
Code of Conduct

Doing the Right Thing



Franciscan
Missionaries
of Our Lady
HEALTH SYSTEM

SAFEGUARDING
OUR MINISTRY

Mission, Vision and Values

Mission

Inspired by the vision of St. Francis of Assisi and in the tradition of the Roman Catholic Church, we extend the healing ministry of Jesus Christ to God's people, especially those most in need.

We call forth all who serve in this healthcare ministry to share their gifts and talents, to create a Spirit of Healing—with reverence and love for all of life, with joyfulness of spirit, and with humility and justice for all those entrusted to our care.

We are, with God's help, a healing and spiritual presence for each other and for the communities we are privileged to serve.

Vision

To make a significant difference in our communities through Catholic health care services.

Values

- Service
- Reverence and Love for All of Life
- Humility
- Justice
- Joyfulness of Spirit

Core Four Behaviors





A Message from Richard Vath, MD

Dear Colleague,

As a Catholic, mission-driven organization, Franciscan Missionaries of Our Lady Health System has a clear sense of organizational ethics. Our mission, vision and values-based Compliance Program is a vital part of how we conduct ourselves in carrying out daily activities.

This Code of Conduct, which reflects our ministry of caring for those most in need, sets forth clear expectations for our behaviors as they relate to our healing encounters, our business transactions, and our corporate citizenship. If you encounter a situation that may not be consistent with the Code of Conduct, your responsibility is to speak up. Please contact your supervisor, a member of management, your Compliance Officer, or the anonymous Compliance Hotline - IntegrityLink 1(888) 400-4517. Each of us is accountable for our actions, and we have a duty to report violations.

This Code of Conduct is a resource for you, serving as a guiding reminder that we are grounded in our faith in God. We are committed to actions reflecting the highest standards that are set forth in this Code of Conduct and expect compliance and broad support for these values and principles that are essential to our healthcare ministry.

Thank you for your personal integrity and excellence in adherence to our standards.

Sincerely,

A handwritten signature in black ink, appearing to read "Richard R. Vath".

Richard R. Vath, MD

Chief Executive Officer

Franciscan Missionaries of Our Lady Health System

Table of Contents

About The Code Of Conduct	5
Who Must Follow The Code Of Conduct	5
Our Responsibilities	6
• Team Members, Volunteers, Students, Medical and Allied Staff	6
Asking Questions And Raising Concerns	6
• Non-Retaliation Policy	7
Making The Right Choice	8
Violations Of The Code	9
Our Commitment	9
Doing The Right Thing	10
Patient And Business Information	10
• Confidential Patient Information	10
• Confidential Business Information	11
• Electronic Information	11
• Team Member Information and Personnel Actions	11
• Peer Review Information	11
Quality Of Care	12
Relationships With Our Patients	12
Relationships With Team Members	13
Relationships With Physicians	14
• Medical Ethics	14
Relationships With Competitors	15
Gifts, Gratuities And Business Courtesies	15
Laws And Regulations	16
• False Claims and Deficit Reduction Act	16
• Ineligible Persons	17
• Emergency Medical Treatment and Active Labor Act (EMTALA)	17
• Tax-Exempt Status	18
• Research, Investigations and Clinical Trials	18
Workplace Conduct	18
• Personal Use of FMOLHS resources	18
• Intellectual Property	19
• Conflict of Interest	19
• Disclosure, Approval and Recusal	20
Acknowledgment	21
Resources For Guidance And Reporting Concerns	22

About the Code of Conduct

The Code of Conduct (Code) and Compliance Program are a vital part of how we achieve our mission and uphold our core values and behaviors. We remember the mission and our ministry's Catholic identity in all that we do.

The Code provides guidance to all Franciscan Missionaries of Our Lady Health System (FMOLHS) colleagues regarding who we are and how we are expected to act when carrying out daily activities. It is expected that these activities follow ethical and regulatory standards.

The Code cannot address every situation you might encounter, FMOLHS relies on your good judgment and values to uphold the spirit and intent of the code. When in doubt, it is your responsibility to seek clarification from your supervisor, manager, director, vice president, human resources, compliance officer or legal.

