

Code of Conduct



OUR MISSION

To improve the health and quality of life of the individuals and communities we serve.

OUR VALUES

People

We are committed to excellence in serving and supporting our patients, our physicians, our guests and fellow team members.

We not only care for people, we care about them.

We will do everything in our power to ensure that all people are treated with respect, dignity, kindness and compassion.

We will listen intently to our customers and each other with open minds and with open hearts.

We will make a positive difference in the lives of the people we serve.

Quality

We will never compromise on quality.

Our team will provide the highest quality of care and service in everything we do.

We will take responsibility for conserving time, money and resources.

We will be creative and versatile as a team in our solutions.

Community

We are proud to serve the people of this community.

We will never lose sight of the fact that we are a community-owned organization.

We will demonstrate, in our words and actions, the highest level of commitment to each community we serve.

OUR VISION

A trusted leader inspiring hope through the advancement of health.

PROMISE

Positive Attitude

- Choose and commit to a positive attitude everyday.
- Smile and greet others.
- Treat taking care of people as an honor.

Respect

- Reduce suffering - be sensitive to the fears and frustration of patients and guests.
- Personally escort guests to their destination.
- Put our patients' first in every situation.

Ownership

- See it, Own it, Solve it.
- Take ownership in creating a quality outcome for every interaction.
- Ask *“What action can I take right now to improve the patient experience?”*

Mindfulness

- Stop and focus on the person, not the task.
- Look and understand the uniqueness of your patient.
- Listen to your patient and remember to provide safe patient care.

Inclusiveness

- Appreciate and value everyone as an individual.
- Be understanding of differing opinions.
- Validate others by showing empathy.

Superior Communication

- Keep others informed by explaining routines, plan of care, delays and the “why” behind what you are doing.
- Ask for clarification when needed.
- Ask open-ended questions to further understand needs.

Exceed Expectations

- Anticipate needs to create a memory of kindness.
- Do something unexpected to delight guests...going above and beyond is often all about the little things.
- Thank patients for allowing you the privilege to care for them.

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INTRODUCTION

As one of Central Florida's premier healthcare systems, Orlando Health recognizes that fostering an atmosphere of integrity and honesty is of utmost importance. To ignore our responsibilities would jeopardize our mission to improve the health and quality of life of the individuals and communities we serve. In addition, our strategic vision of everyone working together as a team to provide the best quality, comfort and service to our patients and guests in a genuine, caring environment would be at risk.

The purpose of the Code of Conduct is to assist us in maintaining Orlando Health's high ethical standards in all business dealings. It will help guide us in making decisions that conform to the ethical and legal standards expected of us all. While the Code of Conduct is designed to provide overall guidance, it does not address every situation. More specific guidance is provided in Orlando Health's policies and procedures.

If there is no specific policy, the Code of Conduct becomes the policy. If a policy and the Code of Conduct conflict, the Code of Conduct becomes the policy. The Code of Conduct is a "living document" that is periodically updated to respond to changing conditions. Questions regarding the Code of Conduct, or any issue, should be brought to the attention of our immediate supervisor, then up through leadership, including the chief compliance officer. Issues can also be reported anonymously to our confidential Compliance Hotline.

The Code of Conduct is not an employment contract, nor is it intended to provide any expressed or implied rights of continued employment. Conduct contrary to the Code of Conduct will result in an investigation and possible disciplinary action up to and including discharge.

Orlando Health is committed to conducting its business in full compliance with all applicable Laws, Regulations and Policies. When used in this document, "Laws, Regulations and Policies" refer to:

- Federal, state and local laws and regulations
- Requirements such as the Centers for Medicare and Medicaid Services' (CMS) Conditions of Participation
- Accreditation standards such as those required by The Joint Commission and other accreditation entities
- Orlando Health corporate policies and procedures
- Orlando Health Code of Conduct
- Any other rules, regulations or requirements that may be applicable

We have an affirmative duty to be compliant and report compliance concerns. Adherence with the Code of Conduct and Corporate Compliance Program applies to all team members, as well as Board members, providers, volunteers, students and other individuals authorized to act as representatives of Orlando Health. Further, the Code of Conduct applies to community physicians, vendor representatives and independent contractors while carrying out their duties at or on behalf of Orlando Health.

