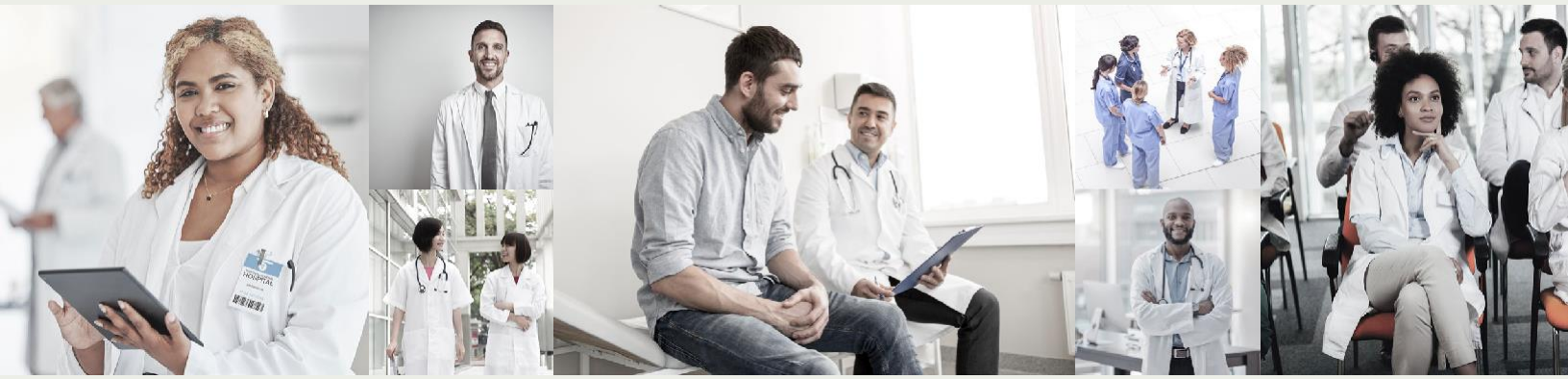
Bringing Our Best Every Day

ETHICS & COMPLIANCE HANDBOOK



Northeast Georgia Health System

ENTER

Table of Contents

OUR STORY STARTS HERE

WHAT INSPIRES US

WE VALUE OUR HANDBOOK.

A shared commitment 6
Our responsibilities 7
Sharing concerns – resources to support you 9

WE RESPECT OUR PATIENTS, COWORKERS AND COMMUNITY.

Treating patients, family and friends with respectful compassion 12
A harassment-free and diverse organization 13
Safeguarding Protected Health Information 14
Research standards 16
Health, safety and wellness 17
Environment and sustainability 18

WE CONDUCT BUSINESS WITH INTEGRITY.

Preventing improper payments 20
Physicians and other healthcare providers 21
Gifts, entertainment and travel 22
Conflicts of interest 23
Contractors and suppliers 24
Billing and coding 25
Recordkeeping and retention 26
Fair competition 27

WE PROTECT OUR REPUTATION AND ASSETS.

Confidential information 29
NGHS assets and cybersecurity 30
Speaking on behalf of NGHS 31
Charitable and political activities 32
Government requirements and requests 33
Healthcare laws and regulations 34

SOME CLOSING THOUGHTS

WHERE TO GO FOR HELP

Our story starts here

Since Northeast Georgia Health System (NGHS)'s first hospital opened in Hall County in 1951 with 90 beds, we've been not only serving our community but growing along with it. Today, we're proud to be a system of five hospitals with over 1,000 beds, a variety of outpatient locations, and a family of employees, medical staff and multispecialty providers. Together, we serve one million people across 19 counties. This is both a source of pride and an acknowledgement of the awesome responsibility we share.

Together, we serve one million people.

Over the years, we've witnessed tremendous change – change in our physical footprint as well as change in technology and medical advancements. We've seen transformational shifts in healthcare services, insurance networks and the regulatory landscape.

Through all the changes, we've never lost sight of our mission of improving the health of our community in all we do, and our unwavering commitment to operate with integrity.

This Ethics and Compliance Handbook reflects that commitment. It offers a high-level overview of the laws and regulations that affect our business along with tips and tools to help you navigate gray-area situations. While it doesn't have the answer to every question that may arise on the job, this Handbook points you to policies that outline rules and people who can guide you down the right path.

I urge you to read the Handbook, refer to it often – along with our core values and core competencies. Remember to keep our mission at the forefront of everything you do at NGHS and ask clarifying questions if something is unclear. You play a critical role in ensuring we achieve the highest ethical behavior and standards among our colleagues, patients and community.

Matt Hanley, MD
President and CEO

What inspires us

OUR MISSION STATEMENT

We are committed to improving the health of our community in all we do.

OUR VISION

We will be the preferred and indispensable healthcare resource for the communities we serve.

OUR CORE VALUES

We pride ourselves on four core values, all of which help us achieve our mission of improving the health of our community in all we do. These values shape the daily interactions between our physicians, staff, volunteers, board members, patients and their loved ones.

Respectful Compassion

I impact life's most sacred moments.

Responsible Stewardship

What I do today ensures tomorrow.

Deep Interdependence

I can't do my job without you.

Passion for Excellence

I bring my best every day.

We value our Handbook.

A shared commitment 6

Our responsibilities 7

Sharing concerns – resources to support you 9

A shared commitment

We work in a highly regulated industry.

Many state, local and federal laws govern our operation, and we're committed to following them. There are also policies, processes and procedures that address our day-to-day duties, and we comply with those, too. We understand the need for this complex regulatory framework, but it's not always easy to stay on top of what's required.

That's where our Ethics and Compliance Handbook ("Handbook") comes in. It's the foundation of our ethics and compliance program and your resource for:

- Summaries of workplace topics and definitions of key terms
- Real-life scenarios that examine everyday ethical challenges
- Advice for handling situations and answers to common questions
- Links to detailed policies for more information
- Resources you can contact for help

Each of us makes countless decisions on behalf of Northeast Georgia Health System (NGHS). Often, the right decision is clear, but when it's not, the Handbook is a resource that can help.

There is a culture of excellence in everything we do from how we treat our volunteers to how we treat our patients.

