



Policy # & Policy Title: LR.03.015 Compliance Code of Conduct
Effective Date: 06/27/2023

Standards of conduct are a vital means of ensuring that all Affected Individuals understand their obligation to conduct themselves in a compliant and ethical manner in providing services to an organization. Thompson Health requires that all Affected Individuals¹ follow the below standards in this Compliance Code of Conduct in connection with providing services of any kind for Thompson Health.

CONDUCT STANDARD NO. 1: MISSION

Thompson Health is committed to continuously improve the health of the residents and communities of the Finger Lakes and the surrounding region.

In this role, we are committed to providing the highest quality health services while exercising prudent fiscal responsibility. Utilizing the resources entrusted to us, we will follow sound management principles in our goal to attain excellence in healthcare.

At all times we will demonstrate regard for the medical needs of those we serve and promote community wellness. In fulfilling our mission, we will exhibit the highest standards of professionalism.

Our dedication of purpose will foster the creation of a caring environment for all whom we serve, without regard to personal resources or other factors not related to their healthcare status.

A complementary and abbreviated statement of our compliance standards is part of the Thompson Health Code of Ethics and Compliance Code of Conduct, available on the Intranet, under Legal & Regulatory Affairs, and is also attached at LR.01.001.00.01.

CONDUCT STANDARD NO. 2: COMPLIANCE WITH LAWS AND REGULATIONS

Thompson Health strives to operate in accordance with high legal, moral and ethical standards, which fully recognizes justifiable expectations of the public it serves, including patients, residents, physicians, associates, vendors, contractors,

¹ “Affected Individuals” means all persons who are affected by Thompson Health’s Risk Areas, including Thompson Health’s associates, executive team, managers, contractors, agents, subcontractors, independent contractors, volunteers, medical staff members, and its board of directors. “Risk Areas” are those areas of operation affected by the compliance program and shall apply to: billings, payments, ordered services, medical necessity, quality of care, governance, mandatory reporting, credentialing, contractor oversight, and other risk areas that should be identified through organizational experience.

lenders, and governmental entities.

- We will comply with all applicable laws, regulations, standards and other compliance requirements at all levels of government.
- We will actively participate in Thomson Health education on compliance and ethics provided by Thomson Health.
- We will not pursue any business opportunity that requires engagement in unethical or illegal activity.
- We will not tolerate payment or reimbursement practices of any kind that are false, fraudulent, inaccurate, incomplete or fictitious.
- We will maintain and, where appropriate, submit all Thomson Health business data, records, and reports in a complete, accurate and truthful manner.
- We will not tolerate fraud, kickbacks or bribes intended to induce patient or resident referrals or admissions.
- Patients and residents will be admitted, receive treatment and be discharged in accordance with all federal, state and local laws and regulations, and Thomson Health policies, procedures and ethical standards.
- Associates who do not comply with the above requirements will be subject to discipline, under the Thomson Health progressive discipline policy, up to and including termination from employment. *See* Associate Handbook, Section 3.14.
- All board members, agents, contractors, subcontractors, independent contractors, vendors, medical staff and volunteers are also required to comply with the above requirements, and a failure to do so will result in applicable sanctions given their role at Thomson Health, including but not limited to, termination of any contract.

CONDUCT STANDARD NO. 3: CONFLICTS OF INTEREST

All Thomson Health associates as well as Board of Directors members will refrain from and avoid conflicts or appearance of conflicts between private interests and their responsibilities to the health system. *See* LR.05.015 Conflict of Interests Policy.

We will avoid engaging in any activity, practice or act which conflicts with the interests of Thomson Health or its patients.

We will not accept gifts, gratuities, compensation, remuneration or entertainment, which might influence, or might reasonably be perceived by others to influence, our judgment or actions as associates of Thomson Health. *See* LR.05.027 Gifts, Gratuities and Improper Inducement Policy.

Thomson Health will make no corporate contributions, gifts or donations to any political party or candidate for office.

We ensure that any funds provided to support healthcare are provided for bona

fide purposes.

CONDUCT STANDARD NO. 4: SAFEGUARDING RESOURCES AND INTERESTS OF THOMPSON HEALTH

Thompson Health will protect its assets, and the assets of others entrusted to it, against loss, theft, destruction, misappropriation and misuse, including physical property and proprietary information.

