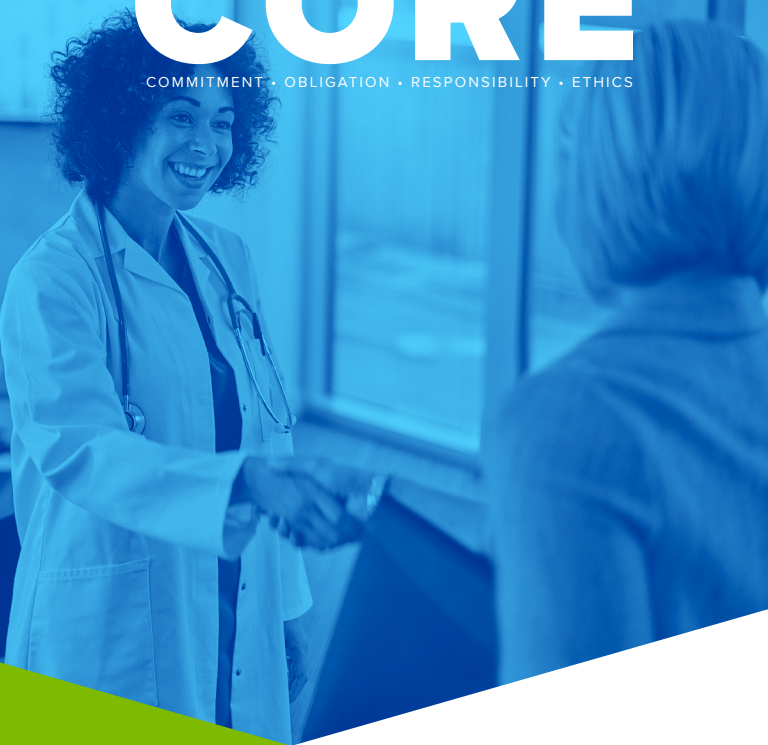


CORE

COMMITMENT • OBLIGATION • RESPONSIBILITY • ETHICS



Advent Health

Code of Conduct

Message from Terry Shaw

We are an organization that impacts thousands of lives, every minute of every day—sharing collective goals, beliefs and principles that guide our choices. Together, regardless of our individual talents and job descriptions, we're working toward a common objective: to *improve quality of life for those we serve*. Whether we work in long-term care facilities, doctors' offices, research centers, hospitals or home health agencies, we're connected in our daily responsibilities by a personal commitment to honesty, integrity and respect.

Each one of us shapes our culture through our words and actions. Simply put, we're the caretakers of our organization's reputation. Our Code of Conduct serves as a cultural compass to do the right thing, and provides guidance in complicated situations. If you see something that doesn't meet our standards, please speak up. Whether it's a quality issue or an ethical business question, we want to know about it and resolve it.

Living up to the highest standards is more than a goal. Doing the right thing in every situation is more than an ideal. These are our corporate responsibilities and our legal obligations. The principles that direct our relationships with patients, fellow employees, business associates and government agencies are not only the highest ethical and legal principles, they're the moral principles of Christianity on which our institutions are founded. Becoming a national leader in healthcare takes more than medical expertise and advanced technology. It takes heart. With more than 80,000 highly-skilled professionals dedicated to delivering exceptional care with uncommon compassion, we want to help you live these values each and every day. Thank you for all that you do.



A handwritten signature in blue ink that reads "Terry".

Terry Shaw
President and CEO

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Our Mission, Vision and Values

Our sacred mission of *Extending the Healing Ministry of Christ* is the foundation for everything we do. AdventHealth’s employees also draw motivation from five strongly-held vision statements and values, which serve as a reminder to live our mission every day.

Our Vision

Wholistic Care to Help Patients Feel Whole

Our calling is to provide whole-person care that tends to body, mind and spirit, just as Christ did during His earthly ministry. Whether it’s lifting your spirits or easing your mind, we believe whole healing serves your physical, emotional, mental and spiritual needs –helping patients feel whole.

Exceptional Care at Every Step

As we strive to exemplify Christ's healing, we aim to provide a continuum of care that exceeds expectations – every person, every time. Our team members are here to provide exceptional care at every step in a patient's journey to physical, emotional, mental and spiritual health.

