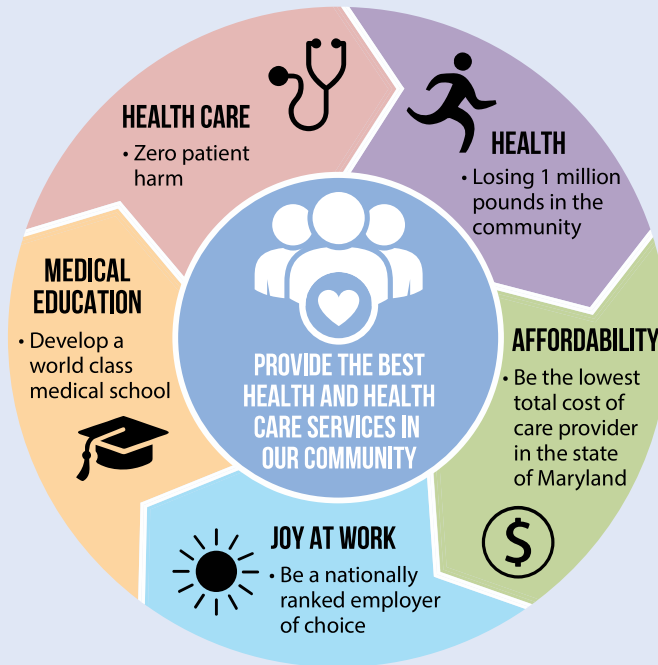


Code of Conduct



2030 Bold Goals

The Meritus Health strategic plan has Bold Goals to be achieved by 2030. Utilizing the quadruple aim framework, the 2030 Bold Goals were created to improve the health in our community, improve health care, having joy at work, and medical care that is affordable for our community; as well as a fifth goal for providing world class medical education.



Mission

Improve the health of our community.

Vision

To be the best health system.

Values

At Meritus, we each support our mission and vision by living our values each and every day. By following our pledge, "I ACT", we each support Meritus with:

I = Integrity - We do the right thing, no matter what.

A = All in for quality and outcomes - Quality improvement isn't just something we talk about, it's a commitment we each live.

C = Community obsessed - We are our community and we are here to take care of our neighbors. This isn't just about medical care, it's about caring for the whole person.

T = Teamwork - Nobody can do it alone. At Meritus we are one team that is diverse and inclusive.

Dear Colleague,

Meritus Health has a vision to relentlessly pursue excellence. That vision can only be accomplished with all of us working together as a team and deeply committed to our Code of Conduct.

This Code of Conduct is essential to how we behave and how we operate to serve our patients and our community. This Code of Conduct is about us committing to the highest level of ethical standards and are our expectations for doing our work every day with integrity. This Code of Conduct is not a nicety, but a necessity. A culture of compliance is the foundation to doing the right thing, all the time, for everyone that we serve.

Please read this Code of Conduct carefully and take the time to discuss any questions or concerns with your supervisor, department leader, or our department of business integrity, at 301-790-8414.

We want Meritus Health to be the most trusted, honest, ethical organization, with unmatched integrity. You make that happen by living this Code of Conduct.

Thank you for what you do for Meritus Health. You make a difference in improving the health status of our region.



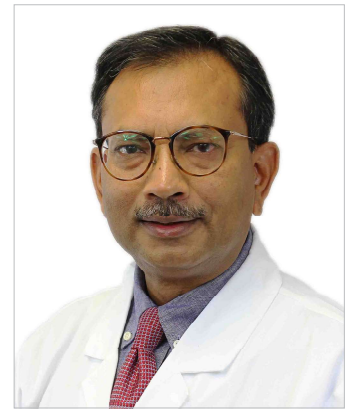
Maulik S. Joshi, Dr.P.H.
President and Chief Executive Officer
Meritus Health

A handwritten signature in black ink that reads "Maulik Joshi".



Robert "BJ" E. Goetz, Jr.
Chairman, Board of Directors
Meritus Medical Center

A handwritten signature in black ink that reads "Robert E. Goetz, Jr.".



Kalim Ahmed, M.D.
Chief of Staff
Meritus Medical Center

A handwritten signature in black ink that reads "Kalim Ahmed, M.D.".

Purpose of the Code of Conduct

Meritus Health is firmly committed to operating with a spirit of trust and integrity. As an organization, it is only through the actions of our staff that trust is built and a reputation for honesty and fairness is earned.

