

Baptist Health Care

Code of Conduct



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Dear Baptist Health Care team member:

Baptist Health Care is committed to a culture of honest and ethical behavior and to conducting our business with integrity. The practice of behaving honestly, ethically and with integrity is an individual responsibility. Each of us decides how to conduct ourselves every day as we go about our work and are all accountable for the actions that we take.



The Baptist Code of Conduct is the keystone of our corporate integrity philosophy and serves as a cultural compass for staff, management, vendors, volunteers and others who interact with us. It is an essential element of our corporate compliance program.

Our primary goal is to provide the highest levels of service and care; however, others may have different expectations of us. That is why we must hold ourselves and one another to high standards and sound decision-making. The Code of Conduct outlined in the following pages sets forth the basic principles we must follow. Without exception, these standards apply to every Baptist team member as well as members of our governing boards.

Of course, no set of standards can adequately anticipate every situation that you might encounter at work. It is up to each of us to seek help if we find ourselves questioning whether a certain situation or issue is consistent with Baptist's Code of Conduct. This means consulting with management, human resources, the compliance department or the Corporate Compliance Hotline by calling 704.323.4980 or by visiting ebaptisthealthcare.ethicspoint.com. Reach out and let us help if you are unclear.

By working together, we can ensure that Baptist remains compliant with the regulations that govern our industry and the spirit and values that define our organization. Our team members are our greatest asset. Thank you for your professionalism and commitment to the fundamental Values we embrace as an organization, Ownership, Integrity, Compassion, Excellence and Service.

Sincerely,

A handwritten signature in black ink, appearing to read "Mark Faulkner". The signature is fluid and cursive.

Mark Faulkner
President and Chief Executive Officer
Baptist Health Care

Our Mission Vision and Values

Our Values at Baptist Health Care are vital to our culture. They serve as an overarching guide to our actions and behaviors. Our Values were carefully developed by team members to best represent who we are. They help us advance our Mission of helping people throughout life's journey and match our Vision to be the trusted partner for improving the quality of life in the communities we serve.

Guided by Christian values, we commit to the following Values of Ownership, Integrity, Compassion, Excellence and Service:

Ownership — Accountable, Engaged, Stewardship, Responsive, Committed

- We hold ourselves accountable for our actions and take pride in our work.
- We take responsibility for our actions and their consequences. We correct our mistakes as quickly as possible.
- We take pride in our organization as if we own it. We pick up trash or debris and dispose of it properly. We do the "Baptist shuffle" to remove scuffs on the floor.
- We do our jobs to the best of our ability and take initiative to make the organization better. We do not say "that's not my job." If we are unable to meet a request, we find someone who can.
- We hold each other accountable.

Integrity — Honest, Principled, Trustworthy, Transparent

- We do the right things for the right reasons and manage our business and ourselves with the highest ethical standards.
- We adhere to all Baptist policies, procedures, governing regulations and ethical standards.
- We promptly report any situation that appears to be in violation of a policy, procedure, regulation or ethical standard.
- We only do business with those who embrace and demonstrate high standards of ethical business behavior.
- We foster an environment of open communication, trust, and mutual respect and do not retaliate against those who bring forward a concern in good faith.

Compassion — Empathetic, Merciful, Sensitive, Kind, Giving, Forgiving, Hopeful

- We take the time to understand the needs of others and possess a desire to help.
- We provide an environment that is pleasant, welcoming, supportive, and reassuring.
- We remain focused on the needs of others and we listen to their concerns in a way that shows we care and want to help.
- We are respectful of other cultures and diverse beliefs.
- We respect others' privacy.

Excellence — Safety, Quality, Distinguished, Learning, Improving

- We commit to delivering the highest quality and value in everything we do as we continually strive to do better.
- We set ourselves apart by consistently demonstrating practices that exceed expectations.
- We present ourselves in a professional manner and fulfill the commitments that we make to others.
- We provide suggestions and new ideas to continually improve our processes and workforce. We focus on learning and advancing our professional competencies.
- We are committed to providing a clean and safe environment. We report and fix any potential safety hazard or incident.

