

CODE OF CONDUCT



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The DCH Health System has a comprehensive Ethics and Compliance Program based on our core values of Compassion, Accountability, Respect, and Engagement. These four values are the cornerstone of our organizational culture. They have helped DCH earn the trust of our community for almost one hundred years. This history of trust has been built on a foundation of ethics and integrity; therefore, it is paramount that our daily decisions continue to be rooted in ethical principles and conduct.

This Code of Conduct is designed to provide our team members (DCH Board of Directors, employees, physicians, volunteers, vendors, etc.) with general guidance on the ethical principles that are necessary for DCH to be successful in its mission "to improve the health of our patients and community" and our vision "to be the provider of choice in our market by delivering excellent care to patients and families in West Alabama."

While the Code of Conduct provides detailed business conduct policies for which strict adherence is expected, it is not designed to provide a specific course of action for every ethical decision encountered by our team. Rather, the Code is intended to support our team members in their commitment to business integrity, ethical behavior, and generally "doing the right thing."



Katrina Rose Keefer
President/CEO

If you have questions about the Code of Conduct or encounter a situation that you believe violates any provision of this Code, please reach out to your supervisor, human resources, or the compliance officer. You may also utilize the anonymous Compliance and Ethics Hotline by calling 1-877-847-4324. DCH has a very strict non-retaliation policy, and there will be no retribution for asking questions or raising concerns about the Code or for reporting, in good faith, potential violations of the Code.

We expect that everyone read and understand this Code, as ethical practices are everyone's responsibility. We appreciate everyone's participation in helping DCH continue to maintain the highest standards of ethical conduct.

Sincerely,

Katrina Rose Keefer
President/CEO



INTRODUCTION

DCH, in and of itself, is a brick-and-mortar building. Its life, character, and reputation come from the people who provide patient care, support providers of patient care and deliver services, products, and materials to DCH. It is those services and relationships that result in the DCH Culture. The DCH Mission, Vision, and Values (MVV) serve as a guiding light to the type of healthcare organization we desire to be and that our community deserves (Table 1). High-quality patient care and outcomes are our objectives. Doing that with integrity and ethical behavior is also vitally important to DCH's MVV.

As an organization, DCH strives to remain fully compliant with all applicable rules and regulations governing the health care industry. In addition, DCH has an ethical responsibility to patients and the community to maintain a culture that encourages ethical behavior in patient care and business practices.

(TABLE 1. DCH' MVV)