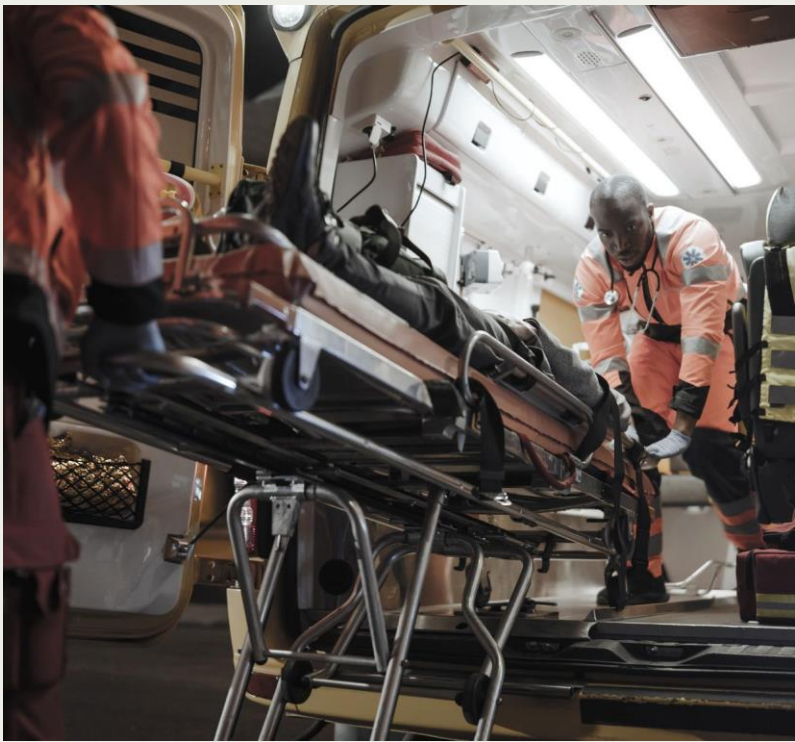
WHO MUST FOLLOW THE HANDBOOK?

We all do. It is the duty of every director, officer, executive, employee and volunteer to read, understand and follow our Handbook.

Consultants, contractors, subcontractors, agents, suppliers, vendors, temporary employees and anyone else who works with or for NGHS ("third parties") are expected to abide by the same high standards presented in our Handbook.

VIOLATIONS OF THE HANDBOOK

Our Handbook represents who we are and the expectations we have for everyone, at every level of NGHS. Violations of the Handbook are serious because they can breach the trust of patients and families, as well as healthcare and community partners who work with us. That's why violating the Handbook can result in disciplinary action, up to and including termination. Depending on how serious an incident is, there can even be civil or criminal consequences.



Our responsibilities

Each of us has a role to play in maintaining an ethical culture:

- **Conduct business with integrity.** Know and follow our Handbook, our policies and the laws that apply to your job. If our policies and the law don't address a concern, rely on our Core Values to help make ethical decisions.
- **Complete required training.** It's the best way to put our policies into practice. Every year, you will be asked to affirm your commitment to abide by the standards set forth in the Handbook and to comply with applicable federal, state and local healthcare laws.
- **Be transparent.** Be honest and forthright in any representations made to patients, vendors, payers, other employees and the community.
- **Ask for guidance.** Reach out to people who can help you anytime you're unsure of what to do.
- **Share your concerns.** Speak up if you see or suspect anything unethical or illegal, and cooperate with any investigations into misconduct.

Leaders have additional responsibilities:

- **Set the tone**. Show your team – through your words and actions – that you respect and follow our Handbook.
- **Be responsive.** Create the kind of workplace where employees feel comfortable coming forward with questions and concerns and support them when they raise issues.
- **Take action.** If you see, suspect or learn of misconduct, address it through the appropriate channels. Never retaliate, or allow others to retaliate, against those who raise concerns.
- **Ensure accountability.** Make sure your employees have completed all mandatory education and training modules.

When we walk into this building, we put down all our titles and degrees and focus on one thing: taking care of people.

Our responsibilities

ETHICAL DECISION-MAKING

Making the right decision is always important, but it's not always easy. If you encounter a situation where the right course of action is unclear, it can be helpful to ask yourself a series of questions to determine next steps.

Is it legal?

Is it consistent with our Mission, Vision and Core Values?

Would I feel comfortable if my decision or actions were made public?

Would I feel comfortable if my supervisor, family, friends and coworkers knew about it?

If the answer to all of these questions is "yes," the decision to move forward is probably OK, but if the answer to any question is "no" or "I'm not sure," stop and ask for guidance.

WHAT IF THERE'S A CONFLICT?

NGHS is committed to following the laws and regulations in all the jurisdictions where we operate. If any provision of our Handbook conflicts with a local law or requirement, seek guidance from the Compliance Department.

Sharing concerns – resources to support you

A positive, productive workplace is best achieved when there is good communication and open, candid discussions of problems and concerns.

We expect and encourage you to come forward and express concerns about any issue, including potential violations of law, regulations, our policies and procedures or our Handbook. Start the conversation with your supervisor or manager – they are often in the best position to understand and resolve the problem.

If you are uncomfortable raising a concern with your supervisor or manager, there are other resources you can contact, including:

- Corporate Compliance
- The Chief Compliance Officer
- Human Resources
- Any member of management or administration
- The Ethics and Compliance Hotline: **1-800-299-6321**
- Legal Department

You've got to care, and everybody who works here cares for each other.

USING THE COMPLIANCE HOTLINE

Information provided through the Hotline will be documented in detail by a third-party interview specialist (if you report via phone) or through use of a web form (if you report online) and forwarded to NGHS for investigation and follow-up. You may choose to remain anonymous when making a report, and translators are available, if needed.

Please note that the Ethics and Compliance Hotline is not a substitute for addressing concerns with your supervisor if you're comfortable doing so. Additionally, there are established procedures to address HR related grievances or dispute resolutions.

Sharing concerns – resources to support you

INVESTIGATIONS

Any compliance concern reported through the Ethics and Compliance Hotline or RL6 will be investigated by the Compliance Department. Compliance may assign cases to Human Resources ("HR") when the nature of the report involves employee relations concerns or questions. Patient-related compliance concerns should be filed through either Patient Experience's Customer Feedback ("FB") or Risk Management's Variance system (RL6).

In these circumstances, if the nature of the concern primarily impacts another responsible department, as mentioned above, that department may take the lead in investigating the concern with oversight from the Compliance Department unless the person making the report specifically identifies a good faith reason why that department shouldn't take the lead. In all cases, the reported information will be considered confidential to the maximum extent possible and investigated as needed.

An investigation may include:

- Interviews of relevant individuals
- A review of relevant documents
- Participation by outside counsel or other experts, as needed

If an investigation reveals a violation, we will take appropriate disciplinary action. All Hotline reports are treated as confidentially as possible, but there may be a point where an individual's identity may become known or must be revealed in order to complete the investigation.

You are expected to cooperate fully and truthfully in any internal or external investigation or audit.

Reporting in good faith means making a genuine attempt to provide honest, complete and accurate information, even if it later proves to be unsubstantiated or mistaken

NO RETALIATION AT NGHS

We know it takes courage to come forward and share a concern. That's why we prohibit retaliation or reprisal against anyone who makes a good faith report or assists with an investigation into misconduct.