Who Must Follow The Code Of Conduct

The FMOLHS Board of Trustees through the Audit Leadership Committee has adopted this Code, which applies to all FMOLHS affiliated entities, board members, independent contractors, third party vendors, volunteers, students and team members.

You are expected to comply with this Code and all applicable policies. Leaders have an additional responsibility to understand this Code and how it applies to their area(s) of responsibility so they may serve as a resource and provide guidance to team members.

Q&A

Q: What if I'm facing a situation that is not covered in the code of conduct?

A: Our Code of Conduct cannot address every issue that may arise. If you are unable to find direction in our policies and procedures or other resources, ask for help. Start with your manager, human resources or your market compliance officer.



Our Responsibilities

Team Members, Volunteers, Students, Medical and Allied Staff

This Code applies to all team members, volunteers, students, medical staff members, officers, and board members of FMOLHS and its wholly owned subsidiaries, which are referred to in this document as sponsored organizations. We also expect independent contractors (such as vendors), in their relationship with us, to abide by the Code. Each must do the following:

- **Read and follow** the Code of Conduct
- **Ask questions** when you are not sure about something
- **Speak up** and report when you know someone is not following the Code of Conduct
- **Help** with all internal investigations

Leaders and Board Members



Leaders within FMOLHS are held to a high standard. If you are a supervisor, manager, senior executive, medical staff leader or board member, you must also:

- **Set an example** of high ethical standards as you do your work. Share that you have the same high standards for your team
- **Use** the Code of Conduct in your work
- Hold team members **accountable** when they do not follow the Code of Conduct
- **Answer** team members' questions about the Code of Conduct timely
- **Follow** FMOLHS policy of non-retaliation
- **Disclose** Conflicts of Interest

Asking Questions and Raising Concerns

Two of our Core Four Behaviors, "Be the Guide" and "Be the Catalyst," means that we set direction and identify solutions. By speaking up, asking questions and raising concerns we promote a speak up culture.

Speak up if you have a question or need to report a possible violation of the Code of Conduct, policies, or the law. You have several options

- Talk to your manager or supervisor, human resources, legal or any executive team member, including our Chief Compliance Officer and market compliance officers.
 - Use FMOLHS' online reporting system, IntegrityLink, at **fmolhsintegritylink.ethicspoint.com**
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Any report you make will be fully kept confidential. Regardless of the communication method you choose, or whether you want to remain anonymous, the same process will be used to investigate your concerns and follow up as necessary. If you decide to remain anonymous, please provide as much detail as possible and check back to see if we have posted any follow up or requests for additional information.

A contact resource guide is provided on page 22.

Non-Retaliation Policy

For those who report concerns in good faith, FMOLHS will not tolerate any form of retaliation against those who report, including:

