

Code of Conduct



Banner Health®



Introduction

Banner Health (“Banner Health” or “Banner”) is committed to possessing and demonstrating the reliability, honesty, trustworthiness and high degree of integrity expected of a leading healthcare organization and a participant in federally funded health-care programs. To help strengthen this commitment, Banner has implemented its Compliance Program.

Identifying Compliance Issues

At Banner, each employee is expected to know and understand Banner’s compliance policies as well as the basic laws and regulations that affect his or her job. If you are unsure about the legality or appropriateness of an action or proposed action, think of the following:

- Does it comply with the law and Banner’s compliance policies and procedures?
- How would it make you feel if you did it?
- How would it look to your family and friends, your coworkers or our patients and the community?
- How would I feel if I did it?

If you are not sure, ask. And keep asking until you get an answer that makes sense. Get the right answer, not just the easy answer.

Resolving Compliance Issues

Many resources are available to help employees resolve compliance issues:

The Compliance Handbook and Compliance Policies: These comprehensive resources for compliance issues or concerns can be found on the Ethics & Compliance intranet web page.

The Four-Step Communication Process: For compliance questions or concerns that cannot be resolved by reviewing the various Banner compliance documents, discuss the issue with your supervisor, manager or another higher-level supervisory employee. Seek to resolve the compliance problem promptly, constructively and at the lowest level possible by following these four steps:

- **Discuss the issue with your supervisor.** Supervisors are familiar with the particular workplace environment and its issues. Therefore, they should be given the first opportunity to resolve the matter.
- **Speak to the department manager.** If you and your supervisor cannot resolve the matter, if you feel that your concern is not getting the proper attention, or if your supervisor is the issue, you should request a meeting with your Department Manager or Director to discuss the matter further.
- **Speak to your Facility Compliance Officer, Human Resources Department, and/or your CEO.** If your Department Manager or Director is unable to resolve the matter to your satisfaction, you should contact your Compliance Officer or Human Resources Department, or alternatively, you may elect to bring the matter directly to your CEO or Senior Executive. The Ethics & Compliance intranet website lists the Facility Compliance Officers.
- **Bring the matter to the attention of the Ethics & Compliance Department or the Legal Department.** Matters that are not resolved at the facility level should be brought to the attention of the Ethics & Compliance Department or the Legal Department.

Reporting Compliance Issues

Each employee must report any issue or practice that he or she believes in good faith may constitute a violation of a law or Banner’s compliance policies. People who are found to have engaged in unlawful conduct or conduct in violation of Banner policies, or who have failed to detect, report and/or correct any offense, are subject to corrective action, up to and including termination of employment.

Anti-Dumping Laws - Emergency Treatment

Banner must meet or exceed the requirements of the Emergency Medical Treatment and Active Labor Act (“EMTALA”) in providing emergency medical treatment to all patients, regardless of their race, religion, national origin, age, gender, physical condition, or ability to pay. In general, when an individual arrives alone or with another person at a Banner facility, and a request is made on the individual’s behalf for a medical examination or for treatment, Banner will provide for an appropriate medical screening examination within the capability of the facility’s emergency department, to determine whether an emergency medical condition exists, or with respect to a pregnant woman having contractions, whether the woman is in labor. The facility must not delay the examination or treatment to inquire about the method of payment or the individual’s insurance status.

Anti-Kickback Statute

The anti-kickback statute is a federal law prohibiting persons from willfully offering, paying, seeking or receiving anything of value to bring about a referral for medical services or goods payable under Medicare or Medicaid. Failure to obey this law can result in fines, jail or exclusion from the Medicare and Medicaid programs. This law prohibits kickbacks and bribes. It also affects the way health-care entities carry out a broad range of ordinary business deals.

Antitrust Matters

Antitrust laws forbid companies from doing business in a way that gives them too much control in the marketplace. The purpose of these laws is to preserve competition. These laws may affect your dealings with patients, doctors, payers, suppliers and competitors of Banner.

Billing and Claims

Honesty and accuracy in billing and in the making of claims for Medicare or Medicaid payment is vital. It is a federal felony to willfully make a false statement in connection with a claim for payment or an application for certification under Medicare and Medicaid.

Confidential Information

Information about a patient's medical condition is highly sensitive and its confidentiality must be maintained. No employee, physician or other health-care provider has the right to any patient information other than that necessary to perform his or her job. No employee should ever release or discuss patient-specific information with others unless it is necessary to provide appropriate medical care to the patient, it is with the patient's written consent or it is required by law.

