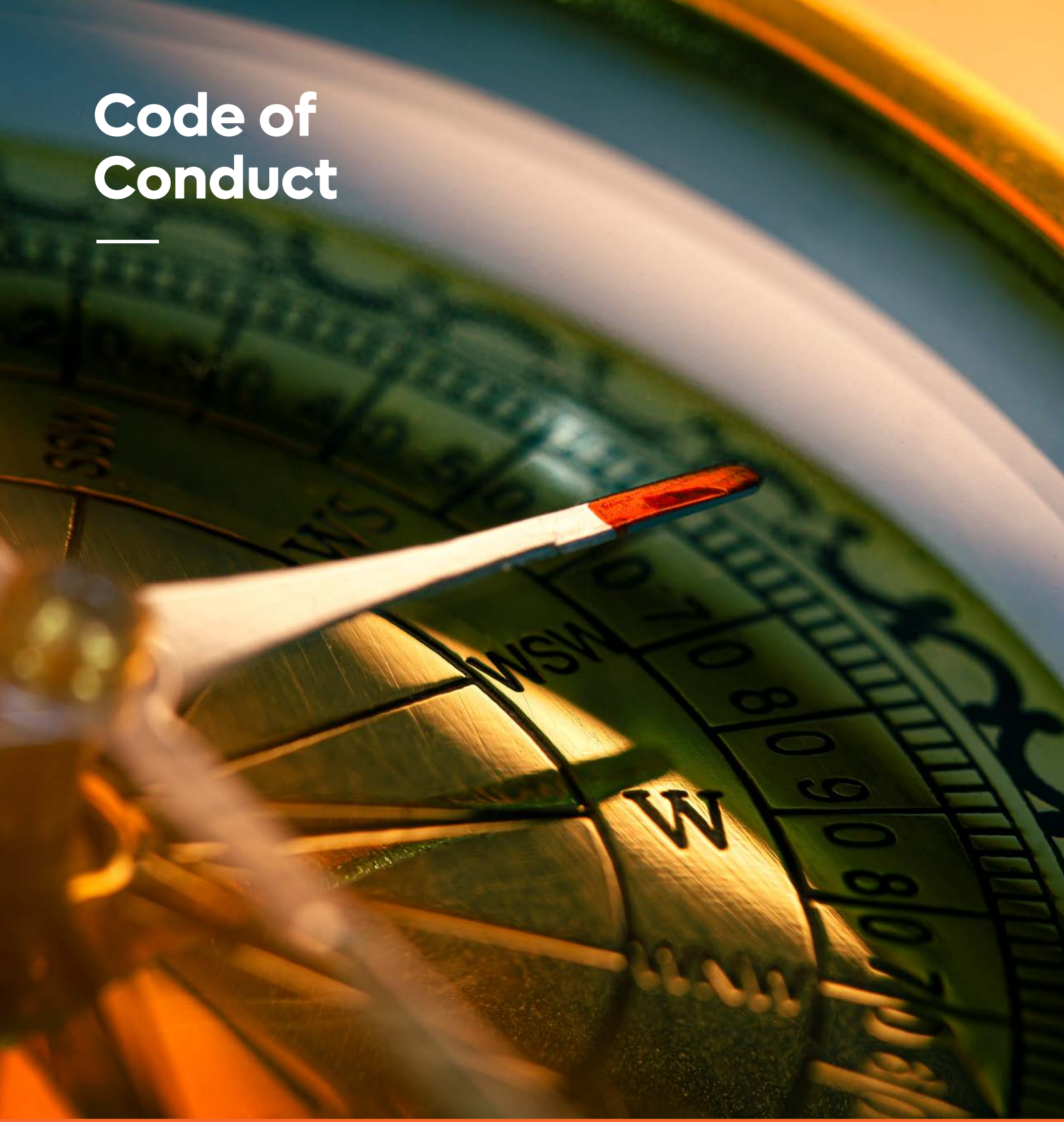


Code of Conduct



ORLANDO HEALTH®

Table of Contents

Message from CEO.....	4
The Pledge	5
The Orlando Health Way	6
We Care For and About Our Patients	
Treating Patients with Compassion and Dignity.....	7
Providing Quality Healthcare Services.....	7
Patient Diversity	7
Notice of Nondiscrimination.....	8
Providing Emergency Treatment.....	9
Pharmaceuticals, Prescription Drugs and Controlled Substances.....	9
Research Activity.....	9
We Support Our Team Members	
Compliance and Ethics Program	10
Workforce and Recruitment Diversity.....	10
Reporting Compliance Concerns.....	11
No Retaliation	12
Workplace Conduct and Integrity	12
We Are Committed to Our Community	
A Responsible Not-for-Profit Organization.....	13
Political Activity	13
Antitrust Commitment.....	14
Safeguarding Our Environment.....	14
We Protect Sensitive Information	
Confidentiality of Patient Information.....	15
Information Security.....	15
Cybersecurity.....	17
Social Media.....	17
Public Affairs and Media Relations.....	17
Team Member and Human Resources Information	17
Proprietary Information.....	18
Intellectual Property.....	18
Search Warrants, Subpoenas, and Government Inspections and Investigations.....	18
Record Keeping.....	19
Record Retention and Destruction	19

We Value Ethical Business Practices

Fraud, Waste and Abuse..... 20

Internal Investigations and Requests for Information..... 21

Criminal Conduct..... 21

Screening of Covered Persons..... 21

Financial Relationships..... 22

Business Inducements..... 22

Competitors and Vendors..... 22

Contracting and Business Relations..... 23

Vendor and Product Selection..... 23

Gifts and Business Courtesies..... 23

Workshops, Seminars and Training Sessions..... 24

Conflict of Interest..... 24

Protection of Assets

Financial Reporting..... 25

Use of Company Assets..... 25

Travel and Entertainment..... 25



Message from CEO

Dear Orlando Health Team,

As one of the Southeast's premier healthcare systems, Orlando Health is dedicated to preserving our reputation as a trusted leader that acts with integrity and upholds ethical standards. We believe in treating each other and the patients and families we serve with dignity and respect.