MISSION

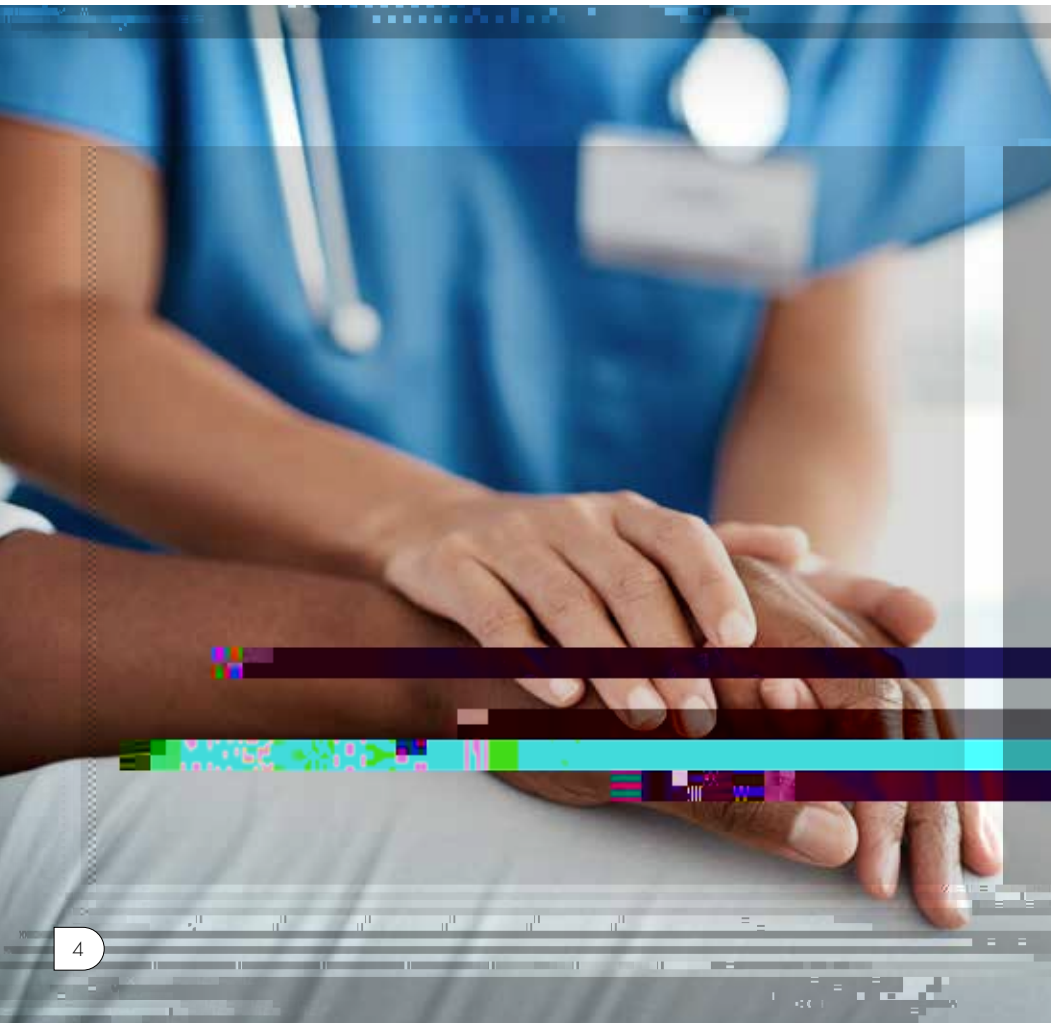
We serve to improve the health of our patients and community.

VISION

To be the provider of choice in West Alabama by delivering excellent care.

VALUES

- Compassionate
- Accountable
- Respectful
- Engaged





Compliance Department

The Compliance Department's DCH page on the intranet includes more information about the Compliance Department, the compliance program, and related educational materials. It also has links to many other compliance resources. Additionally, the Compliance Department is available to assist you with any questions or concerns about any laws, rules, or regulations that apply to DCH.

Written Guidelines

DCH policies and procedures, along with this Code of Conduct, provide guidance on performing job responsibilities ethically and legally. As DCH team members, it is your responsibility to become familiar with and follow the policies and procedures that govern the workplace.

Therefore, all DCH team members are encouraged to review these policies and procedures to remain up-to-date with current guidelines.

Training

DCH has developed training programs to provide information about:

- Our compliance program
- Federal and state false claims acts
- Anti-Kickback statutes
- Fraud and abuse
- Patient privacy protections

- Emergency Medical Treatment and Active Labor Act (EMTALA)
- Theft of drugs
- Other topics that relate to operating an effective compliance program

Monitoring

Internal and external monitoring systems allow DCH to assess how our guidelines and training programs address compliance concerns. The information gained through monitoring is used to improve operations.

Ethics is the Foundation of an Effective Compliance Program

Some ethical situations are black and white. For example, if a particular action would be considered illegal, a team member should avoid it. For example, a team member should avoid using false information to obtain a contract or labor law.

Honesty and integrity are core values of DCH. The need to make ethical decisions is essential as we interact with patients, physicians, and co-workers. It's not only the right thing to do; it's necessary for success. Our Code of Conduct provides direction to all DCH team members. It assists us in carrying out our daily activities ethically and legally.

The Code of Conduct applies to every DCH employee, regardless of their role. The Code and its guidelines also apply to all non-employees who work on behalf of DCH. These include members of the DCH Board of Directors, physicians, contractors, vendors, volunteers, and other health care professionals connected to us or doing business in our facilities.

PERSONAL ACCOUNTABILITY

We are personally responsible for our decisions and actions. Doing right is your responsibility. No one has the power to tell you to do anything unethical or illegal. However, we must behave in ways that maintain or improve DCH's reputation for honesty and integrity. Because of this, we must understand the laws, policies, and contractual agreements that apply to DCH.

