CommonSpirit Health© Standards of Conduct:

Our Values in Action

Policy and Reference Guide

June 2026

CommonSpirit

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Welcome

The CommonSpirit Health name was inspired by scripture:

"Now to each one the manifestation of the Spirit is given for the common good." (1 Corinthians 12:7 NIV)

These words embody why we formed CommonSpirit in 2019 and continue to motivate and guide us every day. Our pledge of corporate responsibility is tied to our values and commitment to the common good.

Personal responsibility and integrity on the part of everyone who works for and with CommonSpirit is fundamental to our corporate responsibility and the advancement of our mission. This means:

- Our daily conduct mirrors our values.
- We behave ethically and appropriately.
- We meet our obligations and are good stewards of our resources.
- We hold ourselves accountable for the decisions we make and the actions we take.
- When in doubt, we seek guidance.

Health care settings are governed by a complex set of rules and laws that are often difficult to understand and apply. This guide is a resource designed to help you make decisions at work. Please become familiar with the standards of conduct defined in this guide.

The examples provided in this guide help illustrate the importance of honesty, directness and respect in your interactions with everyone we serve: patients, residents, family members, colleagues, and business and community partners.

If at any time you believe our standards of conduct are being or have been compromised, please use the CommonSpirit Reporting Process to report your concerns. If the situation is related to human resources, you may also contact your local Human Resources department.

All of us at CommonSpirit share a proud heritage and strive to uphold the legacy of our participating congregations. We carry on their tradition of living our values and maintaining a strong ethical culture, with this guide as an important tool.

Thank you for your continued dedication to our healing ministry.

Sincerely,

Wright Lassiter III
Chief Executive Officer

Nima Davis
Chief Compliance Officer

Our Standards of Conduct Reference Guide and Corporate Responsibility Program

This is a guide to our Corporate Responsibility Program (CRP), which all CommonSpirit employees are obligated to follow. Our Corporate Responsibility Program provides resources for making ethical decisions based on our values and standards of conduct and helps us to understand and comply with legal, ethical and professional standards for the provision of health care and prevent or resolve activity that could lead to fraud, waste or abuse.

This guide is designed to help you work in a responsible, professional and ethical way that demonstrates our values. At a minimum, this means obeying the law and avoiding improper activities.

The Table of Contents helps locate specific topics within the guide.

Additional tools and resources for corporate responsibility include:

- Local and national policies and procedures, including those specific to corporate responsibility.
- Corporate responsibility reference and guidance documents.
- Educational offerings, including training in complex or high-risk areas.
- Consultation with local and national Corporate Responsibility Officers.
- Federal and state laws and regulations.
- Consultation with the CommonSpirit Legal Team.

The CRP collaborates with multiple functional areas to provide guidance to support compliance. By understanding and using this guide, we demonstrate our commitment to our mission and values.

This guide is designed to help you work in a responsible, professional and ethical way that demonstrates our values.

Organizational Beliefs

Mission

As CommonSpirit Health, we make the healing presence of God known in our world by improving the health of the people we serve, especially those who are vulnerable, while we advance social justice for all.

Vision

A healthier future for all — inspired by faith, driven by innovation, and powered by our humanity.

Values

Compassion

- Care with listening, empathy and love
- Accompany and comfort those in need of healing

Inclusion

- Celebrate each person's gifts and voice
- Respect the dignity of all

Integrity

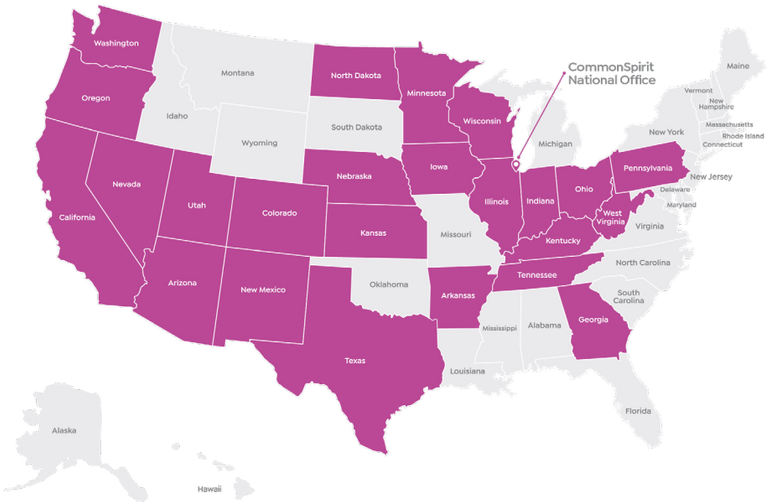
- Inspire trust through honesty
- Demonstrate courage in the face of inequity

Excellence

- Serve with fullest passion, creativity and stewardship
- Exceed expectations of others and ourselves

Collaboration

- Commit to the power of working together
- Build and nurture meaningful relationships



CommonSpirit Health brings health and humankindness to people in 24 states (as of July 2023).

Ethical Standards, Conduct and Guidance

Each employee is accountable to abide by CommonSpirit's mission, vision and values. As part of this commitment, you are expected to follow our ethical standards and conduct while working on behalf of CommonSpirit.

Ethical Standards

CommonSpirit abides by all rules, regulations and laws that govern the health care industry. Our heritage calls us to a higher standard: we follow regulations, but we also engage in ethical decision-making by applying our values to business decisions.

Ethical Conduct

We are expected to be responsible stewards of our ministry by behaving in an ethical manner. Building ethical relationships with employees, patients and families, and business and community partners is important to our ministry.

Guidance for Employees

When you're in a situation that raises questions about ethical conduct, follow these steps:

- Be accountable: Take ownership of your actions and assume responsibility for addressing the situation.
- Apply our values: Your decisions or actions must demonstrate our values of Compassion, Inclusion, Integrity, Excellence and Collaboration.
- Follow the rules that govern us: Identify and adhere to applicable policies, procedures, laws and regulations.
- Report concerns: Contact your manager, Human Resources representative, or Corporate Responsibility Officer.