In an effort to adhere to all laws, government regulations, third-party payor agreements, and our own policies and procedures, we maintain a Compliance and Ethics Program.

Our Code of Conduct is an essential component of our Compliance and Ethics Program. It provides us with the opportunity to keep compliance and ethics front and center. Our Code of Conduct supports our mission by reaffirming the values and professional standards that exist among the Orlando Health Family ... quality, honesty and integrity.

The Code of Conduct is a guide to help each of us do things the right way. Please take time to read and familiarize yourself with these responsibilities. If you ever have a question or concern that is unclear or not covered within the Code of Conduct, be sure to ask your manager or contact Compliance and Ethics.

Thank you for your continued dedication to Orlando Health.

Warm regards,

David Strong

President and CEO
Orlando Health

Our Code of Conduct and our corporate policies tell us about what we must do (compliance) and what we should do (ethics).

Our values set us apart, and we each must do our part to achieve and sustain these standards. While the Code of Conduct is designed to provide overall guidance, it does not address every situation. It will help guide us in making decisions that conform to the ethical and legal standards expected of us all. More specific guidance is provided in Orlando Health's policies and procedures.

This Code of Conduct is a critical part of our Compliance and Ethics Program and the standards herein apply to us all.

We pledge to:

- Read the Code of Conduct and seek to understand how it applies to us.
- Refer to the Code of Conduct and Orlando Health policies in all situations.
- Ask questions and report issues.
- Complete required annual training.
- Attest our commitment to the Code of Conduct.



The Code of Conduct is not an employment contract, nor is it intended to provide any expressed or implied rights of continued employment. Conduct contrary to the Code of Conduct will result in an investigation and possible disciplinary action, up to and including discharge.

The Orlando Health Way



What is the Orlando Health Way?

Simply said, it is everything we do and how we do it.

To understand what makes Orlando Health so unique, we conducted research with hundreds of patients and team members. We heard from the research that what sets us apart is that we not only care for our patients, but we also care about them.

Caring for them speaks to our ability to deliver the clinical care they need. We deliver on our competence to get them well with the best science, technology, teamwork and processes. To care about them speaks about our intent – do they believe we have their best interest in mind? Do we treat them as humans, and do we present ourselves as humans? Patients tell us they feel that way when we do three things:

Assure

- Remove fear by giving our customers confidence that “we’ve got it” and courage to depend on us for their care.
- Create a safe place to share feelings without fear of judgment.
- #iremovefear.

Engage

- Build lifelong relationships based on personal trust that extends along the full continuum of care.
- Listen intently and think about how you might feel if you were in their situation. Don’t persuade, defend or interrupt. Be curious, be conversational, be real.
- #ibuildrelationships.

Unite

- Act as one team aligned to the shared purpose of caring for and about every person we encounter.
- Celebrate the values we have in common and the shared purpose that unites us as one team.
- #oneteam.

The Orlando Health Way is who we already are at our best.
You are the Orlando Health Way!

Our Mission

To improve the health and quality of life of the individuals and communities we serve.

Our Vision

A trusted leader inspiring hope through the advancement of health.

Our Values

People

We are committed to excellence in serving and supporting our patients, our physicians, our guests and fellow team members.

We not only care for people, we care about them.

We will do everything in our power to ensure that all people are treated with respect, dignity, kindness and compassion.

We will listen intently to our customers and each other with open minds and with open hearts.

We will make a positive difference in the lives of the people we serve.

Quality

We will never compromise on quality.

Our team will provide the highest quality of care and service in everything we do.

We will take responsibility for conserving time, money and resources.

We will be creative and versatile as a team in our solutions.

Community

We are proud to serve the people of this community.

We will never lose sight of the fact that we are a community-owned organization.

We will demonstrate, in our words and actions, the highest level of commitment to each community we serve.

We Care For and About Our Patients

Treating Patients with Compassion and Dignity

As a not-for-profit organization, Orlando Health is committed to excellence in serving and supporting our patients, their family and guests. We will do everything in our power to ensure that all people are treated with respect, dignity, kindness and compassion.

- We listen intently to our patients and each other with open minds and open hearts.
- We help our patients understand and exercise their rights, such as the right to privacy; to be free from discrimination; to make informed healthcare decisions and advance directives.
- We inform our patients and, when permission is given, their families and others about care, treatment and service options.
- We help our patients understand financial assistance available to them.

Providing Quality Healthcare Services

We will never compromise on quality. Our team will provide the highest quality of care and service in everything we do.

At Orlando Health, we believe that quality and safety go hand in hand. We are dedicated to providing a healing environment that embraces quality care, promotes health and safety, and delivers the best possible patient experience.

We take our commitment to patient safety seriously by following proven best practices and processes that decrease harm to both our patients and our team members.

Orlando Health is repeatedly recognized for excellence in quality and safety, demonstrating our commitment to the highest level of care and service. We do this by comparing our service and clinical quality against national standards to identify ways to continually improve the quality of care we provide. We will continue to be creative and versatile as a team in our solutions.