We respect our patients, coworkers and community.

Treating patients, family and friends with respectful compassion 12

A harassment-free and diverse organization 13

Safeguarding Protected Health Information 14

Research standards 16

Health, safetyand wellness 17

Environment and sustainability 18

Treating patients, family and friends with respectful compassion

Our patients are the reason we're here. Whether you are a nurse in the cardiac care unit, a part-time café worker, a scheduler in the radiology department or one of the more than 10,000 employees at NGHS, there is a patient that benefits from the job you do.

We all must be committed to providing high-quality care and delivering services in a responsible, reliable, ethical and appropriate manner. We should always strive to understand patient needs and requirements, and take all reasonable actions necessary to help us continue to provide an unparalleled level of service.

NGHS pledges to:

- **Work to engage the services of only clinicians with proper credentials, experience and expertise in meeting the needs of our patients.**
- **Screen our medical professionals against duly authorized licensing and disciplinary authorities for any sanctions for performance or conduct.**

SHOW YOU CARE

- Treat every patient with dignity, respect and compassion. Demonstrate sensitivity and responsiveness to their needs by listening attentively and patiently to their comments and concerns.
- Recognize the rights of every patient to receive appropriate and quality care without discrimination based on race, national origin, sex, disability, age or ability to pay.
- Provide medical services to patients that are safe, and comply with all applicable, laws, regulations and professional standards.
- Take reasonable steps to ensure the safety of all patients, visitors and each other.
- Honor a patient's right to receive information about our policies, procedures and charges and also the identity and qualifications of NGHS personnel who provide services to them.
- Ensure patients have the right to participate in decision-making regarding their healthcare, including refusal of treatment where permitted by law. Allow them to exercise their right to voice complaints about the care and services we provide.
- Protect the confidentiality of all patient information, particularly patient medical records, as required by law (for more information see Safeguarding Protected Health Information).

NEED MORE INFORMATION?

- All related policies may be found in the MCN system.

A harassment-free and diverse organization

At NGHS we take any form of harassment or inappropriate conduct seriously. We believe a respectful workplace starts with everyday acts – treating each person we encounter with courtesy and dignity. But it doesn't end there. We also have a responsibility to watch out for, and speak out against, harassing, hostile or abusive behavior by others.

We are committed to providing equal employment and advancement opportunities to every individual, regardless of race, creed, color, religion, sex (including pregnancy), national origin, citizenship, age, genetic information, disability, status as a veteran, or any other characteristics protected by law. And we comply with the Americans with Disabilities Act, prohibiting discrimination against qualified individuals with disabilities and providing reasonable accommodation where it does not result in undue hardship.

Help us deliver the highest quality of services and benefits to our patients by keeping kindness in and harassment out.

Harassment is any action that intimidates, insults, offends or shows hostility toward someone on the basis of race, creed, color, religion, sex (including pregnancy), disability, age, genetic information, national origin, citizenship, status as a member of the Armed Forces of the United States or as a veteran, or any other characteristics protected by law.

HARASSMENT ...

CAN BE SOMETHING THAT'S SAID

It can be verbal – like demeaning jokes, slurs or name-calling.

CAN BE SOMETHING THAT'S FELT

It can be physical – like unwelcome touching or sexual advances.

CAN BE SOMETHING THAT'S SEEN

It can be visual – like posting or sharing inappropriate images or cartoons.

CAN HAPPEN ONLINE

It can be inflicted via emails, texts and social media sites.

CAN HAPPEN TO ANYONE

It may be directed at the same or opposite sex.

CAN HAPPEN ANYWHERE

It may occur at work-related meetings, business trips or offsite events.

NEED MORE INFORMATION?

- Contact your immediate supervisor, the Human Resources Department or the Compliance Department.

Safeguarding Protected Health Information

Everyday patients trust that we will honor and respect their Protected Health Information (PHI). The HIPAA Privacy Rule provides federal protections and guidance on how we must safeguard this data. We only access and disclose PHI when there is a HIPAA-permissible reason to do so.

Part of our commitment to safeguarding PHI is continuously monitoring appropriate user access, as well as regularly providing HIPAA-related education to workforce members.

SHOW YOU CARE

Follow these examples to safeguard PHI:

- If you are responsible for processing or managing PHI, follow all applicable federal and state data protection laws (including the Health Insurance Portability and Accountability Act (HIPAA) and the Health Information Technology for Economic and Clinical Health Act (HITECH)) and regulations (including the General Data Protection Regulation (GDPR)) as well as NGHS policies.
- Ensure that any business associates or sub-contractors requiring access to a patient's PHI have properly executed agreements on file.
- Encrypt any PHI that will be transmitted online.
- Don't post PHI to social media.
- Don't photograph PHI except when it's clinically appropriate to do so and in accordance with NGHS policies.

Protected Health Information (PHI) Identifiers

- Name
- Address (all geographic subdivisions smaller than state, including street address, city, county and ZIP code)
- All elements (except years) of dates related to an individual (including birthdate, admission date, discharge date, date of death and exact age if over 89)
- Telephone numbers
- Fax number
- Email address
- Social Security number
- Medical record number
- Health plan beneficiary number
- Account number
- Certificate or license number
- Vehicle identifiers and serial numbers
- Device identifiers and serial numbers
- Web URL
- Internet Protocol (IP) address
- Finger or voice print
- Photographic image – photographic images are not limited to images of the face
- Any other characteristic that could uniquely identify the individual, including license plate numbers
- Device identifiers and serial numbers
- Payment for healthcare