Deciding to NOT take action may result in serious consequences for the organization and our employees.

Reporting Concerns

Each employee is responsible for promptly reporting potential violations of law, regulation, policy or procedure using the following reporting process.

CommonSpirit Reporting Process:

1. Speak with your manager or another manager.
2. If your manager is not available, you are not comfortable speaking with them, or you believe the matter has not been adequately resolved, contact your Human Resources representative or your local Corporate Responsibility Officer.
3. If you want to anonymously report a concern to a neutral third party 24 hours a day, seven days a week, you have two options.
   a. Call this reporting hotline number: **1 (800) 845-4310**
   b. File a report online: https://compliancehotline.commonspirit.org.

All calls to the hotline are received by external, trained staff who document and forward information to your local Corporate Responsibility Officer for appropriate action. You may remain and communicate anonymously if you wish. If you choose to identify yourself, there is no guarantee your identity will remain confidential, however, it is easier for Corporate Responsibility staff to respond. Retaliation against any employee who in good faith reports potential or suspected violations is unlawful and will not be tolerated.

Relevant CommonSpirit Policies

- No-Retaliation Policy

Whistleblower Protection

The federal False Claims Act protects anyone who files a false claim lawsuit – which alleges that improper or false claims have been submitted to the government for payment – from retaliation by their employer.

Failure to Act

CommonSpirit, like other health providers, is regulated by many governing entities and must demonstrate compliance in all aspects of its business. Therefore, all CommonSpirit employees must conduct all business activities in a way that complies with and is consistent with our mission, values, policies and this guide. Failure to do this may result in consequences including but not limited to risks to the safety of those we serve, refund of payments received from government programs, civil or criminal liability, exclusion from federal payment programs, and loss of tax-exempt status. Individuals may also be subject to criminal liability and substantial fines from governing entities.

CommonSpirit reserves the right to implement appropriate disciplinary action, including but not limited to suspension or termination of employment, termination of a non-employed service provider relationship or removal from office or board membership.

Standards of Conduct

The following standards of conduct describe and demonstrate CommonSpirit's commitment to honest and ethical conduct and provide guidance to employees facing uncertain situations. All board and committee members, officers, employees, volunteers, medical staff and others working with CommonSpirit must act in accordance with the following standards of conduct:

- Demonstrate fairness, honesty and integrity in all interactions in support of our mission.
- Uphold a high standard of skill and knowledge to deliver exceptional quality care, service and outcomes.
- Abide by the laws, regulations and policies that govern what we do.
- Maintain the integrity and protect the confidentiality of our patient, resident, client, employee and organizational information.
- Use our resources wisely to protect our assets, reduce our environmental impact and increase our public health footprint.
- Create an environment that promotes community, respects dignity and supports safety and well-being.
- Properly disclose and manage situations that pose potential or actual conflicts of interest.
- Foster a diverse and inclusive work environment in reverence to our employees, partners and those we serve.

Standard 1

Demonstrate Fairness, Honesty and Integrity in all Interactions in Support of Our Mission

Employee Expectations

In performing your job duties as an employee of CommonSpirit, you are expected to:

- Take responsibility for your actions.
- Know and comply with all policies, guidelines, procedures and practices, including federal health care program requirements. Please refer to this guide and all policies and procedures as they apply to your job responsibilities.
- When in doubt about your job responsibilities or obligations, seek guidance as provided in this guide; as outlined in our policies, guidelines, procedures and practices; or from your manager.
- Refrain from involvement in any illegal, unethical or other improper acts.
- Promptly report any known, potential or suspected violation of our policies or applicable laws and regulations.
- Assist authorized personnel in investigating alleged violations of our policies or applicable laws and regulations.

CommonSpirit provides employees with policies, training and other aids to help fulfill work responsibilities under our standards of conduct.

Management Expectations

Management is responsible for the implementation and enforcement of all compliance efforts. In carrying out these responsibilities, managers are expected to:

- Adhere to applicable policies when screening candidates and supervising employees.
- Inform employees of our Corporate Responsibility Program and their obligation to adhere to all of its requirements.
- Train employees on the requirements in this guide in accordance with applicable laws, regulations, policies, guidelines and procedures.
- Create and maintain a trusting work environment that allows for a free exchange of information about compliance without fear of retaliation.
- Conduct periodic reviews to provide reasonable assurances of employees' adherence to the Corporate Responsibility Program.
- Promptly report any known, potential or suspected violation of law, regulation, policy or procedure.
- Set a proper example of ethical conduct for employees to follow.

Standard 2

Uphold a High Standard of Skill and Knowledge to Deliver Exceptional Quality Care, Service and Outcomes

Documentation Standards

Financial and Business Records

CommonSpirit's financial books and records must not contain false, misleading or deceptive information. Financial reports must fairly and consistently reflect CommonSpirit's performance and accurately disclose the results of operations in accordance with generally accepted accounting principles and other applicable rules and guidelines. Financial reports must also provide a sufficient platform to complete cost reports and requests for payment for services provided to beneficiaries of federal and state health care programs such as Medicare, Medicaid and TRICARE (formerly known as CHAMPUS).

Ethical Use of Technology

The evolution of Artificial Intelligence (AI) and Machine Learning (ML) technology in health care is transforming patient care and operational insights. CommonSpirit is committed to the trustworthy, responsible and ethical use of these technologies in service of the ministry's mission and values. Consequently, CommonSpirit and its employees must ensure that all AI/ML technology is acquired and utilized in objective, compliant and nondiscriminatory ways to minimize undue bias and promote transparency with the communities we serve.

Internal Controls

An internal control is any process or procedure designed to help perform activities safely, accurately and in a way that is consistent with applicable laws, policies and best practices to meet operational objectives. These processes are designed and intended to protect CommonSpirit, its employees and other members of our workforce from errors, fraud or other issues that could lead to non-compliance with applicable laws, regulations or operational goals.

All CommonSpirit employees share responsibility for maintaining and complying with required internal controls. In carrying out their documentation, review, evaluation, financial reporting and recordkeeping responsibilities, employees must provide complete and accurate documentation consistent with CommonSpirit standards and requirements.