Service — Welcoming, Attentive, Humble, Respectful, Exceeds Expectations, Collaborative

- We have a culture of service that values teamwork and focuses on the needs of others.
- We treat others with courtesy, honesty and respect. We say “please” and “thank you.”
- We use the 10/5 rule: smile and make eye contact with others within 10 feet and verbally greet them within 5 feet.
- If someone appears to need directions, we offer to help. We escort others to their final destination. If we are unable to personally escort others, we take them to someone who can.
- We apologize for delays in service.
- We work together.

Living by our Values

This Code of Conduct describes how to make decisions that support our Values. Because value-based decisions are so critical, these standards are a condition of employment for every Baptist team member. They ensure that we make consistent decisions that are in the best interests of those we serve, our communities, our colleagues and Baptist.

Every Baptist team member has an obligation to do the right thing the first time, every time. Doing the right thing is your responsibility and nobody has the authority to instruct you to deviate from this standard. If you need help or are unclear about what to do, you have the responsibility to find help. Talk with your leader when you need advice. You can also contact human resources, the compliance department or the Baptist Compliance Hotline at any time.

Baptist's business is highly regulated by state and federal law, so it is important to get the details right by following our policies and procedures. Every Baptist team member plays a vital role in ensuring our compliance with laws, rules and regulations.

To access Baptist's policies and procedures, go to the policy library on CONNECT. Failure to follow Baptist's policies and procedures will result in disciplinary action up to and including termination.

Team members have the responsibility to thoroughly read the Code of Conduct and ask questions about anything he or she doesn't understand. Baptist team members are expected to use good judgment and common sense in their actions and decisions to be sure they comply with the Code of Conduct.

Generally, if an issue is not covered in the Code of Conduct, team members should be guided by the following considerations:

- Is the action legal?
- Is the action ethical?
- Is the action fair?
- Is the action consistent with Baptist's core Values?
- Is the action consistent with the general principles stated in the Code of Conduct?
- Would I be willing to have my action published on the front page of the local newspaper for my family, friends and team members to see?

We believe in transparency.

Transparency is important for improving our quality of services, particularly when we make a mistake. We identify our mistakes so that we can learn from them. Baptist leaders are responsible for promoting an environment where problems are raised and — most importantly — solved without fear of retaliation.

Honesty is our policy.

We believe in honesty in everything we say and do. If you are making a statement or signing your name to a document, you are confirming that the statement is true. We do not back-date documents, make up entries, or make it appear as though we documented something that we did not execute. We do not sign other people's names to documents, and we do not share each other's passwords. Those we serve depend on us to accurately document their records. We make every effort to ensure that any record entries are clear and complete and reflect exactly the service that was provided. We do not exaggerate or lead others to document in a certain way.

We always communicate in an open, honest and respectful way, refraining from communications that are unprofessional or embarrassing if made public. It is generally acceptable to use telephones, email and the internet at work for personal purposes, but a leader must approve, and the use must be appropriate (nothing offensive or proprietary) and limited, and take up only a small part of work time without additional costs to Baptist. We also must remember that the organization has an obligation to monitor email and internet use, and has the right to do so without notice.

What we say and how we say it ultimately reflects on Baptist. That's why we ensure that all written and verbal communications – even emails – reflect the highest professional standards. We send messages only to those who need them, and we clearly state the purpose of the communication and what we seek in response. We think about the size and content of our emails to avoid wasting company resources with excessive distribution or attachments. We do not use aggressive language or tone in our communications and never write anything we would not want to read in the newspaper.

We engage in fair and ethical business practices.

We don't offer, accept or give bribes or kickbacks. We don't compensate anyone based on referrals or business opportunities. If we believe that someone has offered or received a bribe or kickback, or provided something of value in exchange for referrals or other business, we contact the compliance department.

