

# Code of Conduct

Academic medicine, delivered with  
compassion and integrity.



## A message from our CEO

### Colleagues:

As the region's academic health system, we have a unique and important responsibility to our community. As we fulfill our mission and strive to achieve our vision, our actions must be grounded in a foundation of caring and excellence. That's why we have a comprehensive, values-based Compliance Program to guide us along the way.

The Compliance Program — and its Code of Conduct — is a vital part of the way we conduct ourselves at UC Health. In fact, it's built on our purpose, mission, vision and PRIIDE values. As we strive to deliver healthcare compassionately and act with absolute integrity, each of us can use the Code to ensure our daily activities are done in an ethical and legally responsible manner.

The Code promotes our shared common values and supports our tradition of caring and excellence — for our patients, our community and our teams. It also contains resources to help answer questions about appropriate conduct at work. Please review it thoroughly. Your adherence to its spirit, as well as its specific provisions, is critical to our success.

If you have questions regarding this Code of Conduct or know of a situation that you think violates any part of this Code, you should immediately consult your supervisor or another member of management. There will be no retaliation for asking questions or raising concerns about the Code of Conduct or for reporting possible improper conduct in good faith. If you do not feel comfortable discussing your concern with your supervisor, or it would not be appropriate to do so, please contact the Compliance HelpLine at 866-585-8030 or [compliance@uchealth.com](mailto:compliance@uchealth.com).

We are committed to ensuring that our actions consistently reflect our words. In this spirit, we ask you to assist us in supporting the high standards, values and principles that allow us to further our purpose to advance healing and reduce suffering.



Richard P. Lofgren, MD  
President & CEO

► The Code provides an overview of laws and regulations that impact UC Health.



**As we strive to deliver healthcare compassionately and act with absolute integrity, each of us can use the Code to ensure our daily activities are done in an ethical and legally responsible manner.**

[ Richard P. Lofgren, MD, President & CEO ]







# As the region's academic health system, we play an important and distinct role in our region.



## Our purpose:

To advance healing and reduce suffering.

## Our vision:

To use the *power of academic medicine* to advance the science of discovery and transform the delivery of care.

## Our mission:

We are committed to advancing medicine and improving the health of all people – regardless of race, ethnicity, geography or ability to pay – by fostering groundbreaking medical research and education, delivering outstanding primary and specialty care services and building a diverse workforce.

## Our PRIIDE values:

We will serve our patients, our community and one another by:

- ▶ Putting **P**atients & families first
- ▶ Showing **R**espect
- ▶ Acting with **I**ntegrity
- ▶ Embracing **I**nclusion
- ▶ Seeking **D**iscovery
- ▶ Offering **E**mpathy

## Our Core Four Strategies



**Growth & Access:** Leading in the care of distinct populations.



**Research & Education:** Partnering with the University of Cincinnati to advance research, training and education.



**Performance & Culture:** Delivering better, safer and smarter care.



**Community Health:** Improving the physical and economic health of our community.

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## Why we have a Code of Conduct

The Code of Conduct – referred to as the Code – is part of UC Health's Compliance Program. The Compliance Program is the cornerstone of our organization's commitment to the highest possible standards of business ethics and compliance. Through the Code, the Program also provides the framework for us to achieve these standards.

The Code provides an overview of laws and regulations that impact UC Health. It also gives each of us a roadmap to follow as we carry out our daily activities. This map ensures that we act not only within the law but also with the highest ethical standards. More importantly, it sets expectations for how each and every one of us treats our patients and each other.

All individuals must follow the Code when making business decisions and caring for patients. You will find UC Health policies and procedures that complement the Code on the Intranet.

## Who should read this Code

The UC Health Code of Conduct governs all of the actions of UC Health and any of its affiliates. As such, all employees, providers, contractors, consultants and vendors should review this Code and recognize any circumstances that may arise that would require reporting. All employees and providers are required to sign an Acknowledgement Form confirming that they have received and read the Code of Conduct, and are committed to adhering to its terms.

## What's expected of our leaders

People look to their leaders for guidance and direction. That's why we expect our leaders to set a good example by working with:

- ▶ Kindness
- ▶ Sensitivity
- ▶ Thoughtfulness
- ▶ Attentiveness to PRIIDE Values

▶ *We count on our leaders to create an environment where each individual is encouraged to raise concerns and propose ideas.*

We count on our leaders to create an environment where each individual is encouraged to raise concerns and propose ideas. The culture must promote the highest standards of compliance and business ethics. As individuals and as a system, we can never sacrifice these behaviors as we conduct our business.