Patient Diversity

As a leading healthcare provider, Orlando Health is continually striving to incorporate multicultural and diversity awareness into our patient care – making each and every patient experience the best experience possible. Central Florida is home to a diverse cultural population, as well as visitors from around the world, which is reflected in our patient population. Our Diversity and Minority Business Development Department is a valuable resource for providing culturally competent care for all of our patients and guests.

We are dedicated to providing the highest quality of care to everyone in our community.





Notice of Nondiscrimination

Discrimination Is Against the Law

Orlando Health complies with applicable federal civil rights laws and does not discriminate on the basis of race, color, national origin, sex, age, disability, gender identity or sexual orientation.

Orlando Health does not exclude people or treat them differently because of race, color, national origin, sex, age, disability, gender identity or sexual orientation.

Orlando Health:

- Provides free aids and services to people with disabilities to communicate effectively with us, such as:
 - Qualified sign language interpreters
 - Written information in other formats (large print, audio, accessible electronic formats, other formats)
- Provides free language services to people whose primary language is not English, such as:
 - Qualified interpreters
 - Information written in other languages

If you need these services, contact any team member or care provider of the Orlando Health facility or physician's office where you will be receiving services, or call the Orlando Health Language Access Service at **(321) 841-2522**. Patients who use sign language please call TTY **1 (800) 955-8771** (English), TTY **1 (877) 955-8773** (Spanish), or TTY **1 (877) 955-8707** (French) to connect with the nurse or physician's office representative to inform them that you will be using our interpreter services during your visit/appointment.

If you believe that Orlando Health has failed to provide these services or discriminated in another way on the basis of race, color, national origin, sex, age, disability, gender identity or sexual orientation, you can file a grievance with the senior compliance coordinator, Compliance and Ethics, by mail at 1414 Kuhl Ave., Mail Point 29, Orlando, FL 32806; by telephone at **(321) 841-2335**; by fax at (407) 246-7083; or by email at R-Compliance&EthicsDepartment@OrlandoHealth.com.

You can also file a civil rights complaint with the U.S. Department of Health and Human Services, Office for Civil Rights, electronically through the Office for Civil Rights Complaint Portal, available at <https://ocrportal.hhs.gov/ocr/portal/lobby.jsf>, or by mail or phone at:

U.S. Department of Health and Human Services

200 Independence Avenue, SW

Room 509F, HHH Building

Washington, D.C. 20201

1 (800) 368-1019, 1 (800) 537-7697 (TDD)

Complaint forms are available at: <http://www.hhs.gov/ocr/office/file/index.html>.

Providing Emergency Treatment

We comply with the Emergency Medical Treatment and Labor Act (EMTALA).

This means:

- We provide emergency medical and (if necessary) stabilizing treatment to all patients, regardless of their ability to pay.
- In an emergency situation, financial and demographic information is obtained only after the patient's medical needs are met.
- We do not consider the ability to pay as a factor in determining whether to admit or discharge patients.
- Orlando Health only transfers patients to other facilities when we cannot meet their medical needs and only after they have been stabilized.

Pharmaceuticals, Prescription Drugs and Controlled Substances

We are fully committed to the safe and legal handling of all pharmaceuticals, prescription medications, over-the-counter medications and controlled substances.

If you have responsibility for, or access to, prescription drugs, controlled substances, or over-the-counter drugs, you must do the following:

- Comply with all applicable laws, regulations, policies, procedures and standards.
- Keep all drugs secure.
- Immediately report the mishandling of drugs or controlled substances to your supervisor or the Compliance and Ethics Department.

We report and resolve any deviations, misconduct or conflicts.



Research Activity

Orlando Health complies with all state and federal regulations regarding the conduct of research and the protection of human subjects research.

We pledge to:

- Strictly adhere to the rules of safe research.
- Respect and safeguard the rights of all individuals and research participants.
- Apply sound ethical values, scientific principles and judgment.
- Comply with all privacy and confidentiality laws and regulations.



We Support Our Team Members

Compliance and Ethics Program

Our Compliance and Ethics Program (CEP) exists to assist us in complying with laws, regulations, policies and procedures. The program supports team members and other affiliates by providing education on these requirements, while being a resource to consult and interpret corporate policy and compliance matters.

Compliance and Ethics sustains the CEP by helping us fulfill our job responsibilities in an ethical and legal way.

Compliance and Ethics refers to Orlando Health's Corporate Compliance, Internal Audit and Privacy teams collectively. The department is a great resource for any questions or concerns we have about our ethical responsibilities.

Orlando Health is committed to conducting its business in full compliance with all applicable laws, regulations, policies and procedures.

When used in this document, "laws, regulations, policies and procedures" refer to:

- Federal, state and local laws and regulations.
- Requirements such as the Centers for Medicare and Medicaid Services' Conditions of Participation.
- Accreditation standards such as those required by The Joint Commission and other accrediting entities.
- Orlando Health corporate policies and procedures.
- Orlando Health Code of Conduct.
- Any other rules, regulations or requirements that may be applicable.

Workforce and Recruitment Diversity

As one of Central Florida's largest employers, we recognize our responsibility to develop a workforce that reflects the communities we serve. From the recruitment and hiring of our physicians and team members, to the identification and recruitment of our board members, Orlando Health promotes diversity by selecting the most qualified and skilled representatives to meet the needs of our culturally diverse and growing community. We know that by mirroring the diversity of our community, we are better able to relate effectively to our patients and families.