CORPORATE COMPLIANCE PROGRAM

The Corporate Compliance Program exists to assist us in complying with Laws, Regulations and Policies. The program supports team members and other affiliates by providing education on these requirements while being a resource to consult and interpret corporate policy and compliance matters. The Corporate Integrity department sustains the Corporate Compliance Program by staying abreast of current healthcare trends and information to better forecast the evolving compliance needs of Orlando Health.

“Corporate Integrity” refers to Orlando Health’s Corporate Compliance, Internal Audit, Privacy and Information Security teams collectively. Corporate Integrity does not replace any other function within Orlando Health. The department helps to ensure that we are providing excellent patient care in accordance with Laws, Regulations and Policies.

THE THREE-STEP COMMUNICATION PROCESS

Maintaining the ethical standards of Orlando Health is everyone’s responsibility.

If we become aware of or suspect a situation that might jeopardize the ethical integrity of our organization, it is our obligation to report the circumstances.

The *Three-Step Communication Process* was developed to assist us with our responsibility to report possible violations of Laws, Regulation or Policy. The process asks us to do the following:

1. Talk to our immediate supervisor;
2. Talk to the manager or director responsible for our area; or
3. Call our confidential Compliance Hotline at 888.464.6747.

For more information about our *Three-Step Communication Process*, please see below.

COMPLIANCE HOTLINE

What steps should we take to report a concern?

First, concerns should be reported as outlined in our *Three-Step Communication Process* above. If those reports are not acted upon in a timely manner, we should call our confidential Compliance Hotline.

What is our confidential Compliance Hotline?

Orlando Health’s Compliance Hotline is a simple, confidential, risk-free method for us to report concerns. The Compliance Hotline is available 24 hours a day, seven days a week and is managed and operated by an independent communications firm hired by Orlando Health to ensure the integrity and objectivity of compliance reporting. All suspected violations of Laws, Regulations or Policies must be reported when known or suspected. Examples of reportable activities include but are not limited to violations related to:

- Patient rights
- Professional standards of practice

COMPLIANCE HOTLINE (continued)

- Medicare/Medicaid fraud and abuse
- Fraudulent documentation, coding or billing
- Professional and business ethics
- Bribes or kickbacks
- Confidentiality concerns
- Conflicts of interest

What happens when we make a call?

Calls to the Compliance Hotline are answered by an independent, third-party communications specialist who will document the information and generate a written report. Upon receipt, Corporate Compliance will initiate an investigation and collaborate with the appropriate department for inquiry. Results will be reported back to the communications specialist who will provide an update for the caller to retrieve if desired.

To protect everyone involved, no disciplinary or legal action will be taken based solely on Compliance Hotline calls. Only substantiated findings from an investigation will result in further action.

Do we have to reveal our name?

No. We are not required to identify ourselves and calls are not recorded. At the end of the call, the communications specialist will assign a uniquely coded number that can be referred to during any follow-up calls.

What if we do not have all the facts?

We should call the confidential Compliance Hotline even if we are not sure there is a problem. Corporate Compliance will investigate the information provided and take appropriate action if warranted.

COMPLIANCE REPORTS CAN BE MADE THE FOLLOWING WAYS:

Call the confidential Compliance Hotline:

888.464.6747

Call Corporate Integrity directly:

321.841.2335

Send concerns in writing to:

David Huddleson
Chief Compliance Officer
Orlando Health
1414 Kuhl Ave., MP 29
Orlando, FL 32806

Email concerns to the chief compliance officer at:

david.huddleson@orlandohealth.com

Government regulation of the healthcare industry is increasingly complex. Furthermore, federal and state governments have made healthcare fraud and abuse a top law enforcement priority. Orlando Health takes its responsibility to comply with the law very seriously and has taken steps to prevent, detect, deter and correct legal violations. The following standards are neither exclusive nor complete. We are required to comply with all applicable laws, whether or not they are specifically addressed in corporate policy or the Code of Conduct. If we have any questions regarding the existence, interpretation or application of any law, we should contact Corporate Integrity or the Legal Department.

Antitrust

Antitrust laws are designed to create a level playing field in the marketplace and to promote fair competition. We will comply with applicable antitrust and similar laws that regulate competition. There will be no discussions or agreements with competitors regarding price or other terms for product sales, prices paid to suppliers or providers, dividing up customers or geographic markets, or joint action to boycott or coerce certain customers, suppliers or providers.

