

# Common Ground Code of Conduct



## Dear Colleague,

At Lifepoint, we share a singular mission of making communities healthier® and a common vision to create places where people choose to come for healthcare, physicians want to practice and employees want to work. To successfully make these ideals reality, each of us must share a deep commitment to the highest legal and ethical standards. In fact, legal and ethical compliance is one of our company's core values.

This shared commitment – or “common ground” – helps to ensure operational excellence and integrity at our hospitals, outpatient centers, physician practices and post-acute facilities, and drives success for our physicians, providers, employees and our entire company.

The Code of Conduct included here guides us in our daily interactions with colleagues, patients, affiliated providers and others with whom we work. Much of its content may seem second nature to you, and that is certainly understandable. We depend on you to possess your own personal code of ethics to help fortify the principles defined in our company Code. We ask that you review the Code carefully, as your commitment to it is crucial to our success.

With this in mind, we also understand that we operate in a complex professional environment. Situations may arise that feel confusing and for which you may have questions. While this Code helps to address and resolve many concerns, if you have additional questions or are faced with a situation you believe is not aligned with the Code, please consult your supervisor immediately. If the nature of a situation precludes you from comfortably approaching your supervisor, contact another member of management, or your facility's ethics and compliance officer. You may also call the HSC ethics and compliance hotline at 1.877.508.LIFE (5433). Please be assured that there will be no retribution for any inquiry or for reporting a possible breach of the Code.

You play a crucial role in Lifepoint's success as a provider of high-quality, community-based healthcare services. Thank you for upholding our Code of Conduct. By standing together on common ground, we will be **making communities healthier.**®

Sincerely,



A handwritten signature in black ink that reads "David M. Dill". The signature is written in a cursive, flowing style.

David M. Dill  
Chairman and Chief Executive Officer

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# Purpose of Our Code of Conduct

Our Code of Conduct provides guidance to all Lifepoint employees and assists us in carrying out our daily activities within appropriate ethical and legal standards. These obligations apply to our relationships with patients, affiliated physicians, third-party payors, subcontractors, independent contractors, vendors, consultants and one another.

The Code is a critical component of our overall ethics and compliance program. We developed the Code to ensure that we meet our ethical standards and comply with applicable laws and regulations.

The Code is intended to be a statement that is comprehensive and easily understood. In some instances, the Code deals fully with the subject covered. In many cases, however, the subject discussed has so much complexity that additional guidance is necessary for those directly involved with the particular area to have sufficient direction.

Though we promote the concept of local management autonomy to meet local needs, the policies set forth in this Code are mandatory and must be followed.

## Lifepoint Health's Cultural Elements

### Our Mission

# Making communities healthier<sup>®</sup>

### Our Vision

We want to create places where:

- People choose to come for healthcare
- Physicians and providers want to practice
- Employees want to work

### Our Values



# Leadership Responsibilities

While all Lifepoint employees are obligated to follow our Code, we expect our leaders to set the example — to be in every respect a model. Leaders must ensure that those on their team have sufficient information to comply with law, regulation and policy, as well as the resources to resolve ethical dilemmas. They must

help create a culture within Lifepoint that promotes the highest standards of ethics and compliance. This culture must encourage everyone in the organization to raise concerns when they arise. We must never sacrifice ethical and compliant behavior in the pursuit of business objectives.

## Our Fundamental Commitment to Stakeholders

We affirm the following commitments to Lifepoint stakeholders:

**To our patients:** We are committed to providing high-quality care that is sensitive, compassionate, promptly delivered and cost-effective.

**To our employees:** We are committed to providing a work setting that treats all employees with fairness, dignity and respect, and affords them an opportunity to grow, develop professionally, and work in a team environment in which all ideas are considered.

**To our affiliated physicians:** We are committed to providing a work environment that has excellent facilities, modern equipment and outstanding professional support.

**To the communities we serve:** We are committed to understanding the needs of those communities and providing them with high-quality, cost-effective healthcare. We realize that we as an organization have a responsibility to help those in need. We proudly support charitable contributions and events in the communities we serve in an effort to promote goodwill and further good causes.

**To our shareholders:** We are committed to the highest standards of professional management, which we are certain can create unique efficiencies and innovative healthcare approaches and thus provide favorable returns on our shareholders' investments over the long-term.

**To our third-party payors:** We are committed to dealing with our third-party payors in a way that

demonstrates our commitment to contractual obligations and reflects our shared concern for quality healthcare and bringing efficiency and cost-effectiveness to healthcare. We encourage our private third-party payors to adopt their own set of comparable ethical principles to recognize explicitly their obligations to patients, as well as the need for fairness in dealing with providers.

**To our regulators:** We are committed to an environment in which compliance with rules, regulations and sound business practices is woven into our culture. We accept the responsibility to aggressively self-govern and monitor adherence to the requirements of law and to our Code of Conduct.

**To our joint venture partners:** We are committed to fully performing our responsibilities to manage any jointly owned facilities in a manner that reflects the mission and values of each organization.

**To our suppliers:** We are committed to fair competition among prospective suppliers and the sense of responsibility required of a good customer.