Reporting Compliance Concerns

Orlando Health provides a simple, confidential and risk-free Compliance Hotline for you to make good-faith reports regarding your concerns. It is also a resource for you to seek direction on laws, regulations, policies and procedures, and the Code of Conduct. Your concerns can be reported by calling **(888) 464-6747** or visiting [OrlandoHealth.EthicsPoint.com](https://www.orlandohealth.com/ethics). The Compliance Hotline is available 24 hours a day, seven days a week, and is administered by an independent communications firm to ensure the integrity and objectivity of compliance reporting. Remember, you do not have to provide your name or email address. Calls and web reports are not recorded, and confidentiality is protected to the greatest extent possible up to the limits of the law. We use the Compliance Hotline if we have exhausted other means of communication or are uncomfortable with disclosing our identity when reporting a concern. Some concerns should be referred to Human Resources. The charts below help us determine who to contact in certain situations.

We report concerns and suspected misconduct that could violate state or federal laws, Orlando Health policies or this Code of Conduct.

Maintaining the high ethical standards of Orlando Health is everyone's responsibility. If we become aware of or suspect a situation that might jeopardize the ethical integrity of our organization, it is our obligation to report the circumstances.

This means we:

- Report any suspicious activity in good faith.
- Provide true and complete information.
- Keep matters under investigation confidential, unless otherwise required or permitted by law.

These duties apply to all of us, including team members, board members, providers, volunteers, students, community physicians, vendor representatives and independent contractors while carrying out their duties at or on behalf of Orlando Health.



Contact Compliance and Ethics or use the Compliance Hotline if the situation involves:

- Breaches of protected health information
- Bribes and kickbacks
- Confidentiality intrusions
- Conflicts of interest
- Discrimination or discriminatory practices
- Fraudulent billing
- Fraud, waste and abuse
- Improper gifts
- Patient rights abuses
- Professional standards infringements
- Research misconduct

Contact Human Resources if the situation involves:

- Conflicts of interest involving solicitation, including selling products
- Conflicts with coworkers
- Disciplinary issues
- Harassment/unfair treatment
- Inappropriate team member behavior
- Payroll and benefits questions

Compliance and Ethics

Three-Step Communication Process



Call (888) 464-6747 or
visit OrlandoHealth.EthicsPoint.com

We developed a **Three-Step Communication Process** to assist us with our responsibility to report possible violations of laws, regulations, policies and procedures.

No Retaliation

Orlando Health resolves reports made in good faith in a discrete and professional manner. We do not tolerate any type of retaliation. If you feel that you have experienced retaliation as a result of reporting concerns in good faith, please contact Human Resources or make use of the Three-Step Communication Process.

Workplace Conduct and Integrity

Orlando Health is dedicated to providing high-quality, skilled care in a courteous, professional and compliant environment. We are committed to fostering an atmosphere that promotes integrity, honesty and mutual respect. We encourage and foster a workplace where we are free to discuss any concerns we may have.

We maintain a positive work environment that supports our values and policies.

This means we:

- Respect one another.
- Support and observe a workplace free of alcohol, drugs and tobacco use.
- Do not discriminate in employment opportunities or practices on the basis of race, color, national origin, age, sex, disability, gender identity, sexual orientation or any other status protected by law.
- Do not tolerate intimidating, threatening or harassing behavior, such as:
 - Offensive comments, jokes, disparaging language and slurs.
 - Unwelcome sexual advances, including 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.
 - Workplace violence.

If you do not want to contact the Compliance Hotline, you may write to us at:

Orlando Health Compliance and Ethics

1414 Kuhl Ave., MP 29

Orlando, FL 32806

Or email R-Compliance&EthicsDepartment@OrlandoHealth.com



Use your mobile device to scan the QR code to access the online Compliance Hotline portal to seek guidance or report a concern.

We Are Committed to Our Community

Orlando Health maintains a rich tradition of service to the community and promoting its cultural diversity. In addition to the many services we provide, we are proud of our relationships with organizations in Central Florida that promote our commitment to cultural diversity and allow us to provide benefits beyond traditional healthcare programs, such as health fairs, screenings and wellness activities. Orlando Health's Community Relations Department supports these numerous, diverse community affiliations and outreach programs.

A Responsible Not-for-Profit Organization

Orlando Health is organized and operated exclusively as a not-for-profit organization to service the healthcare needs of the community. As a charitable organization, Orlando Health is exempt from the payment of federal income tax. All of Orlando Health's assets are used exclusively to further its charitable purposes. None of our assets may be used to benefit an individual who is in a position to exercise influence over the business concerns of Orlando Health. We do not allow net earnings to benefit insiders of the organization, nor do we take part in any activities that result in excess financial benefits to any private individual.

As a not-for-profit organization, we:

- Avoid compensation arrangements in excess of fair market value.
- Accurately report payments to appropriate taxing authorities.
- File all tax and information returns consistent with applicable laws.

Political Activity

As an organization, Orlando Health's political activities are limited by law.

As individuals we:

- Are encouraged to participate in personal civic and political activities on our own time and at our own expense.
- Do not engage in partisan political activity using Orlando Health organizational funds or resources (such as work time, paper, envelopes, secretarial time, postage or telephones).
- Do not seek reimbursement from Orlando Health for any personal contributions to political organizations or campaigns.
- Do not attempt to influence the decision-making process of governmental bodies or officials by improperly offering any benefit.
- Do not represent that Orlando Health endorses or supports a specific political party, candidate, issue campaign, law, or piece of legislation unless approved by the Government Affairs and Public Policy Department.