Safeguarding Protected Health Information

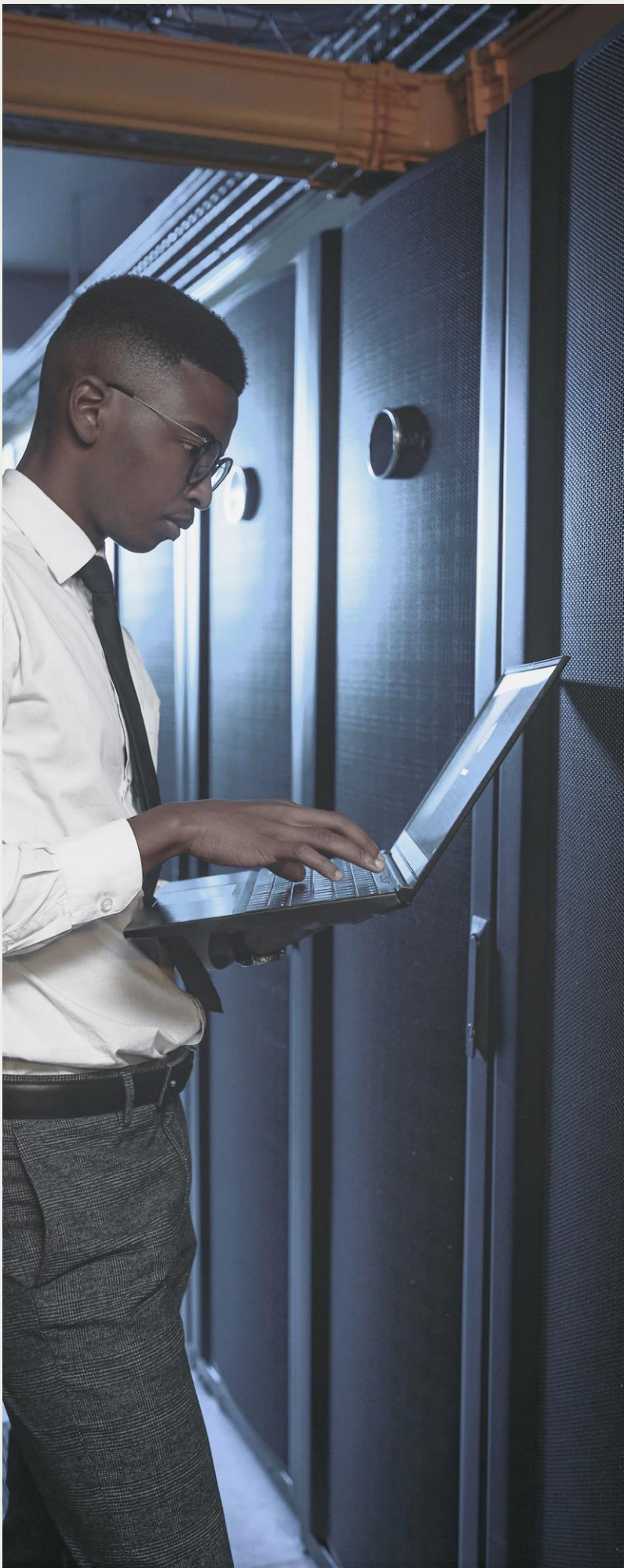
WHAT IF ...

There has been a shooting at a restaurant nearby and victims are being treated at the NGHS hospital where you work. Friends and neighbors have been asking you if the wounded have been admitted and how they are doing. What can you tell them?

Nothing. You have a duty to respect the privacy of these individuals. You must not confirm or deny whether they are being treated at your hospital or provide any information on their condition. Take care that you never discuss patient information or confidential information with anyone, including coworkers, family or friends, unless they have a legitimate need to know.

NEED MORE INFORMATION?

- Contact the Privacy.Officer@nghs.com or see the Compliance Privacy Manual.



Research standards

Research is an important part of our mission to improve the health of our community in all we do. Research studies and clinical trials ensure that our physicians are up to date on the latest advancements, that we're continually improving on the services and treatments we provide and that our patients are receiving the best care.

As we study, evaluate and seek to find new and better ways to improve outcomes, we act responsibly and with scientific integrity, protecting the rights and well-being of patients and human subjects. All research we conduct is approved in advance by the Institutional Review Board and protocols are strictly followed.

SHOW YOU CARE

- If you lead or participate in research, investigations or clinical trials, follow the highest ethical standards and comply with all applicable federal and state laws and regulations as well as any requirements, terms or conditions of grant awards or contracts.
- Follow the proper procedures for gaining informed consent and maintaining patient and volunteer confidentiality.
- Clearly communicate with patients and volunteers about the risks associated with the research or trial.
- Manage information from the research or trial in accordance with all data protection laws and regulations.
- Do not participate in any relationship or activity that could influence – or appear to influence – our ability to protect research participants or compromise the validity of research results.
- Billing for patients enrolled in research trials is complicated. Before billing governmental or commercial payers for services provided to patients enrolled in a research study, make sure the correct payer or research study sponsor will be billed correctly.
- Speak up immediately about any situation that could put research subjects at risk or if you suspect plagiarism, falsification, fabrication of data or other forms of scientific misconduct.

NEED MORE INFORMATION?

- All related policies may be found in the MCN system.

Health, safety and wellness

Our people-first commitment means we prioritize health, safety and wellness. We strive for an injury-free work environment and follow all health and safety laws, policies, regulations and standards that apply to our jobs and our work locations. We also offer programs and policies that promote wellness and a good work-life balance.

Who is responsible for health, safety and wellness? We all are. Each of us must work in a way that minimizes harm to others. From keeping your work area clean and addressing slipping, tripping and falling hazards, to reporting accidents, injuries and near-misses, NGHS counts on you to do your part.

SHOW YOU CARE

- Take reasonable precautions to protect yourself and others (including coworkers, patients, volunteers and healthcare providers and visitors) on NGHS property.
- Practice prevention! Complete all required safety training and always use personal protective equipment when required.
- Don't work under the influence of alcohol, illegal drugs or narcotics.
- Comply with policies that ensure all drugs and other controlled substances used to treat patients are maintained, dispensed and transported in compliance with applicable laws and regulations.
- We are a drug-free/smoke-free workplace. Share your concerns if you see or suspect that a coworker's judgment or abilities are impaired.
- Observe good physical security practices and report any strangers, threats of violence or suspicious activity.
- Report any accidents to your supervisor or the Human Resources Department's manager of Worker's Compensation, as applicable – if medical treatment is necessary, it will be provided by NGHS in accordance with applicable law and our policies.

WHAT IF …

I recently noticed a coworker who wasn't following one of our safety procedures. I reminded them of what's required, but they said they'd been doing it this way for a long time – that it was faster and just as safe to skip this step. Should I say something or mind my own business?

Safety is everyone's business. Rather than waiting to see if something happens or someone else reports it, come forward with your concerns right away. Talk to your immediate supervisor – you won't face retaliation for speaking up, and you may prevent a future accident.

NEED MORE INFORMATION?

- Contact the Human Resources Department.

Environment and sustainability

We believe that part of being a good community partner is being a good steward of the spaces we share. We're committed to protecting and maintaining the quality of the environment and observing sound environmental and safety practices.

One person can make a difference. Know and follow any environmental requirements that apply to your job, complete any required training and immediately report any situation that could pose a risk.

SHOW YOU CARE

- Comply with all applicable laws and take care to minimize the generation, discharge and disposal of medical waste and other hazardous materials.
- Be proactive – look for opportunities to:
  - Improve our environmental, health and safety programs.
  - Reduce waste and conserve water and energy.
  - Minimize any negative impact our operations may have on the environment.
- Immediately report any situation or condition that could be hazardous to human health or violate our environmental practices or policies to your supervisor or the Compliance Department.
- Know and be prepared to implement emergency preparedness plans if necessary.