Connecting Patients to the Care They Need

Rather than discharging patients from our care, our compassionate caregivers are committed to helping them navigate our connected system. Our team members serve as partners in their care journey through every stage of life and health.

Dedicated to Delivering Access to Affordable Care

We're on a journey to lower the cost of care while providing quality services. Our community care efforts, affordable care programs, and efficiency innovations are some of the ways we put this vision to work for those we serve.

Innovative, Viable Care That Adapts to Patient Needs

Wholistic, Exceptional, Connected, Affordable, Viable.

Our Values

Inclusiveness

We celebrate diverse backgrounds, cultures, and experiences of our patients, visitors, and colleagues, and embrace opportunities to learn and grow from new perspectives. Christ loved all, and we strive to be inclusive and ensure all employees, regardless of background, feel part of the team.

Quality and Service Excellence

We consistently deliver exceptional care and strive for excellence in all we do.

Community Well-Being

We are committed to improving the health, prosperity, and well-being of the communities we serve.

High Ethical Standards

We are called to uphold the highest standards, with integrity driving every decision we make and every action we take.

Stewardship

We are guided by relentless stewardship in the management of the resources entrusted to us.

About our CORE *Commitment. Obligation. Responsibility. Ethics.*

As an organization that is guided by ethics, AdventHealth is committed to maintaining the highest professional and ethical standards at every level of our business.

The Code of Conduct is an important tool to help promote and maintain a culture of honesty, integrity and accountability. It helps unite us all by communicating the expectations and behavioral



standards across our organization – fostering a safe, healthy work environment that values its team members and those in our care.

The CORE handbook is intended to provide an overview of our shared commitments, obligations and responsibilities, as well as capture changing regulations and conditions.

All representatives of AdventHealth, including employees, administrators, supervisors, clinical staff, contractors, volunteers, and other agents,

are expected to comply with the Code of Conduct, regardless of individual responsibilities. Please read it carefully, and follow the principles outlined, complying with all applicable laws and regulations. If you are ever unsure of what to do in a situation, please contact your Corporate Responsibility Office for support.

For your reference, AdventHealth's policies and procedures are also available on AdventHealth Connect.

Points of Integrity

Quality of Care

With a long-standing history of commitment to excellence, our common objective is to provide the highest quality, affordable care for all our patients while respecting the patients' rights. We are committed to delivering medically-necessary healthcare in a compassionate, respectful and ethical manner without regard to race, creed, color, religion, national origin, gender or disability.

Patient Rights

Caregivers will provide patients with information regarding rights and responsibilities and we will make every effort to protect those rights throughout their care and treatment.

Our healthcare providers will give patients information concerning diagnosis, treatment, alternatives, risks and prognosis. Team members of AdventHealth will respect each patient's right to impartial access to all medical care, treatment or accommodations that are available and medically indicated.





We will also ensure that the patient knows which support services are available within our facilities, such as interpreter services. Patients have a right to express grievances regarding any violation of their rights

through the grievance procedure of the healthcare provider or facility that served the patient.

Confidentiality of Patient Information

We have significant safeguards to maintain the confidentiality, integrity and availability of patient information. Under the Health Insurance Portability and Accountability Act (HIPAA), we uphold all standards for maintaining our patient's protected health information. Sharing of private information with anyone, including other caregivers or others outside the organization, is strictly forbidden unless the person receiving the information has a legitimate business or care-related need.

Confidential information includes protected health information, which may be accessed, used or

disclosed only in accordance with AdventHealth privacy and security policies.

Business Ethics

We are committed to complying with all applicable federal, state and local laws and regulations, including those described below.

Fraud, Waste and Abuse

Our policies are designed to prevent and detect fraud, waste and abuse activities within our organization. Various federal and state laws, including the Federal False Claims Act, prohibit false claims and other fraudulent activity, such as knowingly submitting a false claim or making a false statement to get a fraudulent claim paid.

Anti-Kickback and Bribes

AdventHealth policies, as well as federal and state laws, prohibit anyone from offering, paying, asking for, or accepting any money or other benefit in exchange for patient referrals, purchases, leases or orders. All

contracts and interactions with any referral source are to follow all applicable laws and regulations.

Emergency Treatment

We will provide a medical screening examination and, if appropriate, stabilizing treatment to all patients who come to an AdventHealth hospital or dedicated emergency department for emergency treatment, regardless of their ability to pay.

