

Code of Conduct

Building our culture



*“It is more than what we say,
it is what we do every day.”*

Effective January 1, 2018

Message from the Chief Executive Officer of Hartford HealthCare



At Hartford HealthCare, our vision and our values go hand-in-hand. We can only achieve our vision to be “most trusted for personalized coordinated care” by living our values in all we do. To serve our customers and communities, we must stand by these principles: **Integrity, Caring, Excellence and Safety.**

Understanding our Code of Conduct is one important way we show what we mean by those values. In this Code, we describe behaviors we expect all of us at Hartford HealthCare to follow — every employee, volunteer, medical staff and board member. Being clear about expectations is important, but the Code of Conduct is much more. It is a guidebook to help you in your relationships with patients, colleagues, business partners and others.

We want you to feel comfortable asking questions or seeking advice about this Code of Conduct, the Office of Compliance and Integrity, or about any of our policies, rules or regulations, or guidelines for ethical behavior, business practices or safety. Your manager, your Human Resources representative, the Chief Compliance Officer or the Legal Department are all available to help. You may even report in an anonymous manner at compliance.hartfordhealthcare.org, or the ComplianceLine, at 1.855.442.6241.

Following our Code of Conduct ensures ***we do the right thing, the kind thing, the best thing and the safe thing***. With these values on display, we will achieve our vision of excellence. Thank you for all you do.

Sincerely,

A handwritten signature in black ink that reads "Elliot Joseph". The signature is fluid and cursive, with a long horizontal flourish extending to the right.

Elliot Joseph
Chief Executive Officer
Hartford HealthCare

Mission:

To improve the health and healing of the people and communities we serve.

Vision:

Most trusted for personalized coordinated care.

Our Values

This Code of Conduct is based on HHC's values: **Integrity, Caring, Excellence, and Safety.**

INTEGRITY: We Do the Right Thing

Our actions tell the world what HHC is and what we stand for. We act ethically and responsibly in everything we do and hold ourselves accountable for our behavior. We bring respect, openness and honesty to our encounters with patients, families and coworkers and support the well-being of the communities we serve.

CARING: We Do the Kind Thing

Every HHC Community member touches the lives of the patients and families in our care. We treat those we serve and each other with kindness and compassion and strive to better understand and respond to the needs of a diverse community.

EXCELLENCE: We Do the Best Thing

In HHC, only the best will do. We work as a team to bring experience, advanced technology and best practices to bear in providing the highest-quality care for our patients and families. We devote ourselves to continuous improvement, excellence, professionalism and innovation in our work.

SAFETY: We Do the Safe Thing

Patients and families have placed their lives and health in our hands. At HHC our first priority — and the rule of medicine — is to protect them from harm. We believe that maintaining the highest safety standard is critical to delivering high-quality care and that a safe workplace protects us all.

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Hartford HealthCare Corporation Code of Conduct

Introduction

The standards described in our Code of Conduct (the “Code”), along with our values, mission statement, and policies serve as guidance to promote ethical, honest, and lawful actions for you, as part of our HHC Community. Additional information can be found in policies, procedures and guidance disseminated throughout our healthcare system.

DEFINITIONS:

- **Hartford HealthCare (HHC)** refers to the Hartford HealthCare Corporation and any and all Member Organizations.
- **Member Organization** is any entity directly or indirectly controlled by Hartford HealthCare.
- **HHC Community** includes all HHC employees, contracted individuals with the role and responsibility of an employee, medical directors, chiefs of a section, department and division, members of the HHC and regional board of directors and board delegated committees, officers, executive leadership, volunteers, and trainees.
- **OCI** refers to the HHC Office of Compliance and Integrity.

As the delivery of healthcare changes, this Code may be modified at any time. There may be other HHC or Member Organization policies that apply to matters covered by this Code, including but not limited to, medical staff policies, Privacy and Security policies and Human Resources policies. In the event that more than one policy applies to a situation, all such policies will be applied to the fullest extent possible. If there is a conflict or gap in the individual policy provisions, the provision of the policy that is most consistent with the values of HHC and compliance with the law will be applied.

