reflect high standards of business ethics and integrity. Conduct not specifically addressed by these standards must be consistent with legal and compliance as discussed above.

Honest Communication

LG Health requires candor and honesty from Individuals in the performance of their responsibilities. No Individual shall knowingly make false or misleading statements to any patient, payor, vendor, person or other entity doing business with LG Health.

We will be forthright in dealing with any billing inquires. Requests for information will be answered with complete, factual and accurate information. We will cooperate with and be courteous to all government inspectors and provide them with the information to which they are entitled during an inspection.

During a government inspection, we will never conceal, destroy, or alter any documents, lie, or make misleading statements to the government representative. We will not attempt to cause another colleague to fail to provide accurate information or obstruct, mislead, or delay the communication of information of records relating to a possible violation of law.

No Discrimination

LG Health believes that the fair and equitable treatment of employees, patients and other people is critical to fulfilling its mission and goals. LG Health is committed to providing equal employment opportunity and a work environment where each employee is treated with fairness, dignity and respect.

It is the policy of LG Health to treat patients without regard to their race, color, national origin, sex, sexual preference, physician and/or mental disability, religious affiliation, creed, age, ability to pay or any other classification prohibited by law.

It is the policy of LG Health to provide equal opportunity to all employees and applicants for employment without regard to race, color, religious creed, ancestry, age, sex, sexual orientation, national origin or non-job related handicap or disability or the use of a guide or support animal because of blindness, deafness or physical handicap. *(Please refer to the Equal Employment Opportunity Policy for further guidance.)*

Fraud and Abuse

LG Health requires all Individuals to refrain from conduct that may violate the fraud and abuse laws or the False Claims Act. In general, these laws prohibit: (1) direct, indirect or disguised payments (whether in the form of cash or any other benefit of value) in exchange for or to reward the referral of patients; (2) the submission of 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 rendered, or claims that do not otherwise comply with applicable program or contractual requirements; and (3) making false representations to any person or entity in order

to gain or retain participation in a program or to obtain payment for any service. Any billing errors discovered will be corrected and any improper or inaccurate payments will be refunded or resubmitted promptly, and, if necessary, we will clarify procedures and educate employees to prevent or minimize recurrence of those errors.

LG Health stresses complete compliance with these laws to prevent fraud, abuse, and waste. Violations of these laws may result in significant fines and penalties levied against LG Health. Therefore, Individuals should be aware of LG Health's False Claims Act Compliance Policy. *(See also Billing for Services Rendered Section.)*

Billing for Services Rendered

It is the policy of LG Health that bills submitted to patients and their third party payers for services rendered be complete and accurate. Specifically, all billing shall be submitted in accordance with the terms and conditions of any contract between LG Health and the payor, or in the case of Medicare and Medical Assistance or other governmental payers in accordance with applicable program rules. Supporting documentation must be prepared for all services rendered. All patients shall be consistently and uniformly charged. Discounts will be appropriately reported and items and services consistently described so that comparability can be established among payers. Any billing errors that

are discovered must be corrected promptly, and any improper or inaccurate payments will be refunded or resubmitted, and, if necessary, LG Health will clarify procedures and educate employees to prevent or minimize recurrence of those errors.

All Individuals have a responsibility to ensure that LG Health is in compliance with all applicable laws relating to proper billing. As a result, any Individual who believes a department of LG Health has incorrectly billed or submitted a false claim shall report this in one of the following ways:

- Contact the manager of the department which incorrectly billed or submitted the false claim.
- Contact the Compliance Officer or Compliance Department at 717-544-5866.
- Contact the Compliance Hotline at 1-215-726-6759. The Hotline allows the caller to remain anonymous if the caller chooses.
- Access LG Health's AlertLine website from the LG Health Intranet site under "Share Your Experience." This website allows the Individual to remain anonymous if he or she so chooses.

Any Individual who reports a potentially incorrect bill or false claim shall be protected by federal and state whistleblower protection laws and LG Health's Non-Retaliation

policy. No Individual may be disciplined, terminated, or have any other adverse action taken as a result of reporting a potential incorrect bill or false claim.