**To our volunteers:** The concept of voluntary assistance to the needs of patients and their families is an integral part of the fabric of healthcare. We are committed to ensuring that our volunteers feel a sense of meaningfulness from their volunteer work and receive recognition for their volunteer efforts.

# Relationships with Our Healthcare Partners

## PATIENTS

### Patient Care and Rights

It is our priority to provide high-quality healthcare to all of our patients. We treat all patients with respect and dignity and provide care that is both necessary and appropriate. We make no distinction in the admission, transfer or discharge of patients or in the care we provide based on race, color, religion, national origin, ancestry, citizenship, age, gender, gender identity or expression, sexual orientation, pregnancy, disability, medical condition, marital status, veteran status, payment source or ability, or any other basis prohibited by federal, state or local law. Clinical care is based on identified patient healthcare needs, not on patient or organization economics.

Upon admission, each patient is provided with a written statement of patient rights. This statement includes the rights of the patient to make decisions regarding medical care and conforms to all applicable state and federal laws.

We assure patient involvement in all aspects of their care and obtain informed consent for treatment. As applicable, each patient or patient representative is provided with a clear explanation of care including, but not limited to, diagnosis, treatment plan, right to refuse or accept care, care decision dilemmas, advance directive options, estimates of treatment costs, organ donation and procurement, and an

explanation of the risks and benefits associated with available treatment options. Patients have the right to request transfers to other facilities. In such cases, the patient will be given an explanation of the benefits, risks and alternatives.

Patients are informed of their right to make advance directives. Patient advance directives will be honored within the limits of the law and the organization's mission, philosophy and capabilities.

Patients and their representatives will be accorded appropriate confidentiality, privacy, security and protective services, opportunity for resolution of complaints and pastoral counseling. Any restrictions on a patient's visitors, mail, telephone or other communications must be evaluated for their therapeutic effectiveness and must be fully explained to and agreed upon by the patient or patient representative. During prolonged stays in the hospital, patients have the right to refuse to perform tasks in or for the hospital.

Patients are treated in a manner that preserves their dignity, autonomy, self-esteem, civil rights and involvement in their own care. Lifepoint employees receive training about patient rights in order to clearly understand their role in supporting them.

We are committed to providing care to our patients in a safe and reliable way. Our culture fosters patient safety, speaking up when safety is threatened or breached and continuous learning and process improvement to provide reliable care to every patient with every encounter.

Compassion and care are part of our commitment to the communities we serve. We strive to provide health education, health promotion and illness prevention programs as part of our efforts to improve the quality of life of our patients and our communities.



# Relationships with Our Healthcare Partners cont.

## Emergency Treatment

We follow the Emergency Medical Treatment and Labor Act (EMTALA) in providing emergency medical treatment to all patients, regardless of their ability to pay. Anyone with an emergency medical condition is treated and admitted based on medical necessity. In an emergency situation, financial and demographic information will be obtained only after the immediate needs of the patient are met. We do not admit or discharge patients simply on their ability to pay.

Patients will only be transferred to another hospital upon their request or if their medical needs cannot be met at the Lifepoint hospital and appropriate care is knowingly available at another hospital. Patients will only be transferred after they have been stabilized within the capabilities and capacity of the transferring hospital, and are formally accepted for treatment at the receiving hospital.

## Patient Information

We collect information about the patient's medical condition, history, medication and family illnesses to provide the best possible care. We realize the sensitive nature of this information and are committed to maintaining its confidentiality. We do not release or discuss patient-specific information with others unless it is necessary to serve the patient or authorized by law.

Lifepoint employees must never disclose confidential information that violates the privacy rights of our patients. No Lifepoint employee, affiliated physician or other healthcare partner has a right to any patient information other than that necessary to perform his or her job.

Patients can expect that their privacy will be protected and that patient-specific information will be released only to persons authorized by law or by the patient's written consent. In an emergency situation, when requested by an institution or physician then treating the patient, the patient's specific authorization is not required by law, but the name of the institution and the person requesting the information must be verified.

## AFFILIATED PHYSICIANS

Any business arrangement with a physician must be structured to ensure precise compliance with legal requirements. Such arrangements must be in writing and approved by the HSC Legal Department.

In order to ethically and legally meet all standards regarding referrals and admissions, we will adhere strictly to two primary rules:

- 1. We do not pay for referrals.** We accept patient referrals and admissions based solely on the patient's clinical needs and our ability to render the needed services. We do not pay or offer to pay anyone — employees, physicians or other persons— for referral of patients or to induce referrals. Violation of this policy has grave consequences for the organization and the individuals involved, including civil and criminal penalties and possible exclusion from participation in federally funded healthcare programs.
- 2. We do not accept payments for referrals that we make.** No Lifepoint employee 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 healthcare provider, we do not take into account the volume or value of referrals that the provider has made (or may make) to us.

All referral source data must be used only for the purpose of understanding service line, provider and quality deficiencies, and to improve quality, access, and patient and physician satisfaction. Such data may never be used to direct referrals, intimidate or embarrass physicians and other referral sources into redirecting their referrals, or for purposes that are prohibited under Lifepoint's policies. All employees, medical staff members and privileged practitioners should immediately report violations or suspected violations to a supervisor or member of management, the local ethics and compliance officer, the HSC ethics line or the HSC ethics and compliance officer.

