

CORPORATE COMPLIANCE PROGRAM AND STANDARDS OF CONDUCT

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MESSAGE TO LORETTO COMMUNITY


Welcome to Loretto Hospital.

The Standards of Conduct describe the behavior and conduct expected of employees and affiliates; Board and Board Committee members; as well as contractors. The Standards of Conduct are intended to help you respond to questions and situations you may encounter in your daily work. Please read it carefully and consider what it says. The Standards of Conduct are an adjunct to The Loretto Hospital Code of Conduct (a copy of which is attached).


No Standard of Conduct can anticipate every question or substitute for each individual's sense of honesty and integrity. If you have questions about the Standards of Conduct or come across any situation which you believe violates the Standards, you should consult your Supervisor, the Chief Compliance Officer or call the Compliance Hotline at (773) 854-5047. There will be no retaliation for asking questions or reporting possible compliance issues in good faith.

Our commitment to corporate compliance begins and ends with each individual. The Board of Trustees of Loretto Hospital is ultimately responsible for compliance. The Compliance Officer reports to the CEO and Chairman of the Board of Trustees.


Thank you for joining us in our shared commitment to the Standards of Conduct.




George N. Miller
President and Chief Executive Officer
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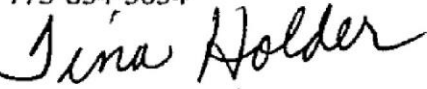
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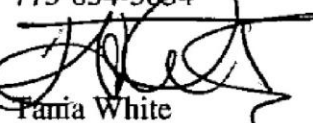
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TABLE OF CONTENTS

Message to Loretto Community.....	2
Definitions	4
Introduction	5
Mission, Vision and Values	7
Relationships with Others	8
Compliance with Laws and Regulations	9
Human Resources	10
Business and Ethical Practices	11
Conflicts of interest	12
Your Voice: Where to Find Help	13
Compliance Hotline.....	14
Standards of Conduct Acknowledgement (For you to keep).....	15
Standards of Conduct Acknowledgement (Sign and return).....	16
Loretto Hospital Code of Conduct	17

DEFINITIONS

The following words and phrases have the following meanings as used in the Standards of Conduct:

Contractors are third party individuals or organizations with whom we do business, such as vendors that provide supplies and services.

Retaliation is a harmful action against an employee in response to the employee asking questions or reporting a concern in good faith.

Compliance Hotline is a confidential phone number for employees to report ethical and legal issues without being required to provide their name. Our Hotline number is 773-854-5047.

INTRODUCTION

This document details the Mission, Vision and Values of Loretto Hospital; explains the Standards of Conduct we are responsible for practicing; and describes ways for employees and affiliates to find help and report ethical and legal issues.

Responsibilities of Associates, Leaders, Board Members, Board Committee Members, and Contractors

The Standards of Conduct apply to all Employees, Affiliates, Board and Board Committee Members, and Contractors. You are expected to:

- Review and follow the Standards of Conduct, paying particular attention to those Standards of Conduct that apply to your everyday work responsibilities.
- Ask questions when you are uncertain what to do.

Responsibilities of Leaders

Leaders have a role in receiving and responding to questions and concerns raised by employees and others you lead. How you respond to these questions and concerns is key to others having the trust and confidence to bring important matters to your attention.

You are expected to:

- Serve as a role model for our Mission, Vision and Values by carrying out your responsibilities with the highest degree of personal integrity.
- Clearly communicate to others your expectations for the highest standards of ethical behavior.
- Promote a culture of trust, open communication and respect.
- Hold those you lead accountable for behavior consistent with the Standards of Conduct.
- Encourage others to raise issues and concerns so they can be addressed.

- Respond timely and appropriately to issues and concerns brought to your attention and forward concerns expressed by your staff to the Corporate Compliance Officer, Human Resources or other appropriate leaders.
- Support our policy of non-retaliation for anyone who raises issues and concerns in good faith.
- Learn and follow applicable laws and regulations that affect your work.
- Ask for assistance when you are unsure how to respond to an issue or concern.