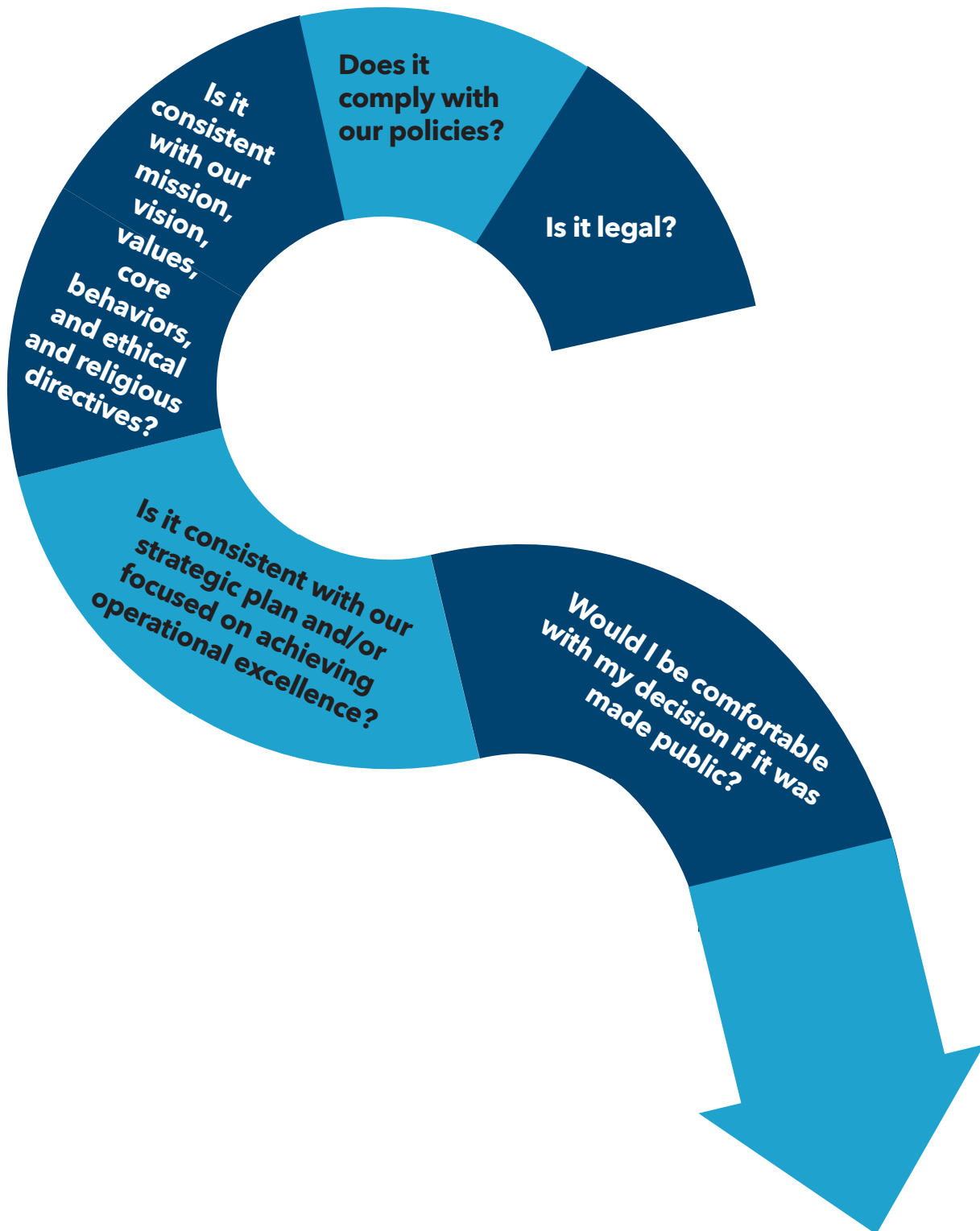
- Direct or indirect retaliation
- Actions or threats against anyone who makes a report
- Retaliation from supervisors or co-workers

When you ask a question, report possible misconduct, or take part in an investigation, you are complying with the Code of Conduct and Doing the Right Thing. Under no circumstances will retaliation against you be tolerated.

Retaliation can take many forms, such as unfair dismissal, bullying, and harassment. We take claims of retaliation seriously. We will investigate each claim thoroughly and take appropriate action when needed. We consider acts of retaliation to be acts of misconduct. If substantiated, retaliation could result in disciplinary action up to, and including, termination.



Making the Right Choice



If your answer is "NO" to any of these questions, don't do it, or seek further guidance.

Violations Of The Code

Violating this Code, organizational policies, laws and regulations, and the ethical and religious directives have potential legal, regulatory and mission consequences. No team member is authorized to commit, or direct another team member to commit, an unethical or illegal act.

All violations of this Code, organizational policies, ethical and religious directives or laws will be taken seriously and may result in disciplinary action, up to and including termination.