The LG Health Compliance Department will investigate all reports to ensure that LG Health is complying with all applicable laws.

For more information regarding the False Claims Act and LG Health's commitment to preventing fraud, abuse, and waste *please see the False Claims Act Compliance Policy on LG Health's intranet.*

Cost Report

Our business involves reimbursement under government programs that require the submission of certain reports of our costs of operation. We will comply with Federal and State laws relating to all cost reports. These laws and regulations define what costs are allowable and outline the appropriate methodologies to claim reimbursement for the cost of services provided to program beneficiaries. Any cost report preparation or submission errors and mistakes will be promptly corrected and, if necessary, we will clarify procedures and educate employees to prevent or minimize recurrence of those errors. Given the complexity, all issues related to the completion and settlement of cost reports must be communicated through or coordinated by the Vice President of Finance, or his or her designee.

Internal Control

LG Health has established control standards and procedures to ensure that assets are protected and properly used, and the financial records and reports are accurate and reliable. All Individuals share the responsibility for maintaining and complying with required internal controls and procedures.

Financial Reporting

All financial reports, accounting records, research reports, expense accounts, payroll records and other documents must accurately and clearly represent the relevant facts or the true nature of a transaction. Improper or fraudulent accounting, documentation or financial reporting is contrary to the policy of LG Health and may be a violation of applicable laws.

Record Retention

LG Health is required to maintain certain medical, financial, legal and operational records. The retention requirements for some of these records are established according to state, federal or accrediting agency guidelines. Other retention requirements are determined according to the operational requirements of LG Health. *(Please refer to the Retention of Hospital Records Policy for further guidance.)*

Antitrust

Individuals must comply with applicable antitrust and similar laws which regulate competition.

Examples of conduct prohibited by these laws include: (1) agreements to fix prices, bid rigging, and collusion (including inappropriate price sharing) with competitors; (2) boycotts, certain exclusive dealing and price discrimination agreements; and (3) unfair trade practices including bribery, misappropriation of trade secrets, deception, intimidation and similar unfair practices. In general, Individuals are to avoid discussing sensitive topics with competitors or suppliers, including information on pricing or reimbursement for services. Individuals are expected to seek advice from the LG Health Legal Department when concerned that a business decision involves a risk of violation of antitrust laws. Individuals must not provide any information in response to oral or written inquiry concerning an antitrust matter without first consulting the LG Health Legal Department.

Interactions with Physicians

Federal and State laws and regulations govern the relationship between hospitals and physicians who may refer patients to the facilities. The applicable federal laws include the Anti-Kickback Law and Stark Laws. It is important that those Individuals who interact with physicians, particularly regarding making payments to physicians for services rendered, leasing space, recruiting physicians to the community, and arranging for physicians to serve in leadership positions in facilities, are aware

of the requirements of the laws, regulations and policies that address relationships between facilities and physicians.

Any business arrangement with a physician must be structured to ensure compliance with legal requirements, our policies and procedures and with any operational guidance that has been issued. Most arrangements must be in writing and approved by the Legal Department.

Tax Exempt Status

LG Health and many of its affiliates are organized as not-for-profit corporations, and are exempt from state and federal taxation as charitable institutions. As not-for-profit, tax exempt entities, LG Health and these affiliates have a legal and ethical obligation to act in compliance with applicable laws, to engage only in activities in furtherance of their charitable purposes, and to use their resources in a manner that furthers the public good, not the private or personal interests of any person or entity other than LG Health or its affiliates. Any profits earned are reinvested to further the charitable mission of the LG Health related organizations. Consequently, LG Health and these affiliates will avoid compensation arrangements that may be construed as creating a private inurement, will accurately report payments to appropriate taxing authorities, and will file all tax and information returns in a manner consistent with applicable laws.

Ineligible Persons

LG Health does not contract with, employ, or bill for services rendered by an individual or entity that is excluded or ineligible to participate in Federal Healthcare programs; suspended or debarred from Federal government contracts; or has been convicted of a criminal offense related to the provision of healthcare items or services and has not been reinstated in a Federal healthcare program after a period of exclusion, suspension, debarment, or ineligibility.