This Code of Conduct, which has been adopted by the Meritus Health board of trustees, outlines the health system's commitment to:

- Provide safe, high-quality, compassionate care and service;
- Respect patient rights, including the right to privacy and confidentiality;
- Provide a safe and respectful work environment;
- Comply with all laws and regulations that govern our business;
- Bill for the services that we provide with honesty and integrity;
- Avoid conflicts of interest and safeguard the assets of our organization; and
- Honor the trust of our patients, our employees and the community we serve.

The Code of Conduct sets forth a series of expectations regarding the manner in which employees and other members of our organization are to conduct themselves. The Code applies to employees, officers, board members, medical staff members, contracted employees, students and volunteers of Meritus Health and its subsidiaries.

The Code of Conduct is intended to be both comprehensive and easily understood. However, in some cases, the subjects discussed are complex, or may apply more specifically to certain disciplines or departments. Therefore, additional guidance is often necessary. To provide

that guidance, Meritus Health has developed a comprehensive set of policies, procedures, bylaws and/or rules and regulations. Members of our organization are expected to follow those policies that apply to their areas of responsibility.

In each section of the Code of Conduct, lists of expected behaviors and unacceptable behaviors are provided. These lists are not intended to be exhaustive. Rather, they are intended to be used as guidance to assist us in carrying out our daily responsibilities to the organization, the patients and the community that we serve.



Our commitment to provide safe, high-quality and compassionate care and service.

Patients and families who entrust their care to Meritus Health are our number-one priority. We are committed to providing high-quality care and service to those we serve and to delivering that care in a manner that is safe, compassionate and caring.

We are committed to understanding the needs and expectations of all of our customers and continually striving to meet or exceed those needs and expectations.

We support and uphold recognized quality standards and guidelines, as well as sound standards of professional practice. We strive to continually improve the quality and safety of the care that we deliver.

Expected Behaviors

You are expected to:

- Strive for quality in your job performance, always giving your best effort on the job
- Maintain skills and current competence in your areas of responsibility
- Provide care in accordance with all professional standards that apply to your position
- Act in the best interests of patients and others in your care
- Comply with your departmental and system-wide safety rules, policies, procedures
- Abide by all customer service standards of your department and the health system
- Actively participate in the quality improvement and safety activities of your department / business unit and of the health system
- Report all deficiencies or errors, even if they appear small, so as not to jeopardize the health and safety of our patients and fellow workers
- Make care decisions based solely on clinical needs and the medical appropriateness of those decisions
- Complete all records and documentation needed to provide excellent care in a timely, accurate and legible manner

Unacceptable Behaviors

It is unacceptable to:

- Ignore safety concerns or patient care needs expressed by another caregiver
- Refuse to comply with known and generally accepted practice standards
- Deliberately fail to adhere to organizational policies designed to protect our patients and improve patient care
- Provide care that you are not qualified to provide

Our commitment to respect the rights of patients and other customers, including the right to privacy and confidentiality.

We recognize that the provision of health care is often a very personal decision. We respect the right of patients and customers to have their own personal values and beliefs. We support each patient's right to make his or her own decisions regarding medical treatment and to choose the providers of their health care services.

We also recognize that health care is a very private matter. We are committed to maintaining patient privacy and confidentiality.

Expected Behaviors

You are expected to:

- Treat all patients and customers with dignity and respect regardless of sex, race, age, sexual orientation, national origin, disability, diagnosis or ability to pay
- Involve patients and as appropriate, their family members and representatives in decisions about their care
- Understand and follow departmental, hospital and system-wide policies on patient and customer rights
- Protect the privacy and confidentiality of all medical and other information of those in your care
- Follow the health system's policies on privacy, confidentiality and release of information and to access patients' personal and health information only on a need-to-know basis
- Safeguard confidential information regarding our customers from misuse, theft or unauthorized access

Unacceptable Behaviors

It is unacceptable to:

- Discriminate against patients or customers based on sex, race, age, sexual orientation, national origin, disability, diagnosis or ability to pay
- Violate patient privacy or confidentiality by:
 - Discussing patient information in common areas where privacy and confidentiality may be compromised
 - Discussing patients with family or friends
 - Posting or discussing patient information on social media.
 - Accessing patient information for any reason other than a need-to-know basis
 - Making unauthorized disclosures of protected health information
- Violate patient or customer rights in any other manner

Our commitment to provide a safe and respectful work environment.

The delivery of high quality patient care requires teamwork among all individuals involved. Data shows that work environment has a direct impact on the quality and safety of care delivered.

At Meritus Health, we are committed to providing a work environment where all team members are treated with honesty, dignity, fairness and respect. We support the right of every employee, medical staff member, volunteer, contractor and student to work in an environment free of unlawful harassment or abusive, threatening or intimidating behavior.

Disruptive behavior endangers patient safety and will not be tolerated.