## Why you should report an issue

### Duty to report:

We are committed to ethical and legal conduct that complies with all relevant laws and regulations. We are also committed to correcting wrongdoing whenever it occurs.

Each individual has a duty to report any activity that appears to violate applicable laws, rules, regulations, accreditation standards, standards of clinical practice, federal healthcare conditions of participation, UC Health policies or this Code.

If you report a matter that poses serious compliance risk to the organization or that involves a serious issue of medical necessity, clinical outcomes or patient safety, and you doubt the issue has been given proper attention, you must report the matter to higher levels of management. This could include contacting the Chief Compliance Officer or the Compliance HelpLine. Continue voicing your concerns until you are satisfied that the full importance of the matter has been recognized.

### How to report an issue or concern:

If you would like to report a compliance concern, contact your supervisor. If you are not comfortable talking to your supervisor about the issue or you don't think it would be appropriate, contact the Compliance and Business Ethics Department at (513) 585-7224 or at [compliance@uchealth.com](mailto:compliance@uchealth.com).

Individuals are always welcome to call the Compliance HelpLine at (866) 585-8030 or submit a HelpLine report on the Intranet home page. You may choose to remain anonymous. We make every effort to maintain, within the limits of the law, the confidentiality of the identity of any individual who reports concerns or possible misconduct.

### No retaliation:

There is no retaliation against anyone who reports a compliance concern in good faith.

### Examples of non-compliant actions, reportable actions and consequences for non-compliance:

Submitting false bills to any payor.

Accessing patient information without a business reason to do so.

Violations of any law, regulation, policy or procedure.

Consequences of non-compliance are implemented according to the UC Health Standards of Performance and Conduct Policy.

### Where to report

#### Compliance Department

(513) 585-7224

[compliance@uchealth.com](mailto:compliance@uchealth.com)

#### Compliance HelpLine

(866) 585-8030

24/7/365

in multiple languages

#### Compliance HelpLine Form

Reporting Form found on the UC Health Intranet homepage

#### Privacy and HIPAA

(513) 585-7155

#### Office of General Counsel

(513) 585-8062; ask to

speak to an attorney

#### Human Resources

UC Medical Center

(513) 584-2777

West Chester Hospital

(513) 298-7800

Daniel Drake Center

for Post-Acute Care &

Bridgeway Pointe

(513) 418-2614

UC Health Business Center

(513) 585-6009

UC Physicians Company

(513) 245-3629

#### In Emergencies

Contact the Compliance HelpLine, file an online HelpLine report or contact the location's front desk and ask for Compliance to be paged.

## The Code: Honoring our commitments to our stakeholders

From the actions of individuals to the operation of our facilities, we pledge to comply with the ethical and legal principles found in this Code, as well as with federal, state and local laws and regulations.

We also will work to uphold the following commitments:

### To our patients:

1. We are committed to providing the highest quality of care and patient safety.
2. We are committed to complying with the Conditions of Participation as set by the Centers for Medicare & Medicaid Services and The Joint Commission and we strive to implement best practices.
3. We do not discriminate in the availability of services, the admission, transfer or discharge of patients or the care we provide.
4. We recognize diverse backgrounds and cultures to respect each patient's needs.
5. We respect that all patients have a right to effective communication.
6. We provide a statement of patient rights and notice of privacy practices to all patients.
7. We seek to involve patients in all aspects of their care, including giving consent to treatment, making healthcare decisions and understanding options for care at the end of life.
8. We provide clear explanations of all treatment patients will receive.
9. We respect any request for a transfer to another healthcare facility.
10. We treat all patients in a manner that preserves their dignity, autonomy, self-esteem, civil rights and involvement in their own care.
11. We protect patient medical information in compliance with HIPAA and applicable state laws.
12. We follow the Emergency Medical Treatment and Labor Act ("EMTALA") in providing emergency medical treatment and stabilization to all patients regardless of their ability to pay.

► *We are committed to providing the highest quality of care and patient safety.*



**To our employees:**

We are committed to establishing a work setting that treats all with fairness, dignity and respect. We strive to provide opportunities to learn and grow, to develop professionally and to work in a team environment in which all ideas are considered.

**To our providers:**

We are committed to collaboration between those who are a part of UC Health and those who have been credentialed and privileged to practice in UC Health facilities. We are committed to providing an excellent work environment in our facilities.