Our Commitment

We affirm the following commitments:

- To **our patients** by providing quality care that is sensitive, compassionate, prompt, cost effective and confidential.
 - To **our team members** by creating a work setting that treats all team members with fairness, dignity, and respect, providing an opportunity for team members' growth and professional development. The work environment will be open so that all ideas are considered.
 - To **our affiliated physicians** by providing a work environment that has excellent facilities, modern equipment, and outstanding professional support.
 - To **our third-party payors** by dealing with them in a way that reflects our shared concern for quality, efficient and cost-effective healthcare services.
 - To **our regulators** by creating a culture of compliance with rules, regulations, and sound business practices. We accept responsibility to monitor adherence to the rules and regulations, our Compliance Program Manual and Code of Conduct.
 - To **our joint venture partners** by fully performing our responsibilities to govern our jointly owned facilities in a manner that reflects the mission and values of each of our organizations.
 - To **our vendors** by ensuring fair competition among prospective vendors and interacting with vendors as partners.
 - To **our volunteers** by ensuring that they feel a sense of meaning from their volunteer work and receive recognition for their efforts.
 - To **the communities we serve** by understanding the needs of the communities we serve and providing quality, efficient, cost-effective healthcare to these communities. We realize our responsibility to help those most in need.
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Do the Right Thing

FMOLHS is dedicated to furthering our mission, while promoting adherence to the highest standards of ethical conduct. The Compliance Program supports organizational efforts to live the mission and values of FMOLHS and to assist team members and other colleagues in following applicable laws, regulations and policies.

Compliance Program elements include setting standards (Code of Conduct and Policies and Procedures), communicating the standards (education), providing reporting mechanisms (IntegrityLink), monitoring and auditing, investigating instances of non-compliance and identifying and preventing fraud waste and abuse.

- We hold ourselves to the highest standards of personal and organizational integrity.
- We share the responsibility for preventing fraud, waste and abuse.
- We are accountable for complying with this Code, all applicable laws, and regulations.
- Leaders have an enhanced obligation to understand the Compliance Program and to ensure that activities in their business units align with the program.



To obtain more information on the structure of the Compliance Program visit the **Safeguarding Our Ministry** page on *TeamLink*.

Patient And Business Information

We maintain the privacy and security of patient medical information, including information that can be used to identify a patient, as required by Health Insurance Portability and Accountability Act (HIPAA) and similar laws.

We do not share private information about other team members or FMOLHS or sponsored organizations unless expressly allowed.

Confidential Patient Information

- We protect and respect the privacy of our patients and their medical information.
 - We only give patient medical information to those who are allowed to have it.
 - We only access and use the patient medical information needed to do our jobs.
 - We do not release patient medical information or take it out of the building without permission.
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- We do not leave patient medical information, hard copy or electronic, unattended.
- We do not talk about patient medical information in public areas such as the cafeteria, hallways, elevators or restrooms.
- We do not record patient information or take patient images unless required for patient treatment or as authorized by the patient or his/her representative.
- We do not post or share patient information on social media unless expressly authorized by the patient or his/her representative.
- We report actual or suspected breach of confidential information to the Compliance Officer right away.

Q&A

Q: My co-worker asked me to come visit while he/she is in the hospital. Can I look up his/her room number in Epic?

A: No, you must not look up room numbers in Epic for personal visits. Your level of access may expose confidential information that your co-worker does not want you to see.

Confidential Business Information

- We protect confidential business information such as FMOLHS' and its sponsored organizations' finances and strategies.
- We respect intellectual property such as patents, trademarks, copyrights and software.
- We do not use any information that was obtained illegally at FMOLHS.
- We do not use confidential business information to gain personal benefit.

Electronic Information

- It is essential that team members adhere to our information security policies and procedures.
- Team members are prohibited from sharing their network credentials.
- Team members must ensure that emails containing PHI are secured when transmitting to outside email addresses.

Team Member Information and Personnel Actions

We protect confidential employee information such as social security numbers, salary, benefits and discipline. Information is released only pursuant to a subpoena or other legal request.

Peer Review Information

We protect the confidentiality of peer review information.