NEED MORE INFORMATION?

- All related policies may be found in the MCN system.

Did you know?

Northeast Georgia Medical Center Braselton achieved Gold-level leadership in Energy and Environmental Design Healthcare Certification (LEED-HC). Read more about the practices they are implementing to reduce their impact on the environment by visiting our Focus on Innovative Sustainability page.

We conduct business with integrity.

Preventing improper payments 20

Physicians and other healthcare providers 21

Gifts, entertainment and travel 22

Conflicts of interest 23

Contractors and suppliers 24

Billing and coding 25

Recordkeeping and retention 26

Fair competition 27

Preventing improper payments

For more than 70 years, we've been building a culture of excellence – not only in terms of serving the people of Northeast Georgia, but also in terms of operating our business with integrity. We maintain high standards and don't offer or accept improper payments or anything of value in order to influence a business decision.

Anything of value could be something other than cash, such as a loan, a trip, a donation, an expensive meal or even a job offer.

Anything of any value that is given to influence a government official, patient, physician (or their family members) or other source of referrals violates our policies and the law.

Do your part to make sure decision-making is ethical and honorable and puts the experience of our patients and their families first. And if you see or suspect anyone of using improper payments (including kickbacks or bribes) to get around the rules, share your concerns**.**

SHOW YOU CARE

- Know and follow our gifts, entertainment and travel policies – that's the best way to steer clear of anything improper.
- Honor a patient's freedom to choose their service provider and never offer to pay – or accept payments – for referrals.
- Choose the right business partners.
- Keep accurate books and records.

WHAT IF ...

In a conversation with another physician, you learn that she just returned from a speaking engagement at a medical device conference. She says the meals provided at the event were amazing and that they paid her well for the short presentation she made about their product. "They even gave me free samples!" she adds.

Based on the information the physician shared with you, there is cause for concern. We have strict policies in place about what we may accept in terms of speaking fees, samples and meals, because improper payments like the ones she described could compromise her medical judgment and prompt her to use, prescribe or order their product. As healthcare providers, we have an obligation to make sure we're motivated by what's in the best interest of our patients and not by illegal kickbacks. The best course of action would be to come forward and share information about the conversation with your supervisor or the Compliance Department.

NEED MORE INFORMATION?

- Contact Corporate.Compliance@nghs.com.

Physicians and other healthcare providers

We value the physicians, nurses, technicians and other healthcare providers who share our commitment to providing an exceptional level of care to our patients. We respect their work and follow the laws and regulations that guide them.

Make sure any interactions you have with healthcare providers are professional and serve a legitimate business purpose. Never engage in any conduct that is intended to – or could even suggest the appearance of – improperly influencing a decision.

SHOW YOU CARE

- Comply with all applicable credentialing reviews and requirements before entering into a relationship with a healthcare provider. Recertify their credentials at regular intervals, as required by any regulatory requirements.
- Be honest and ethical in all interactions with physicians and other referral sources.
- Accept referrals based only on:
  - A patient's unique medical needs
  - Our capability to provide needed services
  - The availability of our resources
  - The need for collaborative care
- Make referrals based on the clinical needs and preferences of the patient.
- Never pay or accept payment from anyone – or offer or provide anything of any value – for patient referrals.
- Do not refer (or fail to refer) patients based on the number of referrals that physicians or healthcare providers make to NGHS.
- Ensure that payments to healthcare providers for healthcare services represent fair market value and comply with contracts approved by NGHS.
- Remember, there are very strict rules about what we may give to or accept from healthcare providers – see Preventing improper payments and Gifts, entertainment and travel.

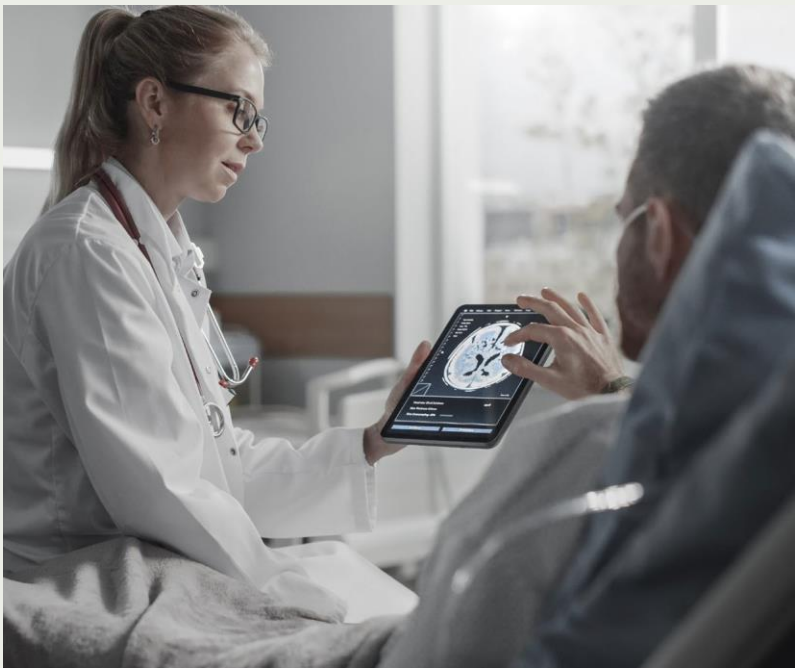
WHAT IF …

You recently read about a doctor who was offered a large office and the services of a staff member in exchange for referring patients to a hospital for MRI services. Since there was no actual money changing hands, was that improper?

Yes. Anything of value that is provided in exchange for a referral is improper. That includes office space, additional staff, lavish speaker fees, gifts, paying more than fair market value to purchase shares in physician-owned clinics, etc. If you suspect anyone of offering anything of value in exchange for patient referrals, report it to the Compliance Department.

NEED MORE INFORMATION?

- Contact Corporate.Compliance@nghs.com.



Gifts, entertainment and travel

Offers of gifts, entertainment and travel – actually, anything of value – can also pose a conflict of interest if they don't align with our policies. That's because gifts that are expensive or offered frequently could affect your objectivity, or cause someone to question your objectivity.

Anything given or received must not exceed nominal value unless it is reported and approved by the appropriate levels of management, and cash gifts of any amount are strictly prohibited.

SHOW YOU CARE

- Before you offer or accept anything of any value, check our policies and obtain all necessary approvals in advance.
- Remember that the rules are even more strict in terms of what we may offer or accept from healthcare providers, vendors, and government officials – don't offer anything of value without obtaining approval in advance.
- Don't accept an offer of (or reimbursement for) travel or lodging from a vendor or service provider unless it's:
  - For educational or consultative purposes
  - Provided by the sponsor of a public event
  - Approved in advance by our Chief Executive Officer or designee
- Discounts represent something of value, too. Don't accept any discount on products or services unless approved by our Chief Executive Officer or designee and made available to everyone at NGHS or to the general public.