Responsibilities of Board Members and Board Committee Members

Members of the Board and Board Committees have a responsibility to be informed and exercise appropriate judgment to:

- Ensure that legal and ethical business practices expressed in the Standards of Conduct guide the decisions you make on behalf of Loretto Hospital and its affiliated entities.
- Disclose any potential Conflict of Interest and take appropriate actions to address any situations that may appear to interfere with independent judgment or the duty to serve in the best interest of Loretto Hospital and its affiliated entities.
- Hold senior leadership accountable for effective policies, procedures and internal control systems that address compliance with laws and regulations and promotion of ethical business practices.
- Respond timely and appropriately to issues and concerns brought to your attention.

The following Standards of Conduct are a foundation for the behaviors that are expected from Employees, Affiliates, Board Members, Board Committee Members, and Contractors.

MISSION, VISION, AND VALUES

Our mission, vision and values have been updated to reflect the hospital's ongoing commitment to healthcare leadership in the community.

OUR MISSION

The mission of The Loretto Hospital is to improve the health of the community we serve by providing quality, patient-centered care in an environment that promotes lifelong wellness and health education.

OUR VISION

To be the preferred healthcare provider in our community, recognized for quality care, excellent service and an exceptional work environment for our physicians and employees.

OUR VALUES

Patient First: Caring for our patients and their families is the most important thing we do.

Teamwork: We believe that staff must always work toward a common goal with a positive attitude.

Excellence: We continuously strive for excellence by working to improve our skills, programs and services.

Respect: We believe that each person we encounter should be valued and treated with dignity, courtesy and respect.

Integrity: We hold our medical and support staff accountable for their actions and expect them to be honest, ethical and open in all they do.

Community Involvement: We are dedicated to improving the health and well-being of the communities we serve.

RELATIONSHIPS WITH OTHERS

We will interact with others in a sincere and authentic manner. We will develop relationships with others based on honesty, fairness and mutual trust. We will act with dignity and mutual respect and will not discriminate against individuals on the basis of race, color, religion, gender, sexual orientation, national origin, age, disability, genetic information, marital status, amnesty, any other legally protected status or status as a covered veteran in accordance with applicable federal, state and local laws.

What is expected of me?

- Treat others fairly, honestly and with dignity.
- Treat others respectfully, without discrimination.
- Communicate with others openly, honestly and respectfully.

Q. I heard a co-worker making racially offensive jokes with other co-workers. It made me really uncomfortable. What should I do?

A. If you feel comfortable doing so, tell the co-worker to stop. If the activity continues or you cannot address it directly, report the incident to your Supervisor or the Human Resources Department or the Corporate Compliance Officer or call the Compliance Hotline.

Q. I heard a director yelling at an employee in front of others. It made me really uncomfortable. What should I do?

A. Immediately report the incident to your Supervisor, the Human Resources Department, the Corporate Compliance Officer or the Compliance Hotline.

COMPLIANCE WITH LAWS AND REGULATIONS

We will operate in accordance with all laws and regulations applicable to Loretto Hospital and its affiliated entities.

What is expected of me?

Follow all laws and regulations that apply to your work and ask for assistance if you have questions about how they affect you. Examples of laws that apply to Loretto Hospital and its affiliated entities are as follows:

- Maintain privacy and security of protected health information in keeping with HIPAA. Do not access, use, disclose or discuss protected health information with others unless permitted to do so or required by law.
 - Ensure that reports or other information required to be provided to any federal, state or local government agency are filed accurately and timely to comply with applicable laws and regulations.
 - Avoid discussions and collaborations with competitors about pricing, terms and other market information in compliance with Antitrust Laws.
 - Be aware that Loretto Hospital has a designated HIPAA Privacy Officer who handles privacy violations.
 - Be aware that Loretto Hospital has a designated Chief Technology and HIPAA Security Officer.
- Q.** My co-worker recently posted a notice on the employee bulletin board asking other employees to join her in forming a group to support a candidate for city council. Is this allowed?
- A.** No. Using Loretto's resources to participate or encourage participation in political campaign activities is not allowed and could jeopardize our tax-exempt status.
- Q.** What should I do if my laptop is stolen on a weekend or after business hours?
- A.** Contact your Supervisor, the HIPAA Privacy Officer and the Loretto Hospital Information Services Help Desk.

HUMAN RESOURCES

We strive to cultivate a work environment where employees are highly regarded; where they are treated honestly and respectfully; where their health and safety are protected; where they are motivated to reach their potential; where they are given the opportunity for personal and career learning and advancement; where they are provided with opportunities to participate in decisions that affect their working conditions; where they are provided with the tools necessary to do their jobs well; where there are safe and adequate procedures for resolving conflicts; and where employees are recognized and rewarded for their achievements, without prejudice or discrimination.