Your Responsibilities

As members of the HHC Community, we are each responsible for upholding these same high standards in all aspects of our work and our professional relationships. Responsibilities include, but are not limited to:

- Review and follow the Code of Conduct.
- Use good judgment and seek help when you are uncertain what to do.
- Speak up and report concerns about actions you encounter at HHC that may be inconsistent with the Code.
- Participate in training programs to further your understanding of the Code, its application to your work at HHC, and your responsibilities.
- Consistently utilize H3W Leadership Behaviors in all workplace interactions.

Additional Responsibilities of Leaders

Leaders, including all individuals in a position of supervisory responsibility are accountable for shaping the values-based culture within our organization. Therefore the following are additional responsibilities that are expected:

- Serve as a role model for supporting our Mission, Vision and Values.
- Clearly communicate expectations for high standards of ethical behavior to those they lead.
- Promote a culture of trust, open communication and respect.
- Encourage those they lead to ask questions and raise issues and concerns.
- Ensure those they lead complete all mandatory trainings.
- Comply with HHC's non-retaliation policies.

Violations of Our Code of Conduct

The standards set forth in our Code are mandatory and must be followed. Individuals will be held accountable for behaviors and actions inconsistent with the Code.

The following are examples of behaviors and conduct that can result in disciplinary actions or sanctions:

- Knowingly authorizing or participating in a violation of law or regulations or policy;
- Withholding information or failing to report violations;
- Retaliating against individuals who report issues and concerns (in good faith);
- Deliberately filing false or frivolous reports of violations;
- Actions that are discriminatory or rise to the level of harassment;
- Reckless or intentional actions or behaviors that jeopardize the privacy and security of personal health information and other confidential business information.

Resources for Getting Answers

To ask for guidance or to report a concern, there are several options to choose from as noted below. HHC encourages the resolution of issues through the proper channels.

Resource Contact Information

| | |
|---|---|
| Your Manager..... | Refer to your Department Directory |
| Human Resources..... | Refer to your Member Organization Intranet site |
| HHC Legal Department | 860.972.9240 |
| The ComplianceLine | 1.855.442.6241 or ComplianceLine.Hartfordhealthcare.org |
| The HHC Office of Compliance and Integrity (OCI)..... | 860.972.1573 |
| Medical Staff Office..... | Refer to your Member Organization Intranet site |
| Marketing and Planning | 860.972.4500 |

Duty to Report

Reporting a violation: You have an important role in helping us comply with laws, regulations and HHC policies. When you discover a problem or suspect something is wrong, it is your individual responsibility to report the activity to the appropriate department within our organization (see page 6).

Hartford HealthCare's ComplianceLine: Contact HHC's ComplianceLine any time at **1.855.442.6241** or via the internet at <http://Complianceline.Hartfordhealthcare.org>. The ComplianceLine is staffed 24 hours a day, seven days a week by an outside organization on behalf of HHC.

Anonymity & Confidentiality: When contacting the ComplianceLine, you may choose to remain anonymous. HHC maintains, to the full extent of the law, the confidentiality of any individual who reports concerns or possible misconduct.

HHC takes all reports to the ComplianceLine very seriously and handles each one on a case-by-case basis. Internal investigations of reported concerns are handled in a manner that is as confidential as possible. After filing a report you may contact the ComplianceLine to provide additional information and/or request a status update.

Non-Retaliation: It is your responsibility to report any concerns or inappropriate actions you know about. Consistent with our values, HHC maintains a Non-Retaliation Policy that prohibits retaliation against any HHC Community member who reports an incident in good faith.



STANDARDS

STANDARD: Quality of Patient Care

HHC is committed to providing the highest quality, safest care and value to our patients. As an HHC Community member, you are expected to follow our Standards below.

Dignity and Respect: We deliver services with dignity and respect for each person, including a patient's family members. Examples of such behaviors include acting in the best interests of patients, maintaining a positive, customer-focused attitude and responding to requests for information while safeguarding privacy and security. We respect our patients' dignity and provide comfort and convenience with courtesy. We respect our patients' spiritual and cultural beliefs.

Safety: We are committed to maintaining a safe healthcare environment. We follow clinical care guidelines that we have adopted. We explain the outcome of treatment and procedures to patients and family members.