Expected Behaviors

You are expected to:

- Treat every member of the organization and health care team with courtesy and respect
- Work together to resolve conflicts that may arise among colleagues and co-workers
- Be considerate of the needs of others and consider a wider view when making decisions
- Take ownership of problems and become part of the solution
- Report disruptive, threatening, harassing or intimidating behavior
(See: *How to Report a Concern* on page 14)

Unacceptable Behaviors

It is unacceptable to:

- Use inappropriate words (e.g., profane, insulting, intimidating, demeaning, humiliating or abusive language)
- Make sexual comments or innuendo
- Engage in inappropriate touching, sexual or otherwise
- Make racial or ethnic slurs or jokes
- Engage in intimidating behavior that has the effect of suppressing input by other members of the health care team (e.g., outbursts of anger, throwing instruments, charts or other objects, etc.)
- Criticize fellow employees in front of patients, customers, families or other staff
- Make comments that undermine a patient's or customer's trust in fellow employees or the hospital, or that undermine a caregiver's self-confidence in caring for patients
- Retaliate or threaten retaliation, as a result of an individual's negative response to harassing conduct
- Shame others for negative outcomes
- Not return pages or calls promptly

Our commitment to comply with the laws and regulations that govern our business.

The delivery of health care is a complex business that is subject to many state, local and federal laws and regulations. Examples include, but are not limited to: 1) employment and non-discrimination laws, 2) fraud, abuse and referral laws (Stark, Anti-kickback, False Claims Act), 3) billing and financial reporting laws, 4) privacy and security laws, including HIPAA, 5) environmental and safety laws and 6) multiple laws and regulations designed to protect patients and ensure the quality of care (e.g., Emergency Medical Treatment and Labor Act, Medicare Hospital Conditions of Participation, etc.).

Meritus Health is committed to complying with all laws and regulations which apply to our business. We continually update our policies, procedures, monitoring plans and educational programs to support ongoing organizational compliance with these laws.

Expected Behaviors

You are expected to:

- Follow all laws that apply to your work and ask for assistance if you have questions about how they affect you
- Abide by the policies and procedures of Meritus Health and its subsidiaries
- Participate in training and education opportunities on laws or regulations that apply to your work responsibilities
- Report any suspected violations of law
(See: *How to Report a Concern* on page 14.)

Unacceptable Behaviors

It is unacceptable to:

- Knowingly violate any federal, state or local laws in the performance of your work
- Knowingly contract or otherwise engage with a provider who is excluded from participation in the Medicare and Medicaid programs by the federal government
- Offer, pay or accept money, goods or anything of value in return for the referral of patients or health care business
- Offer or give something of value to patients or customers in order to induce them to use or purchase health care services that are reimbursed by federal health care programs. (Note: In limited circumstances, individual gifts of less than \$10 may occasionally be provided.)

Our commitment to honesty and integrity in billing for the services we provide.

At Meritus Health, we are committed to accurate billing for the services we provide. We employ policies, procedures and systems to facilitate timely, complete and accurate billing.

Our federal and state governments are responsible for a significant portion of the health care services we provide to patients covered by the Medicare and Medicaid programs. We are committed to following the requirements of these programs, as well as other third-party payors.

The Federal False Claims Act (see following page) makes it a crime for any person or organization to knowingly make a false record or file a false claim with the government for payment. Meritus Health expects that all employees who are involved with creating or filing claims, or documenting services rendered, will do their part to ensure that true, complete and accurate information is used.

Expected Behaviors

You are expected to:

- Provide and maintain honest and accurate records of all services provided to patients and customers
- Follow established rules and procedures when charging patients and customers
- Understand the billing requirements specific to your department or ask questions if you do not understand them
- Do your part to ensure that we submit bills for payment that are appropriately coded, using current rules and guidelines
- Follow billing guidelines for medical necessity
- Correct and resubmit bills when errors are discovered
- Follow federal rules requiring the return of overpayments by Medicare or Medicaid within 60 days of identification (See Meritus Policy, ADMN 0447, Reporting and Returning Overpayments to Federal Health Care Programs)
- Actively participate in performance improvement activities to identify, understand and prevent billing errors
- Immediately report any concern about possible false claims at Meritus Health to the department of business integrity so that any erroneous claims may be investigated and corrected
(See: *How to Report a Concern* on page 14.)

Unacceptable Behaviors

It is unacceptable to:

- Knowingly submit or cause to be submitted a claim which is inaccurate or misleading
- Make false statements or representations to obtain payment for services or to gain participation in a program
- Fail to report the discovery of any false claim submissions to your manager, supervisor or the department of business integrity
- Fail to take steps to correct known errors in billing

Federal False Claims Act

As a recipient of federal health care program funds, including Medicare and Medicaid, Meritus Health is required by law to include in its policies detailed information about the federal False Claims Act and the Maryland State False Claims Act.

