

CORPORATE COMPLIANCE

CODE OF CONDUCT



PORTAGE HEALTH
COMPLIANCE PROGRAM



PORTAGE HEALTH
Here for life.

PORTAGE HEALTH CODE OF CONDUCT

Portage Health is committed to providing quality care to our patients. As part of this, we must consistently demonstrate that we act with absolute integrity in the way we do our work and conduct our business.

By Resolution of the Portage Health Board of Directors, Portage Health has in place a Compliance Program to ensure that all Portage Health's associates (i.e., *employees, medical staff, volunteers, directors, officers, suppliers, vendors, contractors, consultants and agents*) conduct themselves in a manner consistent with the mission, vision and values of Portage Health, including complying with ethical, professional, and legal obligations.

This **Code of Conduct** is an integral part of Portage Health's Compliance Program, and has been developed to provide guidance to all Portage Health associates in carrying out our daily activities within the appropriate ethical and legal standards. No document or code will cover every situation that an associate may encounter, nor is it a substitute for personal integrity, common sense, or sound judgment.

Accordingly, each associate is expected to discuss with his or her supervisor, the Compliance Officer, or another appropriate person, a situation that he or she feels may not be in compliance with the law, or which is deemed to be unfair or unjust. Portage Health's Compliance Program is designed to be a resource to all Portage Health associates, providing guidelines, education, and tools to help you "***do the right thing.***" The Compliance Program is built on basic principles such as:

- Treating others with respect and dignity
- Using good judgment
- Maintaining high ethical standards
- Raising concerns when appropriate

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A MESSAGE FROM THE PRESIDENT



JIM BOGAN

Dear Portage Health Associate,

At Portage Health we have always had a tradition of caring - for our patients, our communities, and our associates. We must demonstrate consistently that we have a commitment to act with absolute integrity in the way we do our work and the way we live our lives. Unwritten, but certainly understood in our mission statement is our continual pledge to comply with all federal, state and local laws, regulations and rules.

In further demonstration of our commitment, Portage Health has published a Code of Conduct, which reflects our tradition of caring and provides guidance to ensure that our work is done in an ethical and legal manner. This Code of Conduct has to do with our corporate character and puts our practices into words. It emphasizes the shared common values which guide our actions. It also contains resources to help resolve any questions about appropriate conduct in the work place. Please review it thoroughly. Your adherence to its spirit, as well as its specific provisions, is absolutely critical to our future.

If you have questions regarding this Code of Conduct or encounter any situation which you believe violates provisions of this Code of Conduct, you should immediately consult your supervisor, another member of your management staff, or a member of the Compliance Department. You may also contact the Compliance Hotline at (906) 483-1990. You have my personal assurance there will be no retribution for asking questions or raising concerns about the Code of Conduct or for reporting possible improper conduct.

We have a rich heritage of integrity and ethics, which are reflected in our Mission, Vision and Values here at Portage Health, as well as in our Code of Conduct. We are equally committed to assuring our actions consistently reflect our words. In this spirit, we want this organization to be a family of men and women of shared values, and we expect all of our associates' actions to reflect the high standards set forth in this Code of Conduct.

No Code of Conduct can substitute for our own internal sense of fairness, honesty, and integrity. Thus, in our daily lives and work, if you encounter a situation or are considering a course of action which "does not feel right", please discuss the situation with any of the resources mentioned above. Please read the Code of Conduct carefully. Compliance is not the responsibility of one person, one department or one unit. To have a successful program, we need everyone's help.

Sincerely,

A handwritten signature of Jim Bogan in dark ink. The signature is cursive and matches the printed name below it.

Jim Bogan
President

MISSION

- To improve the health of our community by providing the highest quality healthcare services.

VISION

- To be a leader in promoting preventive medicine, restoring health and enhancing the quality of life.
- To have a culture of safety.
- To be a great place to work.
- To be the first choice for healthcare services.

VALUES & EXPECTATIONS

ACCOUNTABILITY — We use our human and financial resources responsibly. Utilizing our time well and embracing technology to enhance productivity.

COMMUNICATION — We strive for transparent and skillful communication that supports organizational success, protects confidentiality, and strengthens trust.

EXCELLENCE — We constantly strive to provide the highest quality of clinical care and maintain a safe environment.

INNOVATION — We identify and apply innovative approaches that promote the mission and vision of the organization, seeking out new ideas and processes, and adapting to change.

RESPECT — We treat all people with respect and compassion. Being honest in all situations, accepting differences, and acting selflessly thinking of others first.

TEAMWORK — We demonstrate that our strength is in our people, working together with personal responsibility and trust. Anticipating the needs of each other and leading with a positive attitude and recognition of others.

CONFLICT OF INTEREST

Portage Health associates are expected to conduct business in a manner that promotes the integrity and reputation of Portage Health in order to avoid situations that may be perceived as inappropriate. If you or a member of your household has a financial interest in an organization (e.g., vendor, contractor, or competitor) that creates a potential to influence decisions that you may make for the organization, you must complete the ***Disclosure Statement Regarding Conflict of Interest*** and give it to your supervisor (see the Conflict of Interest policy).

Gifts and Gratuities

- Gifts must never be accepted or used to improperly influence relationships or business outcomes (See Gifts and Gratuities policy).
- Vendor relationships are subject to the guidelines in Portage Health's ***Gifts and Gratuities*** policy.

Honoraria

Honoraria for speeches and articles given or prepared by associates as part of their duties for Portage Health are to be paid to Portage Health. The associate may only retain honoraria if:

His/her speech or article is totally prepared outside of work and outside of the scope of his/her Portage Health duties, ***and***;

There is a prior written agreement with the associate.

