

## Noyes Health Corporate Compliance Program

The Corporate Compliance Program and the Code of Conduct for Noyes Health provides guidance for our organization to conduct business with integrity and in accordance with all federal, state and local laws, and regulatory requirements.

Our Code of Conduct states of our beliefs:

- We are committed to providing a caring and comfortable environment and each employee makes an integral contribution in creating this environment.
- We are committed to complying with all laws, regulations, standards and other compliance requirements that apply to the business of Noyes Health.
- We are committed to complying The Joint Commission standards and elements of performance that affect the delivery of healthcare and apply to the hospital.
- We are committed to the proposition that all billings for patient services and other transactions must be properly documented and authorized in accordance with applicable legal requirements and Noyes Health's policies and procedures.
- We are committed to avoiding any activity, practice or act that conflicts with the interest of, or that could bring into question Noyes Health's integrity.
- We are committed to attracting, retaining and developing the highest quality and most dedicated work force possible in today's market.
- We are committed to using our resources wisely and shall be accountable to ourselves and to others for their proper use.
- We are committed to operating in an environment wherein the health, safety, privacy and comfort of patients and staff comes first.



Our Corporate Compliance Program sets forth the means by which the Code and related policies are implemented and monitored. The Corporate Compliance Program includes the following elements:

Written standards of conduct, as well as written policies and procedures that promote Noyes Health's commitment to compliance.

Designation of a Corporate Compliance Officer

Education and training programs for all employees

Maintenance of a process, such as a hotline, to receive complaints

A system to respond to allegations of improper/illegal activities and the enforcement of appropriate disciplinary action

Audits to monitor compliance

Investigations and remediation of identified problems and development of policies addressing the non-employment or retention of sanctioned individuals.

A policy of non-intimidation and non-retaliation

Every individual has the right to report any suspected violation of the Corporate Compliance Program, Code of Conduct to the Corporate Compliance Officer at [compliance@noyes-hospital.org](mailto:compliance@noyes-hospital.org) or by calling 585-335-4305

An alternative is the New York State Department of Health Compliance Hotline available at 1-585-423-8100, or by contacting The Joint Commission accreditation agency via postal mail at: Office of Quality Monitoring, The Joint Commission, One Renaissance Boulevard, Oakbrook Terrace, Illinois 60181, or by emailing [complaint@jointcommission.org](mailto:complaint@jointcommission.org).

Individuals will not be subject to any reprisal for a good faith report of a suspected violation of the Compliance Program, Code of Conduct, or related policy.