



Hutchinson CLINIC

CODE OF CONDUCT

MESSAGE FROM OUR CHIEF EXECUTIVE OFFICER

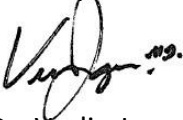
The mission of the Hutchinson Clinic is to maintain a culture of excellence by delivering to our patients the most advanced, timely, and compassionate care possible. In order to achieve our mission, we as an organization, have to perform at the highest standards to be successful. In performing at the highest standards, it is the expectation that every person performing work on behalf of our organization behave honestly, ethically, and with integrity.

As we work to meet the ever-evolving needs of those we serve, it is important to strive for success and apply our Code of Conduct to every situation you may encounter. The Hutchinson Clinic's Code of Conduct is the keystone of its corporate integrity philosophy and communicates its ethical business standards. The Code of Conduct serves as a cultural compass for staff, physicians, management, vendors, and others who interact with our organization. It is also an essential element of our Compliance Program.

The Hutchinson Clinic wants to provide the tools and information to perform these essential and reputable principles daily. In addition to the Code of Conduct, the Clinic has created the Compliance Manual (the "Manual") which provides a detailed outline of the laws and policies that apply to every aspect of the services we provide. The Code of Conduct and Manual, provides the guidance to ensure that our work is accomplished in an ethical and legal manner. If you ever have a concern about a particular business practice, or you question whether a situation violates a standard of care or a legal requirement, report your question or concern immediately. You are encouraged to report any questions or concerns to your supervisor, the Compliance Department, input a report internally through the RL6 system (if you are an employee), or make a report to the Compliance Hotline (anonymously reporting is always allowed). The hotline number is 855.900.0067 or 800.216.1288 (Spanish).

The Hutchinson Clinic appreciates your commitment to success. We are all guardians for the reputation of ethical and legal business practices as a physician practice group. Part of that success is directly related to your conduct. The clinic offers this Code of Conduct (the "Code") to ensure that these expectations are understood and met. Please be mindful and act in a way that represents the Hutchinson Clinic in a positive, ethical, and legal manner at all times.

Thank you,



Dr. Verlin Janzen, Interim Chief Executive Officer

Approved by Hutchinson Clinic Board on January 28th, 2019

CODE OF CONDUCT

Acknowledge and Understand.

The Clinic expects every employee and agent to acknowledge and understand the Code of Conduct applies to everyone, including all employees, physicians, and anyone working on behalf of the Clinic, including any persons or entities that provide supplies or other services to the Clinic. Everyone is responsible for following the Code and helping build a culture of compliance.

Be Honest and Ethical.

The Clinic expects every employee and agent to adhere to high ethical standards and be honest at all times when acting on behalf of the Clinic. Employees and agents should never place consideration for the “bottom line” ahead of ethical conduct. Legal and ethical conduct is everyone’s job. All employees and agents are expected to do the right thing, including abiding by this Code, reporting potential issues, identifying and correcting issues, and protecting public resources from fraud, waste and abuse. Never be afraid to ask questions and to ensure you know what the Clinic expects or what the law requires in any situation. You may do this without fear of retaliation. We encourage you to raise questions. All employees and agents should work together to help solve issues and support each other in establishing an environment free of retaliation. Further, you should avoid situations which could be viewed as a conflict of interest in which your individual position is used for personal gain. An example of a conflict of interest situation is having an ownership interest in a business that is a vender of, or supplier for, the Clinic.

Obey the Law.

There are many laws and regulations that govern the activities of the Clinic, particularly those related to billing and business relationships. The Clinic has developed policies set forth in the Manual and elsewhere to help explain these requirements. As a condition of employment or contracting with the Clinic, all employees and agents are expected to comply with applicable laws and regulations. All agents and employees of the Clinic must be committed to full compliance with all federal and state laws, regulations, and requirements related to billing, services provided, and business relationships. We must work to report potential issues, identify and correct issues and protect public resources from fraud, waste and abuse. If you are not certain about what the law requires, please ask questions and seek help from a supervisor, the Compliance Committee, or the Director of Compliance. It is required that you report actual or suspected violations of the Clinic’s Compliance Program, which includes any violation of law or regulation.

Report Information Truthfully.

We expect and require employees and agents to take particular care to ensure that all communications within the Clinic and with outside agencies (including government agencies) are truthful, accurate and complete.

Confidentiality.

The Clinic expects all employees and agents to maintain the confidentiality of all patient information (including medical and billing records), the Clinic's business information and information relating to the Clinic's vendors and suppliers. Employees and agents should not use any such confidential information except as is appropriate for carrying out business on behalf of the Clinic. It is expected that all patient information will be kept strictly confidential and released only in accordance with applicable law and the terms of the privacy policies and procedures of the Clinic.

Reporting Possible Violations.

Every employee and/or agent of the Clinic is required to report any activity he or she reasonably believes to be in violation of the law or the Clinic's policies. We do not require you to report issues and concerns to your supervisor or through your chain of supervision. **Our only requirement is that you report your concerns or issues.** Reports may be made to your supervisor, internally through the RL6 system (if you are an employee), any member of the Compliance Committee, the Compliance and Risk Management Department, or to our Hotline. Reports may be made without fear of retaliation and confidentiality will be protected to the full extent of the law. **The hotline number is 855.900.0067 or 800.216.1288 (Spanish).** The Hotline does not require you to tell us your name, but the details you give may expose your identity. We will attempt to protect your identity, if asked.

Retaliation Prohibited.

We will not tolerate anyone retaliating against you for participating in our Compliance Program. Our Code requires you to speak up when you see an issue or violation. You may not look the other way and comply with our Code or expectations. We need you to voice concerns or ask questions about your conduct or the conduct of others. We cannot ensure we are preventing misconduct and resolving mistakes without your assistance in asking questions and reporting concerns to us. The Clinic will protect you from retaliation for any issue identified or report made in good faith. If you refuse to participate in any action that you, in good faith, believe violates the law, we will protect you from any retaliation that results. If you ever feel you are being retaliated against, please report it promptly. Again, you can report to your supervisor, the Compliance and Risk Management Department, or to the Hotline.

Disciplinary Action.

The failure to follow any of these principles of conduct may result in disciplinary action, including termination. There are also a range of penalties that can apply to individuals for violations of state and /or federal healthcare program regulations. Such penalties can include monetary fines, civil and criminal legal actions, and program exclusions.

As a reminder, it is the policy of the Clinic to promote a productive work environment. The Clinic prohibits discrimination, harassment, and violence in the workplace against employees and non-employees. The Clinic Policy Manual can be found on HC News under the Human Resources tab. As an employee, you acknowledge understanding and agree to maintain compliance with these policies. Additionally, the Clinic Code of Conduct sets forth the expectations that every person performing work on behalf of the Clinic behave honestly, ethically, and with integrity.

While the Clinic cannot predict or anticipate every situation that might arise with respect to compliance matters, we have developed a Compliance Program to address certain risk areas that have been identified as affecting physician practices, such as that of the Clinic. We work to set forth procedures for monitoring compliance in those risk areas and strive to maintain compliance with all aspects of the laws that affect our business. If you have questions about other topics or issues not addressed in within our Code of Conduct, Compliance Program in general, or policies and procedures, please contact your supervisor, the Compliance Committee, Compliance and Risk Management Department, or our hotline.

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PUTTING YOUR HEALTH FIRST