In fulfilling their financial reporting obligations, employees must also disclose all material facts related to financial matters to avoid any false or misleading financial reporting.

Employees must cooperate in all audits and investigations, and must not influence, coerce, manipulate or mislead any person or entity involved in the audit or investigation.

Medical Records

CommonSpirit complies with health care program requirements, including federal rules governing documentation and billing of medical necessity determinations and procedures performed in all care settings.

Medical records must be a timely, meaningful, authentic, accurate and legible description of the patient's clinical condition and treatment course. Medical record documentation must meet documentation standards and be consistent with applicable medical staff rules and regulations, policies and health information best practices.

Relevant CommonSpirit Policies

- Medical Record Documentation Standard

Q Clinicians on our unit sometimes perform a service or provide treatment to a patient but do not document it in the chart until later. Is this okay?

A Documentation is to be accurate and completed on a timely basis. A delay in documentation may jeopardize patient care and could impact our ability to receive payment from a federal or state health care program. We are obligated to follow our organization's policies and procedures, bylaws and all applicable federal and state laws regulating documentation.

Coding and Billing

Federal and state laws control third-party billing for patients, residents and others in our care. CommonSpirit submits accurate, complete and timely claims for payment. CommonSpirit could be required to refund payments for filing inaccurate or fraudulent claims, and CommonSpirit and its employees could be subject to criminal prosecution.

Our policy is to provide, document and bill for medically necessary services for the diagnosis or treatment of an illness or injury, in the appropriate location, ordered by a physician or other health care provider.

Clinical, health information management, billing and coding employees and others responsible for creating charges must:

- Provide accurate and timely work that complies with our policies as well as federal and state laws and regulations.
- Bill only for services provided and appropriately documented, using accurate billing and diagnosis codes.
- Immediately notify a manager or a local Corporate Responsibility Officer of inaccuracies so they can be corrected.
- Retain billing and medical record data as required by law and our record retention policies.

Q If documentation is not available when we are ready to submit a bill, is it okay to submit the bill?

A No. Do not submit the bill until appropriate documentation is on file. This verifies the services were provided to the patient.

Q Can we perform services for patients who are not registered in our patient registration system?

A No. All services must be documented and appropriately billed, so all patients must be registered.

Maintaining Licensure Requirements and Qualifications

All individuals whose positions with CommonSpirit have license requirements must:

- Perform job duties within the scope of the license.
- Maintain an active and current license and provide verification on request in compliance with CommonSpirit policies.
- Comply with all licensing and credentialing requirements to remain in good standing and active with the requisite local, state or other licensing authority.
- Immediately inform Human Resources if their license becomes inactive.

Relevant CommonSpirit Policies

- License and Certification Policy

Training and Education

CommonSpirit is committed to providing the training and education necessary to carry out your job duties and conduct yourself in an ethical and responsible way. Training in regulatory compliance, privacy and security is provided at the time of hire and annually thereafter. Failure to complete required training will be noted in your annual evaluation.

Relevant CommonSpirit Policies

- Required Training Policy
- Privacy Education and Training Policy

Standard 3

Abide By the Laws, Regulations and Policies That Govern What We Do

If a government agent contacts you, ask for a government identification card and obtain proof of identification to verify the agent's name, department and agency.

Responding to Government and Regulatory Agencies

CommonSpirit responds to requests from all government and regulatory entities in a timely and cooperative manner. If a government agent contacts you, or you receive a subpoena or search warrant, follow the guidance below:

- Be calm and respectful.
- Ask for a government identification card and obtain proof of identification to verify the agent's name, department and agency.
- Advise the agent that you will contact a manager to assist with their request; ask them to wait.
- Refer any request for information to a manager. Immediately call the following persons, in the order given, until you reach one of them:

  a. Manager or administrator on call

  b. Local Corporate Responsibility Officer or designee

  c. CommonSpirit Corporate Responsibility Officer

  d. Local Legal Team attorney

  e. Reporting hotline number: 1 (800) 845-4310

If a government agent asks to speak with you, you may agree to speak with the agent, but you are not legally required to do so. You have the right to legal representation during an interview. You may tell the agent that you, or someone on your behalf, will contact the agent to discuss their concerns.

If a government agency conducts an interview or investigation, or serves and executes a search warrant, do not:

- Interfere with the agent.
- Alter, remove, or destroy documents or records belonging to CommonSpirit, including but not limited to paper, electronic, phone or computer records.
- Provide false, misleading or incomplete information.
- Suggest to any employee that they not cooperate with government investigators.
- Offer any item of value to a government official, including food or beverage.

Relevant CommonSpirit Policies

- Government Contact Protocol

Physician Self-Referral Law (Stark Law)

Stark Law is a set of federal laws that prohibit a physician from referring Medicare and Medicaid patients to a health care provider if the physician (or an immediate family member of the physician) and provider have any type of financial arrangement. However, referrals are permitted if the arrangement complies with certain exceptions to the Stark Law. If the arrangement does not fully comply with an exception, the provider cannot bill for certain services ordered or referred by the physician.

Stark Law is subject to "strict liability." This means even unintentional violations may have significant financial penalties. If you have any questions about whether an arrangement with a physician is compliant with Stark Law, contact your local Corporate Responsibility Officer or Legal Team attorney for guidance.

Q A physician provides medical director services to our hospital and is paid for these services. Under Stark Law, does this result in a financial relationship?

A Yes. For the purposes of Stark Law, a financial relationship occurs whenever anything of value is exchanged between a hospital and a physician (or a physician's immediate family members). This arrangement may be permissible if it meets the personal services exception under Stark Law.

Q Who qualifies as an "immediate family member" under Stark Law?

A The term "immediate family member" is defined broadly to mean husband or wife; birth or adoptive parent, child or sibling; stepparent, stepchild, stepbrother or stepsister; father-in-law, mother-in-law, son-in-law, daughter-in-law, brother-in-law, sister-in-law; grandparent or grandchild; and spouse of a grandparent or grandchild.

