

Integrity Standards

Live Our Mission, Know Our Code

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About Us

Our Mission

We extend the healing ministry of Christ by caring for those who are ill and by nurturing the health of the people in our communities.

Our Core Values

Compassion

Respect

Integrity

Spirituality

Stewardship

Imagination

Excellence

Our Vision

Centura Health will fulfill a covenant of caring for our communities with excellence and integrity to become their partner for life.

Our Sponsors

In 1996, Adventist Health System and Catholic Health Initiatives hospitals in Colorado formed Centura Health, a faith-based, nonprofit health care network designed to manage and strengthen their hospitals and services.

Adventists establish hospitals that place an emphasis on holistic care and wellness promotion. Catholics are well-known for their tradition of caring for the poor. Both sponsors are inclusive in their values with an understanding of the vital role that all types of spirituality can play in health care.



Our Commitment

Words written in a *code of business conduct* do not automatically guarantee that an organization will operate ethically or responsibly.

The *value* is realized when you make it personal and join others to bring these words to life.

Our conduct shapes our *culture* and impacts more than just us. Look for opportunities every day to put the principles of these Integrity Standards into practice and let us continue to make Centura Health an organization of which we can all be proud.

Over the years, Centura Health has made and continues to make a difference in the lives of millions of people, both because of the services we provide and our contributions to the communities in which we work and live. The respect and confidence patients, residents, providers and associates have in our organization is rooted in the hard work and integrity of the thousands of people who have dedicated their lives to caring for and nurturing the health of the people in our communities throughout history.

As we attend to the activities needed to fulfill our Mission, legal and ethical issues will continue to challenge us. However, we must meet these challenges with uncompromising integrity and commitment to our Core Values. Our patients and communities rely on us to act responsibly, and our continued success depends on it.

Our Integrity Standards serve as the foundation for Centura Health's Corporate Responsibility Program, a program that helps you understand and comply with complex laws and regulations as well as provide guidance on how to conduct business both ethically and responsibly. The Integrity Standards are designed to point you in the right direction; however, they do not cover every situation you may encounter. We must ensure that all individuals working for Centura Health understand their personal responsibility for complying with laws and regulations as well as business conduct expected in the workplace. Regardless of the job you perform or the location where you work, your actions, words and behaviors do matter.

These Integrity Standards should be relied upon as the organization's code of business conduct and applied equally to all Centura Health associates, including temporary and contract employees, volunteers, providers, and our Board of Trustees and its committee members.

Because this program is so important to assure exemplary performance in all aspects of our work, ongoing training will be provided. Each of you will be required to participate in the training and sign a statement affirming your knowledge and understanding of Centura Health's Integrity Standards. You can find an electronic copy of the Integrity Standards on Centura Health's intranet.

Additional Responsibilities of Leaders

As a leader at Centura Health, you are called upon to serve as a positive role model in fostering a culture of compliance and ethical behavior. You have the added responsibility to inspire others and focus on principles that are larger than your own existence. You must lead with honesty and a strong commitment to doing the right thing.

Don't give others the impression that it is acceptable to ignore policies or skip steps. Don't create or tolerate an environment where associates feel pressured to bend the rules. Instead, make time to provide guidance, review applicable policies and demonstrate how to act in a manner consistent with our Integrity Standards.

For purposes of this document the term "leader" includes supervisory and management positions at all levels.



Sound Decision-Making

If you find yourself thinking, saying or hearing any of the following, take a minute to reconsider your decision or seek guidance:

"We have always done it that way."

"I would never get my job done if I tried to follow this policy and procedure."

"Our competitors are doing it, so it must be OK."

"It is very unlikely we will ever get caught."

"Even if that is what the policy says, that is not how we do it here."

"Everybody else is doing it."

"I don't have time to look into this issue; hopefully someone else will catch it."

"We will not meet our goals if we don't find a way to make this happen."

We each make decisions every day while on the job. Our individual and collective performance depends upon whether the decisions we make are the right ones. We must assess whether we are aligning our values with our actions. Take the following steps to help you make the right choice:

1. Evaluate the Situation

In order to determine the best course of action, you must have a clear understanding of the situation. Ask yourself what you are specifically being asked to do and determine if your concerns are based on facts, rumors or assumptions. Make sure you have all the facts necessary to make an informed decision.

2. Check the Rules

Take the time to review applicable policies and procedures and consider whether a decision would be lawful and comply with our policies. Also think about whether you have the authority to make this decision on your own.

3. Consider the Consequences

Think about the potential consequences of the decision you make, including how it might impact others. Consider whether your actions could give the impression of being unethical or inappropriate, or if it would cause reputational harm to the organization.