DCH defines "acceptable behavior" as ethical, legal behavior and supports policies, procedures, and the Code of Conduct. It demonstrates a commitment to our patients and other customers by providing excellent service.

Code of Conduct

As a team member, it is your responsibility to tell your leader and Human Resources if you are arrested or convicted of a crime. Also, if you become ineligible to participate in federal health care programs or are

WHO ARE DCH'S CUSTOMERS

At DCH patients, family members, guests, coworkers, physicians, and volunteers are considered customers.

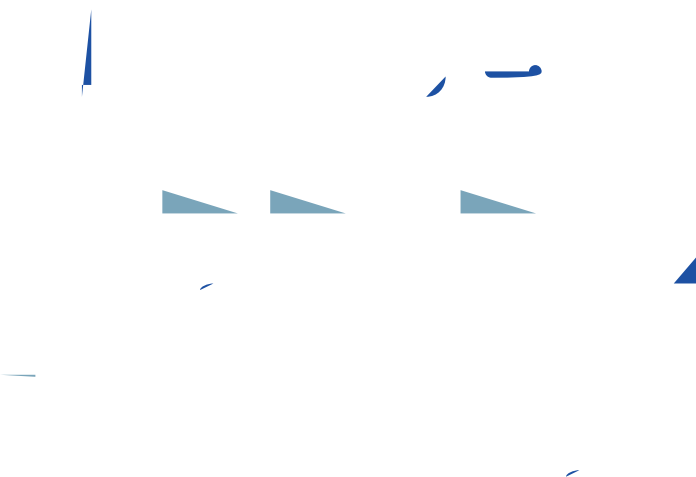
convicted of a crime that could cause you to become ineligible, you must inform the Human Resources Department or the Compliance Department.

Behavior that interferes with patient care or the course of business is disruptive and will be addressed according to policy and procedure or through the appropriate medical staff committee.

LEADERSHIP RESPONSIBILITIES

While all DCH team members must follow these guidelines, each DCH leader must be an example for others in the organization. It is expected that all leaders be open and willing to discuss ethics and compliance related concerns with their respective team members. The work environment should be structured to where team members feel comfortable raising and discussing such concerns. Leaders also owe it to their team members to hold each team member accountable in a fair and consistent manner, which includes enforcing discipline consistently.





The mission of DCH is: *W*orking *m*ore closely with our patients and communities to improve their health. The following standards help us in our goal to achieve “best practices” in clinical outcomes and support our commitment to provide high-quality patient care.

QUALITY OF CARE



- Personal privacy and confidentiality of their protected health information.
- Compliance with a request to transfer to another health care facility. In such circumstances, the patient is provided with an explanation of the associated risks, benefits, and alternatives.

EMERGENCY MEDICAL TREATMENT AND ACTIVE LABOR ACT (EMTALA)

DCH is committed to providing emergency medical treatment regardless of the patient's ability to pay. EMTALA applies to any patient who (1) comes to DCH seeking emergency treatment (2) has emergency treatment requested on his/her behalf or (3) is reasonably believed to be in need of emergency treatment. Patients in any of these categories will be given a medical screening examination. If an emergency medical condition is found to exist, the patient will be stabilized and treated within the capabilities of DCH. If the patient needs treatment that is beyond the capabilities or resources of DCH, the patient

will be transferred to a facility that can provide the level of care needed. The transfer will occur after the patient is stabilized as much as possible and another facility accepts the patient.

A patient may also be transferred at the request of the patient or his/her next of kin if an appropriate facility accepts the patient.

Patient registration can take place at any time during the patient encounter. However, this process may not delay the patient's evaluation, stabilization and/or treatment and may not discourage the patient from receiving treatment. Therefore, the discussion of financial matters prior to the time that DCH's EMTALA obligations have been discharged is strongly discouraged.

The immediate needs of the patient always come first.



We strive to improve the services provided to our patients and other customers. We are entrusted to provide excellent care and service to our patients every day. We are committed to treating each other and our patients with respect and dignity. We demonstrate these commitments when we live out the following standards.