Anti-Kickback Statute

The federal Anti-Kickback Statute (AKS) prohibits individuals and entities from knowingly offering, paying, soliciting or receiving "remuneration" (anything of value, or "kickbacks") to induce or reward referrals of items or services paid for by Medicare, Medicaid or other federally funded programs.

No person may directly or indirectly ask for, pay or provide anything of value to physicians or other health care providers to refer patients to our facilities or other health care entities. If you are in doubt about whether a situation may be problematic, before proceeding, contact your Corporate Responsibility Officer or Legal Team attorney for guidance.

The AKS is intended to prevent:

- Compromised medical judgment and treatment decisions due to financial incentives.
- Overuse of items or services covered by federal health programs.
- Increased costs to the Medicare and Medicaid programs because unnecessary or excessive care has been provided.
- Unfair competition (also see Antitrust section).

Q What are "kickbacks?"

A Kickbacks can be gifts or anything of monetary or other value given with the intent, expectation or

understanding that an individual will make referrals to us or be rewarded for past referrals. In addition to cash and cash equivalents (for example, gift certificates or gift cards), other examples of activities or items of value prohibited under the AKS includes:

- Free supplies, space, personnel or equipment.
- Free travel and lodging.
- Discounts, account adjustments or write-offs (other than those defined in charity care or other discount policies).

Q What types of arrangements are inappropriate to offer physicians and may be considered a kickback?

A Examples include:

- Anything of value given with an expectation of future referrals or as a reward for past referrals.
- Providing office space at less than fair market value.
- Providing items or services free of charge or at less than fair market value (for example, hazardous waste disposal service).
- Writing off a physician's bill or recruitment loan.

Q Dr. Jones occasionally sends patients to our hospital. He said he would send us more patients if we provide him with free or discounted office space. Can we do this?

A No. We must charge and the physician must pay fair market value for office space. Free or discounted lease arrangements may appear to be an incentive for referrals from the physician, also known as a "kickback."

Physician Agreements and Transactions

CommonSpirit maintains positive working relationships with physicians in compliance with applicable state and federal laws and may enter into employment or other arrangements with physicians to provide access to care for our patients. Our policies provide an efficient framework to transact business with physicians in compliance with those laws. All agreements involving payments or other compensation between CommonSpirit or CommonSpirit facilities and physicians or physician-owned entities will comply with policies and applicable law.

For information regarding physician agreements and transactions, contact your Legal Team attorney for guidance before proceeding.

Relevant CommonSpirit Policies

- Physician Transaction Review and Signature Authority Policy
- Gifts and Business Courtesies to Physicians
- Purchases from Physician-Owned Entities Policy
- Gifts and Gratuities To and From Business Sources Policy

Excluded Providers

The federal government prohibits a health care provider from receiving payment for services provided in part or in whole by an individual or entity that the government has excluded from participating in a federally funded health care program. CommonSpirit does not knowingly employ, conduct business with or contract with excluded providers. CommonSpirit conducts pre-employment, pre-contracting, pre-credentialing and ongoing excluded provider status checks on individuals, providers and affiliated entities. Any relationship with an employee, individual or entity found to be an excluded provider may result in termination of that relationship.

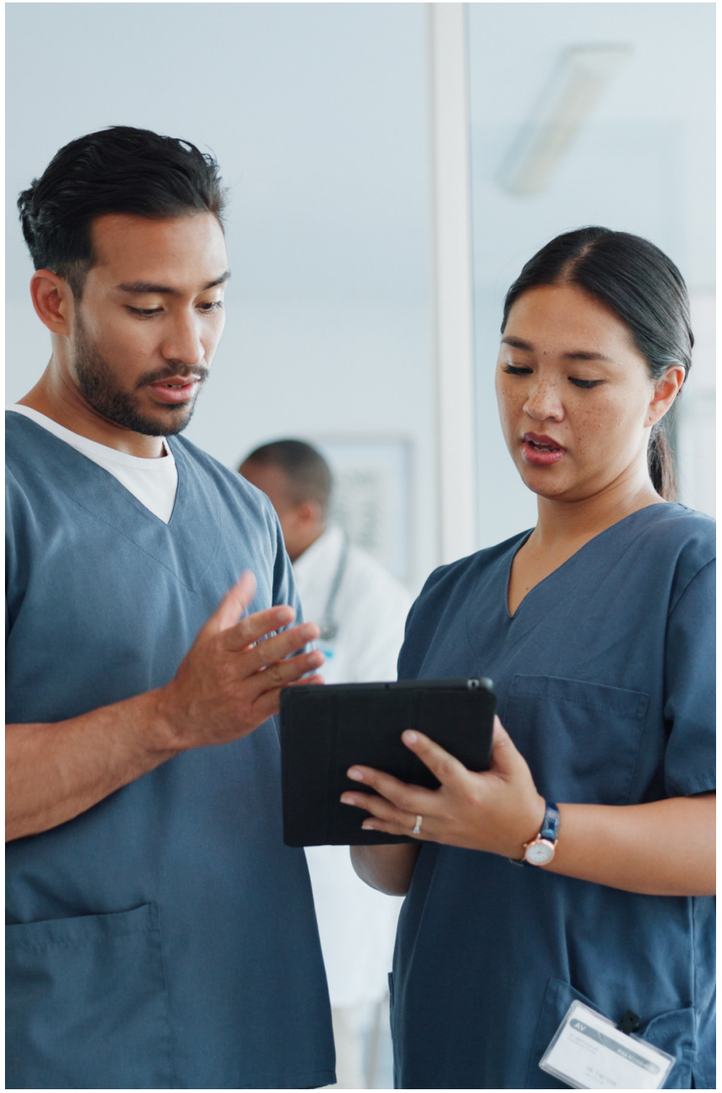
Relevant CommonSpirit Policy

- Screening for Excluded Providers Policy

Antitrust and Trade Regulation Rules

CommonSpirit does not participate in activities that illegally reduce or eliminate competition, control prices and markets or exclude competitors. The purpose of antitrust and trade regulations is to protect the public, CommonSpirit and other companies from unfair trade practices and to support competition.