Access to Quality Care: We are committed to providing optimum, cost-effective and medically necessary care to our patients. We respect our patients' right to be involved in their plans of care and commit to keeping our patients informed of treatment plans and available treatment alternatives. Our healthcare professionals will provide medically necessary services to patients in a safe and effective manner, supported by proper documentation that supports the services provided.

Emergency Treatment: When an individual presents at the hospital, HHC will provide the healthcare services required under the law regardless of their ability to pay. We follow the federal law, Emergency Medical Treatment and Active Labor Act ("EMTALA") in providing an emergency medical screening, examination and necessary stabilization to all patients prior to any transfer or discharge.

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STANDARD: Privacy and Confidentiality

HHC is committed to protecting the privacy of the health information of our patients. You are required to follow HHC privacy and security policies and state and federal privacy laws. We also are committed to informing patients about their rights with regard to their protected health information (PHI). In addition, we respect the personal information of our employees. Through confidentiality agreements, we protect the information shared with our business partners in accordance with laws and standards.

PHI: You are expected to safeguard the PHI of patients and respect our patients' confidentiality by using PHI only when it is necessary to serve the patient or as permitted or required by law. Patients have certain rights regarding their PHI. You must familiarize yourself with HHC's policies and procedures and Notices of Privacy Practices to protect the privacy and security of PHI. The Chief Privacy Officer and the Legal Department are available if you have questions or need further guidance related to HIPAA or any other privacy laws.

What is PHI?

Protected Health Information (PHI) includes any individually identifiable information that relates to past, present or future medical or behavioral conditions, treatment or payment that may identify a patient and can be found in many places, including medical records and financial information.

TIP: If your friends or colleagues are in the hospital, and you are not involved in their care, you cannot access their PHI. You may only access this type of information if you need it to fulfill your job responsibilities. Any known violation of patient privacy must be reported to the HHC Office of Compliance and Integrity.

Personal Information: We treat salary, benefits and personnel files as confidential and only access this information for authorized business purposes. Contact your manager or the appropriate department (see page 6) when you have questions about maintaining confidentiality or releasing information.

Proprietary Information: We do not share confidential information related to HHC business or operations, including financial data, business strategy, and proprietary information, unless it is to an authorized person and for a legitimate business reason. If you receive a request from the media for HHC's information, you cannot provide it. HHC policy requires you to refer the media to the identified HHC contact person, (see page 6).

Use of Electronic Media: All communication systems provided by HHC, including computers, email, instant messaging, Internet access, telephone and voicemail systems are the property of HHC and are to be used primarily for business purposes. HHC reserves the right to monitor all aspects of the usage of these systems for appropriateness and to ensure the use supports the business goals of HHC.

Security: You are expected to follow all security policies; including using and maintaining your own log-in credentials and system passwords in a responsible and confidential manner. You are also expected to use your badge to identify yourself as an HHC Community member and to comply with all HHC security policies and procedures.

Social Media: HHC Community members may use social media in various platforms such as Facebook, LinkedIn, Twitter, blogs, etc., during their personal time. During such use, you are expected to follow all HHC policies, including privacy and confidentiality and not let your use of social media interfere with your job responsibilities. You may not post any personal health information, (PHI) pictures, or comments regarding a patient of HHC.



STANDARD: Personal Conduct and Business Ethics

HHC is committed to creating and maintaining a workplace that is professional, ethical and respectful. All members of the HHC Community are expected to follow our standards of personal conduct. Be honest and respectful and adhere to ethical standards when dealing with colleagues, staff, patients and their families, the public, auditors and government officials and any others with whom HHC does business. Abusive and disruptive behavior is not tolerated.

Conflicts of Interest: HHC Community members are expected to act in the best interest of the organization and its patients at all times. HHC Community members must avoid any outside activities that distract or negatively impact their job performance. An individual's position as an HHC Community member cannot be used for personal gain or to assist others unfairly at the expense of HHC. A conflict of interest may occur if outside activities or personal interests influence, or appear to influence, the ability to make objective decisions in the course of performing your responsibilities on behalf of HHC. Employees, officers, agents and board members of HHC are required to disclose situations where there is an actual and/or potential conflict of interest in accordance with HHC policy.

HHC has a Conflict of Interest Policy that you are required to review and follow. Any questions about whether an outside activity might be a conflict of interest should be directed to the appropriate department (see page 6).