# Relationships with Our Healthcare Partners cont.

## THIRD-PARTY PAYORS

### Coding and Billing for Services

We will take great care to ensure that all billings to governmental and other payors reflect truth and accuracy and conform to all pertinent federal and state laws and regulations.

We prohibit any employee or agent of Lifepoint from knowingly presenting or causing to be presented claims for payment or approval that are false, fictitious or fraudulent.

We will operate oversight systems designed to verify that claims are submitted only for services actually provided and that services are billed as provided. These systems will emphasize the critical nature of complete and accurate documentation of services provided. As part of our documentation effort, we will maintain current and accurate medical records.

Any subcontractors engaged to perform billing or coding services must have the necessary skills, quality assurance processes, systems and appropriate procedures to ensure that all billings for governmental and other payors are accurate and

complete. Lifepoint prefers to contract with such entities that have adopted their own ethics and compliance programs. Third-party billing entities, contractors and preferred vendors that we consider must be approved consistent with our HSC policy on this subject.

For coding questions, contact the 3M Nosology line at 1.800.435.7776. For questions concerning billing issues, contact your local business office director.

### Cost Reports

Our business involves reimbursement under government programs that require the submission of certain reports of our costs of operation. We will comply with federal and state laws relating to all cost reports. These laws and regulations define which costs are allowable and outline the appropriate methodologies to claim reimbursement for the cost of services provided to program beneficiaries. Given their complexity, all issues related to the completion and settlement of cost reports must be communicated through or coordinated with our Reimbursement Department.





# Regulatory Compliance

Lifepoint's facilities provide varied healthcare services in many states. These services generally may be provided only pursuant to appropriate federal, state and local laws and regulations. Such laws and regulations may include subjects such as certificates of need, licenses, permits, accreditation, access to treatment, consent to treatment, medical record-keeping, access to medical records and confidentiality, patients' rights, terminal care decision-making, medical staff membership and clinical privileges, corporate practice of medicine restrictions, and Medicare and Medicaid regulations. The organization is subject to numerous other laws in addition to these healthcare regulations.

We will comply with all applicable laws and regulations. All employees, medical staff members, privileged practitioners and contract service providers must be knowledgeable about and ensure compliance with all laws and regulations and should immediately report violations or suspected violations to a supervisor or member of management, the local ethics and compliance officer, the HSC ethics line or the HSC ethics and compliance officer.

Lifepoint will be forthright in dealing with any billing inquiries. Requests for information will be answered with complete, factual and accurate information. We will cooperate with and be courteous to all

government inspectors and provide them with the information to which they are entitled during an inspection.

During a government inspection, you must never conceal, destroy or alter any documents, lie or make misleading statements to government representatives. You should not influence another employee to provide inaccurate information or obstruct, mislead or delay the communication of information or records relating to a possible violation of law.

In order to ensure that we fully meet all regulatory obligations, Lifepoint employees and affiliated physicians must be informed about stated areas of potential compliance concern. The Department of Health and Human Services, and particularly its Inspector General, has routinely notified healthcare providers of areas in which it believes that insufficient attention is being given to government regulations. We should be diligent in following such guidance and reviewing appropriate elements of our system to ensure their correctness.

Lifepoint will provide its employees with the information and education they need to comply fully with all applicable laws and regulations.

## Dealing with Accrediting Bodies

Lifepoint will deal with all accrediting bodies in a direct, open and honest manner. No action should ever be taken in relationships with accrediting bodies that would mislead the accreditor or its survey teams, either directly or indirectly. Where Lifepoint determines to seek any form of accreditation, all standards of the accrediting group are important and must be followed.

The scope of matters related to accreditation of various bodies extends beyond the scope of this Code of Conduct. The purpose of our Code of Conduct is to provide general guidance on subjects of wide interest within the organization.



# Business Information

## Accuracy, Retention and Disposal of Documents and Records

Each Lifepoint employee is responsible for the integrity and accuracy of our organization's documents and records, not only to comply with regulatory and legal requirements but also to ensure that records are available to defend our business practices and actions. No one may alter or falsify information on any record or document.

Medical and business documents and records are retained in accordance with the law and our record retention policy. Medical and business documents include paper documents such as letters and memos, computer-based information such as e-mail or computer files, and any other medium that contains information about the organization or its business activities. It is important to retain and destroy records appropriately according to our policy. You must not tamper with records or remove or destroy them prior to the date specified in company policy for such action.

## Confidential Information

Confidential information about our organization's strategies and operations is a valuable asset. Although you may use our confidential information to perform your job, you must not share this information with others outside of Lifepoint or your department unless you are doing so within the scope of your job responsibilities, and the person to whom you intend to disclose the information has a legitimate business need to know this information. Violation of this policy may subject an employee to termination and other legal action.

As a condition of your employment with Lifepoint, you will not seek to benefit personally or permit others to benefit through the use or disclosure of our confidential information. Your obligations are not limited to documents and materials that are specifically marked as "confidential."