4. Consult with Others

When making difficult decisions, do not try to do it by yourself. You may be able to benefit from having an additional perspective or seeking guidance.

5. Consider our Values

Think about our Values. Evaluate your options and determine which Value should guide your decision. Sometimes there can be tension when deciding between two or more Values. A decision may impact many stakeholders, or it may bring high visibility to the organization internally or externally. In these cases a Values in Action (VIA) assessment may help make the right choice.

6. Use Your Best Judgment

Use your judgment and common sense. If something seems unethical or improper, it probably is. No matter how urgent the business need, never interpret high-performance goals as direction or permission to overlook problems or do things the wrong way. Never put others in a position in which they feel pressured to violate the law, our Integrity Standards, or company policies and procedures.

Seeking Guidance, Raising Concerns and Reporting Misconduct

We have a responsibility to ourselves, our organization and each other to ask questions and raise concerns. If you observe behavior that may represent a violation of our Integrity Standards, policy or law, raise the issue promptly. We value integrity, trust and respect. The earlier potential issues can be raised, the sooner they may be resolved.

Reports of misconduct must always be made in good faith, which means you believe the information you are providing is truthful. Company resources should never be used to make intentionally false or misleading reports. All requests for guidance or reports of misconduct will be taken seriously and handled promptly, professionally and with the highest degree of confidentiality possible.

You have several ways you can obtain guidance or report a concern:

Corporate Responsibility Department

Contact your designated Corporate Responsibility & Privacy Officer.

Integrity Helpline

You can contact Centura Health's Integrity Helpline at 1-888-424-2458 or integrityhelpline.org. The Integrity Helpline is available 24 hours a day, seven days a week and is staffed by an independent third party. You are encouraged to provide your name and contact information to ensure that appropriate action and follow-up can occur, but you can choose to remain anonymous.



Integrity Helpline: 1-888-424-2458
or integrityhelpline.org

Human Resources Department

We encourage you to contact your supervisor or designated human resources representative for human resources-related issues.

Policies and Procedures

You can refer to policies and procedures on Centura Health's policy management system. Policies and procedures are often a great place to start when trying to figure out the rules or the procedures necessary for carrying out certain job functions.

Nonretaliation

We value your help to identify potential problems that the organization may need to address. Any retaliation or intimidation against an individual for making a good-faith report, complaint or inquiry is a violation of our Integrity Standards. Any individual who conducts or condones retaliation in any way will be subject to disciplinary action up to and including termination of employment. Nonretaliation policies do not protect you if your actions violate the policies of Centura Health, licensure requirements, standard of care practices or applicable law.



Act with Integrity in the Workplace

Every day, Centura Health associates are *united* by our heritage, Mission and Values. This common thread makes working for our organization a special experience and receiving care at our facilities different from other experiences. In order for those outside our workplace to experience this difference, it is essential that we act with *integrity* in the workplace. Much like the foundation of a building, integrity in the workplace is essential for lasting success and provides for an honest and trusting environment.

Organizations that *demonstrate* integrity draw others to them because they are trustworthy and dependable. They are principled and can be counted on to behave in honorable ways even when no one is watching.

Quality Care and Services

Centura Health is dedicated to the consistent delivery of high-quality patient care and providing a respectful, caring and healing environment for patients, residents and families. We are committed to protecting our patients' dignity by respecting their cultural and spiritual values. We deliver consistent patient care without regard to payer source or ability to pay.

We provide individuals in our care with information regarding their rights and help them understand and exercise those rights. We keep patients informed of options related to their care, treatment and services. We listen with sensitivity and consider the informed preferences of the patients.

Our providers are committed to providing only medically necessary goods and services and ensuring that all goods and services meet professionally recognized standards for quality and safety.

Taking personal responsibility for maintaining our high quality standards is not just important for our organization, it is also essential for the millions of people we serve, many of whom may be our own children, parents, relatives and friends.

Safeguard Information

In the course of business, we collect and store a wide range of information about patients, health care professionals, associates, business partners and others that may be confidential, protected, sensitive or proprietary. We must handle this information responsibly and in compliance with all applicable privacy and security laws and company policies.

This information should be used only for legitimate business purposes, shared only with those who are permitted, protected in accordance with security policies and retained only for as long as necessary. We must also ensure that third parties with access to these types of information are contractually obligated to protect it.