Quality of Care

We treat all patients with warmth, respect and dignity while providing medically needed and appropriate care. We always try to provide high quality, cost-effective healthcare to all patients:

- We base care on patient needs, not on patient or FMOLHS or sponsored organization finances.
- We follow best practices outlined by the Joint Commission, Medicare's Conditions of Participation, the National Quality Forum as well as others.

Relationships with Our Patients

FMOLHS honors the inherent dignity of each person. We recognize and respect diverse backgrounds and cultures of our patients and equip our team members with the knowledge and resources needed to respect each patient's cultural needs.

- We provide high quality services to all patients and do not make decisions based on race, color, religion, national origin, age, sex, disability or other legally protected classification.
 - We allow patients to participate in decisions about their care by giving them information in a way they can understand.
 - We honor advance directives and similar orders within the limits of the law and FMOLHS' mission, values and capabilities. We provide information about setting advance directives for treatment decisions, financial considerations and the designation of surrogate healthcare decision-makers.
 - We allow patients to request transfers to other facilities. In such cases, the patient is given an explanation of the benefits, risks and alternatives of the transfer.
 - We allow patients or their legal representatives to choose other facilities for follow-up care upon departure of an FMOLHS facility.
 - We respond promptly and courteously to patient inquiries and requests.
 - We disclose medical errors and adverse events according to our policy and process.
 - We give medically necessary care that is properly documented in the patient's medical record.
 - We report quality concerns through the appropriate channels and fix such situations as soon as possible.
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Relationships with Team Members

FMOLHS treats team members with honesty and respect

- We recruit, hire, train, promote, assign, transfer, lay-off, recall and terminate team members based on business decisions, work performance, team member achievements, experience and conduct without regard to race, color, religion, national origin, age, sex or disability or other legally protected classification.
- We do not tolerate any form of harassment or discrimination.
- We provide team members with the training that is needed to fulfill their job duties.
- We provide opportunities for professional satisfaction, pride of work and career growth.
- We keep team members informed of activities and events that affect their specific work environment and job duty performance.
- We provide training opportunities for team members to assist with obtaining and maintaining certifications or licensures necessary for the performance of their job duties.
- We maintain a drug free workplace and will not tolerate the use or possession of illegally acquired drugs and/or alcoholic substances while on duty.
- We provide a process to report and resolve conflicts without fear of retaliation.
- We expect team members to provide care in FMOLHS and sponsored organization facilities that is compliant with the Ethical and Religious Directives for Catholic Health Care Services and Catholic social teachings.

Q&A

Q: One of my coworkers emailed a joke that I find offensive, should I say something?

A: Yes. Each of us has a responsibility to promote a respectful workplace. If you feel uncomfortable speaking to your co-worker directly about the email, contact your manager, human resources or use the hotline.





Relationships with Physicians

- FMOLHS strives to provide a work environment for physicians and other providers that is excellent in all ways. Members of our medical staff have always supported FMOLHS and our team members.
- Only physicians and other providers who have the necessary training and are properly credentialed will be permitted to provide patient care.
- Members of the medical staff are expected to follow the Code of Conduct.
- We do not pay, solicit, offer or receive kickbacks, and we follow all applicable state and federal laws associated with physicians and clinicians, including the Stark physician self-referral law.
- We do not pay for referrals. We take patient referrals and admissions based only on competency (the patient's medical needs and how well we can meet those needs) and capacity. We do not pay or offer to pay anyone - other team members, physicians or entities - for referral of patients.
- We do not accept payments for referrals we make. Team members may not ask for, or take, anything of value in exchange for the referral of a patient.
- When making patient referrals to another healthcare provider, we do not pick the provider based on the referrals the provider has made or may make to us.
- All business arrangements with physicians and other referral sources must be structured to meet a community or hospital need and not based on volume or value of referrals.

Medical Ethics

Physicians are expected to:

- Provide care in FMOLHS and sponsored organization facilities that is compliant with the Ethical and Religious Directives for Catholic Health Care Services and Catholic social teachings.
 - Use a medical ethics committee to resolve ethical concerns that develop.
 - Talk with patients/residents, family members and clinicians about medical ethics to ensure the best clinical quality of care.
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Relationships with Competitors

FMOLHS has strict restrictions on communications with competitors or about competitively sensitive information. Generally, team members are not to discuss non-public competitively sensitive topics with competitors.