Conflict of Interest

A conflict of interest arises whenever an employee's interest or that of an employee's immediate family conflicts or appears to conflict with the interest of Banner. Everyone has a duty to avoid conflicts of interest or the appearance of conflicts of interest.

Employee Rights Protection

Employees' rights are best protected by open communication and a spirit of cooperation. Banner is committed to equal employment opportunity in the workplace and a working environment free of prejudice or harassment on the grounds of race, color, religion, sex, sexual orientation, age, disability, national origin or any other legally prohibited factor. All employees are expected to abide by all federal, state and local laws dealing with employment matters.

Federal and State False Claim Acts

The Federal False Claim Act imposes civil liability on any person or entity that knowingly submits, or causes to be submitted, a false or fraudulent claim for payment to the U.S. government. This would include fraud involving any federally funded contract or program such as Medicaid and Medicare.

Intellectual Property

Intellectual property includes patents, trademarks, service marks, trade secrets, copyrights, proprietary information and inventions or techniques. Intellectual property is protected by federal and state laws. Violations of the intellectual property laws may result in personal civil damages or criminal charges. In addition, Banner may be held responsible for the actions of individual employees who break intellectual property laws.

Non-Retaliation for Reporting Suspected Non-Compliance

Banner strictly prohibits retaliation against any individual, including patients, who in good faith reports a suspected violation of Banner policy or suspected illegal or unethical conduct.

Political Activity

As employees, we are encouraged to take part in community and political affairs and to vote in elections. If we participate in such activities, please remember to make it clear that we are acting as private citizens and not as representatives of Banner Health.

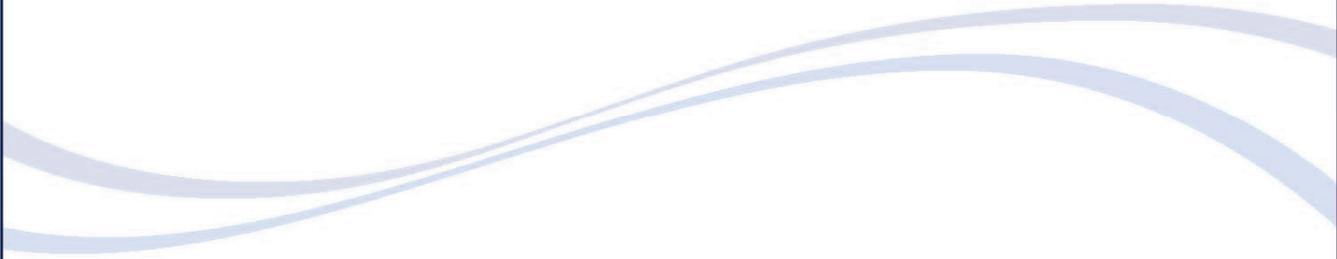
Respecting Patient Rights – Freedom of Choice

Upon admission, Banner must provide patients with a written statement of their rights. This statement must include the rights of patients to make decisions regarding their medical care and it must conform to all applicable state and federal laws and regulations. Patients must be given the opportunity to be involved in all aspects of their care and Banner must obtain their informed consent for treatment.

The ComplyLine: Banner's compliance hotline (888-747-7989) and website <https://bannerhealthcomplyline.alertline.com> is available to all Banner Callers. Calls to the ComplyLine will not be traced and will be treated confidentially. Employees may remain anonymous if they choose. No caller will be subject to retaliation for bringing forth a good faith concern. Anyone who attempts to retaliate against an employee who has in good faith made a call to the ComplyLine will be subject to corrective action, up to and including termination of employment.

The ComplyLine is toll-free from anywhere in the United States. It is answered 24 hours a day, 7 days a week by an operator who is trained to take your report of suspected illegal or unethical activity. A call to the ComplyLine will satisfy your obligation to report suspected illegal or unethical activity to a compliance officer.

The ComplyLine is intended to supplement existing internal communication channels. It is not intended to replace the local management team or the Four-Step Communication Process outlined above. The ComplyLine is available when employees feel they have exhausted normal channels or are uncomfortable about bringing an issue to their supervisor or manager. Inquiries about an investigation can be obtained with the Report Number and PIN by logging into <https://bannerhealthcomplyline.alertline.com>.



Banner's ComplyLine (888) 747-7989

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