All Affected Individuals are responsible for protecting Thompson Health's confidential patient and proprietary information.

We will be responsible and accountable for the proper expenditure of funds and for the proper use of property.

We will hold contractual terms, the names of Thompson Health patients and residents and the nature of Thompson Health's dealings as confidential matters.

We will use computer systems, networks and software for only authorized and appropriate purposes.

We will ensure that drugs and other pharmaceuticals are safely stored, secured, and inventoried and that missing supplies are promptly reported.

CONDUCT STANDARD NO. 5: MAINTAINING A SAFE HEALTH CARE ENVIRONMENT

Thompson Health is committed to operating in an environment that provides for the health, safety, privacy and comfort of all patients, residents, medical staff, visitors and associates.

- We will comply with all applicable laws and apply due diligence and care to minimize the general discharge and disposal of medical waste and other hazardous materials.
- We will maintain a drug-free, smoke-free environment.
- We will promote courteous behavior toward our patients and visitors.
- We will report to our supervisor any practice or condition that may violate any rule, regulation, policy or safety standard.
- We will report all unusual events or accidents, by both verbal and written form, which involve patients, visitors or Affected Individuals in a timely manner.
- We will respect the privacy and confidentiality of everyone.
- We will utilize all required safety equipment, follow all safety procedures and attend all safety training sessions as dictated by Thompson Health policy.

CONDUCT STANDARD NO. 6: CONSIDERATION OF HUMAN RESOURCES

Thompson Health will protect, support and develop its human resources to the fullest of their potential in a fair and equitable manner.

- Reasonable training will be provided to all Affected Individuals.
- Proper respect and consideration will be shown for all Affected Individuals.
- We will provide opportunities for professional satisfaction, pride of work, and career growth for our associates.
- We will ensure that Affected Individuals are afforded nondiscriminatory terms, conditions and privileges in accordance with laws, regardless of race, color, sex, age, disability, religion, citizenship, national origin, ancestry, military status or veteran status, marital status, sexual orientation, gender identity, domestic violence victim status, predisposing genetic characteristics and genetic information, and any other status protected by law.
- We will not tolerate discriminatory treatment or unlawful harassment.
- We will comply with all applicable laws and regulations related to human resources.

CONDUCT STANDARD NO. 7: CODING AND BILLING INTEGRITY

Thompson Health is committed to the proposition that all payments and other transactions must be accurate, complete, properly documented and authorized by management. We are committed to ensuring that billing practices comply with all federal and state laws, regulations, guidelines and policies.

- We will not knowingly file a claim or bill for services that were not rendered or were not rendered as described on the claim form or statement.
- We will not file a claim for services that were rendered, but were known to be medically unnecessary.
- We will not knowingly submit claims for payment that were not properly coded, documented or billed according to all applicable laws and regulations.
- We will ensure that diagnoses are properly coded and that they are supported by medical necessity documentation.
- We will make reasonable efforts to identify and locate the owner of funds received that are not due Thompson Health and subsequently refund them to the owner.
- We will ensure that any filed cost report accurately reflects appropriate costs incurred while furnishing health care services.

CONDUCT STANDARD NO. 8: COMPLIANCE REPORTING- (CORPORATE COMPLIANCE HOTLINE)

An important factor in the success of Thompson Health's Corporate Compliance Program is maintaining open channels of communication.

All Affected Individuals must report suspected or identified problems that they recognize to their Thompson Health supervisors, the Thompson Health Chief Compliance Officer (**585-396-6714**) or through the confidential Thompson Health Corporate Compliance Hotline. (**585-756-8888**).

Affected Individuals may refer to Thompson Health's Compliance Program Policy (LR.03.002) and Non-Retaliation Policy (LR.03.010) if they are not sure of the proper process for reporting problems they recognize. Affected Individuals who ignore compliance issues and do not comply with the above requirements will be subject sanctions including but not limited to sanctions, termination of contract or discipline, as appropriate. Discipline for associates will follow the Thompson Health progressive discipline policy. *See Associate Handbook, Section 3.14.*

The Thompson Health Corporate Compliance Hotline allows Affected Individuals, as well as patients and visitors to report concerns confidentially. The Corporate Compliance Hotline may be used to report concerns about suspected or known instances of fraud or violations of law, regulations, Thompson Health policies, its Compliance Code of Conduct or Code of Ethics and Professionalism. No one reporting a concern in good faith may be intimidated or retaliated against for reporting such a concern.