Given that antitrust laws are complex and the application of these laws can depend upon the conditions in local markets, team members should consult with their supervisors or FMOLHS Legal Services for guidance concerning relationships with competitors and laws and policies relating to their areas of responsibility.

Gifts, Gratuities And Business Courtesies

The limitations of this section do not apply to business meetings at which food (including meals) may be provided. The following guidance must be followed:

- We must not accept personal gifts such as cash or cash equivalent gift cards, gift cards or any other personal item from patients or their family members. Patients or patient family members who want to thank us for good service should be encouraged to donate to one of our Foundations or provide a gift that can be shared, such as candies or cookies.
 - Travel and entertainment at a vendor's expense is usually not allowed and must be approved by the appropriate Vice President in advance.
 - Team members may not solicit gifts, tickets or other vendor sponsored benefits for personal or business use.
 - Foundation representatives may solicit vendor sponsored benefits for Foundation fundraising efforts.
 - Gifts or other courtesies must not improperly influence relationships or business outcomes.
 - Gifts from contractors or vendors of small value, such as pens or coffee mugs, are permitted.
 - Gifts of food, if accepted, should be shared with the entire group or department and must be reasonable.
 - When offering discounts to medical staff, policy **FIN_04_040_PFS** must be followed.
 - Any entertainment, gift or token of appreciation involving physicians or other referral sources must be in accordance with FMOLHS policy and applicable laws and regulations regarding these practices.
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Q&A

Q: I received an invitation from a vendor to attend a two-day conference. The subject of the conference is relative to my job duties. The invitation includes travel, lodging, admission to the conference, entertainment, and meals. May I accept?

A: Generally, vendor sponsored education and travel is not allowed. If the education is pertinent to your job duties, you may seek approval from your Vice President for the organization to pay for the education. You may be allowed to accept free admission to the conference in limited circumstances such as if you are a speaker at the event.

Laws and Regulations

FMOLHS follows all laws and regulations. Services are provided pursuant to appropriate federal, state and local laws and regulations, and the conditions of participation for Federal healthcare programs. We must know and understand the laws and policies that apply to our work. We must also be sure our work and documents are accurate and truthful.

- We make sure that reports or other information given or reported to a government agency are accurate and follow the law.
- We follow the environmental, health and safety rules that apply to our work.
- We do not alter or falsify information on any record or document. Records must never be destroyed to impede a government investigation.
- We keep medical and business records as required by law and our record retention policy.
- We keep accurate and complete business documents and financial information.
- We cooperate with government agencies in investigations or inquiries.

False Claims and Deficit Reduction Act

The State and Federal False Claims Acts and the Federal Deficit Reduction Act protect government programs such as Medicare and Tricare from fraud and abuse. It is a violation of the False Claims Act to knowingly submit, or cause another person or entity to submit, false claims for payment of government funds. Additionally, the State and Federal False Claims Acts contain provisions that allow individuals with actual knowledge of alleged false claims to sue on behalf of the government, as well as provide protections against retaliation for individuals taking a false claims action.

It is illegal to submit claims for payment to government programs that we know or should know are false or fraudulent. No specific intent to defraud the government is required for a claim to qualify as a false claim. The False Claims Act defines “knowing” to include not only actual knowledge, but also instances of deliberate ignorance or reckless disregard of the truth or falsity of a claim. Filing false claims may result in damages of up to three times the amount of the government program’s loss, fines, imprisonment, entering into a Corporate Integrity Agreement and exclusion from participation in federal and state health care programs.



- We are committed to submitting claims that are accurate and truthful.
- We report anything that is false, inaccurate or questionable right away. Overpayments are refunded promptly in accordance with payer guidelines.
- We create accurate and truthful patient bills for all payers and patients.
- We take steps to make sure that our billing and coding follow the rules and have the needed medical record documentation.