AdventHealth will only transfer patients with emergency medical conditions to another facility in compliance with state and federal requirements and AdventHealth policies.

Excluded Individuals and Entities

We will not knowingly employ or contract with individuals or entities that have been listed as debarred, excluded or ineligible to participate in a federal healthcare program. As a condition of employment, employees are required to notify Human Resources immediately if they are excluded from participation in federal or state healthcare programs, including such agencies

as the Federal Department of Health and Human Services Office of Inspector General, General Services Administration or the applicable Medicaid Exclusion and Suspension List.

Not-for-Profit Organization

AdventHealth is a responsible not-for-profit, tax-exempt entity because of its charitable mission to serve the healthcare needs of our communities. We provide benefits that include healthcare services, medical training, education, research and community outreach activities – using resources in a manner that further the public good rather than the private or personal interests of any individual or entity.

Records Integrity

Accurate Billing Records

We are committed to ensuring accurate and reliable patient and organizational records. Business records are prepared honestly and in accordance with established finance and accounting procedures. Preparation and

documentation of all patient records will be completed accurately, and records will be kept confidential, except when release of information is authorized and where legal exceptions apply. Maintaining concealed or unrecorded funds or assets and false or fictitious entries in any books or records, within AdventHealth or its subsidiaries, is prohibited.

AdventHealth maintains a high standard of accuracy and completeness in the documentation and reporting of all financial records. These records serve as a basis for managing our business and are important in meeting our obligations to patients, employees, suppliers and others – while also necessary for compliance with tax and financial reporting requirements.

Financial and Billing Practices

We ensure openness, honesty and accuracy in billing for services, as well as being accountable for the use of corporate assets. Payments and other transactions will be properly authorized, completed and accurately recorded in accordance

with generally accepted accounting principles and AdventHealth policies.

Upon request, we will provide a reasonable estimate for services, before medical services are provided. Team members will evaluate each situation of financial hardship individually, in accordance with AdventHealth's financial need policies, to determine whether a patient is in need of financial assistance, and the appropriate plan of action to be followed.

Any business conflicts are to be resolved in a fair and equitable manner. If overpayments are identified, AdventHealth will promptly return the amount received in excess of the amount due and payable under any regulatory requirements.

Workplace Environment

Employment Opportunity

Our people are our greatest asset, and a diverse workforce enables us to meet the needs of our diverse patient population. AdventHealth is an

equal opportunity workforce and provides an inclusive work environment, as supported by our Human Resources policies and procedures.

Discrimination and Harassment

We maintain a positive work environment that aligns with our mission, vision and values, in which all individuals are treated with fairness, dignity and respect. AdventHealth will not tolerate any form of workplace discrimination, harassment, intimidation or retaliation.

Gifts and Business Courtesies

All gifts or business courtesies, such as meals and entertainment with outside entities, must meet the requirements that are established within our policies. We discourage the appearance of favoritism and giving or accepting of gifts that may influence relationships, decision making, or business or governmental outcomes. Additionally, our caregivers are not permitted to solicit or receive personal gratuities or gifts from any source. If team members are unclear on the nature, value

and circumstances of an offer, or whether it's reasonable and ethical, contact management for further guidance.

Business Relationships

Team members are required to employ fairness and impartiality with business relationships, partners and contractors. AdventHealth will enter into business relationships that will not conflict, or appear to conflict, with our business objectives and responsibilities.

Conflict of Interest

We hold ourselves to a high standard of honesty, objectivity and fairness in regards to potential



conflicts of interest and our outside business activities – always acting in the best interests of AdventHealth. Should a situation arise that may create a business conflict or influence a team member’s ability to make objective decisions, contact your manager or Regional Corporate Responsibility Officer for clarification.

Marketing and Advertising

We engage in marketing, advertising and communications activities to educate the public, provide information to the community, increase awareness of our services and recruit employees – in an effort to support our mission and brand positioning. While ensuring accuracy and sensitivity to our organizational culture, we will offer factual and transparent information to the general public, without distorting the truth, making false claims, engaging in comparative advertising or employing disparaging tactics against another provider of services.