If, however, a document is expressly marked as "confidential," you are expected to follow all instructions noted on such document pertaining to the photocopying, transmitting or disclosing of any information contained therein. Examples of confidential information include personnel data maintained by the organization, patient lists and clinical information, pricing and cost data, information pertaining to acquisitions, divestitures, affiliations and mergers, financial data, research data, strategic plans, marketing strategies, techniques, employee lists, supplier and subcontractor information, training materials, proprietary computer software and other information not generally known by the public.

This provision does not restrict the right of an employee to disclose, if he or she wishes, information about his or her own compensation, benefits or terms and conditions of employment.

# Business Information cont.

## Electronic Media

All communications systems, electronic mail, intranet, internet access, Lifepoint-provided telephones or voicemail are the property of the organization and are to be primarily used for business purposes. Highly limited reasonable personal use of Lifepoint's communications systems is permitted; however, you should assume that these communications are not private. Patient or confidential information should not be sent through the intranet or the Internet unless security measures are in place that assure confidentiality.

Lifepoint reserves the right to periodically access, monitor and disclose communications usage and content. Access and disclosure of individual employee messages may only be done with the approval of the HSC Legal department.

Employees may not use internal communication channels or access the Internet at work to post, store, transmit, download or distribute any threatening, knowingly reckless, maliciously false or obscene materials. This prohibition includes anything constituting or encouraging a criminal offense, giving rise to civil liability or otherwise violating any laws. Additionally, these channels of communication may not be used to send chain letters, personal broadcast messages or copyrighted documents that are not authorized for reproduction, nor are they to be used to conduct a job search or open misaddressed mail.

Employees may not install personal software on Lifepoint computer equipment, and Lifepoint-owned software may not be installed on employees' personal computers. While there are exceptions, there are very few. Please contact your local director of information systems or refer to the Lifepoint PC Software License Management policy for more details.

Employees who abuse our communications systems or use them excessively for non-business purposes may lose these privileges and be subject to disciplinary action.

## Financial Reporting and Records

We have established and maintain 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 and other stakeholders. They are also necessary for compliance with tax and financial reporting requirements.

All financial information must reflect actual transactions and conform to generally accepted accounting principles. No undisclosed or unrecorded funds or assets may be established.

Lifepoint maintains a system of internal controls to provide reasonable assurances that all transactions are executed in accordance with management's authorization and are recorded in a proper manner so as to maintain accountability of the organization's assets.



# Workplace Conduct and Employment Practices

## Conflicts of Interest

A conflict of interest may exist if your other activities or personal interests influence or appear to influence your ability to make objective decisions in the course of your job responsibilities. A conflict of interest may also exist if the demands of any of those activities hinder or distract you from the performance of your job or cause you to use Lifepoint resources for non-Lifepoint purposes. It is your obligation to ensure that your interests remain free of conflicts in the performance of your responsibilities at Lifepoint. Employees and individuals retained as independent contractors who have any questions about whether an outside activity might constitute a conflict of interest must obtain the approval of their supervisor before pursuing the activity.

## Controlled Substances

Some of our employees routinely have access to prescription drugs, controlled substances and other medical supplies. Many of these substances are governed and monitored by specific regulatory organizations and must be administered by physician order only. It is extremely important that these items be handled properly and only by authorized individuals to minimize risks to Lifepoint and to patients. If you become aware of the diversion of drugs from the organization, you should report the incident immediately.

## Copyrights

Lifepoint employees may only make copies of copyrighted materials pursuant to the organization's policy on such matters.

## Diversity and Equal Employment Opportunity

Our employees provide us with a wide complement of talents that contribute greatly to our success. We are committed to providing an equal opportunity work environment where everyone is treated with fairness, dignity and respect. We will comply with all laws, regulations and policies related to non-discrimination in all of our personnel actions. Such actions include hiring, staff reductions, transfers, terminations, evaluations, recruiting, compensation, corrective action, discipline and promotions.

No one may discriminate against any individual with a disability with respect to any offer, term or condition of employment. We will make reasonable accommodations to the known physical and mental limitations of otherwise qualified individuals with disabilities.

## Harassment and Workplace Violence

Each Lifepoint employee has the right to work in an environment free of harassment. We will not tolerate harassment by anyone based on the diverse characteristics or cultural backgrounds of those who work with us. Degrading or humiliating jokes, slurs, intimidation or other harassing conduct is not acceptable in our workplace.

Any form of sexual harassment is strictly prohibited. This includes unwelcome sexual advances or requests for sexual favors in conjunction with employment decisions. Moreover, verbal or physical conduct of a sexual nature that interferes with an individual's work performance or creates an intimidating, hostile or offensive work environment has no place at Lifepoint.

# Workplace Conduct and Employment Practices cont.

Conduct that includes behaviors and communication that intimidate individuals and result in a barrier to work performance are not tolerated at Lifepoint. At Lifepoint we strive to foster a culture of learning, mutual respect and professionalism and individual accountability for our behaviors and performance.