Because antitrust matters can only be analyzed on a very fact-specific basis, the CommonSpirit Legal Team must be consulted on any arrangement that could affect market competition.



- Do not engage in:
  - Price fixing, which is an agreement between organizations about the prices one or both will charge others for goods or services.
  - Bid rigging, which is any agreement between organizations about who will or will not bid.
  - Customer allocation, which is an agreement between organizations or individuals to divide customers, patients or other business among themselves.
- Do not discuss with any competitor:
  - Prices, terms or conditions of sales.
  - Where CommonSpirit intends to sell or bid.
  - To whom CommonSpirit intends to sell or bid.
  - Whether or at what price, CommonSpirit intends to sell or bid.
- If any representative of a competitor attempts to discuss any of these subjects with you, terminate the conversation immediately and report it to your manager.
- Do not improperly use a competitor's confidential information or trade secrets, or engage in conduct that may be perceived as intimidating or threatening.

Emergency Medical Treatment and Labor Act (EMTALA)

CommonSpirit requires our facilities with dedicated emergency departments to comply with the federal Emergency Medical Treatment and Labor Act (EMTALA), sometimes called the "Anti-Dumping Law." Numerous states have also enacted similar laws, and some are more stringent than the federal law.

Consistent with our commitment to people who are poor and underserved, any person, regardless of their ability to pay, who comes to one of our emergency departments is provided an appropriate medical screening examination to determine if an emergency medical condition exists; or, for pregnant women, if active labor exists. Appropriate stabilizing treatment is provided within the capability of the staff and the facility for patients determined to have an emergency medical condition. EMTALA also applies when the need for emergency care is apparent or requested by an individual on the facility's property outside of the dedicated emergency department.

CommonSpirit facilities may not delay medical screening examinations or stabilization to obtain financial or demographic information from the patient. CommonSpirit facilities may only transfer unstable patients with an emergency medical condition to another health care facility if:

1. The patient requests the transfer and has been informed of the facility's obligations and the risks and benefits of transfer; or
2. The facility does not have the capability to provide necessary stabilizing treatment and a physician certifies the medical benefits provided at another facility are reasonably expected to outweigh the increased risks involved with the transfer.

Q Does the EMTALA law permit us to register an individual who comes into our emergency department before we perform a medical screening examination and stabilization procedures?

A You may register an individual first only if the process does not:

1. Delay the medical screening examination and any necessary stabilizing treatment.
2. Include questions about the individual's method of payment or ability to pay.

Registration processes must not discourage the individual from remaining in the emergency department for further evaluation. CommonSpirit facilities shall not request prior authorization from the individual's insurance company or managed care plan before completing a medical screening examination or beginning stabilization treatment.

False Claims Act

The federal False Claims Act makes it a crime for any person or organization to knowingly make a false record or file a false claim with the government for payment. "Knowingly" means the person or organization:

- Knows the record or claim is false.
- Seeks payment while ignoring whether the record or claim is incomplete or false.
- Seeks payment with reckless disregard for whether the record or claim is false.

Under certain circumstances, an inaccurate claim submitted to the government could be alleged to be a false claim. Examples of possible false claims include:

- Knowingly billing Medicare or other government payers for services not provided.
- Billing for services provided, but not medically necessary.
- Submitting inaccurate or misleading claims about the type or level of services provided.
- Making false statements to obtain payments for products or services.
- Failing to repay the federal or state government for an identified overpayment.

A person who has information regarding improper or false claims submitted to the government for payment may file a lawsuit in federal court on behalf of the government (known as a "Qui Tam" or "whistleblower claim").

Fraud, Waste and Abuse

Federal and state governments pay for a large share of health care in the United States. To ensure that it is appropriately paying for Medicare and Medicaid beneficiary health care services, the government actively checks for and investigates potential fraud, waste and abuse (FWA) by health care companies and beneficiaries. According to the government, billions of dollars are improperly spent due to FWA.

CommonSpirit works to actively prevent, detect and correct FWA. Medicare Advantage Plans require that they be notified of FWA. Identification of potential FWA may require that we notify the government or our health plan partners. To remain compliant with federal and state laws, we have policies, procedures and plans in place to detect and prevent FWA.

- Fraud includes intentionally submitting false information to the government to get payment. An example is knowingly billing the government for patient services that did not occur.
- Waste occurs when a health provider's actions result in unnecessary costs to the government without unlawful intent, such as the ordering of too many or unnecessary laboratory tests.
- Abuse takes place when the government pays for services when there is no legal entitlement to that payment, such as when a provider misuses codes on a claim resulting in increased payment.

Marketing Practices

CommonSpirit marketing, communications, fundraising and advertising activities educate our communities about health issues, increase awareness of our services and facilitate employee recruitment. Any advertising or marketing conducted by CommonSpirit must:

- Present truthful and accurate information to the public.
- Distinguish opinion from fact when presenting issues.
- Obtain the consent of any person whose name or likeness will be used before the advertising or marketing material is shared with the public.
- Comply with applicable federal and state laws and system policies for marketing and advertising activities, including any marketing and advertising activities provided for or with non-employed physicians or physician groups.

Q Two oncologists who are not employees of the hospital just joined the medical staff to provide a new service. We would like to send an announcement to the community to highlight this new service. Is this a permitted marketing practice?

A Yes, it is generally acceptable for a hospital to market a new service line. However, this type of announcement and its cost must be in accordance with applicable state and federal fraud and abuse laws and CommonSpirit physician marketing guidelines. Consult your local Corporate Responsibility Officer or Legal Team attorney to determine the applicable requirements and the restrictions for non-employed physician and physician group advertising and marketing activities.