**To our community:**

We are committed to understanding the particular needs of the communities we serve and providing quality, cost-effective healthcare. We realize that our organization has a responsibility to help those in need. We proudly engage in charitable initiatives and events in our communities to promote goodwill and further good causes.

► *We are committed to establishing a work setting that treats all with fairness, dignity and respect.*

**To third party payers:**

We are committed to working with our payers in a way that demonstrates our commitment to contractual and legal obligations. We also will work in a way that reflects our shared concern for providing quality healthcare while striving for efficiency and cost effectiveness.

**To our regulators:**

We are committed to weaving laws, regulations and sound business practices into the culture. We accept the responsibility to self-govern and monitor adherence to the requirements of the law and to our Code.

**To our business partners:**

We are committed to fully performing our responsibilities in a manner that reflects our purpose, mission, vision and PRIIDE values.

**To our suppliers:**

We are committed to fair competition among prospective suppliers and the sense of responsibility required of a good customer. We encourage our suppliers to adopt their own set of comparable ethical principles.

**To our volunteers:**

We are committed to ensuring that our volunteers feel a sense of meaningfulness from their volunteer work and receive recognition for their efforts.







## Following the Code in patient care

Everything we do centers on providing the best patient experience. These sections of the Code support that focus.

### HIPAA and privacy:

Keeping patient and business information confidential is a core practice of UC Health. This information must be kept safe and never given to an unauthorized person or organization.

If you know or suspect that confidential information has been put at risk or shared inappropriately, report the potential breach immediately.

► *Keeping patient and business information confidential is a core practice of UC Health.*

### Professional licenses and certifications:

Any individual whose job requires a professional license, certification or other credential is responsible for keeping them current. They also must comply with the ethical and legal standards of their respective disciplines. We do not allow anyone to work without current licenses or credentials where required.

### Research and clinical trials:

We comply with federal and state laws and regulations in any research, investigations and/or clinical trials. Consent forms for clinical trials must fully inform subjects of their rights and responsibilities. A subject's voluntary, informed consent to participate in a clinical trial is documented according to UC Health and hospital policies.

Anyone performing research must follow applicable guidelines and privacy policies. They also must maintain the highest standards of ethics and accuracy in any written or verbal communications regarding the research project. Researchers may only submit true, accurate and complete costs related to research grants. Anyone doing research on humans must have Institutional Review Board approval and follow all UC Health policies and applicable law.

### Screening of excluded individuals:

UC Health does not knowingly employ, contract with, engage the services of or grant medical staff privileges to any person or business that is currently excluded, suspended, debarred or otherwise ineligible to participate in federal healthcare programs.

Employees, contractors, vendors and privileged practitioners at all UC Health facility are required to report to the Compliance Department immediately if they become excluded, suspended, debarred or otherwise are ineligible to participate in federal healthcare programs. UC Health checks exclusion listings against new and current employees, vendors and medical staff members on a regular basis.

► *The way we conduct our business reflects who we are.*

### **Vendor credentials:**

All vendors who access patient care areas at our facilities must go through the credentialing process and wear a photo ID issued by UC Health. This supports our commitment to patient quality, privacy and safety.

## **Following the Code in billing, finance and records**

The way we conduct our business reflects who we are. These sections of the Code support ethical decision making.

### **Billing compliance:**

Billing must comply with all applicable laws, rules and policies. Individuals who handle patient charges, claims and records must accurately document and report services and supplies. UC Health prohibits anyone from knowingly presenting, or causing to be presented, claims for payment or approval that are false, fictitious or fraudulent.

### **Cost reports:**

UC Health is required by law to turn in specific reports about our operating costs and statistics. To ensure we meet all requirements, the Finance Department must prepare, submit and settle the cost reports.

### **Documents and records:**

We are responsible for the accuracy and safekeeping of documents and records. This helps us comply with legal requirements and supports our business practices. As such:

- No one may alter or falsify any record or document.
- Medical and business records can be destroyed only in compliance with our policy on record retention and must never be destroyed in an effort to conceal information as part of any investigation.
- Records also must be held if the Office of General Counsel puts a hold on them due to a pending legal matter and may be destroyed only after the legal hold is lifted.

### **False claims:**

A false or fraudulent claim cannot be knowingly made to the federal or state government. We regularly audit, monitor and refund amounts paid by payers in error to any of our entities. Examples of false claims include upcoding, false documentation or double billing. Report known or suspected false claims to the Compliance Department. The False Claims Act policy can be found on the UC Health Intranet.