We do not act to "restrain trade" by plotting with competitors to fix prices for goods or services (i.e. price fixing); agree in advance on prices to be submitted in a competitive bidding process (i.e. bid rigging); divide up markets, territories, contract opportunities, or customers' businesses (i.e. market allocation scheme); boycott doing business with third parties (i.e. group boycott); or persuade customers to impose unreasonably restrictive requirements, standards, or conditions to the benefit of one group of competitors and to eliminate or undermine the ability of others to compete (i.e. standard setting).

We do not seek to gain an edge through unfair competition. We do not engage in discussions or communications with competitors concerning: pricing of an upcoming bid or negotiation; deciding to bid or pursue a certain contract; acting in concert to do competitive harm to other competitors. We do not participate in any discussion during a meeting or conversation with competitors to talk about restraining trade or unfair competition. We immediately leave any such conversation if these topics come up, and report the event to our leader. We will not solicit, obtain, or use procurement-sensitive information from the government or other customers or confidential or proprietary information from competitors.

We comply with all antitrust laws and never make agreements with competitors that create monopolies or stifle competition. We do not illegally obtain or use proprietary information from competitors, nor do we use deceptive means to gain such information.

We avoid Fraud, Waste and Abuse.

We operate in accordance with the highest degree of legal, moral, and ethical standards and with all applicable laws, regulations and standards.

We act honestly, openly, and fairly with team members, customers, and people or firms with which Baptist conducts business. We will not lie, cheat, mislead, steal or mistreat anyone while working for Baptist.

We require that all statements, communications and representations be accurate, complete and truthful. Deliberate misstatements to government agencies or other customers of Baptist will be grounds for disciplinary action up to and including termination.

Our agreements with actual or potential referral sources are in writing and approved by the contracts department. We ensure that payments made under a contract are for the services actually provided and at rates set forth in the agreement. We will perform only the services specified in our contracts and will not make changes to our contracts without written approval.

We take every reasonable precaution to ensure that our billing and coding work is accurate, timely and in compliance with our policies and with federal and state laws and regulations. We will submit claims only for services rendered and only for correct amounts as permitted by contract. We will not tolerate the submission of any claims that contain any kind of false, fraudulent, or inaccurate statements.

We do not engage in any conduct that could interfere with or improperly affect internal or external audits or investigations. We do not force or influence a patient, client or customer to sign a legal document.

Our external reports are timely filed and contain accurate, complete, and clear information. Such reports may include tax reports, plans for corrective action, cost reports, reports to government agencies, and reports to private accrediting bodies like CARF and DNV. Our financial records conform to generally accepted accounting principles, and we never attempt to hide expenditures, funds, assets or liabilities. If we see an error, we correct it, even once a submission has been made. If we say we will do something, we follow up to make sure it is done.

We make sure team members know that they must strictly adhere to Baptist's policies and procedures to prevent and detect fraud, waste and abuse.

We ensure they are in compliance with both federal and state law, and they know that they are responsible for reporting credible evidence of overbilling by Baptist or of overpayments by any customer, but particularly the government. We make sure that any team member who lawfully reports a concern is protected.

The Federal False Claims Act and Deficit Reduction Act protect government programs including Medicare, Medicaid, TRICARE, and Ability One from fraud and abuse. Baptist complies with these and all applicable laws and has policies to detect, report and prevent waste,

fraud and abuse, as well as provide protection for whistleblowers. If you see a false claim or report, fix it before it is submitted. If it has already been submitted, contact your leader or the compliance department. Failure to do so will lead to disciplinary action up to and including termination.

We avoid conflicts of interest.

In our work, we have a duty to put the interests of Baptist before our own. We avoid actual conflicts and the appearance of conflicts of interest where someone might question whether we are acting for Baptist's benefit or for personal gain. Executives, board members and employed physicians are required to annually report any actual or potential conflicts of interest by completing the Conflict of Interest Disclosure form.

We never offer or accept anything of value in exchange for referrals or other business. The "something of value" can be services, gifts, entertainment or anything else that has value to the recipient. It does not have to just be money. This includes not giving anything of value to government employees. We let our vendors, physicians, patients, clients, customers and others know that our Values restrict what we can give and receive because we want our services and business relationships to stand on their own. We do recognize that certain items are appropriate and do not present a risk of influencing our decisions. Each Baptist team member needs to be sure that even permitted items do not damage our reputation or integrity under the circumstances. If you are unsure, refer to the policy on Gifts, Gratuities and Business Courtesies, or contact the compliance department before offering or receiving such items.