Patient Information

Our patients trust that we will protect the information provided to us, including their health information and personal data. You are permitted to use and disclose protected health information (PHI) only for legitimate business purposes. Before using or disclosing any PHI, we must ensure it is either required or permitted according to company policies and Health Insurance Portability and Accountability Act (HIPAA) privacy regulations.

If you become aware of a breach or potential breach of any protected or sensitive information, even if accidental, it is necessary that the situation be immediately reported to your designated Corporate Responsibility & Privacy Officer.

A person who fails to safeguard information may be subject to disciplinary action.



Personnel Files

Our associates trust that we will keep their personnel files confidential. Associate personal information includes wage and salary information, employment agreements, employment history and status, Social Security number, and financial and banking information. Access to personnel records is restricted to associates maintaining the records and supervisors with a business “need to know” only. Records may only be disclosed to others where required or permitted by law.

Company Proprietary Information

We rely on you to maintain and protect the confidentiality of company information, which includes business strategies, contract terms or negotiations, financials, payments, etc. Proprietary information should only be used for legitimate business purposes. If your employment with Centura Health ends, you have an ongoing obligation to maintain the confidentiality of this information.

Health Care Professional Files

Health care professionals trust their files used for credentialing and privileging purposes are kept confidential. Access to the files is restricted to associates maintaining the files and supervisors with a business “need to know” only.

We must take care to prevent unauthorized disclosures by taking extra precautions when emailing, disposing, faxing, storing and transporting sensitive information. We should confirm that all paperwork containing patient information is going to the correct patient as well as engage in appropriate and lawful exchanges when discussing sensitive information inside and outside the workplace.

Data Security

Our data security program is designed to protect the confidentiality, integrity and availability of the organization's and patient's information from all threats, whether internal or external, deliberate or accidental, and to prevent unauthorized access to computers, databases, websites, etc. You play an important role in keeping our data secure and should follow all applicable security laws and company data security policies.

If you become aware of a data security issue or suspicious activity, it is necessary that the situation be immediately reported to the Centura Health data security team.

Never leave devices where they could be stolen or misplaced; report any stolen devices immediately.

Keep passwords *confidential*.

Do *not* click on suspicious links or attachments in emails or online.

Do *not* allow others to use our accounts.

Take care to *never* share confidential or proprietary information online.

Encrypt emails that contain sensitive information and are being sent to non-Centura Health email addresses.



Fraud, Waste and Abuse

Centura Health is committed to detecting and preventing fraud and financial waste and abuse. The Federal False Claims Act and similar state laws help the government combat fraud and recover losses resulting from fraud in federal programs such as Medicare and Medicaid.

These laws prohibit, among other things, billing for services not rendered, billing for undocumented services, falsifying cost reports, billing for medically unnecessary services, assigning improper codes to secure reimbursement or higher reimbursement, participating in kickbacks and retaining an overpayment for services or items. A violation of these laws may result in civil, criminal and/or administrative penalties, including monetary penalties, imprisonment, exclusion from Medicare, and Medicaid and loss of licensure.

Federal law and some state laws allow private citizens to file a lawsuit on behalf of the government. If the lawsuit is successful, the individual may be eligible to receive a portion of the government's recovery. These laws protect individuals against retaliation such as being fired, demoted, threatened or harassed if they, in good faith, file or are involved in a false claims act case. If an individual does suffer retaliation, he/she is entitled to compensation for lost wages, reinstatement to a former position and compensation for costs or damages.



Fraud is knowingly and willfully executing, or attempting to execute, a scheme or artifice to deceive any health care benefit program or to obtain, by means of false pretenses, representations or promises, any of the money or property owned by, or under the custody or control of, any health care benefit program. In other words, fraud is intentionally submitting false information to the government or a government contractor to get money or a benefit.

Waste includes overusing services or other practices that, directly or indirectly, result in unnecessary costs to the Medicare or Medicaid programs. Waste is generally not considered to be caused by criminally negligent actions but rather by the misuse of resources.

Abuse includes actions that may, directly or indirectly, result in unnecessary costs to the Medicare or Medicaid programs. Abuse involves payment for items or services when there is not legal entitlement to that payment and the provider has knowingly and/or intentionally misrepresented facts to obtain payment.

Examples of actions that may constitute Medicare or Medicaid fraud, waste or abuse:

Knowingly billing for services not furnished or supplies not provided.

Conducting excessive office visits, writing excessive prescriptions, or ordering excessive laboratory tests.

Misusing codes on a claim, such as upcoding or unbundling codes.

Knowingly altering medical records or billing claims to receive a higher payment.

Billing for unnecessary medical services.