The federal False Claims Act prohibits any person or organization from knowingly submitting a false record or claim for payment to the federal government. A false claim is basically a claim that is inaccurate or untrue. Penalties for violations, as of 2020, which are updated annually, range from \$11,665 - \$23,331 per claim, plus up to 3 times the Government's damages. In addition, the violator can be excluded from participating in the Medicare and Medicaid programs.

The False Claims Act contains provisions that allow individuals with information regarding federal health care fraud to file a lawsuit on behalf of the government and to receive a portion of the recoveries, if the lawsuit is successful. Finally, the False Claims Act has what is known as "whistleblower protections." Individuals who file or otherwise assist in a false claims action are protected from any form of retaliation by their employer.

Maryland has enacted its own version of the False Claims Act for false claims submitted for payment to State health care programs. Violators may be liable for a penalty up to \$10,000 per claim, plus up to 3 times the State's damages. Like the federal False Claims Act, individuals may file a lawsuit on behalf of the State and whistleblowers are protected from any form of retaliation by their employer.

How We Prevent False Claims

Meritus Health is committed to prompt, complete and accurate billing of all services. Neither the health system, nor its employees, shall knowingly make or submit any false or misleading entries on any bills or claim forms. Examples of prohibited behaviors include: 1) billing for services, equipment or supplies that were not provided; 2) billing twice for the same service (duplicate billing); 3) coding or billing a higher level of service when a lower level was provided; 4) unbundling of charges; 5) charging for medically unnecessary supplies or services, including unnecessary hospital days or 6) providing false documentation on a record or claim.

We recognize that billing is often a complex process involving multiple individuals (e.g., coders, billing staff, information technology staff, clinicians, etc.) and complex rules. Therefore, we know that errors in billing will occur from time to time. What is important is that each employee do his or her part to help us identify and correct these errors when discovered and take steps to prevent them in the future.

As part of its commitment to integrity, Meritus Health has implemented policies and procedures to prevent the filing of false claims (See the system-wide policy entitled Preventing False Claims). If you know or suspect that false claims are being filed, you are expected to report this to your manager, supervisor or to the department of business integrity at 301-790-8414. You may also report anonymously by calling the GUIDELINE at 301-790-7950 or 888-847-9247 (toll-free).

Our commitment to avoid conflicts of interest and to safeguard the assets of our organization.

Meritus Health is a community-based, tax-exempt organization. All employees and other individuals working on behalf of the health system have a duty to act in the best interest of the organization and the patients it serves. This means avoiding situations where relationships with vendors or other business partners or affiliates influence decisions that are made by the health system or its subsidiaries.

It also means that all employees, medical staff and contractors with whom we do business must recognize that any decisions regarding choice of medications, supplies, instrumentation or medical devices to be purchased by the health system for use in patient care will be made solely upon the basis of the value and safety of the product and not upon any relationship that an individual may have with a business or vendor.

Expected Behaviors

You are expected to:

- Act in the best interest of Meritus Health and the patients, customers and community it serves, when dealing with vendors and others with whom we do business
- Disclose potential and actual conflicts of interest to your supervisor or manager (Note: if you are an individual who is in a position to make or influence decisions for the organization, you may be expected to complete an annual Disclosure Statement.)
- Safeguard and protect the property and other assets of Meritus Health

Unacceptable Behaviors

It is unacceptable to:

- Knowingly pay more than “fair market value” for goods or services that we purchase
- Solicit gifts from vendors or others with whom we do business
- Accept personal gifts (unless of nominal value) or entertainment from vendors or others with whom we do business
- Make any decision which may impact the safety and effectiveness of patient care based upon personal or business relationships
- Misuse or fail to protect the property of Meritus Health against loss, theft or abuse
- Discuss or release confidential health system business with outside individuals or groups

Our commitment to honor the trust of our patients, employees and the community we serve.

Meritus Health holds a unique position of public trust. Our mission, vision and strategic plans are to be achieved without ever resorting to moral compromise. It is never acceptable for us to falsify information or conceal factual circumstances in an attempt to present better results clinically, operationally or financially. We are committed to representing ourselves fairly in all marketing materials, public relations activities, fundraising solicitations and media releases.

We realize that many parties may be interested in the affairs of our community-based health system. We believe that these stakeholders are entitled to appropriate disclosures of quality, financial and operational data to meet their legitimate needs. Such disclosures will be timely, accurate and complete to the best of our ability.