Gifts and Gratuities: HHC Community members cannot accept money, gifts, services, entertainment or other things of value which may influence your actions relating to HHC. HHC has policies on gifts and gratuities and vendor interaction that you must follow.

Discrimination: We practice fair and equal treatment of employees, volunteers, patients, families and others by celebrating the diversity of all people, without discrimination on the basis of race, color, national origin, alienage, citizenship, religion, creed, gender, pregnancy, age, physical or mental disability, marital or partnership status, sexual orientation, gender identity or expression of any other characteristic protected by law. You are expected to abide by the Standards of this Code including reporting discrimination, intimidation or violence of any kind that you witness in the workplace.

Harassment/Sexual Harassment: Workplace harassment, sexual harassment, comments or other conduct that creates an intimidating or offensive environment will not be tolerated. HHC has adopted policies with respect to workplace and sexual harassment that provide a way for you to bring such improper conduct to the attention of management.

Stewardship: We safeguard HHC's assets, including medical records, financial data, funds, employee sensitive data, intellectual property rights, research data, business strategies and plans about HHC activities, and not use these assets for personal gain.

Research: Ethics and integrity are essential to the advancement of scientific knowledge. HHC is committed to conducting research in accordance with professional, ethical and legal standards.

Controlled Substances: Unauthorized access, use or diversion (e.g. theft) of controlled substances is prohibited. Immediately report to your manager or appropriate department (see page 6) any potential issues or concerns you identify involving the security or diversion of controlled substances.

The firm my organization uses for marketing and advertising offered me two courtside tickets to a professional basketball game. Can I accept the tickets?

HHC policy requires you to politely decline the acceptance of personal gifts that involve social or entertainment activities. You may accept the tickets, only if you personally pay the supplier the cost of the tickets.

STANDARD: Compliance with Laws and Regulations

HHC business is highly regulated and must be conducted in accordance with laws and regulations. Many laws and regulations pertain to patient referrals, physician relationships, billing and payment practices, vendor contracts, lobbying, environmental health, payor relationships and employment practices. Since healthcare delivery is highly regulated and some of these laws are very complex, it is important that you attend trainings regularly. The Legal and OCI Departments are also available to assist you in interpreting laws that apply to our business.

Fraud, Waste and Abuse Laws: Several laws describe activities that may constitute fraud, waste and abuse, including but not limited to, the False Claims Act, the Anti-Kickback Statute and the Physician Self-Referral Law called the Stark Law. These laws generally prohibit the following:

- Submitting inaccurate or misleading claims for services provided.
- Submitting claims for services not provided.
- Submitting claims for medically unnecessary services not covered by the payer.
- Making false statements or representations to obtain payment for services or to gain participation in a health care program.
- Concealing or improperly avoiding an obligation to repay a health care program.
- Offering or paying money, goods, or anything of value to encourage or reward the referral of patients to a health care provider.

We do not pay for referrals: Patient referrals and admissions are based solely on an individual's medical needs and our ability to render the needed services. No one in HHC is allowed to pay or offer payment to anyone for the referral of patients.

We do not accept payments for referrals: No one in HHC is permitted to solicit or receive anything of value, directly or indirectly, in exchange for the referral of patients to a HHC facility or service line. We do not take into account the value or volume of referrals made to us when making referrals to other healthcare providers.

What is the False Claims Act?

A federal law that makes it a crime for any person or organization to "knowingly" make a false record or to file a false claim for payment under any federal or state healthcare program. "Knowingly" means having actual knowledge that a claim is false or acting in deliberate ignorance or with "reckless disregard" as to whether a claim is false. The fines and penalties for violations include up to \$21,562.70 per claim, treble damages and attorney fees. Providers may also be excluded from federal program participation for violations.

Environmental Safety: HHC promotes health, safety and environmental protection in healthcare facilities planning, administrative activities and research. You are expected to safely handle, store and dispose of hazardous materials and waste if your job responsibilities include such work. Report to your supervisor or to the appropriate department (see page 6) immediately if you encounter an unsafe practice or condition.

HHC is equally committed to promoting a safe working environment for our employees and physicians. Each HHC employee shares in the responsibility to keep our workplace safe. Employees are provided with information on handling and working with hazardous materials. HHC also

provides employees with needed protective equipment and training in its use. It is vital that employees use equipment and materials properly and follow the appropriate procedures to ensure that everything possible is done to avoid compromising the safety of co-workers.