Ineligible Persons

- We do not contract with, employ, or bill for services rendered by an individual or entity that is excluded or ineligible to participate in federal or state healthcare programs, or is suspended or debarred from federal or state government contracts.
- We routinely search the Department of Health and Human Services’ Office of Inspector General and General Services Administration’s lists of such excluded and ineligible persons.
- Team members, vendors, contractors, and healthcare clinicians are required to report to FMOLHS or the applicable sponsored organization if they become excluded, debarred or ineligible to participate in federal or state healthcare programs.

Emergency Medical Treatment and Active Labor Act (EMTALA)

We provide an emergency medical screening examination and necessary stabilization to all patients, regardless of their ability to pay.

- Provided we have the capacity and capability, anyone with an emergency medical condition is treated.
 - In an emergency (including if the patient is in labor), we will not delay the medical screening and stabilizing treatment in order to seek financial and demographic information.
 - We do not admit, discharge or transfer patients with emergency medical conditions simply based on their ability or inability to pay or any other discriminatory factor.
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Tax Exempt Status

- We do not engage in activities that jeopardize the tax-exempt status of FMOLHS and its sponsored organizations.
- Lobbying and political activities or any activity that furthers the private or personal interests of an individual rather than our charitable purpose should not be performed before consulting with the FMOLHS or sponsored organization compliance officer or FMOLHS Legal Services.



Research, Investigations and Clinical Trials

We follow all laws and regulations in all research, investigations and/or clinical trials conducted by our clinicians and staff.

- We do not allow research misconduct, including things such as making up or changing results, copying results from other studies without doing the clinical research, not asking about or dealing with conflicts of interest, and doing research without Institutional Review Board (IRB) approval.
- Clinicians conducting clinical trials of investigational products and services are expected to fully inform all subjects of their rights and responsibilities of participating in the clinical trial.
- We will submit only true, accurate, and complete costs related to research and grants.
- Any sponsored organization or clinician engaging in human subject research must do so in conjunction with IRB approval and consistent with FMOLHS policies.

Workplace Conduct

Personal Use of FMOLHS Resources

- It is the responsibility of each team member, vendor, contractor, and healthcare clinician to preserve FMOLHS assets including time, materials, supplies, equipment, and information. FMOLHS assets are to be maintained for business-related purposes.
 - As a rule, the personal use of any FMOLHS asset without prior supervisor approval is prohibited. The occasional use of items such as copiers, where the cost to FMOLHS is insignificant, is permissible.
 - Any community or charitable use of FMOLHS resources must be approved in advance by one's Vice President.
 - Any use of FMOLHS resources for personal gain unrelated to FMOLHS' business is prohibited.
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Q&A

Q: I believe that my co-worker is abusing organizational resources, but I don't want to get them in trouble.

A: It is understandable that you want to protect your co-worker, but you have a duty to report all potential violations of organizational policy. You should contact your manager, your Market Compliance Officer or report your concerns through IntegrityLink.

Intellectual Property

(Copyrights, Patents and Trademarks)

- We comply with all patents, copyright and trademark laws and avoid infringement of those rights.
- We do not copy any copyrighted materials unless an exception to the intellectual property laws applies or we have the permission of the rights holder. Any protected material destined for external use requires the specific permission of the rights holder.
- Any work of authorship, invention or other creation created by a team member during the scope of employment with FMOLHS is property of FMOLHS, unless an express agreement provides for other treatment.

Conflict of Interest

A conflict of interest may exist if a person's outside activities or interests influence or look like they influence a team member's ability to make objective decisions or use FMOLHS resources in the wrong way. A conflict of interest may also exist if an outside activity distracts a team member from doing his or her job.

Each of us has a duty to act in the best interest of the organization. You may not use organizational property, information or your position with the organization to take advantage of opportunities for your personal gain.

You are expected to maintain professional relationships with each other, patients, their families, business partners, medical staff, vendors and other customers. Failure to maintain professional boundaries may result in disciplinary action up to and including termination of employment.