Maintain Accurate Records

The accuracy and completeness of Centura Health's records are essential to maintaining ethical and professional business practices. On a daily basis, we must each strive to ensure our records completely and honestly reflect our business and provide reliable information.

Financial and Business Records

We all play a role in accurately maintaining financial and business records; this includes records such as cost reports, time records, expense reports and other documents. Prepare financial records honestly and in accordance with established finance and accounting procedures. Accurate recordkeeping and reporting reflects on the organization's reputation and credibility, and ensures that the organization meets its legal and regulatory obligations.

Medical Records

Our patients depend on us to accurately document information regarding their medical care. You are responsible for accurately, appropriately and promptly documenting any services provided to individuals in your care. Complete documentation helps us to comply with regulatory and legal requirements and contributes to better patient care.

Do not backdate documents, make up entries or make it appear as though we documented something we did not.

Do not sign other people's names to documents.

When making a statement or signing our names to any document, confirm that the statement is true and the document is accurate.

Records Retention

We keep only those records required to do business or by law. To that end, you should follow the Centura Health records retention policy and schedule.

Tax Exempt/Nonprofit Status

Centura Health is a nonprofit corporation exempt from taxation under the Internal Revenue Code and other applicable state laws. As such, we must comply with applicable laws and regulations, engage in activities that further

our tax-exempt purpose, and use our resources to promote such purpose as opposed to serving the personal interest of any individual.

Tax law prohibits our organization from providing goods, services, leases, compensation or other benefits to organizational insiders (such as an officer, director, key employee or physician) without receiving equivalent value in return. Additionally, and subject to certain exceptions, providing goods, services, leases, compensation or other benefits to a third party (who is not an insider), without receiving equivalent benefit in return, is prohibited.

You are responsible for ensuring that Centura Health assets are used exclusively to further our Mission and tax-exempt purpose.

Political Activities

The tax-exempt status of our organization carries certain restrictions on political activities. We may, and are encouraged to, engage in public policy advocacy efforts, particularly on behalf of persons who are poor or underserved. However, there are restrictions on corporate political activity due to our tax-exempt status.

Under the Internal Revenue Code, the organization is prohibited from participating in any political campaign on behalf of, or in opposition to, any candidate for elective public office. This includes contributions to political campaign funds, or public verbal or written statements of position made on behalf of the organization in favor of or in opposition to any candidate for public office.

You as an individual, not representing the organization, are permitted to participate in political campaign activity outside of the workplace.

Our organization may engage in some activities to attempt to influence legislation, commonly known as lobbying, but too much lobbying activity could result in loss of our tax-exempt status. The Internal Revenue Service (IRS) considers a variety of factors, including the time devoted by both compensated and volunteer workers and the expenditures devoted by the organization to the activity, when determining whether the lobbying activity is substantial.

Using facility resources, such as email or company letterhead, to seek contributions to a political action committee (PAC), or asking others within the tax-exempt organization to support or oppose (financially or otherwise) a candidate, PAC or political party, is prohibited. Violation of the rules could jeopardize our tax-exempt status.

Individual Benefit

We must be mindful of our tax-exempt status, which requires restrictions on activities that may benefit individual associates where the organization doesn't receive equivalent value in return. This includes activities such as associates selling side-business products or services to the organization, fellow associates or patients.

Question: An associate wants to inform patients that are new moms that he/she sells breast pumps as part of his/her own personal business which they run on the side. Is this acceptable?

Answer: No; although there may be good intentions in helping new moms find reasonably priced equipment, activities that are not related to charitable purposes and may personally benefit an individual put the organization at risk.

Third-Party Benefit

Our tax-exempt status puts restrictions on activities that provide goods, services, leases, compensation or other benefits to a third party where the organization doesn't receive equivalent benefit in return. This includes allowing third parties to use facility space and/or meeting room for their business event without paying a fair market value fee for the space use.

Question: A vendor is requesting to use one of our hospital conference rooms for their own promotional event and is hoping we can provide the space to them free of charge. Can we do it?

Answer: No, the third party must pay a fair market value fee for the use of the space. Activities using our resources free of charge that benefit a third-party and are not related to charitable purposes put the organization at risk.

Use Resources Responsibly

The company's physical property includes such things as computers, copiers, phones, internet, email, office furniture, supplies and equipment. With regard to physical property, each of us has a responsibility to be good stewards and protect it from theft, abuse or unauthorized use; use it efficiently to avoid waste; use it for appropriate business purposes; and promptly report its loss, misuse or theft.

We also must remember that the company has an obligation to monitor email and internet use, and has the right to do so without notice.

Treat email as written communication, remembering that these messages are permanent and retrievable.