CARE AND COMPASSION

Care is at the heart of what we do. We must treat our patients equally and with compassion, understanding, and respect. We never treat anyone differently because of race, ethnicity, religion, gender, gender identity, sexual orientation, national origin, age, disability, or veteran status. We involve them in decisions about their care. We obtain their consent for treatment and participation in research and explain available options. We never conduct medical procedures unless they support good medical practices.

PATIENT COMMUNICATION

Our patients have the right to know the name and qualifications of all team members who provide services for them. We offer various resources to our patients and their families to educate them about their illness and treatment plan. We encourage patients to share any concerns with us. We use this information to improve patient care and customer satisfaction.

PRIVACY AND SECURITY

We respect our patients by protecting their privacy and personal information. We recognize that we hold sensitive information about our patients, and they expect the information to be kept confidential.

We have physical and procedural safeguards in place to protect their information. At registration, we provide patients the “Notice of Privacy Practices” that details their rights and responsibilities regarding their medical information.

In alignment with HIPAA (Health Insurance Portability and Accountability Act) standards, DCH will only disclose patient-specific information to others for treatment, payment, or health care operations unless patient consent is obtained to release for other purposes. In addition, no DCH team member or other health care partner has a right to access or disclose any patient information other than what is necessary to perform their job responsibilities (minimum necessary standard).

GUIDING PRINCIPLES OF INFORMATION PRIVACY AND SECURITY

The following list of safeguards serves as boundaries to protect personal health information.

- We comply with all DCH policies and procedures relating to patient privacy and security.
- We safeguard confidential information from misuse, theft, or unauthorized access.
- We use reasonable steps to ensure unauthorized individuals do not overhear or see confidential information. We do not discuss confidential information in public areas.
- We do not access confidential information without a work-related need. All patient information is confidential, not only the medical information – ALL information.

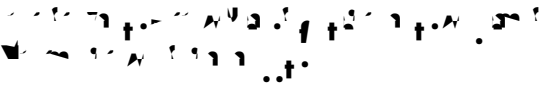


- Team members are encouraged to use the patient portal to access information regarding their health records. They may also officially request records through the Health Information Management Department.
- We do not access records or information belonging to family members, friends, neighbors, co-workers, high profile people, or celebrities without a work-related need.
- We access, disclose or use only the minimum amount of information necessary to complete a task.
- We do not communicate patient information through regular texting on personal devices.
- We do not take photographs or videos of patients, patient information, or post hospital or patient information on social media.
- We report any theft, loss, or breach of confidential information to our supervisor or Privacy Officer.
- We interview patients as privately as possible. We knock before entering a room and close doors or pull curtains whenever possible.
- We communicate with our patients, their families, and significant others privately and respectfully.
- We respect the privacy of our co-workers by refraining from gossip.
- We ensure our patient's dignity by providing appropriate gowns, sheets, or blankets.
- We keep passwords secure and do not share accounts. Authorized users are responsible for the security of their passwords and accounts.
- We log off all PCs, laptops, and workstations when they are unattended.
- We always encrypt emails to healthcare providers outside the DCH network by placing "dchsecure" in the subject line of the email.

- We dispose of patient information by using shred bins.
- We take extreme care to ensure that patient information is not mailed, emailed, or faxed to wrong parties.
- We do not leave patient information in any format unattended in public areas.
- Only the minimum necessary information needed to complete a task is used, accessed, or disclosed regardless of the extent of user access provided.
- We participate in Privacy and Security training at least once annually.

PATIENT WAITING

We know that our patients' time is valuable. Therefore, we strive to provide our patients with prompt service, making them comfortable while they wait.



- If there is a delay in service, thank the patient for waiting, apologize for their inconvenience and determine the best way to meet their needs. In these situations, patients should be updated by the care provider frequently.
- Educate patients and families about processes. For example, they need to know that procedures often do not begin as soon as patients enter the area.
- Our patients' families are as important to us as our patients. Update family members periodically while a patient is undergoing a procedure.
- Provide a comfortable environment for waiting patients and family members.

REMEMBER:

“If our patients wait, we update!”