Expected Behaviors

You are expected to:

- Serve as ambassadors of Meritus Health.
- Adhere to Meritus Health's policy on Social Media use.
- Do your part to ensure that data and information that is reported internally or externally (to regulatory agencies, investors or the public) is complete, timely and accurate
- Notify your manager of any external requests for data or information so that he or she may institute the necessary review and approval process
 - All releases of information to the media must be reviewed and approved by the applicable Meritus Health department;
 - Any release of personal health information to the media, which we initiate, must have a signed consent by the patient and be approved by the applicable Meritus Health department
 - Any release of quality data must be reviewed and approved by the applicable Meritus Health department

Unacceptable Behaviors

It is unacceptable to:

- Provide data or information that you know to be false
- Misrepresent facts or falsify records in any manner
- Release confidential or sensitive information about the organization
- Use social media to post images or comments about one's self, co-workers, supervisors, or Meritus & Health which are vulgar, obscene or defamatory.

Your Responsibility

You have a responsibility to:

- **Review and follow this Code of Conduct**

The Meritus Health Code of Conduct must be followed by all employees, officers, board members, medical staff members, contracted services, students and volunteers of Meritus Health and its subsidiaries. Adherence to this Code of Conduct is a condition of employment, credentialing and affiliation with Meritus Health. Violations of the Code of Conduct may be subject to disciplinary action.



- **Ask questions when you are uncertain about what to do**



In the delivery of health-care services, we often deal with new and complex rules and procedures. As a result, there will likely be times when the answer to a particular issue is not clear. It is your responsibility to ask questions when you don't know the answer and are uncertain about what to do. Resources available to answer your questions include: 1) your supervisor or manager; 2) the human resources department; 3) the division of medical affairs; 4) the risk management department; 5) corporate communications; 6) any member of senior management; 7) the department of business integrity; and 8) the regulatory compliance and patient safety department.

- **Speak up when you are concerned about behavior that is inconsistent with the Code of Conduct**

It is your responsibility to report violations of this Code of Conduct. If you believe that you have information about suspected violations or if you have questions or concerns about a potential violation, it is your obligation to report.

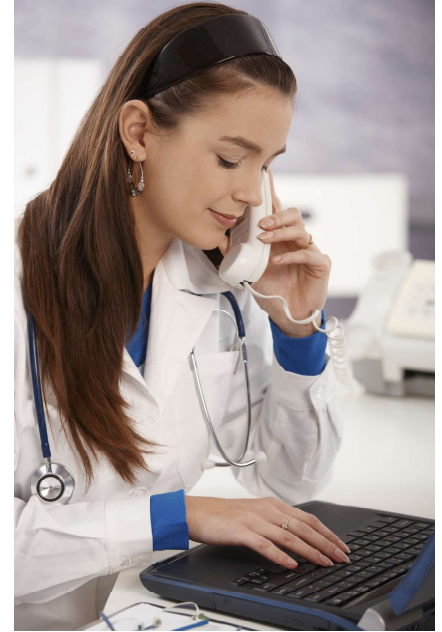
It is the policy of Meritus Health that **no person will be subject to retaliation for reporting suspected violations or concerns in good faith.** Retaliation is subject to discipline, up to and including, dismissal from employment, suspension of medical staff privileges and/or termination of business relationships.



How to Report a Concern

If you believe that this Code of Conduct may have been violated or you have a question or concern, you may file a report by:

- Contacting your manager, supervisor or medical staff leader
- Completing an electronic event report
- Contacting the department of business integrity at 301-790-8414
- Email compliance@meritushealth.com
- Making an **anonymous report** by calling the Meritus Health GUIDeline at 301-790-7950 or 888-847-9247 (toll-free). **The GUIDeline is completely confidential and is available 24 hours a day, 7 days a week.**



How Reports Are Handled

The business integrity department is responsible for oversight of the health system's Code of Conduct reporting process. Every attempt will be made to resolve issues quickly and at the lowest possible level of the organization. However, depending upon the circumstances and individuals involved, the appropriate board, medical staff and human resources policies, procedures and bylaws may be utilized in responding to incidents of inappropriate conduct.



Remember ...



Meritus Health strictly prohibits retaliation, in any form, against an individual for reporting an issue or concern in good faith.

Our organization, our patients and our community all count on your personal commitment to ensuring that we operate with integrity and the highest standards of ethical behavior.

If you have any questions or concerns about the way that Meritus Health (or any of its employees or agents) conducts business, you may call the Chief Compliance Officer, Laurie Bender, at 301-790-8812.



Department of Business Integrity

11116 Medical Campus Road
Hagerstown, MD 21742
301-790-8414
MeritusHealth.com