Excluded Individuals or Entities

We do not contract with, employ or bill for services furnished, ordered or prescribed by an individual or entity that is excluded or ineligible to participate in federal health care programs; suspended or debarred from Federal government contracts and has not been reinstated in a Federal health care program after a period of exclusion, suspension, debarment or ineligibility.

In addition to our initial and ongoing screening, individuals, vendors and privileged providers are required to report to us if they become excluded, debarred or ineligible to participate in federal healthcare programs.

Workplace Conduct and Employment Practices

You are responsible for knowing and complying with company policies and laws that regulate employment as they apply to your job. Examples of these include wage and hour requirements, federal and state labor and civil rights laws, and workers' compensation laws. You are encouraged to seek advice from the human resources and/or legal department when confronted with business decisions involving a potential or suspected violation of these employment laws. You have an obligation to report any potential violations to your immediate supervisor, any human resources representative or the Integrity Helpline when you believe a violation of policy or law has occurred.

Nondiscrimination and Preventing Harassment

We must be treated fairly and respected for our contributions. Our organization provides equal opportunities for employment. We base employment decisions on merit, considering qualifications, skills and achievements. We prohibit discrimination based on race, color, national origin, ancestry, religion, creed, sex, sexual orientation, gender identity, physical or mental disability, marital status, age 40 and older, genetic information, military status or other status protected by applicable laws.

We also do not tolerate harassment. Harassment is unwelcome and offensive conduct that may interfere with a person's ability to perform his or her work. Harassment does not require intent to offend. Inappropriate conduct meant as a joke, a prank or even a compliment can lead or contribute to harassment. Associates have an obligation to report harassment to his or her immediate supervisor, any Human Resources representative, or the Integrity Helpline.

Drug-Free Workplace

Centura Health is dedicated to activities and services that promote health and wellness and encourage associates to achieve their health needs. You must perform your duties and responsibilities unimpaired by the presence of controlled substances or alcohol. The exception is prescribed drugs when used in the manner, combination and quantity intended, subject to fitness-for-duty evaluations.

Safe and Healthy Work Environment

We are committed to providing a safe and healthy workplace for associates working within our facilities and premises. Every associate is responsible for making safety and health a priority and should promptly report unsafe or hazardous conditions to supervisors. Comply with all policies, laws, regulations and standards relating to conditions of employment, including those concerning hours, wages and other working conditions. Comply with applicable workplace safety and industrial hygiene policies, laws, regulations and standards.

Use of Social Media

We understand that social media can be a fun and rewarding way to share your life and opinions with family, friends and co-workers. However, the use of social media also presents certain risks as well as certain responsibilities. To assist you in making responsible decisions about your use of social media, we have established policies for appropriate use of social media, both on the public internet and within Centura Health's intranet.

You should remember that your conduct may impact the way others view who we are and what we stand for as an organization. You should be mindful of the content created, shared and posted, remembering that the internet is a public place. Take extra precaution to ensure patient privacy is never compromised. Ensure your conduct doesn't adversely affect your job performance, or otherwise adversely or unlawfully affect fellow associates. Always use good judgement when engaging in social media.

Social media includes any digital communications that allow individuals to create and share content and post comments.

Staff Rights

Centura Health respects the religious, ethical and cultural beliefs of associates but cannot allow the quality or availability of patient care services to be compromised. In the event that a job assignment, task or responsibility conflicts with your cultural, ethical or religious beliefs and values, and you request not to participate in that aspect of patient care, an attempt will be made to provide you with reasonable accommodations, provided such accommodations do not negatively impact patient care.

We encourage conflict resolution among associates and provide a formal mechanism for associates to attempt to resolve conflicts through the Alternative Dispute Resolution Process.

Credentials

Credentials communicate to our patients and physicians that we are qualified to do our jobs. That's why we are committed to maintaining all required credentials, licenses and certifications. We do not allow caregivers with lapsed or revoked credentials to provide care to patients.

Act with Integrity with Those Outside the Workplace

Building *trusted* relationships with those whom we do business with and others in the communities we serve is an important part of our work. We have a duty to demonstrate professionalism and integrity when we work with those outside our workplace.

A *conflict of interest* occurs when a personal relationship or activity could influence your judgment and ability to perform your job in an objective way and uphold your duties to your employer. Even the appearance or perception of a conflict of interest can place Centura Health at risk. As associates, we should *never* allow personal gain or benefit to prevent us from doing what is in the best interest of our organization.

It is not always clear whether an activity creates a conflict of interest. However, it is the responsibility of every associate to disclose a potential conflict of interest.