ELEVATOR ETIQUETTE

Elevator etiquette can create a positive impression for our customers. Good elevator manners, like the ones described in Box 1, contribute to patient satisfaction.

- Pause briefly before entering an elevator. Do not block the way for anyone exiting.
- Use the elevator as an opportunity to make a positive impression. Smile and speak to other passengers.
- Do not discuss patients, their care, or DCH business in elevators, or disclosed regarding the extent of user access provided.
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To provide the best possible care to our patients, we must produce the financial resources necessary to support our mission. Therefore, we are committed to doing business in an ethical and financially responsible way.

DOCUMENTS AND RECORDS

Each DCH team member is responsible for the integrity and accuracy of our organization's documents and records. This responsibility aligns with regulatory and legal requirements and supports our business practices.

Records must never be altered or destroyed in an effort to deny authorities information that may be relevant to an investigation.

Medical and business documents and records are retained as outlined by law and our record retention policy. Medical and business documents include paper documents, digital documents, or other tools that hold information about DCH or its business activities. It is vital to keep and destroy records as outlined by DCH policy. We will not use patient, employee, or other information

information and third-party information. Proprietary information is anything related to DCH's operations that are not publicly known, including personnel data, patient financial information, passwords, pricing and cost data, financial data, strategic plan, marketing strategies, and techniques. Improper use or release of this type of information could violate our legal and ethical obligations.

Team members may use proprietary information only as necessary to perform their job responsibilities. We will not share this information with others unless the person or organization has a legitimate need to know in order to perform their specific job duties or carry out a contractual business agreement.

Information that is privileged and confidential or otherwise protected by law should never be shared outside of the organization unless expressly authorized by DCH General Counsel.

FINANCIAL REPORTING

DCH is committed to ensuring that all of its financial reports and records are correct, complete, and aligned with generally accepted accounting principles. DCH has a system of internal controls and procedures to assure that all financial actions are performed as outlined by management and are recorded in a way that maintains accountability of DCH's assets.

RELATIONSHIPS WITH VENDORS AND SUBCONTRACTORS

Team members, who work with suppliers, should act professionally and legally. DCH promotes competitive purchasing to the maximum extent possible. DCH selects products or services based solely on business criteria, including quality, price, delivery, technical excellence, availability, service, and maintenance of adequate sources of supply. Purchasing decisions will not be based on personal relationships.

Vendor payments or material gifts to the individual choosing the supplier is strictly prohibited. Likewise, gifts to the individual choosing the supplier are also not allowed unless a specific exception for the situation exists

in the "Gifts, Gratuities and Entertainment" policy. DCH's "no gift policy" prohibits accepting anything of allowed o4(alu-mality)7cw0 08gor wayme[(necessar)-3.8 [(Vd (mat5 information about 35 J0the3te, aplan [(nlu-mcheck- mM)]TJ0 -1.4 Td



DCH requires all team members to report known or suspected wrongdoing (fraud, waste, or abuse) to the compliance officer or through other appropriate means (i.e., the Compliance Reporting Hotline, hospital administration, or immediate supervisor). Any individual who, in good faith, reports known or suspected wrongdoing will be protected from retaliation. DCH will take appropriate corrective action as soon as possible when credible evidence of fraud, waste, or abuse is discovered.

DEFINITIONS

It is important for all DCH team members to know and understand the following terms, as relates to the reporting of suspected wrongdoing:

- **Fraud** – An action taken on purpose to secure unfair or unlawful gain. As it relates to the False Claims Act, fraud is defined as intentionally making false statements to receive some benefit or payment for which no entitlement would otherwise exist.
- **Abuse** – Excessive and wrongful misuse of anything. As it relates to the False Claims Act, abuse includes providing inconsistent services with established, sound medical practices or practices that result in unnecessary costs to the Medicare or Medicaid programs.
- **Whistleblower** – An individual that reveals wrongdoing within an organization to the public or those in a position of power. A whistleblower is an individual who knows of potential illegal activities in their organization and reports them to the public. The False Claims Act protects whistleblowers from retaliation, as detailed below.