The Chief Compliance Officer will promptly and thoroughly investigate all reports to the Corporate Compliance Hotline.

CONDUCT STANDARD NO. 9: PHYSICIAN COMPENSATION AND CONTRACTING

Physician agreements will be based on a standard format approved by Thompson Health's General Counsel. As appropriate, payment to contracted physicians and other types of medical providers, will be made based on written invoices, which document actual hours worked and necessary services performed. Compensation amounts to any medical provider will be consistent with industry and market norms and will reflect fair market value. Any agreements with physicians shall be commercially reasonable.

References: *See above;* LR.03.016 Code of Ethics and Professionalism.

Committee Review: JET
Joint Commission: N/A
NYSDOH: N/A
Other References: Associate Handbook Section 2.09
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Applies To: System
Department List: All
Approved By: Lalena Symonds (Legal & Compliance Admin), Michael Stapleton (President Ceo Ffths)



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Policy:

At Thompson Health it is of paramount importance that we always conduct our day-to-day activities in an ethical and responsible manner.

Thompson Health CARES Values are an expression of organizational and personal beliefs and convictions. In this statement, we publicly profess how our values will guide our organization's behavior in five areas of organizational activity: Community Accountability, Patient and Resident Care, Organizational Conduct, Fiscal Practice and Marketing. This statement will assist us in weighing our values and choosing among alternate courses of action in decision making and policy setting. A complementary and abbreviated statement of our values is part of the Thompson Health Code of Ethics and Compliance Code of Conduct, also available on the Intranet, under Legal & Regulatory Affairs and is also attached at LR.01.001.00.01.

CONFLICT OF INTEREST

Associates and Board members must refrain from participating in any activity or business venture which could create actual or perceived conflicts with the interests of Thompson Health. Specifically, they may not accept personal payment, including tips, favors, excessive business entertainment or other benefits from any supplier or customer of Thompson Health, nor take any action as a representative of Thompson Health for personal gain. Promotional gift items or holiday gifts of nominal value may be accepted from suppliers though this cannot influence business decisions. Associates may not accept a second job with a customer, competitor or supplier of Thompson Health where there is an actual or perceived conflict unless authorized by Associate Services.

PROPRIETARY AND/OR CONFIDENTIAL INFORMATION

While working at or for Thompson Health, Affected Individuals¹ will learn things about our business and about our patients and residents which are confidential. Every Affected Individual of Thompson Health has a professional and ethical responsibility to treat this information as privileged and to ensure such information is not improperly or accidentally accessed or disclosed. Except as required in the performance of an Affected Individual's duties for Thompson Health, Affected Individuals may not use or disclose any confidential and/or proprietary information such as strategies, marketing plans, profit

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Effective Date: 07/05/2023

and loss data, management information systems, trade secrets, customer and supplier information and customer and supplier contracts to anyone who does not work for Thompson Health or have a need to know the information.

Upon termination of employment or contract, Affected Individuals must return all Thompson Health property and all copies of documents, notes, USB drives, and other repositories containing pricing lists, invoices, marketing methods, management information systems, financial information, customer lists, and all other information that is not generally public knowledge relating to Thompson Health and not retain any duplicates.

All Thompson Health Associates are required to sign our confidentiality agreement on a yearly basis and are required to comply with all of its provisions. Failure to do so will subject Affected Individuals to disciplinary action, up to and including termination of employment.

PATIENT/PARTICIPANT/RESIDENT BILL OF RIGHTS

All Affected Individuals must uphold the Patient/Participant/Resident Bill of Rights in connection with any work at Thompson Health. Failure to uphold the Patient/Participant/Resident Bill of Rights will subject Affected Individuals to disciplinary action, up to and including termination of employment or contract.

ETHICS WITH COMMUNITY ACCOUNTABILITY

Guided by Our Value of Commitment:

We will provide leadership to improve the availability and quality of health promotion, education and prevention services in our community. All business activities and decisions will be conducted in an ethical manner, in compliance with all laws, regulations and standards of accrediting bodies, with the goal of improving the health and welfare of the community.

Guided by Our Value of Respect:

We will communicate and disclose information and data about Thompson Health in an accurate and objective manner that respects the privacy and dignity of our patients, residents and associates.