We will only enter into open, honest agreements that are not intended to fix prices or reduce price competition, while complying with applicable legislative and ethical guidelines related to marketing activities. Third party vendors and contractors may not use or associate our name, symbols, logos or trademarks in external materials without prior consent from our Corporate Brand Management Department.

Our Responsibility

Each team member is expected to honor and uphold AdventHealth’s Code of Conduct principles and take responsibility for their own actions. We are committed to knowing and complying with applicable healthcare laws and regulations. Although we strive to meet our expectations, responsibilities and high ethical standards in every situation, every time, if you are aware of or have a suspicion about a situation that fails to meet our standards, you have a responsibility to bring it to light. It is every employee’s responsibility to report suspected violations of the Code of

Conduct or other unethical matters to the appropriate Corporate Responsibility representative.

Leadership Role

Our management team and supervisors at every level are responsible for making sure that employees are aware of and adhere to the provisions of the Code of Conduct. Leaders are expected to set the example, serve as a role model and exercise their responsibilities in a manner that is kind, compassionate, thoughtful and respectful. Each supervisor must create an environment where everyone is encouraged to raise concerns, ask questions and propose ideas – maintaining an open-door policy. Managers must take prompt, appropriate action when a potential violation or policy inquiry arises and should seek assistance from their Regional Corporate Responsibility Officer in addressing questions or concerns.

Non-Retaliation Policy and Discretion

We understand that employees may be reluctant to report suspicious activity due to a fear of retaliation.

We want to assure our team members that we enforce a strong non-retaliation policy and prohibit any form of retaliation or retribution toward a team member who reports, in good faith, an alleged act of misconduct. We will treat all reports as confidential to the extent allowed by law and protect the identities of the team members involved to the maximum extent possible.

Connecting with Your CORE

We want to extend the healing ministry of Christ, and our values are important to us –personally and professionally.

Our Goal

We want to create an enriching work environment where each employee is living the AdventHealth values every day. Our Code of Conduct reflects how we can honor these values in our relationships with patients, co-workers, the organization, the government, business partners, contractors and the community.

Decision-Making Questions

When connecting with your CORE, it may be necessary to determine the best approach, by asking the following questions.

1. Is this consistent with our mission?
2. Am I compliant and following the law?
3. Am I treating others as I would like to be treated?
4. Am I setting a good example?
5. Will I feel good about my actions tomorrow?
6. How would my actions look published in the newspaper or on the evening news?
7. Am I protecting my patient's privacy?

Key Take-Aways

You have compassion.

AdventHealth supports you in providing exceptional care and serving our communities with kindness and integrity.

You have responsibility.

You play a critical role in promoting and protecting AdventHealth's culture, our reputation and our brand.

You have support.

In any situation, you have the full resources of our Corporate Responsibility team, as well as any other applicable compliance resource.

You have a voice.

When you have a concern or feel that something isn't quite right, we want to hear from you and value what you have to say.

Resource Guide

The following resources have been compiled to help you determine how to report or discuss potential Code of Conduct violations. If you become aware of a situation that appears unethical, there are several ways to confidentially share information.

Management

Your immediate supervisor can help offer guidance on operational policies or procedures. If you do not feel comfortable talking with your manager, please contact one of the other available resources.

Corporate Responsibility Department

Your Regional Corporate Responsibility Officer or the Corporate Responsibility Department facilitates all investigations and resolutions of any suspected violations of policies and procedures. They work collaboratively with management to ensure a fair resolution of compliance concerns.

Reporting Options

- Bring the issue to the attention of your immediate supervisor.
- Contact your Regional Corporate Responsibility Officer or the Corporate Responsibility Department at Headquarters.
- Call the Corporate Responsibility GuideLine: **1-888-92-GUIDE (1-888-924-8433)**
- Visit the Corporate Responsibility Webline: **adventhealth.alertline.com** on AdventHealth Connect



Receipt and Acknowledgment

As an AdventHealth team member, I acknowledge that I have received and read the Code of Conduct and agree to adhere to and comply with the guidelines and policies outlined in this handbook, as a condition of my employment. I certify that AdventHealth prohibits retaliation against any individual who makes a good faith report, and I understand my responsibility to report any alleged code violations. Additionally, I recognize that these standards may be amended or clarified at any time and that I will have access to any updates that may occur.

Signature

Printed Name

Date

Department

Notes

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