Antitrust Commitment

Antitrust laws are designed to create a level playing field in the marketplace and to promote fair competition. We comply with applicable antitrust and similar laws that regulate competition. We do not discuss or make agreements with competitors regarding:

- Price or other terms for product sales.
- Prices paid to suppliers or providers.
- Dividing up customers or geographic markets.
- Joint action to boycott or coerce certain customers, suppliers or providers.

We are affiliated with numerous trade and professional associations. These affiliations promote the sharing of information; however, it is not always appropriate to share business information with these associations and their members.

- We engage in marketing and advertising activities to educate the public, provide information to the community, increase awareness of our services and recruit employees.
- We present only truthful, informative and non-deceptive information in our materials and announcements.

We seek advice from Compliance and Ethics and Legal Affairs when confronted with business decisions involving a potential violation of antitrust laws.

Safeguarding Our Environment

Orlando Health is committed to providing a safe and secure environment for all who enter our facilities, to provide a safe work environment for team members and to reduce our impact on the environments in which we serve. To accomplish this, we comply with established safety, occupational health, life safety, environmental and infection prevention laws, regulations and standards.

- We are consistent with occupational safety and health practices, maintain a safe and secure work environment and adhere to infection prevention practices to prevent harm.
- We are respectful of the environment and conserve natural resources.
- We carry out policies and procedures to protect the environment, and use Orlando Health's buildings, property, processes, equipment and products in accordance with federal, state and accreditation standards.
- We comply with regulatory requirements that allow for the safe discharge of pollutants into the air, sewage systems, water or land.
- We comply with all laws and regulations governing the handling, storage, use and disposal of hazardous materials, infectious wastes and other pollutants.

We Protect Sensitive Information

Confidentiality of Patient Information

We all play a role in protecting the confidentiality of patient information. To prevent unauthorized disclosures, we do not access patient information or share it with anyone unless there is a legal need to know. We safeguard patient information and protect the privacy of patient medical records according to federal, state and accreditation requirements. We do not take Protected Health Information (PHI) home or transport PHI without prior approval from management.

To avoid disclosures of PHI to unauthorized individuals, we must safeguard all communications. Examples of communications include faxes, emails and conversations on the telephone or in public areas.

Information Security

Information security refers to safeguarding electronic confidential and sensitive information from damage, loss, unauthorized access or unauthorized modification. To prevent unauthorized disclosures, we maintain the confidentiality, integrity and availability of all types of information, including, but not limited to, email communications, electronic patient data, payroll records, personnel files, access codes and passwords. We exercise caution when opening email attachments, clicking links, and we encrypt emails when sending confidential and sensitive information externally. We also safeguard our system credentials.

Q I received an email from the IT/CE department asking me to click a link to validate my account and change my password. Should I click it?

A No, you should never click a link in an email to change your password or validate information. Orlando Health will never ask you to do so. Do not respond. Click the Report Phishing button to report it and delete the email.



It is OK to access a patient's record when we are:

- Providing medical care to the patient.
- Providing ancillary services to the patient (e.g., billing, coding, scheduling or registration).

Q In the middle of my shift, my coworker was rushed to the Emergency Department. Can I use an electronic medical record system to see what room she is in so I can bring her flowers?

A No. You cannot access a coworker's medical record using an electronic medical record system. In this situation you can contact her directly or contact guest services.

Q During my shift today, my neighbor was admitted to my unit. Can I tell our other neighbors about his condition?

A No. You should never disclose PHI to anyone who is not involved in the patient's care or does not have a legitimate business reason to know.

It is appropriate to disclose a patient's record to:

- A team member providing care to the patient (treatment).
- The insurance company of the patient in order to receive payment for care provided (payment).
- An Orlando Health Quality or Peer Review Committee for quality assessment and improvement activities (operations).

Q I was recently diagnosed with cancer and I have not shared this information with anyone, but I'm concerned that my coworker has been accessing my records. She seems to know a lot about my diagnosis. What should I do?

A Report your concern using the Three-Step Communication Process. Do not conduct your own investigation.

Orlando Health does not tolerate inappropriate, intentional access and/or unauthorized disclosure of patient information by team members. Orlando Health performs system user audits to ensure appropriate usage.

Cybersecurity

To combat the ever-increasing threat of cyberattacks, we maintain a strong and comprehensive cybersecurity program that includes technological safeguards, including access controls, detection, and prevention systems; administrative safeguards, including strong passwords and security policies; and physical safeguards such as locked and badge-controlled access areas. We educate system users to exercise caution when opening email attachments, clicking email links, and train them on how to recognize and report suspicious emails and computer activity. This training helps Orlando Health to minimize phishing attacks and other cybersecurity threats, such as malware and ransomware. Our robust security technologies, along with training and the implementation of security best practices, helps us to thwart cyberattacks, minimize risk, and protect confidential and sensitive data. We remain vigilant and are committed to protecting electronic information and assets from unauthorized access, use and disclosure.



Social Media

Social media provides unique opportunities to participate in interactive discussions and share information using a variety of platforms, such as Facebook, LinkedIn, Twitter, YouTube, Instagram, Snapchat, Pinterest, blogs, forums and posted comments. We recognize that all information, comments and opinions placed on social media sites and blogs can shape the way the public views our delivery of care and treatment to patients, our team members and vendors.