WHAT IF ...

After being discharged, a grateful patient left behind 10 five-dollar bills to thank the team that cared for him.

Although the patient meant well, we never accept cash gifts. Let your supervisor know of the incident – they can discuss it with Compliance and determine the proper disposition as needed. The cash may be returned to the patient or, with their approval, donated to the NGHS Foundation or other charitable cause.

NEED MORE INFORMATION?

- Contact Corporate.Compliance@nghs.com.

Conflicts of interest

Each of us takes part in activities, events and interests outside of work – it's just part of maintaining a good work-life balance. But we need to make sure that what we do outside of NGHS doesn't interfere with the decisions we make inside of NGHS.

Conflicts can arise in a variety of different ways. One way to avoid them is to be able to recognize the kinds of situations that can trigger them. Be sure you're familiar with these situations, and if you see or suspect a conflict, disclose it immediately**.**

SHOW YOU CARE

- Always do what's best for NGHS and its patients.
- Know and respect the line between your work life and your personal life and avoid situations that could create a conflict of interest (or even the appearance of one).
- Be careful! It's not possible to list every possible situation that can pose a conflict of interest – if you even suspect a conflict, seek guidance immediately.

WHAT IF ...

You are a physician with an orthopedic group that is looking for a new vendor to provide braces, boots and slings. Coincidentally, your brother-in-law owns a company that manufactures these. His pricing is competitive, and the product quality is good – any problem in recommending his business?

Doing business with a family member can create a conflict of interest, even if you know the work is high quality and prices are good. If the group sources from your brother-in-law's company, it could appear that the decision was based on your family connection, regardless of whether that's true or not. Before making a recommendation, you should disclose the relationship to the Compliance Department and ask for guidance on appropriate next steps.

NEED MORE INFORMATION?

- Contact Corporate.Compliance@nghs.com.

Contractors and suppliers

We engage with a wide network of contractors, suppliers and other third parties in the course of a workday. It's critical that we choose the right partners and then oversee their work throughout the life of their contract to ensure they're meeting their obligations and our high standards.

If your job requires selecting and working with a third party, source responsibly. Ensure that anyone we engage complies with all applicable federal and state regulatory requirements and conducts business in an ethical manner. Remember that good partnerships support our mission and fuel our success.

Did you know?

We might hire a third party to:

- Furnish direct patient care services to NGHS on a contract basis
- Bill, submit or reimburse claims for NGHS (see Billing and coding for more information)
- Provide products or services (or marketing or documentation for products or services) reimbursable by federal or state healthcare programs

SHOW YOU CARE

- Do what's best for our patients – base selection decisions on objective criteria such as quality, price, service and delivery record, never on personal relationships or friendships (see Conflicts of interest).
- Never make or accept payments in exchange for a contract or favorable rates (see Preventing improper payments).
- Check to see if training is required for any third party you engage. Contractors with service agreements may be required to participate in training programs related to our Handbook.
- Follow our procurement policies and document all agreements in writing.
- Monitor performance. We can be held responsible for the work third parties do on our behalf, so make sure they don't engage in any conduct that would even give the appearance of something improper.
- Never ask a third party to do something that you're not permitted to do.
- Protect any confidential information entrusted to us by our third parties (including personal information and intellectual property) and communicate our expectation that they will protect ours, too.

NEED MORE INFORMATION?

- All related policies may be found in the MCN system.

Billing and coding

When we enter billing and coding information correctly, we help ensure that we're being promptly and properly compensated for our services. Accurate billing and coding also ensure that patients, government, and commercial insurance companies aren't paying more than they should.

Billing and coding are fundamental to our hospital revenue – it's the way we're paid for the services we've provided, and it drives the services we're able to provide in the future. Do your part to preserve the integrity of the system and keep it working the way it's meant to.

SHOW YOU CARE

- Comply with all federal healthcare program requirements, including billing laws and regulations.
- Make sure medical records accurately reflect all services, items or procedures provided.
- When preparing or submitting claims for payment to federal and state healthcare programs, bill only for goods and services actually provided and medically necessary. Be certain claims are supported by proper documentation in patients' medical records by using accurate billing codes.
- Respond promptly to any patient complaint or question regarding a bill.
- Double-check and correct any errors before submitting a bill – if you determine that a bill has already been submitted, correct the underlying problem and make appropriate refunds.
- Never engage in any practice that could result in a false claim – speak up if you see or suspect a false or fraudulent claim was submitted for payment or for any other billing or coding issues.

NEED MORE INFORMATION?

- Contact Corporate.Compliance@nghs.com.

Prevent fraud, waste and abuse.

Complete all required training so you can recognize and report acts of fraud, waste and abuse if you see them.

- **Fraud** is intentionally deceiving someone or misrepresenting information to gain an unauthorized payment or benefit. Example: Billing for services never provided.
- **Waste** relates to mismanaging or misusing resources or spending on services that aren't necessary. Example: Prescribing 90 days of medication when only seven days is needed.
- **Abuse** involves a questionable practice that's inconsistent with accepted medical or business policies. Example: Providing treatment to a patient that doesn't fit the diagnosis.

Recordkeeping and retention

NGHS adheres to being honest, accurate and transparent in our recordkeeping. We also mean that when we record information – a timecard, a performance review, an insurance claim, a medical record – we do it carefully, so that it presents a true picture of the event or transaction. NGHS has management policies and procedures in place to ensure our records are safely stored, well maintained and destroyed in compliance with both federal and state laws.

As an employee, we count on you to help us maintain financial integrity and preserve our reputation as an organization that people can depend on. When the records we keep are honest and accurate, they instill confidence in those we serve and those we do business with.

SHOW YOU CARE

- Ensure all information you report is complete and correct – follow our internal controls as well as applicable laws, regulations and accounting practices, and remember: Each of us is accountable for the accuracy and truthfulness of the records we produce.
- Carefully follow our record retention policies – they outline what's required in terms of maintaining, storing and properly disposing of records. They also keep us in compliance with federal and state laws.
- Never falsify or alter any business document or employment or medical record.
- Report anything improper regarding accounting, patient records, employee timekeeping, financial reporting or any other recordkeeping matter.

WHAT IF …

In cleaning out the office of a coworker who has left NGHS, you discover a box of old stray papers. They appear to be old business documents, not medical records. Is it OK to shred them?

No. We have a responsibility to sort through them, determine if there is any business confidential information or PHI in the stack and review our record retention policies for appropriate disposition. The best course of action would be to contact the Compliance Department for help in determining what may be shredded and what must be retained.