We are affiliated with numerous trade and professional associations. It is not uncommon to learn information about other organizations, including competitors, through legal and ethical means. These affiliations promote the sharing of information; however, it is not always appropriate to share business information with these associations and their members. We will take care to safeguard any proprietary and confidential business data.

Marketing and advertising activities designed to provide information to the community, increase awareness of our services or to educate the public may be used. All communications, both oral and written, are to be presented in a truthful, fully informative and non-deceptive manner.

It is standard practice for physicians to review the work of their peers. However, credentialing and peer review activities conducted by physicians may carry antitrust implications. Participating physicians may, by virtue of their medical specialties, be competitors of physicians being reviewed. Given this, special care must be taken to ensure that free and open competition is maintained. As a result, credentialing, peer review and physician discipline at Orlando Health is conducted only through properly constituted committees. Physicians participating in these activities are expected to use objective medical judgment.

We are expected to seek advice from Corporate Integrity and the Legal Department when confronted with business decisions involving a potential violation of the antitrust laws.

Tax

Orlando Health is organized and operated exclusively for charitable purposes to serve the healthcare needs of the community, and therefore, is exempt from the payment of federal income tax. All of Orlando Health's assets are used exclusively to further its charitable purposes. Such assets may not be used to benefit any individual or person who is in a position to exercise influence over the business concerns of Orlando Health. Moreover, Orlando Health may not allow net earnings to benefit insiders of the organization, nor may Orlando Health take part in any activities that result in excess financial benefits to any private individual. As a tax-exempt organization, we avoid compensation arrangements in excess of fair market value, accurately report payments to appropriate taxing authorities, and file all tax and information returns consistent with applicable laws.

Fraud and Abuse

Orlando Health has adopted policies and procedures to prevent, detect, deter and correct fraud, waste and abuse in accordance with federal and state laws. Our policies are available through SWIFT, the Orlando Health intranet.

Various federal and state laws, such as the Federal False Claims Act and the Florida False Claims Act, prohibit false claims and other fraudulent activity. Violations of these laws can result in civil actions and penalties. For example, the Federal False Claims Act prohibits conduct such as knowingly submitting a false or fraudulent claim to any federal agency or payor. Furthermore, the Florida False Claims Act prohibits knowingly causing the Florida government to pay claims that are false. Other laws and regulations governing Medicare/Medicaid program integrity are in place to reduce fraud and abuse.

The following are examples of fraud, waste or abuse:

- Forging or changing patient billing-related items, such as making false claims, or billing for services or supplies that are not rendered, medically necessary nor documented
- Misrepresenting a diagnosis or procedure code in order to obtain a higher payment
- Altering or forging checks
- Mishandling or improperly reporting financial transactions
- Inappropriately giving or receiving payment in connection with business transactions
- Falsifying or altering any record or report, such as an employment application, payroll or time record, expense account, cost report, patient medical record, scientific research or data collection record
- Theft or unauthorized use of organizational funds, furniture, fixtures, equipment, supplies, software or other property

Routine auditing, monitoring, reviews and the establishment of internal controls help us prevent, detect, deter and correct fraud, waste and abuse. Please do not ignore these types of activities. If we know or suspect activity of this nature, we are to report it immediately using the *Three-Step Communication Process* (referenced on page 7). If we are uncertain whether an activity is fraudulent, we are to contact Corporate Integrity for guidance.

Individuals who lawfully report false claims or other fraudulent conduct, or who otherwise assist in an investigation, action or testimony, are protected from retaliation under federal and state laws and corporate policy. We will not discriminate or retaliate against any whistleblower who files, in good faith, a civil action for false claims or participates in an Orlando Health investigation.

Coding and Billing

We have processes in place to assist with accurate billing to government payors, commercial insurance payors and patients. Coding and billing are performed accurately, in accordance with Laws, Regulations and Policies. We must ensure that the information required for proper coding accurately reflects the care provided and is documented in patient medical records and encounter forms.

Accurate and timely documentation is dependent on the diligence of providers who treat patients in our facilities. We do not destroy any information considered part of the patient medical record.