Outside Business Activities

Activities related to business outside of Portage Health, and are subject to the guidelines described in Portage Health's ***Conflict of Interest*** policy, must be conducted on an employee's own time and must not conflict with job responsibilities at Portage Health. A conflict of interest may occur if:

Decisions while working at Portage Health may be influenced or appear to be influenced.

Portage Health resources are used.

Business is solicited for another organization while working at Portage Health.

CONFIDENTIALITY

Confidentiality is a right of every patient at Portage Health, and guarding patient confidentiality is an obligation of every Portage Health employee. It is Portage Health's policy to adhere to all laws and regulations pertaining to the privacy and confidentiality of patient information or any other sensitive information or records. Patient information can be accessed or shared only when there is a legitimate business need for such information.

Confidential information includes employee data maintained by the organization, patient lists and clinical information, pricing and cost data, information pertaining to affiliations, financial data, research data, strategic plans, marketing strategies and techniques, employee lists, and proprietary computer software. The inappropriate release of confidential patient or employee information may be subject to civil and criminal prosecution as well as disciplinary action that may include termination. You are expected to limit access to patient information and obtain appropriate release of information forms when required by applicable laws.

CONTRACTS WITH PHYSICIANS



To insure compliance with the Federal Anti-Kickback and Stark laws, all contracts with physicians of a financial nature (including but not limited to employment agreements, independent contractor agreements, medical director agreements, purchase agreements and/or leases) may only be executed by persons designated by the President, and, only after such agreements have been reviewed and approved by outside legal counsel and by the Board Compensation Committee.

DOCUMENTATION ACCURACY, RETENTION & DESTRUCTION

Each Portage Health associate is responsible for the integrity and accuracy of our organization's documents. We will comply with regulatory and legal requirements, ensuring that records are available to reflect and/or defend our business practices and actions. No one may alter or falsify information on any document. Medical and business documents are retained in accordance with the law and our record retention policy. It is important to retain and destroy records appropriately according to our policy. Records or documents that have satisfied the required period of retention will be destroyed in a manner to preserve patient confidentiality.

YOUR RESPONSIBILITIES AS AN ASSOCIATE



Portage Health associates have a responsibility to:

- Conduct themselves in an ethical manner.
- Abide by hospital and department policies.
- Abide by applicable laws and regulations.
- Comply with all mandatory educational requirements.
- Report to your supervisor or the Compliance Officer, violations of law or unethical practices.
- Use the reporting system appropriately and refrain from making allegations you know to be untrue.

If at any time you are faced with a situation in which you are unsure of what is expected of you (what is the right thing to do), it is your duty to discuss your questions or concerns with your supervisor, the Compliance Officer, or another appropriate person.

If you don't know the right thing to do — ask — and keep asking until you are satisfied that you know what is the right thing to do.

USE OF CORPORATE PROPERTY

An associate of Portage Health shall not utilize the equipment, supplies, funds, or other assets or property of the Organization for any personal purposes or for the direct or indirect benefit of any member of his or her family or household. No property of the Organization shall be sold, leased or otherwise conveyed to any associate or any other person, unless such person pays fair market value for the item sold, leased or conveyed, together with all applicable federal, state and local taxes.

AN OBLIGATION TO REPORT ILLEGAL OR UNETHICAL PRACTICES

PORTAGE HEALTH HOTLINE

Portage Health has established a Compliance Hotline to report suspected violations or compliance concerns to the Compliance Officer or Privacy Officer.

THREE-STEP REPORTING PROCESS

Discuss questions or concerns with your supervisor or Human Resources. If you are not comfortable talking with your supervisor, or are not satisfied with the answer received, contact a higher-level manager or Compliance.

If you would like to report a concern anonymously, you may contact the **Portage Health HOTLINE:**

Compliance Hotline: (906) 483-1990

Compliance Officer Betty MacInnes: (906) 483-1504

Portage Health shall, to the extent possible, protect the confidentiality of all persons filing reports through the Hotline and/or through other communication methods established under the Compliance Program.

NON-RETALIATION FOR REPORTING

Portage Health policy prohibits any employee, physician, or other corporate representative from taking retaliatory action against an associate who reports compliance related concerns. Any employee who conducts or condones retribution, retaliation, or harassment in any way will be subject to discipline, up to and including termination of employment. The Compliance Officer will actively assist any associate who feels that he or she is being treated unfairly as a result of actions taken by him or her in good faith under the Compliance Program.

REGULATORY COMPLIANCE

While an associate is not required to have full knowledge of all such laws, the expectation is that he or she will have a general knowledge of prohibited activities relating to his or her own work responsibilities, and that all associates will seek guidance from his or her supervisor or from the Compliance Officer with respect to any matter on which he or she has any reasonable concern.

Examples of compliance with some of the laws and statutes that apply to health care providers include:

ANTITRUST

We do not share price or wage information with competitors to fix prices.

ANTI-KICKBACK

Fair Market Value is established in business arrangements.

EMTALA (EMERGENCY MEDICAL TREATMENT AND LABOR ACT)

Patients presenting with an emergency medical condition will be provided stabilizing treatment or an appropriate transfer regardless of ability to pay. Examination and treatment of a patient with an emergency medical condition will not be delayed in order to obtain information about the person's insurance coverage or method of payment.

FALSE CLAIMS ACT

Only complete and accurate bills are submitted for services; billing requirements are followed.

HIPAA

We follow the framework of required standards for maintaining the security and privacy of patient's health information.

STARK

Agreements with physicians are reviewed and approved by the Board Compensation Committee prior to implementation.

TAXATION

Portage Health is a tax-exempt, charitable organization that operates for the benefit of the public and not for any private interest.



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