Relevant CommonSpirit Policies

- Uses and Disclosures of Protected Health Information for Marketing
- Uses and Disclosures of Protected Health Information for Fundraising

Patient Care and Rights

We deliver quality care without regard to race, color, national origin, ancestry, sex, pregnancy, childbirth or related medical condition, marital status, religion, creed, physical/mental disability, medical condition, age, gender identity, sexual orientation, citizenship, payer source or ability to pay, or any other protected categories as defined by law. We treat every person in our care with dignity and respect. Our commitment to quality and service is shared by our board and committee members, employees, officers, volunteers, medical staff and other representatives of our organization. Our commitment to our distinctive Catholic culture enables us to obtain desired outcomes.

We provide individuals in our care with information regarding their rights and responsibilities, and we protect those rights. Individuals in our care have the right to

accurate, timely information about their health, payment options (including charity care) and other information to help them make decisions about their treatment. It is our responsibility to provide this information. Please refer to your organization's guidelines for a description of patient rights.

Q To whom do I report quality of care issues?

A Such issues may include many aspects of care and must first be discussed with your manager. More serious issues may need to be evaluated by the Quality and Risk Management Departments or the Patient Grievance Committee. If you believe a quality of care

issue is not being addressed, use the CommonSpirit Reporting Process.

Q If I see that an individual in our care is not being treated with the proper courtesy and respect, what should I do?

A First, make sure the individual is not in harm's way. Then, talk with your manager. If your manager does not provide a satisfactory response, contact your local patient advocate, patient experience or risk manager, or use the CommonSpirit Reporting Process.

Q What am I to do if I know a medical error has occurred? Should I tell the patient or family?

A CommonSpirit supports compassionate disclosure whenever an error has occurred. To assist the family in making any additional and well-informed care decisions, the disclosure must take place in a coordinated manner. Contact your manager and your quality or risk manager for guidance on handling the disclosure appropriately.

Q How can I help a patient or family member get the information they need to make informed decisions?

A Work with your team to make sure all educational documentation is provided in an easy-to-understand format. Use teach-back methods to build understanding. If you think a patient or family is being pressured to make a particular decision, talk with your manager, your local patient advocate, patient experience manager, or quality or risk manager.

Relevant CommonSpirit Policies

- Patient Rights and Responsibilities

Research Integrity

CommonSpirit is committed to high standards of ethics and integrity when engaging in research. Any dishonesty, misconduct, fraud or harm to research subjects may damage the reputation and credibility of researchers, the scientific community at large, and CommonSpirit. Researchers must be knowledgeable about applicable laws and regulations as well as CommonSpirit policies and procedures related to research compliance.

Grant and Contract Management

CommonSpirit may receive money, in the form of grants and contracts, to conduct specific research studies. The grant/contract awarding organization may be a state or federal government agency or a nonprofit or for-profit company. Effective grant/contract management requires CommonSpirit to demonstrate accountability with sponsor's funds and comply with the specific terms and conditions of each contract and grant. Proper processes must be in place to remain compliant with all federal, state and agency rules and regulations as well as CommonSpirit policies and procedures related to research and grant management. Understanding these requirements prior to accepting an award is important because this information, as well as additional approvals, may be necessary for the application and award acceptance processes.

Human Subjects Research

All human subjects research at CommonSpirit shall have designated Institutional Review Board (IRB) approval or determination of exemption from IRB oversight. The IRBs also perform Privacy Board responsibilities as required under HIPAA. It is important to determine if a project is classified as research or another activity, such as performance improvement, quality assurance or program evaluation.

Human subjects research includes obtaining information or biospecimens through intervention or interaction with an individual and using, studying or analyzing the information or biospecimens; or obtaining, using, studying, analyzing or generating identifiable private information or identifiable biospecimens. IRB approval is required for creation of a biorepository or database if one purpose of the biorepository/database is for research, even if it is not the primary purpose. Individuals shall obtain IRB approval or a determination of exemption from IRB oversight before accessing any tissue, other biospecimens or data including patient information for systematic analysis.

Clinical Research Billing Compliance

Clinical research tests and procedures may be paid for by the sponsor of the study or may be reimbursable by a federal, state or private payer, subject to coverage criteria. Determining how each research test and procedure will be paid and accurately communicating the coverage to the research subject and billing departments is essential for accurate billing.

Animal Subjects Research

CommonSpirit-designated Institutional Animal Care and Use Committees (IACUC) shall approve all vertebrate animal research. Researchers are responsible for proper animal care and handling of animals used in their studies, in accordance with applicable federal and state regulations and CommonSpirit policies and procedures.

Conflict of Interest Management

Potential conflicts of interest shall be identified and managed to promote objectivity and eliminate bias or the appearance of bias in research. A research conflict of interest may exist when a researcher's personal financial, intellectual or equity interest could directly and significantly affect the design, conduct or reporting of the research. Researchers shall report personal interests related to their institutional responsibilities as required by federal and state regulations and CommonSpirit policies and procedures.

Relevant CommonSpirit Policies

- Research Conflicts of Interest ADDENDUM F

Research Misconduct

Federal regulations prohibit misconduct in research, which includes intentional fabrication, falsification or plagiarism in proposing, conducting, reviewing or reporting research results. Honest errors or differences of opinion do not constitute research misconduct. The CommonSpirit Research Integrity Officer follows formal research misconduct inquiry and investigation procedures to determine if research misconduct occurred and protect the rights of all individuals involved. Anyone who suspects research misconduct must immediately contact the Research Corporate Responsibility Officer to discuss their concerns.

Relevant CommonSpirit Policy

- Reporting and Investigating Allegations of Research Misconduct Policy

Contact your Research Institute/Center or the Research Corporate Responsibility Officer if you have any questions related to these requirements.

CommonSpirit is committed to high standards of ethics, integrity and compliance with law when engaging in research.