All payments and other transactions will be properly documented and authorized by management. Payors will be notified of payment errors, and refunds will be processed promptly and accurately.

Political Activity and Lobbying

Orlando Health believes that our democratic form of government benefits from citizens who are politically active. For this reason, we are encouraged to participate in personal civic and political activities on our own time and at our own expense. While doing so, it is important not to give the impression that we are speaking on behalf of or representing Orlando Health.

Orlando Health's own political activities are limited by law. We cannot use organizational funds or resources to contribute to political campaigns or for gifts or payments to any political candidate, political party or any affiliated organization. We cannot be required to make any contribution or ask for reimbursement for any contribution made to political candidates or campaigns.

Intellectual Property

We follow the laws regarding intellectual properties, including patents, trademarks, marketing, copyrights and software. Orlando Health will comply with the law in all our internal and external activities. As a result, it is against corporate policy to inappropriately make, acquire, use, distribute or reproduce intellectual property.

Orlando Health purchases and subscribes to a variety of printed and online publications. We follow all copyright laws of the United States, even if the work does not carry the copyright symbol. These laws prohibit the reproduction or copying of the publication without permission from the copyright holder. We do not reproduce documents for distribution outside Orlando Health unless we have the appropriate permission from management and the copyright holder.

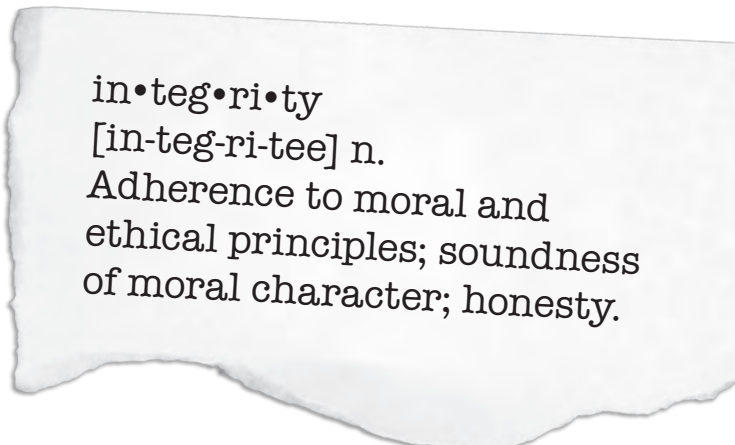
Any work of authorship, invention or other creation made during the scope of our employment with Orlando Health shall be considered the property of Orlando Health, including any patent, trademark, copyright, trade secret or other intellectual property rights. We are to contact the Legal Department for any assistance.

Research Activity

Orlando Health receives federal funds and grants to conduct scientific research. As a condition of receiving funds, we must adhere to federal regulations. Such regulations prohibit "misconduct in science," including intentional fabrication, falsification, or plagiarism in proposing, conducting or reporting research. Any deviations, misconduct or conflicts will be promptly reported and resolved.

We protect and respect the rights of participants enrolled in all research studies. We do not engage in human subject research without the approval of the applicable Orlando Health Institutional Review Board (IRB). We follow all policies regarding human subject research. We provide for fair and equal access to research protocols without discrimination. We will respect and protect a participant's right to refuse, withdraw or agree to participation in a study.

We do not bill a participant or third-party payor for research-related tests, procedures or treatments funded by a study sponsor. Any billing errors will be promptly corrected and any duplicate payments refunded.



in•teg•ri•ty
[in-teg-ri-tee] n.
Adherence to moral and ethical principles; soundness of moral character; honesty.

Environmental

Orlando Health is committed to providing a safe and secure environment for everyone. We comply with established safety and infection control laws and regulations, which are intended to prevent job-related hazards. We are consistent with ergonomic standards and maintain a safe work environment.

We are respectful of the environment and conserve natural resources. We exercise our policies and procedures with regard to the environment and use Orlando Health's buildings, property, laboratory processes and medical products in accordance with federal, state and accreditation standards. We comply with permit requirements that allow for the safe discharge of pollutants into the air, sewage systems, water or land. We comply with all laws and regulations governing the handling, storage, use and disposal of hazardous materials, infectious wastes and other pollutants.

