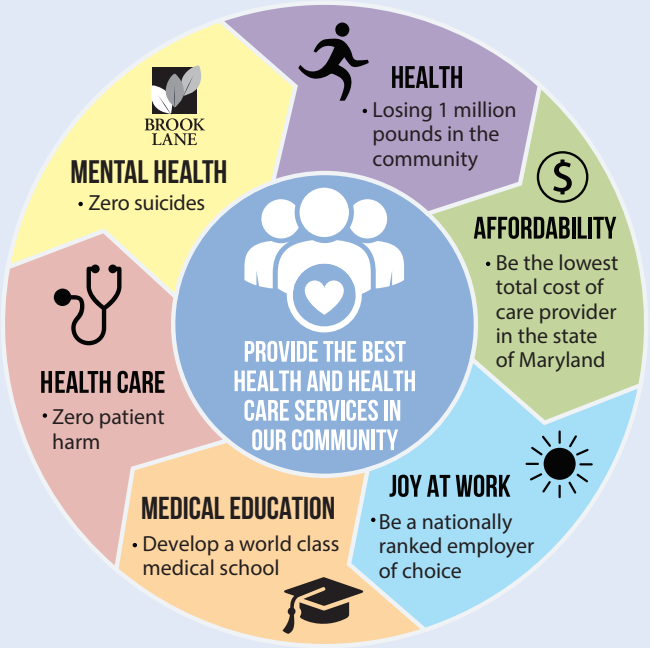
Code of Conduct

Meritus™
Health

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 by providing the best healthcare, health services and medical education.

Vision

To serve as a model community-based, academic 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 All Colleagues,

Meritus Health has a mission to improve the health of our community by providing the best healthcare, health services and medical education. Our vision is to serve as a model community-based, academic health system. That vision can only be accomplished with all of us working together as a team and deeply committed to our Code of Conduct.

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 contribute to making Meritus the model community-based, academic health system we aspire to be:

I=Integrity - We do the right thing, no matter what. This Code of Conduct is essential to how we behave and operate to serve our patients, students and our community with the highest level of ethical standards.

A=All in for quality and outcomes - Quality improvement isn't just something we talk about, it's a commitment we each live. This Code of Conduct represents our expectations for doing our work every day with excellence.

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. This Code of Conduct guides how we serve with compassion.

T=Teamwork - Nobody can do it alone. At Meritus we are one team that is diverse and inclusive, and we support one another and our goals. This Code of Conduct helps us work together effectively and respectfully.

This Code of Conduct is essential to how we behave and how we operate to serve our patients, students and our community. It represents our commitment to the highest level of ethical standards and 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.

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

Robert "BJ" Goetz
Chairman, Board of Directors
Meritus Health, Inc.

Dear Brook Lane Colleague,

Brook Lane, working alongside our affiliated organizations within the Meritus Health network, is committed to integrity and excellence in our behavioral health services for our patients, students, and the community. By joining forces, Brook Lane and Meritus Health have created a comprehensive care network that integrates clinical excellence with a shared commitment to the values that define our community.

As behavioral health professionals and support staff, we have a profound ethical responsibility to create a therapeutic environment where our patients and students feel secure, respected, and treated with dignity. In addition to an ethical responsibility, we also have a legal responsibility to comply with all applicable laws and regulations related to patients' rights and student privacy. This Code establishes the clear expectations for team members when interacting with patients, students in our educational programs, families, the community, and fellow team members.

Our vision is to provide exceptional behavioral health care as a vital component of the Meritus Health system. This Code of Conduct reflects our commitment to maintaining the highest standards in all aspects of our work, from clinical care to educational initiatives.

By committing to our Code of Conduct, you are joining all of us across our system of care to improve the health of our community by providing the best healthcare, health services and medical education. Thank you for your dedication to those we serve and the values we uphold together.

Carrie Adams, Pharm.D.
Interim Chief Executive Officer
Brook Lane

Lauren Huguenin
Chair, Board of Directors
Brook Lane

Dear MSOM Colleague,

The Meritus School of Osteopathic Medicine is committed to promoting and ensuring a safe and respectful educational and working environment for its faculty, staff and students, that is free of harassment, and that maintains academic freedom. The purpose of this Code is to set forth with more clarity of MSOM's expectations for the professional conduct of its faculty and team members.