Guided by Our Value of Excellence:

We will work with area educational institutions to improve health education for the community, our patients, residents and associates.

Guided by Our Value of Service:

We will coordinate efforts and resources to promote access to comprehensive, affordable and high-quality healthcare. We will collaborate with our community partners to create community solutions to provide care for the medically underserved, the poor, and the underinsured and promote other programs to meet specific community needs.

ETHICS IN PATIENT AND RESIDENT CARE

Guided by Our Value of Action:

We will adopt, promote and follow policies related to the protection of patient and resident rights that are consistent with our overall philosophy and which may be required by law, licensure, or accreditation requirements.

Guided by Our Value of Respect:

We will adopt, promote and follow policies and practices that provide patients and residents with necessary and appropriate information, seek their informed consent for treatment, and support the patient/resident's rights in health care decision making. We will safeguard patient and resident confidentiality and adhere to established procedures for the authorized release of data.

Guided by Our Value of Excellence:

We will strive to ensure that the care provided is appropriate and of the highest quality. We are also committed to creating an environment that provides for the health, safety, and comfort of all patients, visitors and Affected Individuals.

Guided by Our Value of Service:

We will adopt, promote and follow policies and practices that reflect professional ethical codes and ethical responsibilities of clinical staff. We will avoid making organizational decisions that may compromise the ability of clinical staff to provide high quality healthcare.

ETHICS IN ORGANIZATIONAL CONDUCT

Guided by Our Value of Commitment:

We will operate in accordance with all legal, moral, and ethical standards expected of a high-quality health care institution. We will ensure that the religious, spiritual, psychological and physical needs, as well as cultural beliefs and practices of patients, residents and families are respected. We will protect, support and develop our human resources to their fullest potential in a fair and equitable manner.

Guided by Our Value of Action:

We will be responsible to safeguard the resources and interests of Thompson Health.

Guided by Our Value of Respect:

We support and promote diversity, equity and inclusion for all Affected Individuals, patients and residents and will ensure that our system remains free of discrimination and harassment.

Guided by Our Value of Service:

We will communicate our mission, values and system priorities to all Affected Individuals with the expectations that they act in accordance with our mission, values and system priorities.

ETHICS IN FISCAL PRACTICE

Guided by Our Value of Commitment:

We will ensure all documentation, coding and billing is accurate, complete and in compliance with all laws, regulations and regulatory guidance. We will retain reputable, independent accounting firms to conduct our annual financial audits to be performed with the highest ethical standards.

Guided by Our Value of Respect:

We will comply with all applicable state and federal laws and regulations that apply to our business transactions and competitive practices.

Guided by Our Value of Service:

We will engage in ethical and sound financial and billing practices expected in the health care industry.

ETHICS IN MARKETING

Guided by Our Value of Respect:

We will reflect integrity, honesty, and high professional standards in all marketing efforts. We will not seek to damage the professional reputation of other organizations or individuals.

MORE INFORMATION

Any Affected Individual who seeks more information about this Code or is aware of a violation of this Code may reach out to their Thompson Health Supervisor (for associates), Associate Services (for associates) or call the General Counsel/Chief Compliance Officer at 396-6714 or the Compliance Hotline at **585-756-8888**.

Ethics consults may be requested in accordance with [LR.01.001.01 Ethics Consultation Procedure](#).

Supervisor's Procedures for Implementation:

SUPERVISOR'S COMMITMENT

Supervisors are responsible for setting the proper example regarding our Code of Ethics and Professionalism. Questions of interpretation pertaining to this policy are to be referred to Associate Services or the General Counsel/Chief Compliance Officer. The supervisor must immediately notify Associate Services or the General Counsel/Chief Compliance Officer if they believe that an associate or other Affected Individual is involved in an activity that might violate our Code of Ethics and Professionalism.

References:

Committee Review: Ethics Committee Last Approved: 07/05/2023

Joint Commission: N/A

NYSDOH: N/A

Other References: LR.01.001.01 Ethics Consultation Procedure

LR.01.001.00.01 Thompson Health Code of Ethics and Compliance Code of Conduct

Policy # & Policy Title: LR.03.016 Code of Ethics and Professionalism
Effective Date: 07/05/2023

Page: 5 of 5

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