If we are ever in a situation where someone might question our loyalty to Baptist or there is the appearance of a conflict, we disclose it and withdraw ourselves from making a decision when we have a conflict. We then withdraw from the decision making process by letting someone else who does not have a conflict make the decision. For example, perhaps you are tasked with buying the linens at your facility. Your best friend from college happens to sell linens. Even if your friend offers the best deal, the appearance of a conflict triggers the requirement to disclose the relationship to your leader. Failure to disclose and withdraw from conflicts of interest can result in disciplinary action up to and including termination.

We devote our working time to the responsibility of proper performance of our duties and not to outside businesses or additional jobs.

We protect private and confidential information.

Those whom we serve trust that we will protect the information provided to us including their health information and personal information. We follow the proper procedures when releasing information. We take steps to prevent identity theft by protecting personal data, and securing our systems from unauthorized access. We must have a business need to access and/or share health and personal information before doing so. Sometimes we provide services to our team members, and when this occurs, we give them the same privacy rights as everyone else.

Posting protected health information or photographs on a web site, social media page or public forum is strictly prohibited, even if the patient/client is not identified. We do not use our personal devices to text or transmit protected health information for any reason unless otherwise allowed by Baptist policy. We do not take or transmit photographs of those to whom we provide services except as required within our policies.

We are responsible with our property and proprietary information.

We have an obligation to use our resources responsibly and only for Baptist's business purposes. We are good stewards over Baptist funds. We use Baptist's physical assets like computers, vehicles, machinery and work space for Baptist business, and we protect these assets from loss, damage and theft. We don't waste supplies, equipment, space, capital or time. We also protect Baptist's non-physical assets like strategic plans, plans for acquisitions and divestitures, non-public financial information, trademarks, processes, know-how and other proprietary information. We keep proprietary information confidential and disclose it only to those who are authorized to know. We do not use company property or information for personal gain.

We take precautions by avoiding discussions of sensitive matters over cell phones, password protecting computers and sensitive documents, and performing virus checks before downloading a file or installing a program. We do not inappropriately share details about our building or computer security systems, surveillance systems or our policies and procedures that are designed to prevent unauthorized access or criminal conduct at our facilities.

We embrace diversity and promote inclusion.

At Baptist, we believe in a diverse and inclusive environment, one that is grounded in our dedication to the health and well-being of all people. Respecting, nurturing, and encouraging diversity of thought, background, and experience contribute to positive work environments that result in exceptional service. We support Baptist's equal opportunity employment and team member development programs that embrace the unique characteristics of our people and our communities and encourage continuous individual improvement. We will not tolerate harassment or discrimination.

We embrace the diversity of our team members, vendors, visitors, job applicants and those we serve. We never harass or discriminate on the basis of race, color, ethnicity, religion, marital status, gender, sexual orientation, gender identity or expression, genetic information, national origin, age, physical or mental disability, veteran status or any other characteristics protected by law. We embrace diversity because it is our culture and it is the right thing to do. We are also committed to providing reasonable accommodations to team members who have qualified physical or mental disabilities, religious or cultural needs.

We follow all legal and ethical hiring standards.

We are qualified to do our jobs. We are committed to ensuring that our workforce maintains all required credentials, licenses and certifications. We do not hire, contract with or bill for services rendered by persons or entities that are excluded or are pending exclusion from participating in the federal health care programs or otherwise ineligible to participate in federal programs by the Office of Inspector General or Government Services Administration. We do not allow caregivers or service providers with lapsed or revoked credentials to provide care to those we serve.

We will not hire a government official, government consultant or source selection board member involved in any contract procurement activity, past or present, without going through appropriate procedures as dictated by the government.