The conduct of faculty and academic staff serves as a powerful influence in the professional development of learners as they model professionalism in their interactions with others. By upholding the expectations set forth in the Code of Conduct we fulfill our mission to "prepare future generations of physicians who are professionally accomplished, socially responsible, and community oriented."

While comprehensive, this Code cannot address every potential situation. Faculty and staff remain accountable for maintaining professional standards even in circumstances not explicitly covered here. The principles of respect, integrity, and excellence should guide all professional interactions. Violations of either the letter or spirit of this Code may be subject to appropriate review and response. Together, we strive to create an exemplary learning environment where our students can thrive and develop into the compassionate, skilled physicians our community needs.

Brian Kessler, D.O., D.H.A., FACOFP DIST.
Dean
Meritus School of Osteopathic Medicine

Fr. Stuart Dunnan
Chair, Board of Directors
Meritus School of Osteopathic Medicine

Dear Meritus Medical Center Colleague,

Meritus Medical Center stands as the cornerstone of healthcare excellence in our region. As the flagship facility within our integrated health system, we hold ourselves to the highest standards of clinical care, patient safety, and professional integrity. This Code of Conduct reflects our unwavering commitment to these principles.

Our mission to improve the health of our community guides every interaction and decision we make. As healthcare professionals and staff entrusted with the care of our community members during their most vulnerable moments, we recognize both the privilege and responsibility this represents.

This Code of Conduct serves as our shared commitment to ethical practice, regulatory compliance, and professional excellence. While comprehensive, it cannot address every situation you may encounter. When faced with difficult decisions, we encourage you to consult with leadership, seek guidance from our compliance resources, and always prioritize patient well-being.

By adhering to this Code, you contribute directly to our vision of being the best health system. Your dedication to exemplary patient care, operational excellence, and continuous improvement strengthens our entire organization and advances our healing mission.

Thank you for your commitment to Meritus Medical Center and to the patients and families who place their trust in us each day. Together, we create a healthier future for our community.

Carrie Adams, Pharm.D.
President
Meritus Medical Center

Robert "BJ" Goetz
Chair, Board of Directors
Meritus Medical Center

Dear Meritus Medical Group Colleague,

In physician offices and specialty clinics across our region, you represent the face of healthcare for our community. Each day, patients choose Meritus Medical Group for their ongoing care needs, entrusting you with their health concerns, personal information, and medical decisions. This special relationship forms the foundation of community wellbeing.

The Code of Conduct you hold reflects the unique responsibilities we carry as outpatient providers and staff. Unlike the episodic care of a hospital setting, our work often involves building relationships that span years or even decades. We become trusted advisors in our patients' health journeys, a role that demands unwavering integrity and professionalism.

Our mission to improve the health of our community takes on personal meaning in our practices. With each preventive screening, timely diagnosis, and thoughtful treatment plan, we fulfill this mission one patient at a time. The collective impact of these individual encounters shapes the health landscape of our entire region.

This Code serves as our shared commitment to the highest standards of patient care, professional behavior, and ethical practice. When you encounter challenging situations or difficult ethical questions, please don't hesitate to reach out to your practice leadership, compliance resources, or ethics committee for guidance. We are here to support you in upholding these important standards.

By living these standards daily, you bring us closer to our vision of being the best health system. Your dedication makes a profound difference in the lives of our patients and the health of our community.

Miranda Ramsey
Vice President
Physician Services for Meritus Medical Group

Robert "BJ" Goetz
Chair, Board of Directors
Meritus Medical Center

Purpose of the Code of Conduct

Meritus Health, encompassing Meritus Medical Center (MMC), Meritus Medical Group (MMG), Brook Lane, the Meritus School of Osteopathic Medicine (MSOM), and all affiliated entities within our health system is firmly committed to operating with a spirit of trust and integrity. We recognize that our reputation for honesty, fairness, and ethical conduct isn't built through policies alone—it emerges from the daily actions and decisions of each team member across our entire organization.

This Code of Conduct, which has been adopted by the Boards of Directors of Meritus Health, Inc., Meritus Medical Center, Brook Lane, and the Meritus School of Osteopathic Medicine, and endorsed by leadership throughout our organization, outlines the organization'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;
- 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 provide guidance to assist us in carrying out our daily responsibilities to the organization, the patients and the community that we serve.