FEDERAL FALSE CLAIMS

The Federal False Claims Act (FCA) was created to punish individuals or companies that file false claims for payment with federal government agencies. These laws apply to

any false claims for payment from the federal government, not just for health care services. Violation of the FCA happens when a service provider, knowingly or recklessly, files false bills for payment to government programs such as Medicare and/or Medicaid. Billing errors are not considered false claims when they are promptly corrected when identified, and refunds are processed.

Violations of the False Claims Act may result in damages and financial penalties ranging from \$11,805 to over \$23,607 (as of 2022) and exclusion from the Medicare and/or Medicaid programs. Penalties adjust annually due to inflation.

Our Code of Conduct requires that all team members report known or suspected wrongdoing. Reports can be made to the compliance

All employees must complete annual compliance training to obtain updated information regarding the compliance program, regulatory changes, and updates regarding the prevention of fraud, waste, and abuse.

All team members are reminded of their responsibility to report any known or suspected wrongdoing. ***Failure to report known or suspected wrongdoing is a violation of our Code of Conduct. It may result in accountability action up to and including separation of employment.***

ANTI-KICKBACK

This federal law prohibits healthcare providers from

DCH seeks to create an environment that attracts and develops the best people to provide the best care possible to our patients. Therefore, team members are expected to read and understand policies, procedures, and other guidelines related to their roles, as they contain specific instructions designed to ensure ethical and compliant behaviors.

POSITIVE WORK ENVIRONMENT

Each DCH team member has the right to work in a positive environment. Therefore, DCH does not allow conduct that disrupts the work environment, including disrespectful, hostile, intimidating, threatening, or unprofessional behaviors. Professional behavior creates





DISRUPTIVE BEHAVIORS

- Belittling or aggressive statements;
- Name-calling;
- Profane or disrespectful language;
- Outbursts of anger;
- Racial, gender, or ethnic jokes;
- Criticizing other caregivers in front of patients or other staff;
- Comments that undermine a patient's trust in other caregivers or the facility;
- Inappropriate comments are written in the medical record;
- Failure to respond to patient care needs or staff requests;
- Deliberate lack of cooperation;
- Deliberate refusal to return phone calls, pages, or other messages concerning patient care or safety;
- Making degrading comments about patients and their families, nurses, physicians, volunteers, facility personnel and/or the facility;
- Physically threatening language or behavior directed at anyone in the facility, including physicians, nurses, or any other member of the DCH team;
- Sexual or other forms of harassment including, but not limited to, persistent inappropriate behavior and repeated threats of litigation;
- Retaliation against a patient, visitor, or another member of the DCH team who reports an instance of violation of the code of conduct or who has participated in the investigation of an incident, regardless of the perceived truth of the report.

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EXAMPLES OF PROFESSIONAL AND DISRUPTIVE BEHAVIORS

PROFESSIONAL BEHAVIORS

- Clearly identifies one's self to patient and staff;
- Maintains a clean and neat appearance;
- Maintains self-control;
- Treats co-workers and patients with dignity and respect
- Collaborates with other members of the health care team and treats them with respect;
- Answers questions and explains the patient's plan of care to the patient, family (with patient's permission), and health care team members;
- Respects cultural and religious differences;
- Is truthful in verbal and written communications;
- Communicates differences in opinion and good faith criticism respectfully in the appropriate place;
- Is on time for meetings and appointments.



WORKPLACE VIOLENCE

We are committed to maintaining a violence-free work environment. Workplace violence includes criminal acts, robbery, violence (actual or threatened) directed at anyone, intimidation, stalking, terrorism, and hate

When it is essential to communicate confidential patient information to another healthcare provider, use DCH's email encryption process by typing "dchsecure" in the email subject line [This will work using Outlook or the Outlook Web Application (Webmail)]. Do not include confidential patient or organizational information in the subject line of an email.

Team members should not use any communication system to post, store, download, or transmit illegal, threatening, or obscene material. Do not use DCH resources to distribute false materials, send or solicit chain letters, or spam.

Do not violate copyright protections. DCH reserves the right to access and monitor company communication systems. Anyone who abuses these systems or uses them excessively for personal purposes will be subject to corrective action.