- We make business decisions based on what is best for FMOLHS. We avoid things that may look like a conflict of interest to others.
- When a team member's outside interest conflicts with FMOLHS, the team member must follow our policy and disclose the conflict.
- We do not ask for or accept money, gifts, favors, services, entertainment or other things of value from patients or business partners for personal gain.

- We do not offer or accept anything of value in return for referrals of patients.
- We will avoid situations that may look wrong to someone else when dealing with clinicians and referral sources.
- We do not take other jobs, consulting arrangements or make personal investments if they do not fit with our job duties or if they influence decisions we make for FMOLHS.

Disclosure, Approval and Recusal

1. We follow FMOLHS policy and disclose any actual or potential conflicts of interest. If you have any question about whether an outside activity or individual interest might be a conflict of interest, talk to your supervisor or manager before doing the activity.
2. You are expected to discuss any situation that may be an actual or potential conflict of interest with your supervisor or other manager. Even the appearance of a conflict can be a problem.
3. We do not participate in discussions or decisions where we have a personal interest that conflicts, or looks like it conflicts, with the interests of FMOLHS.

Q&A

Q: I have a personal relationship with a vendor. I would like to contract with this vendor to provide services for the organization. I have direct influence on which vendors are chosen. Is this a conflict?

A: Yes, if you have a personal relationship with vendors, you should disclose this conflict and remove yourself from the vendor selection process.



ACKNOWLEDGMENT

I have read and understand the provisions of the FMOLHS Code of Conduct.

I will abide by the standards of conduct contained within the Code and FMOLHS policies.

I will complete all required compliance training.

I will speak up, using the resources listed in this code if I am in doubt as to the proper course of conduct, or if I become aware of possible violations of our standards or the law.

I understand that how well I follow and support the Code will be considered when hiring, evaluating performance and in compensation reviews.

Signature: _____

Printed Name: _____

Employee Number: _____

Date: _____



Resources For Guidance and Reporting Concerns

- **YOUR MANAGER**
- **COMPLIANCE TEAM**
- **Safeguarding our Ministry**
(<https://fmolhs.sharepoint.com/sites/TeamLink/SafeguardingOurMinistry>)
- **IntegrityLink**
 - Available 24 hours a day. 7 days a week. You can report anonymously, where permitted by law.
 - **Phone:** (888) 400-4517
 - **Online:** fmolhsintgritylink.ethicspoint.com
- **Your Market Compliance Officer**

You may contact your Compliance Officer by submitting a question to “Questions for Your Compliance Officer” on the Safeguarding our Ministry Compliance page. You may also contact them directly. Contact information is also found on the Safeguarding our Ministry Compliance TeamLink page.

- **HUMAN RESOURCES**
 - **AskHR** (<https://fmolhs.sharepoint.com/sites/TeamLink/HR/SitePages/askHR.aspx>)
 - Email askHR@fmolhs.org
 - **Call (833) 482- 7547**





**Franciscan
Missionaries
of Our Lady**
HEALTH SYSTEM

A Message from Elizabeth Champion

It takes all of us, working together to ensure that we are holding ourselves to the highest ethical standards to Safeguard our Ministry. We embrace a culture that encourages us to “Do the Right Thing” and to speak up when we see something that is not right. Even the most solid policies and internal controls cannot work if we don’t follow them.

Our reputation as an ethical organization is critical to our continued success. As team members and those affiliated with the organization, each of us are empowered to protect and enhance our organization’s reputation.

Listening is a key part of building trusting relationships that enhance our Compliance Program. We are committed to hearing your concerns. By truly listening, we can provide you with the right resources. The Compliance Team is always available if you have questions or concerns.

You make a difference in the lives of all we are privileged to serve. I encourage you to read the Code of Conduct and use it in your daily work. As the Chief Compliance Officer, it is my pleasure to support our culture of listening and **“Doing the Right Thing.”**

Elizabeth Champion. CHC, RHIA

Chief Compliance Officer

Franciscan Missionaries of Our Lady Health System