### **Financial reporting:**

We follow a high standard of accuracy and completeness in documenting, maintaining and reporting financial information. This helps us manage our business. It also is required for tax and debt (external investor) reporting.

All financial information must reflect actual transactions and conform to generally accepted accounting principles in the United States. All funds or assets must be properly recorded in the books and records of UC Health. UC Health maintains a system of internal controls to provide reasonable assurances that all transactions are executed in accordance with management's authorization and are recorded in a proper manner so as to maintain accountability of the organization's assets.

UC Health is a nonprofit, tax-exempt entity and provides community benefits that consist of healthcare services, medical training, research and community outreach activities. UC Health uses its resources to support the public good rather than the private or personal interests of any individual or entity.

► *Our actions support the highest standards of behavior.*

### **Following the Code in business conduct**

The following sections of the Code ensure that our actions support the highest standards of behavior.

#### **Accreditation and surveys:**

Any of our locations may be reviewed at any time by an external accreditation group or government agency. We are committed to working with them in a direct, open and honest manner. UC Health or anyone acting on UC Health's behalf should never mislead any external surveyor, either directly or indirectly.

#### **Antitrust:**

Antitrust laws are extremely complex. Generally, these laws prohibit competitors from agreeing to fix prices that result in higher costs for the consumer. UC Health refrains from engaging in unfair business practices that might restrict competition, and individuals should not provide information about UC Health business to a competitor. You should consult your supervisor or the Office of General Counsel for guidance about competitive activities, laws and policies related to your area of responsibility.

### **Business courtesies and gifts:**

UC Health has a thorough policy about accepting any business courtesy or gift. If you have any questions, contact the Compliance Department for help.

#### **Accepting:**

- ▶ You should never, under any circumstances, ask for a gift.
- ▶ You may not accept any gift intended to persuade UC Health to do business with any person or company.
- ▶ Gifts of cash or cash equivalent (gift cards) are prohibited.

#### **Giving:**

- ▶ You may not give any gifts, including any cash or cash equivalent (gift cards) to persuade a person or company to do business with UC Health or to use our services.
- ▶ Any gifts to Medicare or Medicaid beneficiaries, including service recovery program gifts, must not exceed \$15 per item and no more than \$75 per calendar year per beneficiary, unless approved by the Compliance Department.

### **Confidentiality:**

Every individual affiliated with UC Health is obligated to maintain the confidentiality of patients, personnel and other proprietary information, as well as that of those who enter into business or personal relationships with UC Health. As such, you are trusted with a wide range of confidential information, which remains the sole property of UC Health.

Sharing confidential information with co-workers or others outside of UC Health is strictly forbidden, unless the person requesting the information has a legitimate, legal reason to know it for UC Health business-related purposes.

### **Conflict of interest:**

A conflict of interest may occur if someone acting on behalf of UC Health has outside activities, personal interests or other private interests that interfere or appear to interfere with their ability to make objective decisions on behalf of UC Health.

Each year we require every manager, director, trustee, officer, executive, department chair, physician, member of a committee with board-delegated powers, department or administrative director, executive director for business and administration, and individual with purchasing authority within UC Health to disclose in writing any relationship with vendors or competitors that may present a potential conflict of interest.

▶ *If you have any questions as to whether or not a conflict may exist, ask your immediate supervisor or contact the Compliance Department.*



Any individual who holds a position of trust and stewardship must not directly or indirectly perform duties, incur obligations, or engage in business or professional relationships that creates the appearance of a conflict of interest. No outside activity may interfere with job performance.

### **Contracting:**

All contracts or other written agreements must be first reviewed by the business owner and then uploaded to the contract workflow management system, except for contracts handled by UC Health's designated Group Purchasing Organization (see the Contract Processing Policy on the Intranet). Once it is uploaded, the Office of General Counsel and other required review teams will review the contract. The requesting UC Health business owner is responsible for having the contract signed prior to conducting business, as explained in the Signature Authority for Contracts policy on the Intranet.

### **Electronic media and cybersecurity:**

All communication systems including computers, email, Intranet, Internet access, instant messaging, video conferencing, telephones and voicemail are the property of UC Health. They are to be used primarily for business purposes as explained in our policies.

Limited personal use of UC Health communications systems is allowed. However, you must follow our information security policies and procedures. You also should assume all UC Health devices and any communication through any UC Health system may be monitored and are not private. If you abuse our communication systems or use them excessively for personal use, you may lose your privileges and be subject to corrective action.

### **Environmental safety:**

As an organization we comply with all relevant environmental laws and regulations. We operate our facilities with the required permits, approvals and controls.