PERSONAL USE OF COMPANY RESOURCES

All team members are responsible for using company resources wisely, including time, materials, equipment, supplies, and information. These resources are to be maintained and used for business purposes only. Use of resources for personal financial gain is not allowed. Your supervisor must provide written approval to use resources for charitable reasons.

ATTITUDE

At DCH, we believe that we are here to serve our customers. Therefore, we are committed to providing excellent service in meeting our customers' needs with courtesy and care. This commitment to service is reflected by demonstrating the behaviors listed in Box 4.

GIVING DIRECTIONS AND INFORMATION

Pay attention to customers and visitors. If someone looks like they need directions, offer to help. Let customers know that you will help them to their desired location. If you are unable to escort a customer personally, take them to someone who can.

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CARE BEHAVIORS

- Greet all with a smile, make eye contact and use a friendly tone of voice.
- Introduce myself.
- Ask how I may help.
- Keep all informed.
- Take the time to listen actively.
- Respect the modesty and privacy of others.
- Escort those who appear to need directions or find someone who can assist.
- Ask if there is anything else I can do.
- Pick up litter.
- Avoid using personal technology in hallways and elevators.
- Thank guests for choosing DCH.

COMMUNICATION


The goal of communication is to understand. We must be committed to listening to our co-workers and customers to understand their needs. We must pay attention to both their verbal and nonverbal cues of co-workers and customers.

Our messages should be delivered with courtesy and clarity. Use words that the person you are speaking to can easily understand. DCH team members should avoid gossip and making offensive or hurtful comments.

Greetings and Introductions

When introducing and communicating with others:

- Introduce yourself with a warm and friendly smile.
- Use "please" and "thank you," "sir," and "ma'am" in conversations.
- The use of words such as "honey," "sweetie," etc., is inappropriate in the workplace.
- Listen to concerns closely, showing that you care.



While ethics and compliance can often be complicated and confusing, our commitment to doing the right thing should not waiver. We should always strive to “do the right thing” for our patients, guests, co-workers, and other customers.

PERSONAL OBLIGATION TO REPORT

We are committed to ethical and legal conduct in alignment with all laws and regulations. We will correct wrongdoing whenever and wherever it occurs. Each DCH team member is responsible for reporting any activity that appears to violate laws, rules, regulations, standards of medical practice, Federal Healthcare Conditions of Participation, or this Code of Conduct.

You should report actions/behaviors that conflict with the Code of Conduct, DCH policies, or our commitment to provide high-quality health care ethically as well as incidents that could possibly harm patients or co-workers (See Table 3). Questionable behavior even if you’re not sure there is a problem should also be reported.

Sometimes a small detail of a situation is discovered to be part of a much larger problem. It’s important to remember that even the appearance of a conflict of interest can be serious. If you have concerns that a particular issue has not been sufficiently addressed, you may report the situation to a higher level of management or the Compliance Department.

LEADERSHIP RESPONSIBILITIES

While all team members are responsible for following the Code of Conduct, DCH expects leaders to set the example. Everyone with supervisory responsibility is expected to perform in a kind, sensitive, thoughtful, and respectful manner. In addition, leaders are expected to create an environment where all team members feel free to raise concerns or propose ideas.

Leaders are also expected to ensure that team members have sufficient information to uphold laws, regulations, policies, and the resources to resolve ethical dilemmas. They must help to create a culture within DCH that promotes the highest ethical standards and compliance. This culture must encourage everyone in the organization to share concerns openly and timely. We must never sacrifice ethical behavior in the pursuit of business objectives.

COMPLIANCE REPORTING HOTLINE

The Compliance Reporting Hotline is a confidential telephone line to report ethics and compliance concerns or ask questions about compliance issues. The hotline is answered by a company that is not a part of DCH. You can call the hotline at any time of the day or night from any location.

It’s a free call and completely confidential. You do not have to give your name. When you dial **77. 47.4324**, a specialist will answer the phone and listen to the details

INTERNAL INVESTIGATIONS OF REPORTS

We are committed to investigating all reported concerns quickly and confidentially. If DCH initiates an investigation to determine whether there has been illegal or unethical conduct, you must cooperate with the investigation and