Harassment also includes incidents of workplace violence. Workplace violence includes robbery and other commercial crimes, stalking cases, violence directed at the employer, terrorism and hate crimes committed by current or former employees. As part of our commitment to providing a safe workplace for our employees and physicians, we prohibit possession of firearms, other weapons, explosive devices or other dangerous materials on Lifepoint premises. Employees who observe or experience any form of harassment or violence should report the incident to their supervisor, the Human Resources department, a member of management, their local ethics and compliance officer, the HSC ethics line or the HSC ethics and compliance officer.

## Health and Safety

All Lifepoint facilities must comply with all government regulations and rules and with Lifepoint policies and required facility practices that promote the protection of workplace health and safety. Our policies have been developed to protect you from potential workplace hazards. You should become familiar with and understand how these policies apply to your specific job responsibilities, and seek advice from your supervisor or the safety officer whenever you have a question or concern. It is important for you to advise your supervisor or the safety officer of any serious workplace injury or any situation presenting a danger of injury so that timely corrective action may be taken to resolve the issue.

## Hiring of Former and Current Government Employees

The recruitment and employment of former or current U.S. government employees is subject to complex rules that change frequently and vary by employee. Similar rules may also apply to current or former state or local government employees or legislators and members of their immediate families.

If a former government employee or consultant wishes to become employed by (or a consultant to) Lifepoint, care should be exercised to ensure that the requirements of conflict of interest laws are not violated. Each situation should be considered on an individual basis and you should consult with the HSC Human Resources or HSC Legal departments on issues related to recruitment and hiring of former or current government employees.



# Workplace Conduct and Employment Practices cont.

## Inside Information and Securities Trading

In the course of your employment, you may become aware of non-public information about Lifepoint that may be material to an investor's decision to buy or sell the organization's securities. Securities law and Lifepoint policy prohibit individuals from trading in the organization's securities or influencing others to trade in such securities on the basis of non-public, material information. Non-public, material information may include plans for mergers, marketing strategy, financial results or other business dealings. You may not discuss this type of information with anyone outside of the organization. Within the organization, you should discuss this information on a strictly "need to know" basis only with others who require this information to perform their jobs.

If you obtain access to non-public, material information about the organization while performing your job, you may not use that information to buy, sell or retain securities of Lifepoint or any other company. Additionally, discussing the information with others such as family members, friends, vendors, suppliers and other outside acquaintances is prohibited until the information is considered to be public. Information is considered to be public after the second full trading day following the release of information to the media.

## License and Certification Renewals

Employees and individuals retained as independent contractors in positions that require professional licenses, certifications or other credentials are responsible for maintaining the current status of their credentials and shall comply at all times with federal and state requirements applicable to their respective disciplines. To ensure compliance, Lifepoint may require evidence of the individual having a current license or credential status. Lifepoint will not allow any employee or independent contractor to work without valid, current licenses or credentials.

## Seeking Help

For help with an ethics or compliance issue or to report a possible violation of the Code of Conduct, contact your supervisor, another member of local management, your local ethics and compliance officer, the HSC ethics and compliance officer, or the HSC ethics line at: **1.877.508.LIFE (5433)**.

# Workplace Conduct and Employment Practices cont.

## Personal Use of Lifepoint Resources

It is the responsibility of each Lifepoint employee and/or physician to preserve our organization's assets including time, materials, supplies, equipment and information. Organization assets are to be maintained for business-related purposes. As a general rule, the personal use of any Lifepoint asset without the prior approval of your supervisor is prohibited.

The occasional use of items such as copying facilities or telephones, where the cost to Lifepoint is insignificant, is permissible. Any community or charitable use of organization resources must be approved in advance by your supervisor. Any use of organization resources for personal financial gain unrelated to Lifepoint business is prohibited.

## Relationships Among Lifepoint Employees

In the normal day-to-day functions of an organization like Lifepoint, there are issues that arise that relate to how people in the organization deal with one another. It is impossible to foresee all of these, and many do not require explicit treatment in a document like this. A few, however, routinely arise.

One involves gift giving among employees for certain occasions. While we wish to avoid any strict rules, no one should ever feel compelled to give a gift to anyone, and any gifts offered or received should be appropriate to the circumstances. A lavish gift to anyone in a supervisory role would clearly violate organization policy.

Another situation that routinely arises is fundraising or similar efforts. No one should ever be made to feel compelled to participate in any fundraising or charitable efforts.

## Relationships with Subcontractors, Suppliers and Educational Institutions

We must manage our subcontractor and supplier relationships in a fair and reasonable manner, consistent with all applicable laws and good business practices. We promote competitive procurement to the maximum extent practicable. Our selection of subcontractors, suppliers and vendors will be made on the basis of objective criteria including quality, technical excellence, price, delivery, adherence to schedules, service and maintenance of adequate sources of supply.

Our purchasing decisions will be made on the supplier's ability to meet our needs and not on personal relationships and friendships. We will always employ the highest ethical standards in business practices in source selection, negotiation, determination of contract awards and the administration of all purchasing activities. We will not communicate to a third party confidential information given to us by our suppliers unless directed in writing to do so by the supplier. We will not disclose contract pricing and information to any outside parties. (The subject of business courtesies, which might be offered by subcontractors or suppliers, is discussed later in this Code.)