Workplace Conduct and Employment Practices

Orlando Health provides equal employment opportunities to prospective and current team members based solely on merit, qualifications and abilities. We respect team members and organizational affiliates and do not discriminate in employment opportunities or practices on the basis of race, color, religion, sex, national origin, ancestry, age, physical or mental disability, sexual orientation, veteran status or any other status protected by law.

We support and observe a workplace free of alcohol, drugs and tobacco use.

Orlando Health fosters an environment free of any type of harassment, derogatory comments and disruptive behavior. All types of harassing behavior are prohibited. We do not make offensive comments, jokes, indirect suggestions or sexually oriented statements. Sexual advances, requests for sexual favors and all other verbal or physical conduct of a sexual nature are prohibited.

Any behavior that interferes with a team member's work performance or creates an intimidating, hostile or offensive work environment will not be tolerated by Orlando Health. Management is responsible for preventing discrimination and harassment of any kind. Everyone is responsible for respecting the rights of their fellow team members and for reporting inappropriate behavior to the appropriate parties.

Screening of Team Members, Physicians and Vendors

We do not knowingly contract with, employ or bill for services rendered by an individual or entity that is excluded or ineligible to participate in federal healthcare programs, suspended or debarred from federal government contracts, or has been convicted of a criminal offense related to the provision of healthcare items or services.

The federal government publishes a list of individuals and businesses that are not allowed to receive reimbursement from governmental payors (e.g., Medicare and Medicaid) for services provided. At least twice a year, all Orlando Health team members, physicians, allied health professionals, Board members and vendors are verified against these lists to ensure that we are not employing or conducting business with excluded persons or entities.

Investigations and Requests for Information

It is Orlando Health's policy to promptly and thoroughly investigate reports of illegal activity or violations of our Code of Conduct and corporate policy. We must cooperate with these investigations. We will not take any actions to prevent, hinder or delay the discovery and full investigation of these matters.

We will cooperate fully and promptly with all government investigations, including possible civil and criminal violations of law. It is important, however, to protect the legal rights of Orlando Health and its team members during this process. To accomplish these objectives, any governmental inquiries or requests for information, documents or interviews should be promptly referred to the appropriate party as described in our policies and procedures. Any questions about investigations or requests for information will be referred to Corporate Integrity.

Criminal Conduct

We do not tolerate or condone criminal activity. If we become aware of possible criminal activity, we are required to report the circumstances using our *Three-Step Communication Process* (referenced on page 7).

Any team member found to be involved in criminal conduct will be disciplined in accordance with corporate policy. Disciplinary action will be appropriate for the offense committed, up to and including discharge.

We will refer all instances of suspected criminal conduct to the appropriate governmental authorities for possible criminal prosecution.

Emergency Medical Treatment and Active Labor Act

We comply with the Emergency Medical Treatment and Active Labor Act (EMTALA) in providing emergency medical treatment to patients regardless of their ability to pay. Anyone with an emergency condition or requesting emergency services is given an appropriate medical screening examination and treatment based on medical necessity.

Financial and demographic information is obtained only after the patient's medical needs are met. Ability to pay is not a factor in determining whether to admit or discharge patients.

Patients will only be transferred to other facilities when their medical needs cannot be met by Orlando Health and appropriate care is known to be available at another facility. Patients may only be transferred after they have been stabilized and are formally accepted by the alternate facility. EMTALA procedures must be followed.

re•tal•i•a•tion
[ri-tal-ee-ey-shuhn] n.
Action taken to punish
someone for reporting
an issue.

WORKPLACE CONDUCT AND INTEGRITY

Orlando Health is dedicated to providing high-quality, skilled care in a courteous, professional and compliant environment. We are committed to fostering an atmosphere that promotes integrity, honesty and mutual respect.

Open and Honest Communication

We encourage and foster a workplace where we are free to discuss any concerns we may have. An effective, open communication process is key in securing compliance with Laws, Regulations and Policies as well as maintaining the exceptional quality of the services we provide.

Dignity and Respect in the Workplace

We must conduct ourselves in a professional manner. We treat everyone with kindness, courtesy, dignity and respect at all times. We are responsible for respecting the rights of those we interact with and for reporting questionable behavior. If we become aware of any situation that could jeopardize the integrity of Orlando Health, it is our responsibility to report it. If we are aware of or suspect a possible violation, we are to report it using the *Three-Step Communication Process* (referenced on page 7).