What is expected of me?

- Be supportive of others and work as a team.
- Be committed to ongoing learning, including training or educational opportunities.
- Create a workplace that fosters community and honors and cares for the dignity, safety and well-being of all persons.

- Q.** I don't get along with one of my co-workers. We share certain responsibilities, but I feel like I do most of the work while he just passes the time. What should I do?
- A.** When you have a conflict with a co-worker, the best course of action is to discuss it with the person privately. Explain what you have observed and how it affects the work of your department. If you don't see a change in behavior, notify your supervisor. You should alert your supervisor if you think the behavior may violate a law or the Standards of Conduct.

BUSINESS AND ETHICAL PRACTICES

We are committed to ethical business conduct and integrity. Employees and affiliates must represent the organization accurately and honestly and must not do anything that purposely defrauds anyone, including other companies or the government, of money, property, or services. Employees and affiliates must take all reasonable steps to preserve and protect the organization's assets by making prudent and effective use of its resources, and properly and accurately reporting its financial condition.

What is expected of me?

- Adhere to the highest standards of ethical business practices
- Do not disclose confidential information related to Loretto Hospital or its affiliated entities to any outside unauthorized person or organization, or use such information for your personal benefit.
- Only share confidential information about Loretto Hospital or its affiliated entities with employees or affiliates when they have a legitimate need to know the information in order to perform their job.
- Maintain confidential information, including financial data and employee related information, in a confidential and secure manner
- Prepare all documents accurately and timely, including expense reports, time and attendance records, financial statements, and accounting records.
- Deal with regulatory agencies honestly and accurately.
- Properly use and protect Loretto Hospital and its affiliated entity resources including supplies, equipment, employee time and financial assets.
- Act only within the scope of the authority granted with your job.

Q. Before coming to work at Loretto, I consulted for a competitor and obtained information that would help us negotiate favorable contracts. Should I share this information with others in the organization?

A. No. Do not disclose confidential information learned through another job. It is unethical and possibly illegal to share confidential information you learn from your association with one employer with another employer should you leave the organization. Further, we will not be able to use this type of information in any business dealings.

CONFLICTS OF INTEREST

Employees are expected to act in a manner that is in the best interest of Loretto Hospital and its affiliated entities. Employees may not use their positions to profit personally or to assist others in profiting in any way at the expense of Loretto Hospital and its affiliated entities. In any situation where an employee's or affiliate's outside interests conflict with those of Loretto Hospital or its affiliated entities, the employee or affiliate must disclose the conflict in accordance with the Conflicts of Interest Policy.

What is expected of me?

- Follow the Loretto Hospital Conflict of Interest policy. Do not engage in any activity, practice or act that conflicts with the interests of Loretto Hospital or its affiliated entities.
- Do not make any decision affecting Loretto Hospital or its affiliated entities that might represent a conflict of interest when serving as a member of an outside organization or Board.
- Do not accept employment or consulting arrangements outside of Loretto Hospital or its affiliated entities, or make personal investments, if they interfere with your job or unduly influence the decisions you are required to make on behalf of Loretto Hospital or its affiliated entities.

Q. My sister-in-law is a health care consultant. Would it be a conflict if I recommended her to work on a project at my organization?

A. No, unless you do something to provide her with an advantage or special consideration or if you receive something of value in return. If you recommend your sister-in-law for the project, you should fully disclose your relationship. You should not participate in the selection decision. Also, you must not share information with your sister-in-law that other prospective vendors or consultants would not have.

YOUR VOICE: WHERE TO FIND HELP

You may face circumstances that can leave you wondering which path to take, which choice to make and how to make it. As a responsible employee, it is your right and duty to find help and report situations that you believe may potentially violate laws, the Standards of Conduct or applicable policies. It is not a question of betraying confidence. It's a question of the continued respect and viability of our organization and professional responsibilities. There are several ways in which you can ask a question or share a concern if you do not know whether a particular action would violate laws, the Standards of Conduct or harm Loretto Hospital or its affiliated entities.

Your Supervisor or Manager

This is usually the best place to start in getting answers to your questions. Your supervisor or manager may have the information you need or be able to direct you to the right resource.