Gifts and Entertainment

Vendors, suppliers and others who do business with us are vital to our organization's success. To keep our relationships with them fair, honest and objective, we avoid conflicts of interest.

Conflicts of interest can occur when an associate solicits or accepts gifts, payments, loans, service or any form of compensation from others seeking to do business with our organization. Associates should only accept gifts, entertainment, hospitality, travel and other items of value from vendors, suppliers and other contractors as specified in the organization's policies and procedures.

Any form of gift or entertainment must be infrequent, unsolicited, modest, not cash or cash equivalent, and may not influence business decisions.

Centura Health has many contacts and dealings with governmental bodies and officials. You may not give or accept any items, gifts, business courtesies or entertainment to or from government officials.



Think it Through

The following factors should be considered when determining the appropriateness of accepting individual gifts, items of value and entertainment:

1. Intent

What is the intent behind the gift, item of value or entertainment? If the intent is to influence the decision of Centura Health to transact or conduct business with the person or organization, the associate may not accept. Even when the person or organization does not intend to influence a business decision, the associate must consider whether accepting gives the appearance of interfering with or influencing the independence of a decision to transact or conduct business.

2. Amount

What is the value of the gift, item or entertainment? If the monetary value is above nominal value, the associate should evaluate the appropriateness of accepting against the other six factors included here for consideration. If the monetary value exceeds the policy limit, it should not be accepted.

3. Decision-Making Authority

Is the associate in a position to make decisions or influence decisions on whether Centura Health enters into a business relationship with the person or organization who is offering? If the associate is in the position to make decisions or influence decisions on whether Centura Health enters into a business relationship with the person or organization and the value of the gift, item or entertainment exceeds the policy limit, the associate should not accept. This dual involvement may lead to the appearance of unfair dealing. The associate may not request a direct report accept gift, item or entertainment on his or her behalf.

4. Timing

When does the offer occur in relation to transacting business with the person or organization? Under no circumstances should an associate accept a gift, item of value or entertainment at a time when a person or organization is attempting to gain or renew Centura Health business (e.g., RFP issued, upcoming contract expiration, vendor/product selection underway, etc.). This may give the appearance that the person or organization was expected to provide something of value in order to secure Centura Health business.

5. Sources

Is the associate accepting from just one person or organization? The practice of accepting gifts, items of value or entertainment from a sole source may give the appearance that there is an implied requirement that the person or organization provide gifts to continue to conduct or earn business with Centura Health.

6. Value Opportunity

Does accepting include any value opportunity to the person or organization with whom Centura Health has an actual or potential business relationship? A reasonable effort should be made to ensure that the value provided to the person or organization is reasonable in relation to the value of the gift, item of value or entertainment provided to the associate.

7. Frequency

How often are gifts, items of value or entertainment offered from the person or organization? The practice of accepting gifts, items of value or entertainment should be isolated and infrequent, including accepting perishable goods provided on a global basis (i.e., to all department staff, nursing station, etc.).

Outside Employment, Interests and Activities

We understand that some associates may choose to have a second job in addition to their regular employment. If you hold employment elsewhere, you must disclose the name of your other employer and the nature of such employment to your supervisor to determine if a conflict exists.

Consulting or other outside business activities require advance approval by your supervisor. Any consulting opportunities or other outside business activities must be conducted on your own time and must not conflict with or affect the performance of your Centura Health responsibilities.

Advisory Panels

Associates may serve on a vendor's advisory panel on behalf of Centura Health as long as Centura Health pays for any related travel or lodging expenses as a cost of doing business, associate's supervisor is supportive of the work and ensures participation would legitimately provide benefit to Centura Health, and the business does not conflict or compete in any way with Centura Health's Mission or Values.

Testimonials and Endorsements

You are prohibited from providing testimonial statements or making presentations on behalf of a vendor or contractor for purposes of marketing a vendor or contractor's services in an advertisement, brochure, case study, presentation or other marketing material. Activities that are not related to charitable purposes and that may benefit a third party, where the organization doesn't receive equivalent benefit in return, may put the organization at risk related to its tax-exempt status.

You are not permitted to allow a vendor to use a Centura Health logo for their own marketing purposes, such as being included as a list of clients on their website or in a presentation unless it's been contractually agreed upon or you have been specifically authorized to do so.

You may not speak for or make any representation on behalf of Centura Health unless you have been specifically authorized to do so.

Vendor or Contractor Relations

All business relations with vendors or contractors must be conducted on an impartial and fair basis. Every effort should be made to guard against personal ties with or bias towards a vendor or contractor personnel that could be construed as influencing the decisions you make on behalf of Centura Health.