No Retaliation

Corporate policy and the Code of Conduct are available to assist us in defining expectations and standards of behavior. All good faith reports will be resolved in a discrete and professional manner. Orlando Health will not tolerate any type of retaliation from anyone. If anyone feels that they have suffered retaliation as a result of reporting concerns in good faith, they are to contact Human Resources or make use of the *Three-Step Communication Process* (referenced on page 7).

CONFIDENTIALITY

Orlando Health maintains the privacy and confidentiality of all sensitive information. We are committed to following all Laws, Regulations and Policies.

Privacy of Patient Information

To prevent unauthorized disclosures, we do not share confidential patient information with anyone who does not have a legal need to know. We will safeguard patient information from physical harm and protect the privacy of patient medical records according to federal, state and accreditation requirements.

To avoid disclosures of protected health information to unauthorized individuals, we must safeguard all communications. Examples of communications include faxes, emails and conversations on the telephone or in public areas.

Information Security

Information security refers to safeguarding confidential and sensitive information from damage, loss, unauthorized access or unauthorized modification. All types of information, including, but not limited to, patient data, payroll records, personnel files, access codes and passwords, will be maintained and safeguarded to prevent unauthorized disclosures.

We maintain and monitor security systems, data back-up systems and storage capabilities in order to safely maintain the confidentiality, integrity and availability of information in accordance with Laws, Regulations and Policies.

Orlando Health licensed software may be installed and operated on organizational equipment. We will not download any software from the Internet or install personally acquired software. Only Information Services will approve, purchase and install software.

We must also remember that the use of Orlando Health's electronic communication resources is subject to review and monitoring at any time without notice. Electronic communication resources include devices and services such as computers, systems, Internet, email, text messaging, pagers and cell phones. We should have no expectation of privacy when using Orlando Health resources.

Orlando Health Proprietary Information

We safeguard information technology and proprietary electronic information, and protect it from improper use and access. We guard our assets and the assets of others entrusted to Orlando Health, including physical and intellectual property, and we protect sensitive information against loss, theft or misuse.

We use Orlando Health property appropriately and we take measures to prevent any unexpected loss of equipment, supplies, materials or services. We also adhere to established policies regarding approval for disposing of Orlando Health assets and data.

Personnel Actions and Decisions

Team member salary, benefits, disciplinary records and other personal information are maintained in a confidential manner. Team members must exercise care and reasonable judgment to protect unnecessary disclosures of such information.

Media Relations

All requests from the media for interviews with team members, medical staff members or employees of contracted services are coordinated through Media Relations. This protects patient and team member rights to security, personal privacy and confidentiality.

All inquiries from the news media, including requests for information about a patient's condition, must be referred to Media Relations. There is an on-call Media Relations representative available 24 hours a day, seven days a week.

dig•ni•ty
[dig-ni-tee] n.
The quality or state of being worthy
of esteem or respect; honor.

Documentation

Orlando Health produces a large number of records and documents. Examples include patient medical records, financial records, emails, presentations, X-rays and laboratory results. The following rules apply to all types of documentation:

- We do not falsify facts or make false records.
- We do not sign someone else's name on any document.
- We do not document records as someone else.
- We only create records that are necessary and required.
- We only give records and information to people who have a legal need to know.
- We preserve patient and team member security, confidentiality and privacy.

Record Retention and Destruction

Orlando Health has established policies and procedures regarding the proper storage and destruction of records. All records are kept for the legally required timeframe. After the time requirement has been met, it is important to destroy the records in a timely and appropriate manner in accordance with corporate policy.

Records to be disposed of that contain patient, financial or other confidential information must be discarded in a designated shred bin. Under no circumstances should these documents be thrown in the trash.

Search Warrants, Subpoenas, and Government Inspections and Investigations

Orlando Health has established policies and procedures regarding search warrants, subpoenas, government inspections and investigations. If we are ever approached regarding such matters, we are to contact Risk Management immediately. Risk Management will advise us on the proper procedures to be followed.

