

# MONROE COUNTY HEALTHCARE AUTHORITY BUSINESS CODE OF CONDUCT GUIDE

## *Display good judgment and high ethical standards in your business dealings.*

All of our business affairs must be conducted with honesty, fairness, and integrity. These qualities are evidenced by truthfulness and the absence of deception or fraud.

MONROE COUNTY HEALTHCARE AUTHORITY, DOING BUSINESS AS MONROE COUNTY HOSPITAL, HAS CONFIDENCE IN THE LOYALTY AND INTEGRITY OF OUR OFFICERS, STAFF, CONTRACTORS, AND VENDORS. THE BOARD OF DIRECTORS OF OUR COMPANY CONSIDERS IT DESIRABLE, HOWEVER, TO PUBLISH THIS GUIDE IN ORDER TO ASSIST IN THE AVOIDANCE OF CONFLICTS OF INTEREST AND IMPROPER CORPORATE ACTIVITIES, AND IN ASSURING THAT ALL APPLICABLE LAWS ARE OBEYED.

### 10 BUILDING BLOCKS OF OUR BUSINESS CODE OF CONDUCT

1. Sell the hospital's services and products fairly and honestly, stressing their value and merits.
2. Display good judgment and high ethical standards in your business dealings.
3. Do not use confidential information for personal gain.
4. Conduct personal business to avoid conflicts of interest.
5. Use good judgment when giving gifts to customers.
6. Use hospital property for business only.
7. Keep honest and accurate financial records.
8. Consult the Administrative Office or Compliance Officer about non-routine requests from national, state, and municipal government agencies.
9. Do not use hospital funds for improper or illegal activities.
10. Do not break the law.

#### **Management and Consultation**

Corporate officers, department heads and administrators are responsible for taking timely action, including any necessary remedial action, in response to any matter which arises under these policies. With respect to any such matter, any person has access to and is encouraged to consult with managers, Administrative Officers, or the Compliance Officer as circumstances may require.

#### **Officers, Department Managers, and Administrators**

If you receive a compliance-related concern, complaint, or report from someone (such as an employee, patient, vendor or physician), promptly advise the Compliance Officer or the Chief Executive Officer. After timely appropriate investigation, remedial or other action will be taken as appropriate. The Business Code of Conduct should be reviewed at least annually with employees. Managers are responsible for departmental compliance assessment, training, and reporting to the Compliance Officer. These reviews will be reported to the Board of Directors at least quarterly.

#### **All Officers and Other Employees**

It is your responsibility to detect and report compliance concerns. Share your concerns with your manager, or Administrative Officer, or the Compliance Officer. Anonymous reports may be made to the HealthCare Ethics hotline at 1-800-398-1496 (English) or 1-800-216-1288 (Spanish). You should report your concern if you are requested to make, accept, authorize, or agree to any offer, action or payment which may be contrary to this Business Code of Conduct, the policies in the hospital's Legal Compliance Manual, or is contrary to the law. It is also your responsibility to report anyone who you believe is not following these standards. You must also report known (or possible) conflicts of interest involving yourself or others.

#### **Educational Programs**

Orientation and educational programs, including ethics/compliance training, financial management, and marketing will include instruction in matters covered by these policies.

#### **Responsibility Appraisal**

Actions of employees under these policies are significant indications of judgment and competence. These actions constitute an important element in evaluation, position assignment and promotion. Violations of these policies and the law are subject to disciplinary action, including discharge.