Tax-Exempt Status

CommonSpirit and most of its related organizations are nonprofit, tax-exempt entities operated solely for religious and charitable purposes. This status gives CommonSpirit certain benefits. To maintain our tax-exempt status, we must use our resources to further the religious and charitable purposes of our mission. Tax laws prohibit our tax-exempt organizations from:

- Providing goods, services, leases, compensation or other benefits to organizational insiders (such as an officer, director, key employee or physician) without receiving equivalent value in return. Some examples include:
  - Paying more than fair market value for services, products or leases.
  - Providing courtesy discounts and other uncompensated benefits to physicians, officers, directors and trustees, other than those provided for by organizational policy.
  - Accepting research grants from third parties when the researcher keeps the funds for personal use or the CommonSpirit organization is not paid for the use of its time, equipment or facilities in connection with the research.
  - Allowing a physician to market their private business inside our clinic/hospital (such as a botox clinic or skin care line, or any product that may be used in the clinic/hospital).
- Providing goods, services, leases, compensation or other benefits to a third party (who is not an insider) without receiving equivalent benefit in return, subject to certain exceptions. Some examples include:
  - Taking part in a joint venture, partnership or similar transaction that results in an improper private benefit (gain) to a third party.
  - Recruiting physicians or other key employees with incentives or compensation plans in excess of fair market value or that do not serve an identified community need.
  - Leasing a facility to a third party at less than fair market value.
  - Providing services to a third party at less than fair market value, such as billing services to private physicians or providing health care services at less than fair market value, except where permitted by CommonSpirit's charity, prompt pay or other discount policies.
  - Permitting any person to buy, sell, lease or use organizational property at less than fair market value.
  - Use of tax-exempt space for private practice or for-profit purposes.

Political Activities

The tax-exempt status of CommonSpirit carries certain restrictions on political activities. The law delineates between political campaign activity (such as involvement with the nomination, appointment or election of candidates for public office) and policy activities (such as advocacy and lobbying to influence public policy). Participation by tax-exempt organizations in political campaign activity is not permitted. As a result, CommonSpirit does not use corporate resources for political purposes and complies with all applicable state and federal laws.

As allowed by law, CommonSpirit actively participates in public policy advocacy, particularly on behalf of people who are underserved. Our advocacy and lobbying activities focus on attempts to influence the development of legislation and regulations (including ballot questions, including referenda, initiatives, constitutional amendments, and bond measures, which are considered to be legislation). The CommonSpirit Advocacy Team and our employees participate in these activities to influence public policy at the local, state and federal level.

"Substantial" lobbying activity at the local, state or federal level is not permitted for tax exempt organizations. There is no precise definition of "substantial," but a general rule is committing more than 5% of an organization's total expenditures to lobbying. The Internal Revenue Service

watches and investigates the political activities of tax-exempt organizations. Because violation of this rule could jeopardize our tax-exempt status, CommonSpirit closely monitors and tracks spending on political activities.

The following guidelines provide an overview of what is and is not allowed.

Permissible Political Activities for a Tax-Exempt Organization

- Encouraging individuals to call or write a letter to elected officials to express the organization's view on public policy issues or legislation.
- Arranging personal visits with elected officials, legislators and government agencies to provide the organization's perspective on public policy issues or legislation.
- Holding public forums, lectures and debates to raise awareness of public policy issues and to inform voters of their impact on the organization.
- Providing financial and in-kind support to groups sponsoring ballot initiatives, referenda and similar measures.
- Hosting candidate forums, debates and visits as long as all candidates for office are given an opportunity to appear and speak to employees.
- Allowing a candidate to appear at an organization if the appearance is based on the candidate's status as an expert, public figure or celebrity, as long as no mention is made of the candidacy and there is no campaign or election-related activity.
- Using the organization's resources, facilities and personnel to sponsor non-partisan voter registration drives.

Permissible Political Activities for Employees of a Tax-Exempt Organization

- Personally endorsing, supporting or opposing a candidate as long as the employees do not imply that they are representing CommonSpirit, use their CommonSpirit titles, or use organizational resources (such as phones, office supplies and email).
- Contributing personal funds to support or oppose a candidate or to a political action committee (PAC).

Impermissible Political Activities for a Tax-Exempt Organization

- Endorsing, supporting or opposing a candidate for public office.
- Contributing organizational funds or resources to a candidate, election campaign committee or PAC.
- Sponsoring a fundraiser or another event that endorses a candidate on or off the property of the organization.
- Inviting a candidate or a select group of candidates to appear at a tax-exempt organization for the purpose of conducting election-related activity or promoting a candidacy.
- Permitting candidate, political party or PAC literature to be placed or distributed on the organization's premises.

Impermissible Political Activities for Employees of a Tax-Exempt Organization

- Engaging in activities or making statements that imply CommonSpirit endorses, supports or opposes a candidate.
- Asking or pressuring a fellow employee to endorse, support or oppose a candidate.
- Using the organization's resources (such as phones, office supplies and email), facilities or personnel to solicit support, opposition or contributions for a candidate or PAC.

Use of Copyrighted, Trademarked or Licensed Material

Employees must not copy documents or computer programs that are protected by copyright laws or licensing agreements. Employees must not use confidential business information improperly obtained from competitors or that may violate any employee or organizational contractual obligation.

Standard 4

Maintain the Integrity and Protect the Confidentiality of Our Patient, Resident, Client, Employee and Organizational Information

HIPAA Privacy and Security

HIPAA is a federal law that safeguards the privacy and security of protected health information. Privacy and security are separate rules within HIPAA, but go hand-in-hand.

- The Privacy Rule focuses on health care entities' uses and disclosures of patients' protected health information (PHI). It covers the confidentiality of PHI in all formats, including electronic, paper and oral. The rule safeguards PHI from unauthorized use and disclosure.
- The Security Rule focuses on administrative, technical and physical safeguards as they relate to electronic PHI (ePHI). Protecting ePHI from unauthorized access, whether external or internal, stored or in transit, is covered by the security rule. Typically, ePHI is stored in:
  - Electronic services and applications such as email, Google Drive, electronic medical records (EMRs), department file shares and personal drives.
  - Internet-based services such as cloud storage, third-party services, vendor-hosted applications, etc.
  - Computer hard drives, magnetic tapes, disks, memory cards and removable/portable storage devices.