We each have a duty to follow the environmental laws and regulations specific to our area and file all necessary reports. In fact, failure to comply with proper handling and disposal of waste and other potential contaminants has significant consequences for our organization.

► *As an organization, we comply with all relevant environmental laws and regulations.*

## Government relations, lobbying and political activity:

UC Health complies with all federal, state and local laws governing participation in government relations and political activities. As such, we have policies and guidelines for all UC Health Representatives (including all UC Health employees, agents and volunteers) who engage public officials (including government officials and political candidates).

- ▶ **Public policy:** UC Health Representatives, in their professional capacity, are prohibited from contacting and communicating with federal, state and local public officials without the express consent of the Department of Government Relations. The Department of Government Relations is charged with advancing UC Health's public policy interests at all levels of federal, state and local government and is the designated point of contact within UC Health for public officials and their staff.
- ▶ **Political activity and campaigns:** UC Health Representatives are prohibited from participating in partisan political activities in their capacity as a UC Health Representative. UC Health does not contribute assets, funds, equipment, space, staff services or other resources to partisan political campaigns, political parties or other organizations that use those resources primarily for political objectives.
- ▶ **Personal politics:** UC Health policies regarding contacts and communications with public officials, and political activity and campaigns, do not extend to you as an individual, private citizen. However, due to rules about lobbying and attempting to influence government officials, employees must clearly separate personal political activity from any activity related to UC Health. Therefore, a UC Health Representative shall not use UC Health's name or corporate resources to engage in political activity. When endorsing or opposing a candidate for political office, or taking a position on an issue for the purpose of supporting or opposing a candidate or issue, employees must make it clear they are speaking as an individual and not stating a UC Health position. All contacts with public officials or government agencies for personal or other non-UC Health purposes, whether in person or in writing, should be clearly identified as such.
- ▶ **Conflicts of interest:** If you or an immediate family member serves in an appointed or elected public position or is seeking an appointed or elected public position, this information should be communicated to the Department of Government Relations.
- ▶ **Gifts and meals:** No gifts, even those of nominal value such as meals, may be offered or accepted by UC Health or a Representative of UC Health to or from any public official. The Department of Government Relations will determine any exceptions to this rule prior to the meal or gift provided.

▶ *UC Health complies with all federal, state and local laws governing participation in government relations and political activities.*







### **Insider information and securities trading:**

While working for UC Health, you may become aware of non-public information about UC Health or an external company. If this occurs, you may not use that information to buy, sell, transfer, gift or conduct other transactions of publicly traded securities of that company. Discussing this information with others also is prohibited until the information is made public.

### **Intellectual property:**

UC Health is committed to adhering to all applicable intellectual property laws. We respect the intellectual property and copyright laws regarding books, trade journals, magazines and other applicable resources. All software used in connection with UC Health business must be properly licensed and used in accordance with that license.

### **Mail and wire fraud:**

Any misrepresentation that is part of a scheme to obtain money or property by the use of the mail system or a wire system violates these laws.

### **Marketing and advertising:**

Healthcare is highly competitive. Our marketing and advertising must uphold the standards of the Code. Marketing and advertising activities may be used to educate the public, to provide information to the community, to increase awareness of our services and to recruit talent. Marketing material and media announcements must be truthful, fully informative and non-deceptive.

### **Media relations:**

All requests from reporters or the general public for information should be referred to the Marketing & Communications Department. Employees should never release information without the permission of Marketing & Communications.

### **Prescription medications and medical supplies:**

As part of their jobs, some employees have access to prescription drugs, including controlled substances and other medical supplies. Many of these items are monitored by regulatory organizations and must be administered by a physician order only.

Prescriptions, including controlled substances and medical supplies, must be handled properly and only by authorized persons. This reduces risks to UC Health and to patients. If you know of inadequate security or theft of these items, report the incident immediately.

► UC Health is committed to adhering to all applicable intellectual property laws.



### **Proprietary information:**

UC Health closely controls the distribution and publication of proprietary information. Individuals should not share any non-public business including financial, personnel, commercial or technological information, plans or data unless authorized by management following the established policy and procedure.

### **Relationships with contractors, vendors and suppliers:**

Through our Supply Chain Department, we purchase the items we need to do our jobs. Once Supply Chain has made a central purchasing decision, it is expected that all individuals will purchase and use the items when available.

Supply Chain follows a series of guidelines to establish and manage these relationships. This includes honoring our commitment to use diverse vendors for services and supplies.