All facilities having a relationship with an educational institution must have a written agreement that defines both parties' roles and the facility's retention of the responsibility for the quality of patient care.

# Workplace Conduct and Employment Practices cont.

## Research

We follow high ethical standards and all legal requirements in any research conducted by our physicians and professional staff. We do not tolerate intentional research misconduct. Research misconduct includes making up, changing or copying results from other studies without performing the research.

All patients asked to participate in a research project are given a full explanation of alternative services that might prove beneficial to them. They are also fully informed of potential discomforts and are given a full explanation of the risks, expected benefits and alternatives. The patients are fully informed of the procedures to be followed, especially those that are experimental in nature. Refusal of a patient to participate in a research study will not compromise their access to services.

All personnel applying for or performing research of any type are responsible for maintaining the highest ethical standards in any written or oral communications regarding their research projects, as well as following appropriate legal and research guidelines. As in all accounting and financial record keeping, our policy is to submit only true, accurate and complete costs related to research grants.

## Substance Abuse and Mental Acuity

To protect the interests of our employees, physicians and patients, we are committed to an alcohol- and drug-free work environment. All employees and physicians must report for work free of the influence of alcohol and illegal drugs. Reporting to work under the influence of any illegal drug or alcohol, having an illegal drug in your system, or using, possessing or selling illegal drugs while on Lifepoint work time or property may result in immediate termination. We may use drug testing as a means of enforcing this policy.

It is also recognized that individuals may be taking prescription drugs that could impair judgment or other skills required in job performance. If you have questions about the effect of such medication on your performance, consult with your supervisor.

## Common Ground

### If you are faced with an ethical or compliance issue:

- C**onsider the facts and how the situation affects stakeholders.
- O**bserve the policies, procedures, laws and regulations outlined in the Code of Conduct. Also consider your own values. What applies to this situation?
- M**easure your alternatives for resolving the situation.
- M**ake a decision about the best course of action.
- O**rganize your thoughts and ask yourself once more: Is this the right thing to do? Do my actions support our Code of Conduct?
- N**otify management in a timely manner.

# Marketing Practices

## Antitrust

Antitrust laws are designed to create a level playing field in the marketplace and to promote fair competition. These laws could be violated by discussing Lifepoint business with a competitor, such as how our prices are set, disclosing the terms of supplier relationships, allocating markets among competitors or agreeing with a competitor to refuse to deal with a supplier. Our competitors are other health systems and facilities in markets where we operate.

At trade association meetings, be alert to potential situations where it may not be appropriate for you to participate in discussions regarding prohibited subjects with our competitors. Prohibited subjects include any aspect of pricing, our services in the market, key costs such as labor costs, and marketing plans. If a competitor raises a prohibited subject, end the conversation immediately.

Document your refusal to participate in the conversation by requesting that your objection be reflected in the meeting minutes and notify the HSC Legal Department of the incident.

In general, avoid discussing sensitive topics with competitors or suppliers unless you are proceeding with the advice of the HSC Legal Department.

You must also not provide any information in response to oral or written inquiry concerning an antitrust matter without first consulting the HSC Legal Department.

## Gathering Information About Competitors

It is not unusual to obtain information about other organizations, including our competitors, through legal and ethical means such as public documents, public presentations, journal and magazine articles, and other published and spoken information.

However, it is not acceptable for you to obtain proprietary or confidential information about a competitor through illegal means. It is also generally not acceptable to seek proprietary or confidential information when doing so would require anyone to violate a contractual agreement, such as a confidentiality agreement with a prior employer.

## Marketing and Advertising

We may use marketing and advertising activities to educate the public, provide information to the community, increase awareness of our services and recruit employees. We will present only truthful, fully informative and non-deceptive information in these materials and announcements. All marketing materials will appropriately reflect the level of services available.



# Environmental Compliance

It is our policy to comply with all environmental laws and regulations as they relate to Lifepoint operations. We will act to preserve our natural resources to the fullest extent reasonably possible. We will comply with all environmental laws and operate each of our facilities with the necessary permits, approvals and controls. We will diligently employ proper procedures with respect to handling and disposal of hazardous and biohazardous waste, including medical waste.

In helping Lifepoint comply with these laws and regulations, you must understand how job duties may impact the environment, adhere to all requirements for the proper handling of hazardous materials, and immediately alert your supervisor of any situation regarding the discharge of a hazardous substance, improper disposal of medical waste or any situation that may be potentially damaging to the environment.





# Business Courtesies

## General

Nothing in this part of the Code of Conduct should be considered in any way as an encouragement to make, solicit or receive any type of entertainment or gift. For clarity purposes, note that these limitations govern activities with those outside of Lifepoint. This section does not pertain to actions between the organization and its employees nor actions among Lifepoint employees themselves.

## Receiving Business Courtesies

We recognize that there will be times when you may wish to accept, from a current or potential business associate, an invitation to attend a social event in order to further develop your business relationship. These events must not include expenses paid for any travel costs (other than in a vehicle owned privately or by the host company) or overnight lodging. The cost associated with such an event must be reasonable and appropriate. As a general guideline, this means that the cost will not exceed \$150.00 per person.