We are proud to employ foreign nationals who are legally permitted to be employed and add to Baptist's diverse workforce. We also abide by all laws governing the employment of foreign nationals who are not

authorized to work in the United States (“illegal immigrants”). We will not employ any person who is: (1) not properly authorized or legally entitled to be present at the place of work, or (2) not permitted to perform required work activities because of lack of security clearance, failure to meet criteria specified by a contract, or other lawful reason.

We do not outsource contract labor to persons who are not authorized to be present at a place of work. Information that a Baptist service provider is employing illegal immigrants or other disqualified persons will be reported as if the individual was applying for employment or actually employed by Baptist.

We have a safe work environment.

The health and safety of those we serve is our utmost concern. We follow health and safety policies and regulations that apply to our work and the guidance provided by the facility’s safety management team. This includes following procedures for handling and disposing of hazardous materials and keeping our workplace safe. We access hazardous materials and handle prescription drugs, controlled substances and other medical supplies only as authorized. We may not be under the influence of alcohol or illegal drugs on Baptist property or during work time. We report any unsafe situation to human resources or the compliance department.

We obey all Baptist safe driving procedures, traffic laws and regulations while operating Baptist automobiles or any other vehicles while on company time.

When visiting external locations while in the capacity of Baptist business, we will abide by their safety policy and procedures (e.g., rules on carrying weapons, cellular use and other similar rules for military bases, courtrooms and schools).

We will not enter a Baptist facility with any contraband substance or device that could potentially cause harm (i.e. knives, firearms, explosives and other contraband as defined in our policy). The only exception to the possession of firearms will be limited to those who carry firearms in the course of their duties, such as National Guard personnel, licensed armed guards, or law enforcement officers.

Our team members understand that Baptist has the right to search any person, any personal effects and any vehicle at any premises owned, occupied, or maintained by Baptist, including premises provided by the government to permit Baptist to perform its work, whether privately

owned or furnished by Baptist or the government, for alcohol, drugs, or other prohibited substances.

We do not tolerate conduct that disrupts our work environment including behavior that is disrespectful, hostile, violent, intimidating, threatening or harassing. Harassment can be particularly harmful to the work environment; thus we have a special responsibility to report any instances of it that we may see or know about. We speak up if a team member's conduct makes us feel uncomfortable.

We cooperate with government agencies.

As a good corporate citizen, Baptist cooperates with government inquiries. However, we take the time to consult with the legal department and our risk and/or compliance departments before responding to any non-routine requests in order to be sure that contact with government entities is handled properly. We are always straight forward and truthful in how we respond to such inquiries. We don't alter or destroy records if we are aware of an existing or potential government inquiry.

We follow political activity requirements.

As a non-profit organization, we are limited in participating in certain political lobbying activities. We do not endorse or intervene on behalf of any political candidate or public office and we may not solicit funds or endorsements in support of political issues or causes. If we wish to engage in political activity, we do so on our personal time using our own resources. Please refer to the Political Activity Policy for more information.

We provide services with compassion.

At Baptist, we respect our patients, clients, customers, team members and visitors, and we treat each one with consideration, compassion, dignity, and respect, including recognition of the diverse backgrounds we all bring. We never discriminate against individuals based on race, ethnicity, religion, gender, sexual orientation, gender identity or expression, genetic information, national origin, age, physical or mental disability, veteran status or other characteristics protected by law. We involve the appropriate stakeholders in decisions that need to be made and services that need to be rendered. We disclose unanticipated outcomes. We obtain consent for treatment or participation in research, and we confirm that all available options are explained. We review the services conducted by our workforce to confirm they are necessary according to best practices.

We conform to the standards of our professions and exercise judgment and objectivity in the performance of our duties. Any differences of opinion or judgment should be shared with the appropriate leaders for resolution in accordance with our open door policy.

We recognize that our patients' and clients' time is valuable, and we will provide them with prompt service. We will apologize and be empathetic for problems and inconveniences.

We provide a welcoming environment for our patients, clients, visitors and team members by greeting them in the hallways and not parking in visitor parking spaces.

We are humble and welcome feedback and do not chastise or embarrass others.

We value teamwork.