CONFLICTS OF INTEREST

Orlando Health corporate policy sets forth standards of conduct expected by Orlando Health with regards to conflicts of interest. We will act in the best interest of Orlando Health and carry out our duties with total objectivity. In our dealings with and on behalf of the organization, we are held to a strict rule of honest and fair dealing and will conduct ourselves in accordance with Laws, Regulations and Policies and employment agreements when applicable. We are prohibited from using our positions, or knowledge gained as a result, in any manner that creates a conflict between the interest of Orlando Health and ourselves.

A conflict of interest can exist in any situation in which our personal stake in a matter may influence or give the appearance of influencing our actions on behalf of Orlando Health. All Board or committee members, officers, management team members, medical staff members with administrative duties and all persons in a position to exercise substantial influence over the affairs of the organization have a duty to disclose any possible, perceived or actual conflict of interest utilizing the conflict of interest disclosure process outlined in corporate policy. All potential conflicts (including those of family members) will be reviewed by the chief compliance officer. Conflicts of interest may arise at any time and must be disclosed immediately.

Competitors and Vendors

We will not be employed by, act as a consultant to or have an independent business relationship with any of Orlando Health's vendors or third-party payors unless prior approval is obtained from the chief compliance officer and the Executive Cabinet. Further, management and executive team members will not be employed by, act as a consultant to, or have an independent business relationship with any entity that provides goods or services that are substantially similar to those Orlando Health provides or is considering making available. This will not prevent executives from participating on the board of non-Orlando Health entities or from making public appearances as representatives of Orlando Health or as community leaders.

We will not invest in a vendor, payor, provider, supplier or competitor above the limits established in corporate policy unless we first obtain written permission from the Executive Cabinet through the chief compliance officer.

More detail regarding conflicts of interest and the conflict of interest disclosure process can be found in corporate policy or by contacting Corporate Integrity.

gift
[gift] n.
Any gratuity, favor, discount,
hospitality, loan, forbearance, or
other item having economic value.

Gifts and Business Courtesies

All gifts or business courtesies (including business meals and entertainment) offered, received or exchanged with non-Orlando Health entities and persons must meet the requirements as established in corporate policy. Whenever we are unclear whether a specific offer or exchange is prohibited by policy, we must contact management and Corporate Integrity for further guidance.

Gifts or business courtesies must never be used for the purpose of inducing, securing or rewarding the referral of a patient or the ordering of a service or supply. Gifts or business courtesies must never be used or allowed to improperly influence relationships, business outcomes or decision-making, or promote the appearance thereof. We are required to make objective, unbiased decisions that are in the best interest of our patients and the organization.

Unless an exception is granted per policy, we will not solicit or receive funds from non-Orlando Health entities or persons, including physicians and other referral sources, for our parties or functions such as holiday parties, employee recognition events, retirement or birthday celebrations, staff meetings and similar events. This does not apply to official Orlando Health educational programs or to events coordinated by the Orlando Health Foundation.

We do not accept gifts or business courtesies at any time during active negotiations or throughout the Request for Information/Request for Proposal (RFI/RFP) process with a potential vendor. Further, we will not accept gifts or business courtesies from our patients, patients' families or representatives.

Vendor and Product Selection

All business dealings on behalf of Orlando Health must be the result of usual and proper business considerations. Anyone working on our behalf must agree to abide by our standards and expectations. We select vendors using objective measures. All vendors who meet these standards are afforded an equal opportunity to present their products and services. We do not give or receive any form of payment, kickback or bribe to induce the referral or the purchase of any product or service. We select the product or service that best meets the needs of our patients and Orlando Health.

Business Inducements

We must not attempt to gain any advantage or encourage favors with improper payments, business courtesies or other inducements. We do not offer any improper inducements or favors to patients, providers or others to encourage the referral of patients to our facilities or to use a particular product or service. We will not solicit gifts or favors in exchange for influence or assistance in a transaction when conducting business with an individual or entity, including vendors.

Contracting and Business Relations

All contract negotiations, contracts and business relations must be consistent with the Laws, Regulations and Policies. Contracts must be in writing and signed by the corporate director, Materials Management, or the responsible vice president or president. Contracts identified with potential conflicts of interest will be reviewed by the chief compliance officer.

Information about Orlando Health business activities, including strategy, prices, costs, finances and similar matters, are private and confidential. Orlando Health will not enter into any agreement that is a refusal to deal with another organization or could impair the business of Orlando Health or the other organization. Further, we will not conduct business with an entity that is currently excluded, suspended, debarred or otherwise ineligible to participate in federal healthcare programs.