Cooperation with Government Investigations: You must treat all government auditors and investigators with respect. In accordance with HHC policy, you must bring any requests for information to the attention of the Legal Department or OCI (or your manager) as soon as possible. Such requests may include subpoenas, civil investigative demands, audit requests, search warrants or informal requests.

Tax Exempt Status: HHC enjoys status as a tax-exempt organization under Section 501(c)(3) of the Internal Revenue Code operated for charitable purposes. HHC provides healthcare services, charity care and medical education as examples of the types of activities that support our charitable purposes. To maintain this status, HHC follows certain laws and regulations that require it to pay only fair market value for goods and services, not to engage in private inurement or in substantial lobbying activities. You must use our resources to promote our charitable purposes and not inappropriately advance the private or personal interests of an individual or other company. You are expected to avoid compensation arrangements in excess of fair market value.

HHC encourages its employees to participate in community and political affairs and to vote in elections. If you choose to participate in political affairs, please remember to be clear that you are acting as a private citizen and not as a representative of HHC. If you choose to contribute to a political campaign, it must be as an individual and not as a representative of HHC.

Wage and Hour Standards: HHC is committed to paying its employees all compensation they are entitled to receive in compliance with applicable state and federal laws. HHC has policies about timekeeping and pay practices. Every HHC employee is responsible for understanding these policies and reporting policy violations to the appropriate department (See page 6).

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STANDARD: Financial Reporting

As good stewards, members of the HHC Community must strive to protect and preserve the assets of the organization through efficient and effective use of resources. Use of tax exempt earnings or donated funds are required to be properly recorded by reporting the accurate nature of all financial transactions.

Financial Records: You must maintain a high level of accuracy and completeness in the documentation and reporting of our organization's financial records. It is important to follow HHC policies which address cost report compliance and our commitment to full, accurate and timely reports to regulatory agencies.

Management of Donated Funds: HHC and its member organizations, as non-profit organizations, are being supported by individual, foundation and corporate donors. We have been entrusted with these funds to achieve our mission and we take our duty to use these funds carefully and to meet our responsibilities to donors very seriously. We adhere to the highest standards in the solicitation, acceptance, recording and use of donated funds.

A Final Word

Please use this Code and HHC policies to guide your behavior and decisions as you carry out your daily activities. Your participation is critical to our success.

Frequently Asked Questions

What is the Code of Conduct?

A Code of Conduct is a tool to help create and maintain a culture of integrity. It is a set of rules that clearly and concisely outline the types of behaviors that are expected in the workplace.

Why is it important to have a Code of Conduct?

A Code of Conduct helps unite all of us by providing a set of expectations that we can all follow using the H3W behaviors. A Code of Conduct helps create a safe, secure and healthy environment in which people are respected and valued as equal team members in the delivery of care.

To whom does the Code of Conduct apply?

The Code of Conduct applies to all HHC employees, contracted individuals with the role and responsibility of an employee, medical directors, chiefs of a section, department and division, members of the HHC and regional board of directors and board delegated committees, officers, executive leadership, volunteers, and trainees.

Where can I find more information about OCI?

The OCI SharePoint Site contains HHC Compliance, Privacy and Information Security Policies and other helpful information about the program and healthcare regulations and requirements.

<https://myhhc.hhchealth.org/HHCUnity/SSO/SitePages/Home.aspx#policies>

What is the purpose of OCI?

OCI provides a framework for the management of compliance issues, helping to ensure that the HHC community is able to recognize and avoid situations that might compromise HHC's values.

Our Compliance Program serves to:

- Uphold HCC values as defined in its Code of Conduct;
- Provide employees with a central resource for addressing compliance issues;
- Provide employees with information and policies for successful job performance;
- Encourage reporting concerns and resolving issues;
- Minimize the risk of fraud, waste and abuse;
- Demonstrate our commitment to conducting business in an ethical manner;
- Assist the organization in following local, state and federal laws that apply;
- Protect HHC's reputation in the community.

What is the OCI's mission statement?

To serve as a valued and trusted HHC partner, providing compliance expertise, education and guidance consistent with our values.