Family Members and Close Personal Relationships

Relationships with family members and close personal friends can influence our decisions. It is important to be careful about company business decisions that involve close personal relationships. Avoid supervising or taking part in the hiring or promoting of a family member. Avoid holding a position with access to or influence over performance appraisals, salary information or other confidential information related to a family member.

Outside Board Memberships

You are encouraged to participate in activities within your communities. This may include serving as a board member for other organizations. When serving as a board member for any organization that may have a conflicting interest with Centura Health, you must obtain approval from your supervisor prior to agreeing to serve.

Referrals, Kickbacks, Bribes

Federal and state laws and regulations govern the relationship between hospitals and physicians who may refer patients to the facilities. The applicable federal laws include the Anti-Kickback Law and Stark Law. It is important that associates who interact with physicians, particularly regarding negotiating contracts, making payments to physicians for services rendered, providing space or services to physicians, recruiting physicians to the community, and arranging for physicians to serve in leadership positions in facilities are aware of the requirements of the laws, regulations and policies that address relationships between facilities and physicians.

If relationships with physicians are properly structured, but not diligently administered, failure to administer the arrangements as agreed may result in violations of the law. Any arrangement with a physician must be structured to ensure compliance with legal requirements, our policies and procedures, and with any operational guidance that has been issued. Arrangements must be in writing and be reviewed and approved through the Centura Health physician contracting process.

Any payments to nonemployed physicians, including expense reimbursements, must be supported by a written agreement that has been signed in advance. Before authorizing payment, you must ensure a written agreement exists and payment matches the agreement terms.

Keeping in mind that it is essential to be familiar with the laws, regulations and policies that govern our interactions with physicians, two overarching principles govern these interactions:

We do not pay, or offer to pay, for referrals.

We accept patient referrals and admissions based solely on the patient's medical needs and our ability to render the needed services.

We do not accept payments for referrals we make.

No Centura Health associate or any other person acting on behalf of the organization is permitted to solicit or receive anything of value, directly or indirectly, in exchange for the referral of patients. Similarly, when making patient referrals to another health care provider, we do not take into account the volume or value of referrals that the provider has made, or may make, to us.

Anti-Kickback Law

The Federal Anti-Kickback law prohibits us from requesting, accepting, paying or offering to pay anything of value for referred business that is payable by a federal health care program. In short, we may not directly or indirectly pay patients, physicians or other health care providers to refer patients to us. The law is complex and has limited exceptions.

Stark Self-Referral Law

The Federal Stark Self-Referral law prohibits a physician from referring Medicare or Medicaid patients to a health care provider, such as Centura Health, if the physician (or an immediate family member of the physician) and the health care provider have any type of financial relationship. However, referrals are permitted if the financial relationship is structured to comply with certain exceptions to the law. The law is complex and numerous exceptions exist.

Gifts and Business Courtesies to Nonemployed Physicians

Any activities which involve providing a nonemployed physician a business courtesy or gift must be undertaken in accordance with applicable policies and procedures, which have been developed consistent with federal regulations regarding these practices.

All items, gifts and business courtesies must be logged promptly by associates in order to be appropriately monitored and tracked; they are to not exceed an annual limit set by regulation and are calculated each calendar year by the Centers for Medicare and Medicaid Services (CMS).

Advertising and Marketing Nonemployed Physicians

Centura Health will not pay the cost of advertising that mentions nonemployed physicians or provide marketing services to nonemployed physicians. Certain exceptions may exist as long as specific criteria outlined in applicable policies and procedures apply.

Physician-Owned Entities

While Centura Health is committed to acquiring the highest quality products and services at the lowest possible cost, in light of regulatory concerns and inherent conflict of interest issues, Centura Health will not purchase items or supplies from physician-owned entities where a physician owner holds

medical staff privileges at a Centura Health facility. Additionally, Centura Health will not purchase items or supplies from a privately held vendor that does not have any physician owners, but the vendor has a financial relationship with a physician who holds medical staff privileges at a Centura Health facility, and the physician's compensation from the vendor could be affected by Centura Health using the item or supply purchased.



Applicability, Accountability and Waiver of the Integrity Standards

The Integrity Standards should be viewed as company policy.

As with any company policy, compliance with the Integrity Standards are considered a condition of employment at Centura Health. This is not a contract, nor does it in any way alter the at-will employment status of associates. Any violations of the Integrity Standards may result in disciplinary action up to and including termination of employment.

In the event that a part of the Integrity Standards conflicts with local laws, local laws will apply.