Higher-Level Manager

If you are not comfortable discussing a situation with your supervisor or manager or do not agree with the answer you receive, consider discussing the issue with a higher-level manager.

Corporate Compliance Officer

The Corporate Compliance Officer is responsible for the Corporate Compliance Program and can assist in addressing your questions and concerns.

Key Phone Numbers

- Administration	- 773-854-5000
- Corporate Compliance Hotline	- 773-854-5047
- Corporate Compliance Officer	- 773-854-5054
- General Counsel	- 773-854-5054
- HIPAA Privacy Officer	- 773-854-5380
- HIPAA Security Officer	- 773-844-5243
- Human Resources	- 773-854-5042

COMPLIANCE HOTLINE

We encourage you to use one of the resources on the Where to Find Help page of this booklet to address your questions and concerns. If you are not comfortable contacting any of these employees or if these employees have not fully resolved your concern, you can call the Compliance Office at 773-854-5054 and speak with the Compliance Officer directly or you can call the Compliance Hotline at 773-854-5047 if you wish to report anonymously.

The Compliance Hotline is available 24 hours a day, seven days a week. When you call the Compliance Hotline you can leave a confidential voice mail. If you feel comfortable enough to do so, you can leave a call back number so questions may be asked of you to gather additional information. You do not need to provide your name. The calls are not traced. Your report is forwarded to the Chief Compliance Officer for review, investigation and, when appropriate, corrective action.

- Q.** If I report what I think is a violation of the Standards of Conduct, and no violation is found upon investigation, will I get in trouble?
- A.** There will be no action taken against you for reporting a suspected violation in good faith.

STANDARDS OF CONDUCT ACKNOWLEDGEMENT

Please sign and complete this Standards of Conduct Acknowledgement Form.

I have received my personal copy of the Standards of Conduct and agree to follow them. I understand that compliance with the Standards of Conduct is a condition of my continued employment or association with Loretto Hospital and its affiliated entities.

I will uphold the highest standard of ethical and legal business practices. I will not tolerate illegal or questionable activity. I promise to identify, report and do my best to prevent such activity.

Date: _____

Signature: _____

Print Name: _____

Department Name: _____

(For You to Keep)

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Date: _____

Signature: _____

Print Name: _____

Department Name: _____

(Sign and Return)

Loretto Hospital Code of Conduct

Loretto Hospital has a Code of Conduct to define personal and professional standards of conduct and acceptable behavior for all people while carrying out assigned responsibilities at Loretto Hospital (Hospital). It is the responsibility of individuals to act in a manner consistent with this Code of Conduct and to support the Code of Conduct by holding others accountable to these standards. Code of Conduct violations must be reported to a supervisor or the Compliance Officer.

When reported, violations of this Code of Conduct will be addressed through appropriate administrative, departmental and human resource policies related to inappropriate behavior and conduct. The Hospital will not tolerate acts of retribution or consequence to any employee who carries out the standards of or reports violations to this Code of Conduct.

Standards of Conduct and Professionalism

1. Treat all persons, including patients, families, visitors, employees, trainees, students, volunteers, and health care professionals with respect, courtesy, caring, dignity and a sense of fairness and with recognition of and sensitivity to the needs of individuals from diverse backgrounds (including gender, race, age, disability, nationality, sexual orientation and religion).
2. Communicate openly, respectfully and directly with team members, referring providers, patients and families in order to optimize health services and promote mutual trust and understanding.
3. Encourage, support and respect the right and responsibility of all individuals to assert themselves to ensure patient safety and the quality of care.
4. Resolve conflicts and counsel colleagues in a non-threatening, constructive and private manner.
5. Teach, conduct research and /or care for patients with professional competence, intellectual honesty, and high ethical standards.
6. Promptly report to your supervisor, any individual who may be impaired in his or her ability to perform assigned responsibilities due to any cause (e.g., emotional issues, substance abuse).
7. Promptly report adverse events and potential safety hazards and encourage colleagues to do the same.
8. Willingly participate in, cooperate with and contribute to briefings and investigations of adverse events.
9. Respect the privacy and confidentiality of all individuals. Adhere to all Hospital policies and HIPAA regulations regarding personal health information.
10. Uphold the policies of the Hospital.
11. Utilize all Hospital facilities and property, responsibly and appropriately.
12. Participate in education and training required to perform job duties.
13. Be fit for duty during work time, including on-call responsibilities.