

# **Business Code of Conduct**

## **POLICY**

The mission and values of Lake Superior Community Health Center (LSCHC) are the foundation for ethical conduct. Our reputation rests on an unwavering commitment to the highest ethical standards. LSCHC's Business Code of Conduct provides a clear roadmap for employees and affiliated professionals to follow in their daily work.

In keeping with the mission and values of LSCHC, directors/trustees, officers, managers, employees, contractors, volunteers, students, and others are expected to conduct themselves in a manner consistent with the following principles. All employees, contracted staff and volunteers review and agree to abide by this policy upon hire/placement and annually thereafter. Instances of non-compliance shall be promptly reported and appropriate corrective actions taken immediately. Anyone who in good faith reports knowledge of or a concern of illegal, dishonest or fraudulent activity will not be retaliated against; and insofar as possible, confidentiality of the informer will be maintained.

### **A. OBEY THE LAW**

We educate ourselves so we know the laws and policies that apply to our performance. We make sure our activities are in substantial compliance with these laws and regulations by committing the necessary resources to ensure compliance. We promote and uphold policies and processes that encourage the reporting of unlawful activity such as our anonymous hotline, and we ensure that internal corrective action is taken if we determine that laws have not been followed. If appropriate, we report suspected wrongdoing and cooperate with investigations as may be required. We inform employees that they are responsible for observing this Code of Conduct and for observing high standards of ethical behavior.

### **B. OBSERVE ANTITRUST LAWS**

We do not discuss with a competitor, customer, or business partner information about LSCHC's business relationships if such a discussion is prohibited by antitrust laws. An example is an exchange of price, cost, and profit or market information between or among competitors.

### **C. POLITICAL ACTIVITIES**

We conduct all political activities and contacts with government officials according to the law in keeping with requirements of a non-profit, tax exempt entity. For example, we do not permit political campaigning/fundraising or lobbying activities by individuals acting in their official roles representing LSCHC.

### **D. CONFLICTS OF INTEREST**

All directors, officers, volunteers and employees, as well as family members of employees, are prohibited from engaging in any situation that is or appears to be a conflict of interest involving LSCHC. Conflicts can occur when the persons named above are a party to a contract or are involved in a transaction with LSCHC for goods or services; have a material financial interest in a transaction between LSCHC and an entity with which such person(s) has a business or personal relationship; or when such persons are engaged in some capacity or have a material

financial interest in a business or enterprise that competes with LSCHC. All persons named in this section are required to comply with LSCHC's conflict of interest policy and may be required to complete an annual conflict of interest questionnaire.

#### **E. PURCHASING DECISIONS**

We make all purchasing decisions in a fair and reasonable manner and in the best interest of LSCHC. We carefully negotiate contracts and request multiple bids when deemed appropriate.

#### **F. PREVENT FRAUD, WASTE AND ABUSE**

We comply with all laws relating to the prevention and reporting of fraud, waste and abuse including providing training to employees, directors, officers and volunteers. We do not intentionally deceive, misrepresent or conceal information to gain something of value. For example, we do not bill for services that were not rendered. We are not improper or excessive in our provision of billable services to patients nor do we act in ways that are inconsistent with acceptable business or medical practices.

#### **G. ANTI-KICKBACK**

We comply with the Anti-kickback regulations which means, for example, that we do not solicit or accept gratuities, favors or anything of value from vendors or potential contractors of LSCHC. Contract terms between LSCHC and other health care entities reflect fair market value rates if there is or could be a referral relationship between the parties. A gift means anything offered directly by or on behalf of a contractor other than promotional materials of little or nominal value such as pens, calendars or other similar items intended for wide distribution. A kickback is the payment of something of value to a person with the goal of influencing his/her decision or performance in a certain situation.

#### **H. SAFETY**

We follow safety laws, regulations and rules as well as standard precautions in caring for patients. We maintain a drug-free workplace. We report any environmental or safety hazards or concerns right away and follow posted warnings and regulations.

#### **I. POSITIVE WORK ENVIRONMENT**

We are courteous and respectful to all. Discrimination or harassment, including sexual harassment, is not tolerated.

#### **J. CONFIDENTIALITY**

We maintain the confidentiality of patient information as required by HIPAA and by state law. We also maintain the confidentiality of employee personnel records. We promptly investigate any potential HIPAA breaches and take all required follow up action including patient notification, employee discipline if appropriate, and reporting of the breach to the Department of Health and Human Services.

**K. STEWARDSHIP**

We understand that the community has entrusted us with assets to be used and protected for our patients' needs. We safeguard, invest, and use these assets to achieve our mission. The appropriate use of LSCHC property and equipment is everyone's responsibility and no LSCHC property or proprietary information may be used dishonestly or inappropriately. We avoid waste and act as good stewards of all resources.

**L. REPORTING SUSPECTED VIOLATIONS**

Employee should report any suspected violations as soon as they become aware of them and may do so by contacting their supervisor, emailing or phoning the compliance hotlines, or contacting the LSCHC Compliance Officer. There will be no retaliation against an employee for making, in good faith, a report of suspected noncompliance. All reports of suspected violations are logged and investigated if necessary to determine if the alleged conduct violates the law and/or our policies and procedures. Individuals committing a violation may be subject to discipline, which may lead to suspension, termination or other disciplinary action.

**M. RECORDKEEPING**

We record all transactions promptly and accurately according to accepted general accounting and patient care standards. We never falsify, misrepresent, or leave out facts from any record. All patient records must remain on-site and meet the documentation standards required for quality patient care and for medical staff and reimbursement regulations. We treat patient records confidentially as required by law and complete them in a timely way. We only release confidential patient and employee records as permitted by law.

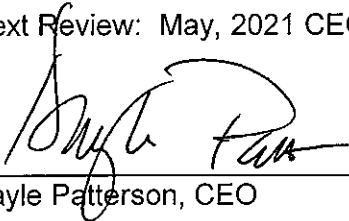
**N. PATIENT RIGHTS**

We have a strong commitment to the rights of each patient in giving the best health care possible. Patients can expect to receive considerate and respectful care. We honor their rights to be informed and to be involved in making decisions about their care.

Date Initiated: January 9, 2012

Date Reviewed: May, 2018

Next Review: May, 2021 CEO



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Dayle Patterson, CEO

5-9-18

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Date