We are committed to ensuring that the use of such communications serves the needs of our business by maintaining Orlando Health's identity, integrity and reputation in a manner consistent with our corporate and brand strategies. When participating on social media please keep in mind:

- Posting of any confidential or proprietary information is prohibited.
- Posting material that is discriminatory, obscene or defamatory is prohibited, whether the subject is the organization, fellow team members, colleagues, business partners, competitors or patients.
- If you mention Orlando Health, or your connection to Orlando Health is apparent, make it clear that you are speaking on your own behalf.

For more information on the established rules and guidelines, please refer to corporate policy.

Public Affairs and Media Relations

To protect patient and team member privacy, we coordinate all requests from the media for interviews with team members, medical staff members or employees of contracted services through Public Affairs and Media Relations.

If we receive an inquiry from the news media, including requests for information about a patient's condition, we immediately contact Public Affairs and Media Relations. There is an on-call Public Affairs and Media Relations representative available 24 hours a day, seven days a week: **call (321) 841-5111 and ask for the on-call Public Affairs and Media Relations manager.**

Team Member and Human Resources Information

We maintain team member salary, payroll, benefits, disciplinary records and other personal information in a confidential manner. We exercise care and reasonable judgment to protect unnecessary disclosures of such information.

Proprietary Information

Just as we protect patient and team member information, we also protect Orlando Health proprietary information.

Therefore we:

- Safeguard information technology and proprietary electronic information, and protect it from improper use and access.
- Guard our assets and the assets of others entrusted to Orlando Health, including physical and intellectual property, and protect sensitive information against loss, theft or misuse.
- Use Orlando Health property appropriately and take measures to prevent any unexpected loss of equipment, supplies, materials or services.
- Adhere to established policies regarding approval for disposing of Orlando Health assets and data.

Q My brother-in-law sells medical equipment. Am I allowed to tell him how much Orlando Health pays for similar products so that he can prepare a competing bid?

A No. Pursuant to corporate policy, we do not use Orlando Health information for personal benefit or personal business purposes.



Intellectual Property

Orlando Health follows laws regarding intellectual property, including patents, trademarks, marketing, copyrights and software. We comply with the law in all our internal and external activities.

As a result, we:

- Do not make, acquire, use, distribute or reproduce intellectual property without proper permission from the intellectual property holder.
- Follow all copyright laws of the United States, even if the work does not carry the copyright symbol.
- Do not reproduce content or documents for distribution outside of Orlando Health unless we have the appropriate permission from management and the copyright holder.

Search Warrants, Subpoenas and Government Inspections and Investigations

- Orlando Health has established policies and procedures to help us handle search warrants, subpoenas, government inspections and investigations. If we receive an inquiry such as a search warrant, subpoena or investigation, we will immediately contact Risk Management and Compliance and Ethics to determine next steps.



Record Keeping

Orlando Health produces a large number of records and documents.

Some examples include:

- Patient medical records
- Financial records
- Email communications
- Transitory messages
- Presentations
- Diagnostic images, e.g., X-rays
- Vital records
- Company business records

Some rules we follow about documentation include:

- We do not falsify facts or make false records.
- We do not sign someone else's name on any document.
- We do not document records as someone else.
- We only create records that are necessary and required.
- We only give records and information to people who have a legal need to know.
- We preserve patient and team member security confidentiality and privacy.

Record Retention and Destruction

We follow the guidelines established in corporate policies and procedures regarding the proper storage and destruction of records.

Some of those guidelines are:

- All records are kept for the legally required timeframe.
- After the time requirement has been met, it is important to destroy the records in a timely and appropriate manner in accordance with corporate policy.
- Records to be disposed of that contain patient, financial or other confidential information, must be discarded in a corporate-approved shred bin. Under no circumstances should these documents be thrown in the trash.



We Value Ethical Business Practices

Fraud, Waste and Abuse

Orlando Health has adopted policies and procedures to prevent, detect, deter and correct fraud, waste and abuse in accordance with federal and state laws.

Fraud is making false statements or misrepresentation of material facts to obtain payment for which a provider is not entitled to receive. An example of fraud is documenting or billing for a service at a level of complexity that is higher than the level of service that was provided.

Waste is the mismanagement, inappropriate actions or an inadequate oversight of government resources. An example of waste is charging for a service that was never provided.

Abuse is a practice that directly or indirectly results in unnecessary costs to the federal healthcare program. An example of abuse is a team member who takes a roll of ace wrap bandages from the supply closet at work so that they can use them at home.

Various federal and state laws, such as the Federal False Claims Act and the Florida False Claims Act, prohibit the submission of false claims for payment and other fraudulent activity. Violations of these laws can result in civil actions and penalties. Other laws and regulations governing the integrity of the Medicare and Medicaid programs are in place to reduce fraud, waste and abuse. Our policies, designed to prevent fraud, waste and abuse, are available through SWIFT, the Orlando Health intranet.

If we know or suspect activity of this nature, we report it immediately using the **Three-Step Communication Process**. If we are uncertain whether an activity is fraudulent, we contact Compliance and Ethics for guidance.

Individuals who lawfully report false claims or other fraudulent conduct, or who otherwise assist in an investigation, action or testimony, are protected from retaliation under federal and state laws and corporate policy. We do not discriminate or retaliate against any whistleblower who files, in good faith, a civil action for false claims or participates in an Orlando Health investigation.

We accurately and legally code claims and bill the government, third party payors and patients.

We are committed to full compliance with federal healthcare program requirements, including preparing and submitting accurate claims consistent with such requirements. Our processes assist us with monitoring and verifying that claims are coded and submitted accurately and appropriately. Strict federal and state laws and regulations govern third-party billing of our insured patients.