Provide safe, high-quality and compassionate care and service.

Patients, students, and families who entrust their care and education 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 and education in a manner that is safe, compassionate and caring.

We are committed to understanding the needs and expectations of all those we serve 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 in everything we offer.

Expected Behaviors

Patient Care

You are expected to:

- Strive for quality in your job performance, always giving your best effort on the job
- Maintain credentials, 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 service excellence standards of your department and the system
- Actively participate in the quality improvement and safety activities of your department / business unit, school 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, complete and legible manner

Expected Behaviors

Education

You are expected to:

- Strive for quality in your job performance, always giving your best effort on the job
- Maintain credentials, skills and current competence in your areas of responsibility
- Provide education in accordance with all professional standards that apply to your position
- Act in the best interests of students
- Comply with your departmental and system-wide safety rules, policies, procedures
- Abide by all service excellence standards of your department and the system
- Actively participate in the quality improvement and safety activities of your department / business unit, school 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 students and fellow workers
- Complete documentation in a timely, accurate, complete and legible manner
- Uphold the highest standards of academic integrity and educational ethics in all teaching activities
- Actively seek and respond to student feedback to continuously improve educational experiences

Unacceptable Behaviors

Patient Care

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

Unacceptable Behaviors

Education

It is unacceptable to:

- Ignore safety concerns expressed by a student
- Refuse to comply with known and generally accepted practice standards
- Deliberately fail to adhere to organizational policies designed to protect our students and improve educational experience
- Provide services that you are not qualified to provide

Respecting Privacy and Confidentiality.

Our values should guide us in our relationships with patients and their families, students, visitors, colleagues, vendors and whomever we do business. We are committed to maintaining confidentiality and privacy of our patients and students. In addition to following the guidelines in this Code of Conduct, ensure you follow the guidelines applicable to your role within Meritus.

Expected Behaviors

Patient Care

You are expected to:

- Treat all patients, colleagues and those we serve 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 rights
- Protect the privacy and confidentiality of all medical and other information of those in your care
- Follow the 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 colleagues and patients from misuse, theft or unauthorized access

Unacceptable Behaviors

Patient Care

It is unacceptable to:

- Discriminate against patients or those we serve based on sex, race, age, sexual orientation, national origin, disability, diagnosis or ability to pay
- Violate patient privacy or confidentiality by:
  - Discussing private 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 patientinformation for any reason other than a need-to-know basis
  - Making unauthorized disclosures of protected health information
- Violate patient rights in any other manner

Expected Behaviors

Education

You are expected to:

- Treat all students, colleagues and those we serve with dignity and respect regardless of sex, race, age, sexual orientation, national origin, disability, diagnosis or ability to pay
- Understand and follow departmental and system-wide policies on student rights
- Protect the privacy and confidentiality of all medical and other information of those in your care
- Follow the system's policies on privacy, confidentiality and release of information and to access patients' and students' personal and health information only on a need-to-know basis
- Safeguard confidential information regarding our colleagues and students from misuse, theft or unauthorized access
- Maintain appropriate professional boundaries in all student interactions

Unacceptable Behaviors

Education

It is unacceptable to:

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

Provide a safe and respectful work environment.

Supporting and promoting a positive work environment requires teamwork among all individuals involved. Research consistently demonstrates that work environment has a direct impact on the quality and safety of care delivered to our patients and the educational experience of our students.

At Meritus Health, we are committed to providing a work environment where all team members are treated with honesty, dignity, fairness and respect. We actively foster a culture of psychological safety where speaking up about concerns is encouraged and valued. We support the right of every employee, medical staff member, faculty, volunteer, contractor and student to work in an environment free of unlawful harassment or abusive, threatening or intimidating behavior. Disruptive behavior endangers patient care, compromises educational quality, erodes team cohesion, and undermines our healing and teaching missions. Such behavior will not be tolerated, and we are committed to addressing concerns promptly and fairly when they arise.