Any waiver of the Integrity Standards requires prior written approval of the Board of Trustees, or a committee of the Board.

Centura Health reserves the right to amend, alter or terminate the Integrity Standards at any time and for any reason.





Acknowledgement of Centura Health Integrity Standards

I acknowledge that I have reviewed the Centura Health Integrity Standards and understand it represents mandatory policies of the organization. I agree to abide by the Integrity Standards.

Signature _____

Print Name _____

(as listed in personnel records)

Department _____

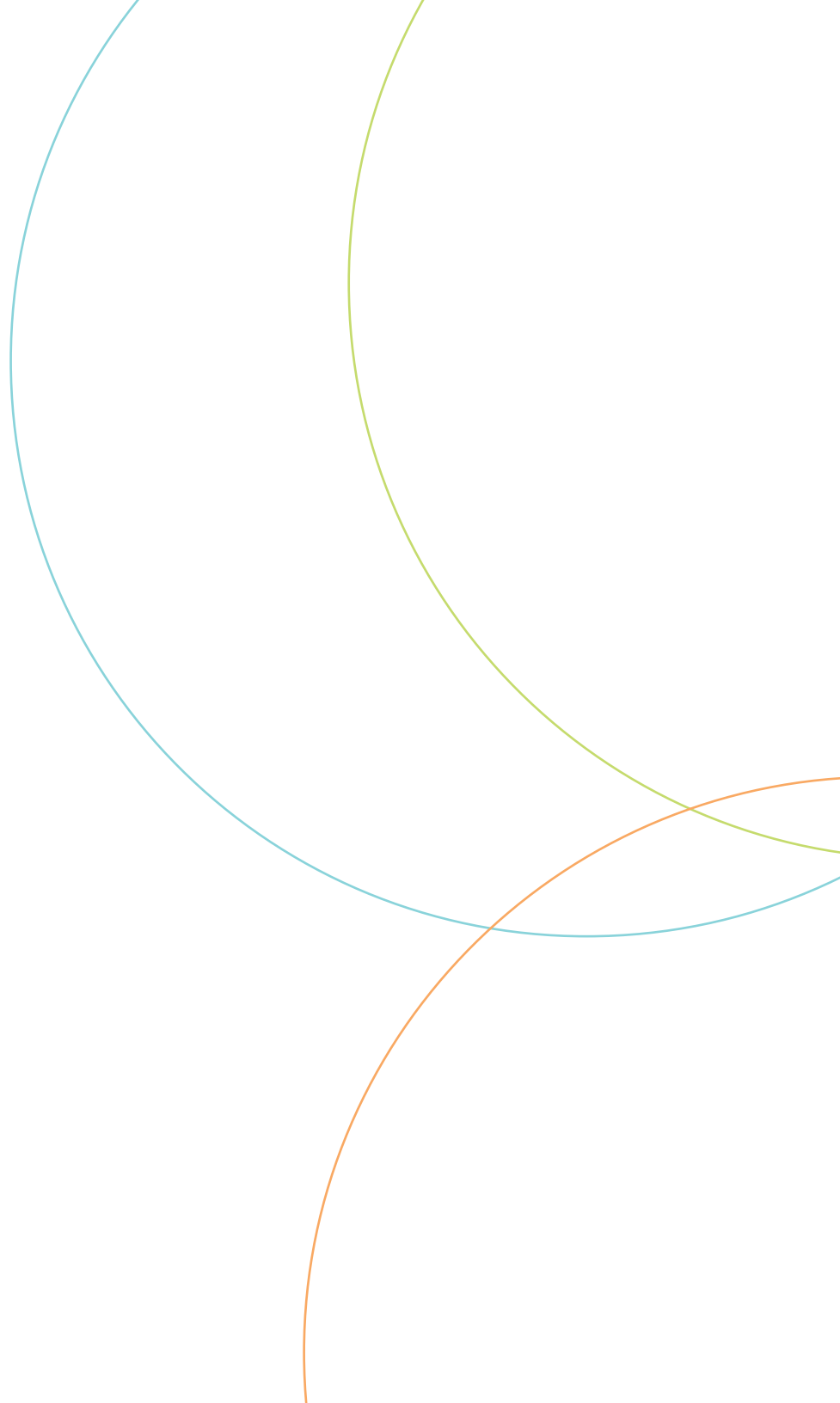
Facility _____

Employee ID _____

Date _____



Acknowledgement shall be retained in your employment file by the Human Resources Department.





9100 East Mineral Circle
Centennial, CO 80112

centura.org