Sometimes a business associate will extend training and educational opportunities that include travel and overnight accommodations to you at no cost to you or Lifepoint. Similarly, there are some circumstances in which you are invited to an event at a vendor's expense to receive information about new products or services. Prior to accepting any such invitation, you must receive approval to do so consistent with the HSC policy on this subject.

As a Lifepoint employee, you may accept gifts with a total value of \$75.00 or less in any one year from any individual or organization who has a business relationship with Lifepoint. For purposes of this paragraph, physicians practicing in Lifepoint's hospitals are considered to have such a relationship. Perishable or consumable gifts given to a department or group are not subject to any specific limitation. Lifepoint colleagues may accept gift cards/certificates but may never accept cash or financial instruments (e.g., checks, stocks). Finally, under no circumstances may you solicit a gift.

## Extending Business Courtesies to Non-referral Sources

No portion of this section applies to any individual who makes, or is in a position to make, referrals to a Lifepoint hospital.

There may be times when you wish to extend to a current or potential business associate (other than someone who may be in a position to make a patient referral) an invitation to attend a social event in order to further develop your business relationship. The purpose of the entertainment must never be to induce any favorable business action. During these events, topics of a business nature must be discussed and the host must be present. These events must not include expenses paid for any travel costs (other than in a vehicle owned privately or by the host entity) or overnight lodging. The cost associated with such an event must be reasonable and appropriate. As a general guideline, this means that the cost will not exceed \$150.00 per person.



## Business Courtesies cont.

With regard to the \$150.00 guideline, if you anticipate an event will exceed the \$150.00 guideline or if circumstances arise where an entertainment event was contemplated prior to the event to meet the guideline but unforeseeably exceeded it, HSC policy on this subject must be followed. Lifepoint will under no circumstances sanction participation in any business entertainment that might be considered lavish.

Also, Lifepoint's facilities may routinely sponsor events with a legitimate business purpose. Provided that such events are for business purposes, reasonable and appropriate meals and entertainment may be offered. In addition, transportation and lodging can be offered. However, all elements of such events, including these courtesy elements, must be consistent with the HSC policy on such events.

It is critical to avoid the appearance of impropriety when giving gifts to individuals who do business or who are seeking to do business with Lifepoint. We will never use gifts or other incentives to improperly influence relationships or business outcomes. Gifts to business associates who are not government employees must not exceed \$50.00 per year per recipient. You may never give cash or financial instruments (e.g., stocks, checks). The HSC policy on business courtesies may from time to time provide modest flexibility in order to permit appropriate recognition of the efforts of those who have spent meaningful amounts of volunteer time on behalf of Lifepoint.

U.S. federal and state governments have strict rules and laws regarding gifts, meals and other business courtesies for their employees. Lifepoint's policy is to not provide any gifts, entertainment, meals or anything else of value to any employee of the executive branch of the federal government, except for minor refreshments in connection with business discussions or promotional items with the Lifepoint or hospital logo valued at no more than \$10.00.

With regard to gifts, meals and other business courtesies involving any other category of government official or employee, you must determine the particular rules applying to any such person and carefully follow them.

### Extending Business Courtesies to Possible Referral Sources

Any entertainment or gift involving physicians or other persons who are in a position to refer patients to our healthcare facilities must be undertaken in accordance with HSC policies. We will comply with all federal laws, rules and regulations regarding these practices.

# Political Activities and Contributions



Lifepoint political participation is limited by law. Lifepoint's funds or resources are not to be used to contribute directly to political campaigns or for gifts or payments to any political party or any of their affiliated organizations. Organization resources include financial and non-financial donations such as using work time and telephones to solicit for a political cause or candidate or the loaning of Lifepoint property for use in the political campaign. Lifepoint operates a federal Political Action Committee (PAC) that is funded solely through individual contributions. Where permitted by law, Lifepoint may choose to contribute to a particular state PAC or State Hospital Association PAC. The conduct of any political action committee is to be consistent with relevant laws, regulations and internal policies.

It is important to separate personal and HSC political activities in order to comply with the appropriate rules and regulations relating to lobbying or attempting to influence government officials. You may, of course, participate in the political process on your own time and at your own expense.

While you are doing so, it is important not to give the impression that you are speaking on behalf of or representing Lifepoint in these activities. You cannot seek to be reimbursed by Lifepoint for any personal contributions for such purposes.

At times, Lifepoint may ask employees to make personal contact with government officials or to write letters to present our position on specific issues. In addition, it is a part of the role of some Lifepoint management to interface on a regular basis with government officials. If you are making these communications on behalf of the organization, be certain that you are familiar with any regulatory constraints and observe them.

Guidance is always available from the HSC Government Relations and Legal departments as necessary.



# The Health Support Center Ethics and Compliance Program

## Program Structure

The HSC ethics and compliance program is intended to demonstrate, in the clearest possible terms, the absolute commitment of Lifepoint to the highest standards of ethics and compliance. That commitment permeates all levels of the organization. There is an oversight committee of the board of directors, an HSC ethics and compliance officer, an HSC ethics and compliance committee consisting of senior management and local ethics and compliance officers and compliance committees. All of these individuals or groups are prepared to support you in meeting the standards set forth in this Code.