NEED MORE INFORMATION?

- See the Record Retention and Destruction Policy.

Fair competition

Part of improving the health of our community is helping to ensure choice in the marketplace. We honor and comply with antitrust and competition laws that are designed to create a level playing field. We win business the right way and promote fair competition with other health systems and facilities in our service area.

Do your best work and help us provide those we serve with the very best experience possible. Steer clear of discussions with competitors about competitively sensitive topics, such as sharing the prices we charge for patient care services, or any conduct that could limit free, fair and open competition.

Competitively sensitive topics include agreements about:

- Dividing up territories, markets or customers
- Raising or setting prices or fees
- Refusing to deal with a customer or supplier
- Interfering with a competitive bidding process

SHOW YOU CARE

- Make sure you understand how antitrust laws apply to the work you do, and ask questions anytime you're unsure about what's OK and what's not.
- Avoid conversations with competitors that could restrict full and fair competition – be especially careful at industry seminars and conferences.
- Gather competitive information ethically and lawfully, and always be transparent about who you are and who you work for.

NEED MORE INFORMATION?

- Contact the Legal Department.

We protect our reputation and assets.

Confidential information 29

NGHS assets and cybersecurity 30

Speaking on behalf of NGHS 31

Charitable and political activities 32

Government requirements and requests 33

Healthcare laws and regulations 34

Confidential information

We manage a vast amount of confidential information – about patients, NGHS and our employees. We have an obligation to be good stewards of this information, using it in the way we are supposed to use it and protecting it from loss, misuse or unauthorized disclosure.

Protect confidential information as directed by our policies. Manage it with care. Keep in mind that one careless act, even if accidental, can have long-lasting repercussions for NGHS and everyone who works here.

Confidential information includes:

- Personal information of patients and employees
- Business and marketing plans
- Financial forecasts and pricing data
- Vendor names, pricing or contract terms
- Inventions, patents and copyrights
- Research data

SHOW YOU CARE

- Protect confidential information as passionately as if it were your own personal information.
- Also protect our intellectual property – the technology, processes and know-how that make us who we are.
- Don't disclose confidential information to anyone – inside or outside of NGHS – unless they are authorized, have a business need for the information and have signed confidentiality or nondisclosure agreements in place.
- Use confidential information only for legitimate business purposes – collect only the amount of data needed to meet your business need and hold on to it only as long as necessary.
- Don't discuss patient information or confidential information with anyone, including coworkers, family or friends, unless they have a legitimate business need to know.
- Avoid discussing confidential information in places where others might overhear it, such as on elevators, visitor or common areas or when using the phone in non-private areas.
- Be aware that your obligation to protect confidential information endures, even if you should leave NGHS.
- If you suspect that confidential information has been compromised in any way, report it immediately.

NEED MORE INFORMATION?

- Contact Corporate.Compliance@nghs.com.

NGHS assets and cybersecurity

From chest compressors to tongue depressors, we use and rely on a multitude of physical and electronic assets to do our jobs. Our people are our most valuable asset, but machines, equipment, technology, supplies and the buildings we occupy are the tools that help us make a difference in our community.

We have a responsibility to use our assets responsibly and safeguard them from loss, damage and theft. No matter what job you have, be a good steward of the assets assigned to you, and if you see anything damaged or dangerous, report it.

SHOW YOU CARE

- Use NGHS assets for NGHS business – don't borrow, lend, give away or dispose of them unless you have approval from NGHS.
- Limit your personal use. Occasional use of assets like phones, copiers and email is permitted as long as it doesn't violate the law or our policies or interfere with your work.
- Make sure that drugs are safely stored, secured and inventoried and that missing supplies are promptly reported to your supervisor.
- Be aware that anything you create on our systems is NGHS property and, where permitted by law, we may monitor your use – you shouldn't have any expectation of privacy when using our systems.
- Practice:
  - Good physical security and wear your identification badge during your work hours.
  - Good cybersecurity – it keeps our systems and networks operational and virus-free.

GOOD CYBERSECURITY MEANS …

DON'T OPEN email attachments from unknown senders or click on suspicious links.

NEVER COPY or use unlicensed or "pirated" software on NGHS computers.

PROTECT your passwords – don't write them down, and don't share them with anyone.

NEVER ALLOW OTHERS, including coworkers or families, to use assets assigned to you.

LOCK YOUR COMPUTER anytime you step away and log off when you complete your shift.

IMMEDIATELY REPORT a lost or stolen device or a suspected data breach.

WHAT IF …

You receive an email from your manager, requesting that you review a file. The message was sent from an external email account, and there is a file link in the body of the email.

It is very important to pay close attention to emails originating from outside the organization and to never open a suspicious link. When you receive an email that appears to be a phishing email, you should immediately contact the IT Help Desk to report the incident. Opening suspicious files may result in malicious software like ransomware, spyware or a virus being installed on your device.

NEED MORE INFORMATION?

- Contact the IT Help Desk or the Legal Department.

Speaking on behalf of NGHS

Many employees, one voice. We are all ambassadors for NGHS. We're proud of what we do and who we serve. But in order to preserve our brand, our name and our good work, it's important that we send one clear, accurate and complete message when communicating with the public and the media.

That's why we have a designated spokesperson to speak about NGHS matters. And if you are approached by someone for information or to answer a question about NGHS, refer them to Public Relations.

SHOW YOU CARE

- Unless you're an authorized spokesperson, don't speak for NGHS or give the impression that you're speaking on our behalf in any communication that may become public.
- Seek approval from Public Relations before making public speeches, writing articles for professional journals or engaging in other public communications about NGHS.
- Post responsibly. If you refer to NGHS in your online or social media activity:
  - Let others know that any opinions you post represent your own thoughts and views, not those of NGHS.
  - Never share or disclose confidential information, whether it relates to NGHS or one of our patients, customers, vendors, coworkers or other third parties.
  - Avoid posts that could harm us or our people, such as references to illegal activity, or anything that could be considered harassment or abuse.
  - Monitor posts others have tagged you in and/or change social media settings so you can approve tags first.

WHAT IF …

A local reporter calls to ask for a comment in connection with the work you do at NGHS. You would like to respond and are confident you can do it in a way that reflects positively on NGHS. Is it OK to talk with the reporter?

No. You should not answer any questions from reporters unless you've been designated as our spokesperson. It's best to let the reporter know that you're not authorized to speak on behalf of NGHS and then politely direct them to Public Relations via the NGHS Switchboard.

NEED MORE INFORMATION?

- Contact Public Relations via the NGHS Switchboard, see the Communications with the News Media policy or email Public.Relations@nghs.com.