### **Travel and entertainment:**

Travel and entertainment expenses must be consistent with an individual's job responsibilities and the needs and resources of UC Health. Individuals are encouraged to participate in and attend educational workshops, seminars and training sessions with the approval of the individual's supervisor.

► *No individual may extend a professional courtesy or offer to provide services for free or at a discount in exchange for any other healthcare services either at UC Health or elsewhere.*

## **Following the Code with referral sources**

The following sections of the Code help ensure that our recommendations and actions are in the best interest of our patients.

### **Bribes/anti-kickback:**

Individuals may not offer, ask for or receive anything of value for referrals. Anti-Kickback issues arise when something of value is provided free of charge or at a reduced cost to a potential referral source or patient.

### **Professional courtesy:**

No individual may extend a professional courtesy or offer to provide services for free or at a discount in exchange for any other healthcare services either at UC Health or elsewhere.

### **Stark Law:**

This law prohibits physicians from referring patients for certain health services to an entity with which the physician or physician's family member has a financial relationship. Please contact the Compliance Department if you have any questions about the Stark Law.

## Following the Code in the workplace

We want to develop a diverse talent pool and create a culture where we celebrate our shared values and respect our differences. The following sections of the Code support this type of work environment.

### Appropriate use of resources:

Individuals have a duty to preserve and protect the assets of UC Health to ensure their efficient use. Theft, carelessness and waste have a direct impact on our success. Individuals may not use equipment, supplies, materials or services for personal, non-work-related purposes. You should not expect any personal privacy when using any UC Health resources.

### Diversity, inclusion and equal employment opportunity:

UC Health extends equal employment opportunities to all applicants based on their qualifications. We demonstrate our PRIIDE values by treating fairly all individuals selected for hire, training, transfer, promotion or layoff—without regard to race, color, religion, sex, national origin, gender identity, age, disability, sexual orientation, military status or protected veteran status, genetic information, ancestry, or any other status protected by applicable law.

It is UC Health policy to provide reasonable accommodations to qualified applicants and employees with a disability.

Every individual has a responsibility to observe this policy as they perform all duties. You can find our Human Resources policies on the Intranet.

### Health and safety:

We strive to comply with all regulations, policies and procedures that promote workplace health and safety. Our policies protect all individuals from potential workplace hazards while also protecting the health and safety of our patients.

You need to understand how these policies apply to your specific job. Ask your supervisor if you have a question or concern. Tell your supervisor or any manager immediately about any serious workplace injury or potential hazard. This will help us resolve the issue.

### Solicitation:

You should never feel pressured to give a donation or gift to anyone else while at work. And no one should ask for donations or gifts during working hours. When UC Health decides as an organization to support charities such as the United Way, you should not be pressured to give, or suffer any consequences for not participating. You can find the Solicitation and Distribution policy on our Intranet for more information.

### Workplace conduct:

UC Health has policies that set expectations for how individuals will conduct themselves at work. The policies include solicitation and distribution, professional business wear and uniform guidelines, use of personal electronic devices, harassment, disruptive behavior and violence in the workplace.

► UC Health extends equal employment opportunities to all applicants based on their qualifications.

# Acknowledgement form

UC Health requires all individuals to acknowledge that they received the Code of Conduct. The Code represents mandatory standards of conduct acceptable at UC Health. New employees and providers are required to submit their acknowledgement through the new hire process as a condition of employment.

## Responsibility

Violations of this Code of Conduct and UC Health policies and procedures can lead to disciplinary action up to and including termination. Conduct that violates the law also may result in civil and criminal penalties ranging from fines to imprisonment.

## Reporting

Individuals affiliated with UC Health have a responsibility to report any suspected or actual violation of the Code of Conduct or other policy irregularities to any member of management, the Human Resources Department or the Compliance and Business Ethics Department. For those who wish to remain anonymous, the report may be submitted by calling the Compliance HelpLine or by filling out the Compliance HelpLine form on the intranet.

## I acknowledge that:

- ▶ I have received the UC Health Code of Conduct and understand that it is my responsibility to read and comply with the legal and ethical practices contained in the Code of Conduct.
- ▶ I must report potential compliance issues to a supervisor, to the Human Resources Department, the Compliance and Business Ethics Department or the Compliance HelpLine.
- ▶ I am aware that violations of the Code of Conduct and UC Health policies and procedures may result in action that addresses my behavior.

▶ *Printed Name*

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▶ *Signed Name*

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▶ *Date*

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▶ *Facility/Department*

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▶ *Employee ID #*

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