Workshops, Seminars and Training Sessions

Orlando Health encourages us to pursue career development through attendance at approved job-related seminars, conferences or workshops. Our attendance at these events will be determined by our department manager based on mutual benefit to us and Orlando Health.

The approval of management is required before accepting a vendor's offer to conduct or fund training sessions or product knowledge classes. Management's approval is also required before a vendor can fund our attendance at a third-party conference, seminar, workshop or other similar function. In determining whether to accept such an offer, the vice president responsible for our area will be consulted for guidance. If approved, registration fees are generally the only expense allowed to be covered by vendors. However, we may accept reasonable meals or attend social events held as part of the event offered to all attendees.

in•duce•ment

[in-dooos-muh-nt] n.

Something that helps bring about an action or a desired result; an incentive.

Financial Reporting

Financial statements aid in business management and are important in meeting obligations to patients, team members, suppliers and creditors. Accurate financial statements are essential in complying with tax and financial reporting requirements. We utilize generally accepted accounting principles to maintain and report accurate financial statements. We maintain a financial reporting system that provides timely, accurate and comprehensive disclosure concerning our financial and business condition. We do not create false or misleading entries in any financial record. We record all transactions, payments and receipts timely, accurately and in a consistent manner.

We promptly report concerns involving accounting, financial reporting, use of assets, internal controls or auditing matters to the chief compliance officer. It is strictly prohibited to interfere with any type of federal, state or local investigation or official proceeding. It is inappropriate to alter, destroy or conceal any records, documents or other objects.

We cannot take any action to fraudulently influence, coerce, manipulate, mislead or obstruct any auditor engaged in an audit for the purpose of misrepresenting the organization's financial condition.

Use of Company Assets

Company assets include, but are not limited to, equipment, inventory, supplies, funds, software, team member time, business strategies and data (financial, patient or otherwise). Company assets will be used for purposes directly related to Orlando Health business. Any other use must be approved by management in advance.

Company assets will not be used for personal gain or benefit and will be handled with the utmost care and respect. We are responsible for reporting and guarding against loss, misuse, waste and/or abuse of company assets.

Travel and Entertainment

Orlando Health funds travel, entertainment, and business-related expenses in accordance with corporate policy. These expenses will only be incurred to support the interests of the organization and will be consistent with job responsibility. We will exercise reasonable judgment when utilizing company resources to fund travel and entertainment expenses. Personal expenses incurred during travel and entertainment will not be reimbursed by Orlando Health.

Internal Control

Internal control is a process designed to provide reasonable assurance regarding the achievement of objectives. Orlando Health has implemented a system of internal controls to ensure effective and efficient operations, reliable financial reporting and compliance with Laws, Regulations and Policies. We make no attempt to circumvent the system of internal controls. We are responsible for reporting known control violations or weaknesses using our *Three-Step Communication Process* (referenced on page 7). We promptly report information involving deficiencies in the design or operation of internal controls that could adversely impact our ability to record, process and report financial data.

The effectiveness of the internal control system is reviewed regularly by Finance and Internal Audit. Internal Audit is responsible for testing internal controls and monitoring compliance with Laws, Regulations and Policies across the organization. Full cooperation will be provided to any internal or external auditor. No attempts will be made to fraudulently influence, coerce, manipulate, mislead or obstruct an auditor.

ACKNOWLEDGEMENT OF RECEIPT

ACKNOWLEDGEMENT OF RECEIPT, REVIEW AND UNDERSTANDING OF THE ORLANDO HEALTH CODE OF CONDUCT

By providing my signature on this form, I acknowledge that I have received, reviewed and understand Orlando Health's Code of Conduct. I agree to comply with all applicable Laws, Regulations and Policies as part of my employment or association with Orlando Health.

I acknowledge that the Code of Conduct is only a statement of principles for individual and business conduct and does not constitute an employment contract. I will promptly report any potential violation to my supervisor or to the chief compliance officer.

I understand that any violation of Laws, Regulations or Policies is grounds for disciplinary action, up to and including discharge from employment.

SIGNATURE _____ TITLE _____

PRINTED NAME _____ DATE _____

EMPLOYEE ID _____



NOTES