Individuals, vendors and privileged practitioners are required to report to us if they become excluded, suspended, debarred, or ineligible to participate in Federal healthcare programs; or have been convicted of a criminal offense related to the provision of healthcare items or services.

Research Participation

All medical research projects must be approved in advance by the performing Affiliate's Institutional Review Board. Any approved project will be conducted in accordance with all applicable rules and regulations, as well as general standards of medical research. Patients to be enrolled in research studies will provide informed consent prior to being enrolled in the project. Disclosure to patients will include the fact that the proposed treatment is a research project, as well as any potential dangers of the project. No undue pressure will be placed on a patient or family of a

patient to influence the decision to participate in any research project. *(Please refer to the Research Project Policy and the Patient's Responsibilities to the Hospital Policy for further guidance.)*

Misconduct in Science

Scientific misconduct means fabrication, falsification, plagiarism, or other practices that seriously deviate from those commonly accepted within the scientific community for proposing, conducting, or reporting research. Scientific misconduct does not include honest error or honest differences in interpretations or judgments of data. LG Health will promptly inquire into, investigate, and correct all incidents of scientific misconduct in connection with any research activity conducted at LG Health. LG Health will report any confirmed scientific misconduct to the appropriate funding and/or governing agency, and will take appropriate disciplinary measures against offenders. *(Please refer to the Procedure for Dealing with and Reporting Possible Misconduct in Science Policy for further guidance.)*

Advertising/Marketing

LG Health's advertising and marketing practices are used to advance the goals and objectives of LG Health, as well as to support its mission. They are tools to communicate, in a meaningful way, the scope and quality of health and wellness services we provide and the manner in which services may be accessed.

Advertising is also to be used by LG Health to educate the public, to report to the community, to recruit employees, and to increase support for LG Health. It is LG Health's intent that its advertising and marketing be truthful, fair, accurate, complete, and sensitive to the health care needs of the community.

Proprietary Information

Information, ideas and intellectual property assets of LG Health are important to organizational success. Information pertaining to LG Health's competitive position or business strategies, payment and reimbursement information, and information relating to negotiations with employees or third parties must be protected and shared only with Individuals having a need to know such information in order to perform their responsibilities. Individuals should exercise care such that intellectual property rights, including patents, trademarks, copyrights and software are carefully maintained and managed to preserve and protect their value.

Individuals associated with LG Health shall not misappropriate confidential or proprietary information belonging to another person or entity nor utilize any publication, document, computer program, information or product in violation of a third party's interest in such product. All Individuals are responsible to ensure they do not improperly copy for their own use, documents or computer software

in violation of applicable copyright laws, patents, trademarks or licensing agreements. *(Please refer to the Installing and Copying of Computer Software Policy, for further guidance.)*

Environmental

It is the policy of LG Health to manage and operate its business in a manner that respects our environment and conserves natural resources. LG Health will strive to utilize resources appropriately and efficiently, to recycle whenever possible, dispose of all waste in accordance with applicable laws and regulations, and work cooperatively with the appropriate authorities to remedy any environmental contamination for which LG Health may be responsible.

It is important to understand how job duties may impact the environment. We will adhere to all requirements for the proper handling of hazardous materials. You should immediately alert your supervisor to any situation regarding the discharge of a hazardous substance, improper disposal of medical waste, or any situation that may be potentially damaging to environment. *(Please refer to the Waste Management and the Hazardous Substance and Spill Procedures and Practices Policy for further guidance.)*

Personnel Actions/Decision

Salary, benefit and other personal information relating to employees is treated as confidential information. Personnel files, payroll information, disciplinary matters and similar information must be maintained in a manner designed to ensure confidentiality in accordance with applicable laws and LG Health policies. Individuals will exercise due care to prevent the release or sharing of information beyond those persons who require such information to fulfill their job function.

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Lancaster, PA 17604-3555
717-544-5511
LancasterGeneralHealth.org

LG Health Compliance Officer
717-544-5866

LG Health EthicsPoint Hotline
1-215-726-6759

EthicsPoint Weblink
Penn Medicine LG Health
upenn.edu/215pcomply