Baptist operates in a service industry, and teamwork and collaboration are essential to providing excellent service and solving problems. We work together to achieve the common goal of serving our patients/clients.

We act as role models by holding ourselves accountable for our actions and the consequences, and then correcting our mistakes as quickly as possible.

We honor our commitment to report for scheduled shifts during times of natural or man-made disasters such as hurricanes, flooding, tornados, epidemics, or hazardous material exposure.

We refer the media to the Marketing Department.

We strive to anticipate and manage crisis situations in order to reduce disruption to our employees and maintain our reputation for quality. To best serve these objectives, we will respond to the news media in a timely and professional manner only through the designated spokespersons. Any media inquiries or requests to issue press releases or use a company logo should be referred to the marketing department, 850.469.3708.

We retain documents as required.

We retain documents, email and other communications for the appropriate and legally required length of time described in Baptist's document retention policy. We never destroy documents before the permitted destruction date or if Baptist's legal department has requested we retain them.

We expect our vendors, contractors, and subcontractors to follow this Code of Conduct.

We work with a variety of vendors, suppliers, contractors, consultants, and others to successfully manage our business. We expect each of these entities and individuals to adhere to our Code of Conduct and to always treat us with the same respect, fairness and professionalism that we demonstrate to them. If there is a business reason to entrust them with confidential information, we expect them to uphold that trust. We are careful about our partners. We look into the background of our vendors and confirm that they are not excluded from federal program participation before working with them. We pay only reasonable fees for services and we do not incentivize vendors to recommend practices that lead to excessive utilization or reimbursement. We do not allow others to use the Baptist name to advertise their products or promote their interests above the interests of Baptist or those we serve. We will terminate our arrangements with vendors who do not follow our Code of Conduct and applicable policies when working for Baptist.

We report any concerns in the appropriate way.

We believe that effective communication is necessary to help resolve team member concerns and ensure that all team members have access to their leaders. We promote an open door environment where team members are encouraged to pursue discussion of their work-related concerns with their supervisor, leadership team, and/or human resources.

If we believe we have information about someone who is engaging in improper activities or arrangements that violate the Code of Conduct, or other policy, rule or regulation, we understand it is our responsibility to report those concerns. We know that failing to report an actual or suspected violation could result in disciplinary action up to and including immediate termination.

If you wish to remain anonymous, a report can be made using the Corporate Compliance Hotline by calling 704.323.4980 or by visiting ebaptisthealthcare.ethicspoint.com. The hotline can be used to report the following type of concerns: time reporting (falsifying or misstating time); billing (falsifying, intentionally over/under billing); misuse of company resources/information; accounting issues; conflict of interest; other ethical violations.

We do not tolerate retaliation.

We promote an environment where reporting concerns is encouraged. If we feel that we have been retaliated against after reporting a concern, we will immediately notify the Human Resources department, the Compliance Office or the Corporate Compliance Hotline. We understand that we will not be penalized in any way for making a good faith report about conduct concerning ourselves or another person.

We take violations of the Code of Conduct seriously.

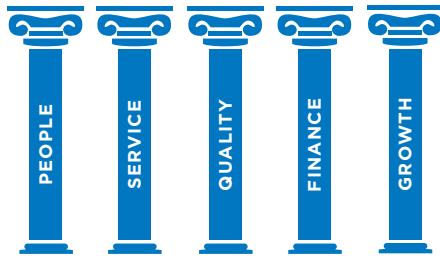
We take violations of the Code of Conduct seriously and will investigate and appropriately address any substantiated violations. Much of the misconduct described in the Code of Conduct is also a violation of law. In addition to disciplinary action, depending on the seriousness of the violation, a team member also may be subject to:

- Fines
- Liability for monetary damages
- Personal debarment from government contracts
- Imprisonment

*The Code of Conduct is a condition of continued employment but does not affect the “at will” employment of any team member, which allows Baptist to terminate employment of any team member at any time, with or without cause, with or without notice, for any reason not prohibited by law.

**Baptist has the right to change any part of the Code of Conduct without notice.*

Notes



Team Member Compliance Hotline:
704.323.4980