The Federal False Claims Act makes it a crime for any person or organization to knowingly make or file a false claim for payment from the federal government.

We do not:

- Falsify patient billing-related items.
- Bill for services or supplies that are not medically necessary or documented accurately.
- Misrepresent a diagnosis or procedure code to obtain a higher payment.
- Alter or forge checks.
- Mishandle or improperly report financial transactions.
- Falsify or alter any record or report, such as an employment application, payroll or time record, expense account, cost report, patient medical record, scientific research or data collection record.
- Destroy any information considered part of the patient medical record.

While fully cooperating with all investigations, we still protect the legal rights of Orlando Health and our team members.

Internal Investigations and Requests for Information

We promptly and thoroughly investigate all reports of illegal activity or violations of our Code of Conduct and corporate policy. We cooperate fully with these investigations. We do not act in any way to prevent, hinder or delay the discovery and full investigation of these matters.

Criminal Conduct

Orlando Health does not tolerate or condone criminal activity. If we suspect possible criminal activity, we report it immediately using the **Three-Step Communication Process**.

We report instances of criminal or illegal activity that present an immediate risk to the safety of any person to Orlando Health Security or the local police.

We understand that any team member found to be involved in criminal conduct will be disciplined in accordance with corporate policy. Disciplinary action will be appropriate for the offense committed, up to and including termination.

Q Who is included in the definition of "covered person?"

A Covered persons include, but are not limited to, employees of Orlando Health, board or committee members, medical staff members, providers, volunteers, students, vendors, independent contractors and individuals doing business on behalf of the organization.

Screening of Covered Persons

We do not knowingly contract with, employ or bill for services rendered by an individual or entity that is excluded or ineligible to participate in federal healthcare programs, suspended or debarred from federal government contracts, or has been convicted of a criminal offense related to the provision of healthcare items or services.

On a prescribed schedule, Orlando Health confirms that all covered persons performing functions or services on Orlando Health's behalf are screened against the government's exclusion lists to ensure that we are not employing or conducting business with excluded persons or entities.



Financial Relationships

We carefully review financial relationships for compliance with the Anti-Kickback Statute and Stark Law.

We must not attempt to gain any advantage or encourage favors by offering or accepting improper payments, business courtesies or other inducements. We do not offer any improper inducements or favors to patients, providers or others to encourage the referral of patients to our facilities or to use a particular product or service. We will not solicit or accept gifts or favors in exchange for influence or assistance in a transaction when conducting business with an individual or entity, including vendors and patients.

Business arrangements with physicians must be pursuant to signed, written contracts and appropriately structured to comply with legal requirements. All contractual relationships and transactions with physicians require advance review and approval by Legal Affairs and the appropriate Orlando Health leaders, which may include leaders from operations, Marketing and Communications, Provider Compensation and Contracting, and Compliance and Ethics in accordance with the Orlando Health physician transaction policies.

All Orlando Health team members who interact with physicians, particularly those in a position to approve financial arrangements with physicians or process payments to physicians, must be aware of the legal requirements and Orlando Health policies that address relationships between Orlando Health entities and physicians.

Business Inducements

A business inducement is an economic advantage or benefit given to an individual or entity based on their position or relationship to Orlando Health. To prevent engaging in business inducements, our policies include the following:

- 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 ask for or accept anything of value, directly or indirectly, in exchange for the referral of patients.
- We do not pay or offer to pay anyone – employees, physicians or vendors – for the referral of patients.
- We do not accept payment or gifts for referrals that Orlando Health makes.
- We do not provide "professional courtesy" discounts to members of the medical staff or their families.
- We do not allow charges owed by an affiliated physician to be waived, in whole or in part.

Q I found a policy related to my question, but I'm not sure if it agrees with the Code of Conduct. Which one should I follow?

Q I can't find a policy to address an issue that recently came up in my unit. Where else can I look for answers?

A Code of Conduct



Competitors and Vendors

Team members will not be employed by, act as a consultant to, or have an independent business relationship with any of Orlando Health's vendors or third-party payors unless prior approval is obtained from the chief compliance and ethics officer and the Executive Cabinet. Further, management and executive team members will not be employed by, act as a consultant to, or have an independent business relationship with any entity that provides goods or services that are substantially similar to those that Orlando Health provides or is considering making available.

Team members will not invest in a vendor, payor, provider, supplier or competitor above the limits established in corporate policy unless we first obtain written permission from the Executive Cabinet through the chief compliance and ethics officer.

Contracting and Business Relations

- Contracts must be in writing and abide by the Orlando Health signatory authority policy.
- All contract negotiations, contracts and business relations must be consistent with laws, regulations, policies and procedures.
- Contracts identified with potential conflicts of interest are reviewed by the chief compliance and ethics officer.
- Information about Orlando Health business activities, including strategy, prices, costs, finances and similar matters, is private and confidential.
- Orlando Health does not enter into any agreement that is a refusal to deal with another organization or could impair the business of Orlando Health or the other organization.

Gifts and Business Courtesies

All gifts or business courtesies (including business meals and entertainment) offered, received or exchanged with non-Orlando Health entities and persons must meet the requirements as established in corporate policy. If we are unclear whether a specific offer or exchange is prohibited by policy, we contact management and Compliance and Ethics for further guidance.

We do not:

- Solicit gifts.
- Allow gifts to improperly influence relationships, business outcomes or decision-making, or promote the appearance thereof.
- Use gifts for the purpose of inducing, securing, or rewarding the referral of a patient or the ordering of a service or supply.
- Give or receive gifts from patients, families or representatives.
- Give or accept cash or any cash equivalents (e.g., checks, gift cards, gift certificates, vouchers, loans, stock investments) to or from any patient or non-Orlando Health person or entity.
- Allow vendors to pay for travel or lodging expenses.