Expected Behaviors

Patient Care

You are expected to:

- Treat every member of the organization and health care team with courtesy and respect, recognizing that collaborative care improves patient outcomes
- 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

Expected Behaviors

Education

You are expected to:

- Treat every member of the academic community with courtesy and respect, modeling the professional behavior we seek to instill in students
- 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

Unacceptable Behaviors

Patient Care

It is unacceptable to:

- Use 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, those we serve, families or other staff
- Make comments that undermine a patient's or 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
- Fail to return calls or emails promptly

Unacceptable Behaviors

Education

It is unacceptable to:

- Use 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 faculty staff (e.g., outbursts of anger, throwing instruments, charts or other objects, etc.)
- Criticize fellow employees in front of students or other staff
- Make comments that undermine a student's trust in fellow faculty or administration
- Retaliate or threaten retaliation, as a result of an individual's negative response to harassing conduct
- Shame others for negative outcomes
- Fail to return calls or emails promptly

Comply with the laws and regulations that govern our business.

The delivery of health care and education 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 and FERPA, 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 (EMTALA), 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

Patient Care

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)*

Expected Behaviors

Education

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 MSOM and other educational facilities
- 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)*

Unacceptable Behaviors

Patient Care

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

Unacceptable Behaviors

Education

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 2024, which are updated annually, range from $13,946 -27,894 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. You may also report anonymously by calling the Compliance Hotline at 301-790-7950 or 888-847-9247 (toll-free).

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.

In addition, if you are a research investigator or another research team member involved in research at Meritus Health you have an obligation to conduct research that is free from any appearance of impropriety or conflict of interest. Any conflicts of interest or potential conflicts of interest must be evaluated by the department of business integrity.

Expected Behaviors

Patient Care

You are expected to:

- Act in the best interest of Meritus Health and the patients and community it serves, when dealing with vendors and others with whom we do business
- Learn to recognize potential conflicts of interest
- 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

Expected Behaviors

Education

You are expected to:

- Act in the best interest of MSOM, Brook Lane, and the students, it serves, when dealing with vendors and others with whom we do business
- Learn to recognize potential conflicts of interest
- 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 MSOM and Brook Lane

Unacceptable Behaviors

Patient Care

It is unacceptable to:

- Use your position to profit personally to assist others in profiting at the expense of Meritus Health
- 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

Unacceptable Behaviors

Education

It is unacceptable to:

- Use your position to profit personally to assist others in profiting at the expense of MSOM or Brook Lane.
- 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
- 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

Honor the trust of our patients, students, 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

Patient Care

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

Patient Care

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

Expected Behaviors

Education

You are expected to:

- Serve as ambassadors of Meritus School of Osteopathic Medicine (MSOM).
- Adhere to MSOM'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 Communications department;
- Any release of student information to the media, which we initiate, must have a signed consent by the student and be approved by the applicable department

Unacceptable Behaviors

Education

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 the organizations 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, faculty, 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**

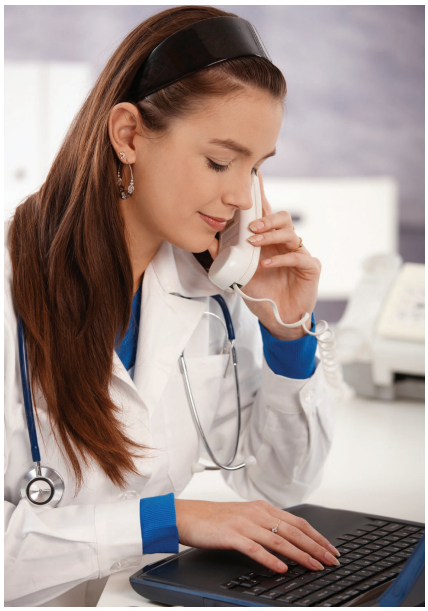
In the delivery of health-care and education services, we often deal with new and complex rules and procedures. As a result, there will likely be times when the answer to a particular issue is not clear. It is your responsibility to ask questions when you don't know the answer and are uncertain about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

- Contacting your manager, supervisor or senior leader
- Completing an electronic event report
- Contacting the department of business integrity
- Email compliance@meritushealth.com
- Making an **anonymous report** by calling the Compliance Hotline at 301-790-7950 or 888-847-9247 (toll-free). ***The Compliance Hotline 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 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, faculty, and team member services 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 Director of Integrity and Privacy Officer, Tara Overton, at 301-790-8812 or Chief Compliance Officer, Lynn Haines at 301-790-8877.

Department of Business Integrity

11116 Medical Campus Road
Hagerstown, MD 21742
301-790-8409
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Revised 6/2026