## Resources for Guidance and Reporting Violations

To obtain guidance on an ethics or compliance issue or to report a suspected violation, you have several options. We encourage the resolution of issues at a local level whenever possible. It is expected good practice, when you are comfortable and think it appropriate, to raise concerns first with your supervisor.

Another important resource who may be able to address issues arising out of this Code of Conduct is the Human Resources Director. Human Resources Directors are highly knowledgeable about many of the compliance risk areas described in this Code of Conduct that pertain to employment and the workplace and are responsible for ensuring compliance with various employment laws. If a concern relates to specific details of an individual's work situation, rather than larger issues of organizational ethics and compliance, the Human Resources Director is the most appropriate person to contact.

If it is uncomfortable or inappropriate to raise your concern with your supervisor or Human Resources Director, there are other options. You can talk with

a member of management, the local ethics and compliance officer or the HSC ethics and compliance officer. You are always free to contact the HSC ethics line at **1.877.508.LIFE (5433)**. The HSC ethics line is available 24/7 and you can elect to be anonymous.

## Confidentiality and Retaliation

Lifepoint will make every effort to maintain, within the limits of the law, the confidentiality of the identity of any individual who reports possible misconduct. There will be no retribution for reporting a possible violation in good faith. Any employee who deliberately makes a false accusation with the purpose of harming or retaliating against another employee will be subject to discipline.

## Specific Reporting Requirements for Fraud and Abuse Laws

All Lifepoint employees are required to report immediately, within one business day or as soon thereafter as possible, all known or suspected violations of Federal or State fraud and abuse laws, Federal or State self-referral laws, and/or the underlying Compliance and Legal policies that support such compliance, through the process set forth in the Special Reporting Requirements Policy. Any person who fails to report such violations will be subject to disciplinary action, up to and including termination.

# The Health Support Center Ethics and Compliance Program cont.

## Personal Obligation to Report

We are committed to a culture of learning and safety and to ethical and legal conduct that is compliant with all relevant laws and regulations and to correcting wrongdoing wherever it may occur in the organization. Each employee has an individual responsibility for reporting any activity by any employee, physician, subcontractor or vendor that appears to violate applicable laws, rules, regulations or this Code.

## Internal Investigation of Reports

We are committed to investigate all reported concerns promptly and confidentially to the extent possible. The Health Support Center ethics and compliance officer will coordinate any findings from the investigations and immediately recommend corrective action or changes that need to be made. We expect all employees and physicians to cooperate with investigation efforts.

## Corrective Action

Where an internal investigation substantiates a reported violation, it is the policy of Lifepoint to initiate corrective action, including, as appropriate, making prompt restitution of any overpayment amounts, notifying the appropriate governmental agency, instituting whatever disciplinary action is necessary and implementing systemic changes to prevent a similar violation from recurring in the future at any Lifepoint facility.



# The Health Support Center Ethics and Compliance Program cont.

## Discipline

All violators of the Code of Conduct will be subject to disciplinary action. The precise discipline utilized will depend on the nature, severity and frequency of the violation and may result in any of the following disciplinary actions:

- Verbal warning
- Written warning
- Written reprimand
- Suspension
- Termination
- Restitution (if necessary)

## Internal Audit and Other Monitoring

Lifepoint is committed to the aggressive monitoring of compliance with its policies. Much of this monitoring effort is provided by the Ethics and Compliance Department, which routinely conducts audits of issues that have regulatory or compliance implications. The organization also routinely seeks other means of ensuring and demonstrating compliance with laws, regulations and Lifepoint policies.

## Acknowledgment Process

Lifepoint requires all employees to acknowledge that they have reviewed the Code of Conduct and understand that it represents mandatory policies of Lifepoint. New employees will be required to acknowledge that they have reviewed the Code of Conduct as a condition of employment.

Adherence to and support of Lifepoint's Code of Conduct and participation in related activities and training will be considered in decisions regarding hiring, promotion and compensation for all candidates, employees and physicians.

## Notice to All Employees Regarding Fraud

The Deficit Reduction Act of 2005, signed into law by President Bush on February 8, 2006, contains specific requirements regarding entities that receive more than \$5 million annually from Medicaid. The law, effective January 1, 2007, requires that entities covered by the law have specific policies dealing with matters of fraud and abuse. In addition, employees are to be informed about a federal law known as the False Claims Act, a civil anti-fraud statute providing that any person who knowingly submits or causes the submission of false claims for government funds or property is liable for damages and penalties. Entities that knowingly violate this law can be liable for triple damages and a penalty from \$10,957 to \$21,916 per claim.

The False Claims Act contains provisions for individuals who are known as "relators," or whistle-blowers. The law provides certain protection for employees who are retaliated against by an employer because the employee filed a whistle-blower lawsuit. Individuals who have questions regarding the specifics should refer to Lifepoint's policies for additional information.



# Acknowledgment

I acknowledge that I have reviewed Lifepoint's Code of Conduct. I understand that it fosters a culture of learning and safety and that it represents mandatory policies of the organization, and I agree to abide by it.

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Signature

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Position

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Printed Name

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Date

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Facility