IMPORTANT!

We do not accept gifts or business courtesies at any time during active negotiations or throughout the Request for Information/Request for Proposal process with a potential vendor.

Vendor and Product Selection

We:

- Select vendors using fair, equitable and objective measures.
- Afford all vendors who meet these standards equal opportunity to present their products and services.
- Do not give or receive any form of payment, kickback or bribe to induce the referral or the purchase of any product or service.
- Select the product or service that best meets the needs of our patients and Orlando Health while maintaining our commitment to support vendor diversity.

Q My patient's father gave me a \$25 gift card. Can I keep it?

A No. Orlando Health policy prohibits team members from accepting cash and cash equivalents. If a patient or other individual wishes to make a donation or provide a gift, refer them to management and the Orlando Health Foundation.

Q My department would like to host a holiday party. Is it acceptable?

A Yes. Team members can pay for the costs of social events as long as the team members are not acting on behalf of Orlando Health. The cost of these private social events cannot be a business expense for tax purposes, and team members will not charge Orlando Health or otherwise receive reimbursement from Orlando Health to cover this expense.

Workshops, Seminars and Training Sessions

We are required to obtain management approval before accepting a vendor's offer to conduct or fund training sessions or product knowledge classes. If invited to attend a conference, seminar, workshop or other similar function sponsored by a third party, we must first seek management approval. Management then consults the vice president responsible for the area when determining whether to accept such an offer.

Q A medical device company invited me to speak at a national conference about a product that Orlando Health is using. The vendor offered to pay the cost of the conference, travel and lodging for three days. Is this acceptable?

A No. Orlando Health policy sets the guidelines for our team member's involvement.

- The team member cannot accept payment from the vendor for their plane ticket to the conference.
- The team member cannot accept payment from the vendor for the cost of the hotel.

Conflict of Interest

Our corporate policy sets forth standards of conduct expected by Orlando Health with regard to conflicts of interest. We act in the best interest of Orlando Health and carry out our duties with total objectivity. In our dealings with and on behalf of the organization, we hold ourselves to a strict rule of honest and fair dealing, and conduct ourselves in accordance with laws, regulations, policies and employment agreements. We do not use our positions, or knowledge gained as a result, in any manner that creates a conflict between the interest of Orlando Health and ourselves.

Q What should I do if I see a potential conflict of interest or have a question about conflicts of interest?

A Speak with your manager or immediate supervisor, or reach out to Compliance and Ethics for guidance.



Generally, if approved, vendors are only allowed to pay for the registration fees.

Here are some examples of potential conflicts of interest:

- Direct reporting relationship between family members.
- Using Orlando Health property, information or resources for non-Orlando Health purposes.
- Holding outside jobs or positions that distract from our work at Orlando Health.
- Making business decisions that could benefit family or friends.
- Having a financial or ownership interest in an entity that competes with Orlando Health.
- Having financial relationships that could appear to influence the independence of patient care decisions.
- Issuing testimonials, endorsing or promoting a vendor, payor, provider, product or service.

A conflict of interest refers to a situation in which financial or other personal considerations may compromise, or have the appearance of compromising, an individual's ability to make objective decisions in the course of the individual's job responsibilities.

Protection of Assets

Financial Reporting

Financial statements aid in business management and are important in meeting our obligations to our patients, team members, suppliers and creditors. We are committed to providing accurate financial statements as they are essential in complying with tax and financial reporting requirements.

This means we:

- Utilize generally accepted accounting principles to maintain and report accurate financial statements.
- Maintain a financial reporting system that provides timely, accurate and comprehensive disclosures.
- Promptly report concerns involving accounting, financial reporting, use of assets and internal controls to the chief compliance and ethics officer.
- Record all transactions, payments and receipts timely, accurately and in a consistent manner.
- Do not create false or misleading entries in any financial record.
- Do not take any action to fraudulently influence, coerce, manipulate, mislead or obstruct any auditor engaged in an audit for the purpose of misrepresenting the organization's financial condition.



Use of Company Assets

We only use company assets for Orlando Health business purposes, not for personal gain or benefit.

Some examples of company assets are:

- Equipment
- Funds
- Team member time
- Inventory
- Software
- Business strategies and data (financial, patient or otherwise)
- Supplies

If we have any questions about how to use company assets, we should speak with our manager first. If we in good faith suspect any loss, misuse, waste or abuse of company assets, we report it to Compliance and Ethics.



Travel and Entertainment

Orlando Health funds travel, entertainment and business-related expenses in accordance with corporate policy.

Travel and entertainment must be consistent with our job responsibilities and support the interests of the organization. We exercise reasonable judgment when utilizing company resources to fund travel and entertainment expenses. We do not ask Orlando Health to reimburse us for personal expenses incurred during travel and entertainment.

Maintaining the Highest Standards of Ethical Excellence

If you have any questions regarding the Code of Conduct, please contact Compliance and Ethics:

(321) 841-2335

R-Compliance&EthicsDepartment@OrlandoHealth.com

Contact the confidential Compliance Hotline to anonymously report any compliance concerns:

(888) 464-6747

OrlandoHealth.EthicsPoint.com

1414 Kuhl Ave.
Orlando, FL 32806
(321) 841-5111

To learn more, visit
OrlandoHealth.com

ORLANDO HEALTH[®]