Charitable and political activities

Our employees are known for the care and services they extend to the community as part of their everyday jobs. But they are also active outside our hospital walls, volunteering their time and talents to a variety of organizations, programs and causes.

We support your participation in charitable and political activities and respect the difference you're making in Northeast Georgia and beyond. We ask only that you take part in outside activities on your own time, using your own resources.

Did you know?

The NGHS Foundation has contributed millions of dollars to fund health system improvements, community benefits programs and partner organizations.

You can find out more about annual events sponsored by the Foundation by visiting the NGHS Foundation website. You are encouraged – but not required – to participate in these initiatives in whatever way feels meaningful for you.

SHOW YOU CARE

- Never use NGHS funds, time, property or name to support your personal charitable or political activities without prior authorization and approval.
- Always make it clear that your personal views and actions don't represent those of NGHS.

WHAT IF …

You're taking part in a fundraiser for your child's school – can you send an email out to your coworkers asking them to sponsor you?

If you see or socialize with work friends outside of the office, it's OK to extend a personal invitation for them to support you, but using your time at work or NGHS systems to solicit sponsors would be inappropriate, and it's never OK to apply direct or indirect pressure on your coworkers to contribute to your personal activities.

NEED MORE INFORMATION?

- Contact the Legal Department.

Government requirements and requests

We are committed to meeting the many special legal, regulatory and contractual requirements that apply to government healthcare programs. And we understand that these requirements may also flow down to individuals and companies working on our behalf.

Make sure you know and follow the laws, regulations, our Handbook and NGHS policies associated with government program requirements. Be truthful and cooperative with all reasonable requests and inquiries from government representatives concerning our operations.

SHOW YOU CARE

- If you:
  - Receive an inquiry or a visit from regulators or government authorities (except DNV), notify the NGHS Compliance Department before answering any questions or providing information – the Compliance Department will coordinate our response. With a DNV visit, follow normal NGHS procedures.
  - Receive notice from NGHS about an investigation or lawsuit, a request for documents or a subpoena, preserve all related records and cooperate with the NGHS Legal and Risk Management Departments in making them ready for evaluation and/or production.
- Never conceal, destroy or alter any documents that may relate to a government inquiry or investigation.
- Never offer gifts or other forms of compensation to a government official or their staff. Report any request from a government official for a gift or improper payment.

NEED MORE INFORMATION?

- Contact the Legal Department.

Did you know?

NGHS screens all new hires, medical staff, business partners, suppliers and vendors against government exclusion lists.

We don't contract with, employ or bill for services provided by anyone who is:

- Excluded from or ineligible to participate in state or federal healthcare programs
- Suspended or debarred from federal government contracts
- Hasn't been reinstated in a federal healthcare program after being excluded, suspended, debarred or ineligible

Healthcare laws and regulations

Like all organizations, we have an obligation to comply with the laws and regulations that apply to our business. But as a member of the healthcare community, we are subject to an even more rigorous set of standards, and we are committed to complying with them, because we understand the reasons behind the requirements and the lives impacted by them.

Here is a sampling of the healthcare laws and regulations applicable to NGHS. Note that this list is not comprehensive. It's important – in fact, it's critical to the operation of NGHS – that you know what's expected of you and come forward anytime you have questions about how they affect you and your everyday job responsibilities.

WE COMPLY WITH …

The Federal False Claims Act (FCA)

and

The Program Fraud Civil Remedies Act (PFCRA)

We watch for and report signs of false claims (e.g., billing the government for services not provided, providing false information to obtain a payment, overbilling or billing for the same service multiple times).

Health Insurance Portability & Accountability Act (HIPAA)

We protect sensitive health information from being disclosed without a patient's consent or knowledge.

The Anti-Kickback Statute and Stark Law

We don't offer or pay anyone for patient referrals or accept anything of value for referrals we make for drugs, supplies or healthcare services.

The Georgia False Medicaid Claims Act

We never submit false or fraudulent claims to the Georgia Medicaid Program or try to conceal or avoid an obligation to pay the State of Georgia.

Emergency Medical Treatment & Active Labor Act (EMTALA)

We stabilize and treat anyone who comes into our ERs, regardless of their insurance status or ability to pay.

SHOW YOU CARE

- We expect our employees to understand and comply with the legal requirements that apply to their job functions and the organization.
- Never forget that the decisions you make every day have an impact on NGHS and the people who place their trust in us.

NEED MORE INFORMATION?

- Contact Corporate.Compliance@nghs.com.

Some closing thoughts

Who we are today was shaped by community visionaries over 70 years ago.

Who we'll be tomorrow is up to you.

Thank you for reading our Handbook and honoring our commitment to improve the health and quality of life for the people of Northeast Georgia. Compliance is a partnership between all of us, and we are each responsible as members of the NGHS workforce. My team is here to help you understand and follow the Handbook and answer any questions you may have.

I encourage you, in every interaction, to let our core values guide and inspire you. When you do, you'll be helping to maintain the trust of patients, their families and our community. You'll also be helping us build an even better NGHS – one poised to serve the next million people.

Steve Kelly
Chief Compliance Officer

This is not work we do alone – this is work we do together. We're true to our values and live them out each day.

Where to go for help

CORPORATE COMPLIANCE

Corporate.Compliance@nghs.com

1-844-917-1116

COMPLIANCE PRIVACY

Privacy.Officer@nghs.com

1-844-917-1115

CHIEF COMPLIANCE OFFICER

Corporate.Compliance@nghs.com

1-844-917-1116

HUMAN RESOURCES

HR.Help@nghs.com

770-219-3500

THE LEGAL DEPARTMENT AND RISK MANAGEMENT

RiskManagement@nghs.com

REVENUE CYCLE

RevCycle.Support@nghs.com

PUBLIC RELATIONS

Public.Relations@nghs.com

770-219-3840

ETHICS AND COMPLIANCE HOTLINE

1-800-299-6321

Available 24/7

ALL ETHICS AND COMPLIANCE HANDBOOK TOPICS ARE SUPPORTED BY POLICIES WITHIN THE NGHS ORGANIZATION AND CAN BE FOUND IN THE MCN SYSTEM.

NGHS reserves the right to modify this Handbook at any time, as necessary, along with our policies, procedures and conditions of employment. The Handbook is not intended as a contract or guarantee of employment.

NGHS also supports an employee's right to speak out publicly about matters of public concern and to participate in concerted activities and communications related to terms and conditions of employment. Nothing in any section of our Handbook or in any of our policies is intended to limit or interfere with that right. That includes, but is not limited to, any and all activities protected under Section 7 of the U.S. National Labor Relations Act, such as discussions related to wages, hours, working conditions, health hazards and safety issues.