Confidentiality

Confidential information includes information about patients, residents, employees and other members of our workforce, as well as proprietary information used while conducting business. It is vital that we protect this information in any form – such as paper and electronic records, email, digital media and oral discussions – and do not share it with anyone unless there is a job-related need to know. Improper use or sharing of confidential information can harm our mission, our reputation, individuals in our care and our business partners. Texting is one example of sharing information improperly. Texting patient information can pose a significant risk to patient privacy and confidentiality as it can be easily intercepted or misdirected. Only approved secure methods can be utilized for texting communications for the protection of this sensitive protected health information (PHI).

Refer to CommonSpirit's policies and standards for privacy, security and confidentiality for more information. Violating these policies, standards, laws or regulations may result in disciplinary action and civil or criminal penalties against the individuals involved or CommonSpirit. If you have any questions, please contact your local Privacy Officer or your local Security Officer.

Relevant CommonSpirit Policies

- Privacy Policies and Standards

Q We just hired a new employee in our department. She has not yet received her computer login information, and she cannot begin her work assignments. She asked me to share my username and password with her so she could begin her new assignment. What should I do?

A Passwords are confidential information and must not be shared with others, including managers and IT employees. Sharing your username and password violates CommonSpirit's information security policies. If you share passwords you will be held accountable for any actions taken under that password, as well as for violation of our policies. Ask your new colleague to speak to their manager and to contact the Information Technology Services (ITS) Help Desk to gain appropriate access.

Relevant CommonSpirit Policies

- Data Asset Usage Policy

Q In order not to fall behind on my assignments, I sometimes take work home. May I email confidential information or work documents to my personal email address, copy them to a portable storage device or save them to my personal laptop computer for this purpose?

A No. You must not email, copy or save work-related documents to an external personal email address, portable storage device or personal computer if the reason is to work from home. All work done for our organization must be done on equipment the organization provides and/or authorizes for work purposes. Use of your personal email address is not permitted for work purposes and use of any portable storage device must be authorized by Information Technology. If you are authorized by your manager to work during times when you are not at our facility, and you are paid hourly as a non-exempt employee, you must also track all time worked for timely and proper payment of wages. Beyond this, you must only use organization equipment provisioned to you or equipment authorized for work purposes. Consult with your manager and your Human Resources Business Partner before engaging in work outside your scheduled work hours and location.

Q Why am I not allowed to use my own USB drive to back up my work files or work from home?

A Many USB drives are not encrypted, and they are easy to lose. Some of the largest breaches of confidential information in health care have been due to lost, unencrypted USB drives.

In addition, USB drives are not a good backup solution and are less reliable than saving information on a Google/network drive. If you have critical files and are concerned about backing them up you are to contact IT and request a network share to be allocated.

Once CommonSpirit information is copied to any removable media device, the organization may not be able to maintain custody or an adequate level of security over the information. Personal computers/laptops do not maintain the same level of protection against computer viruses and hacking as the CommonSpirit network.

Q Can I reuse passwords from other workplace or personal accounts? Can I use a password vault, so I do not have to remember so many passwords?

A CommonSpirit requires that you use strong and unique passwords for business accounts. Reuse of passwords, even strong passwords, may compromise our business accounts as well as any other accounts you have with that same password. Password vault services are not permitted for our business accounts because of the risk of data breaches. Several publicly available password vault applications have experienced breaches that put all stored credentials at risk. Also, password vaults are often tied to your mobile device, which could be lost, stolen or compromised by malware.

CommonSpirit allows users with certain privileges to use an enterprise-grade password management system. However, this is only intended for sensitive system accounts and is not available to store user account information.

Q I am excited about the work I do at CommonSpirit and would like to post information about my work on social media to share with friends. Is it okay to do this?

Individual employees are not authorized to speak, comment or make representations on behalf of CommonSpirit in social media posts.

A Please limit the work-related information you post on social media to general comments. Your personal social media posting must be done during non-working time. Remember that individual employees are not authorized to speak, comment or make representations on behalf of CommonSpirit, nor use our logo, workplace photos, coworker photos or other company insignia in social media posts. If you have questions, contact your Human Resources representative.

You are not permitted to comment on or reference patients or patient events, including but not limited to confidential information. Posting confidential information – such as patient names or other PHI, photographs, videos or business information – violates HIPAA and CommonSpirit privacy and security policies and may result in disciplinary action.

Relevant CommonSpirit Policies

- Corrective Action for Privacy and Security Violations Policy

Employee Information

Employees trust us to keep their personally identifiable information confidential by following applicable laws, regulations and human resources policies. This information includes wages and salaries; employment contracts, history and status; Social Security numbers; and financial and banking information.

Q I work in payroll. A friend who also works at the hospital is being promoted to a management position. He asked me to access our systems to look up how much other managers are making. Can I do so and share the information I accessed from our systems if I do not give specific names?

A No. You may not use our systems to access information that you have no legitimate business purpose for in performing your job duties. This constitutes unauthorized access. Questions about compensation must be referred to your Human Resources representative.

Business Information

We maintain and protect the confidentiality of our proprietary information. This includes but is not limited to information about our intellectual property, competitive position, business strategies, contract terms or negotiations, payments, reimbursements and negotiations with employees or outside organizations. Proprietary information can be used only for legitimate business purposes and protections are in place to prevent unauthorized use or disclosure. If your employment or association with CommonSpirit or our associated businesses ends, you have an ongoing obligation to maintain the confidentiality of this information. Competitive information obtained in violation of a covenant not to compete, a prior employment agreement, or other contract relationship may not be used to conduct business on behalf of CommonSpirit.

Q Before coming to work at CommonSpirit, I had a consulting relationship with a competitor and obtained confidential information about the competitor that would help CommonSpirit negotiate contracts. Should I share the information?

A No. It is inappropriate to use a competitor's confidential information in any business dealings. It would also be unethical for you to share CommonSpirit's confidential information with another employer.

Patient and Resident Information

We follow federal and state privacy and confidentiality laws such as HIPAA. Violating these laws may result in civil or criminal penalties for CommonSpirit or the responsible individuals. Our standards of conduct speak to the importance of confidentiality for our patients, residents and clients.

Employees, affiliated physicians and health care partners may only use and disclose PHI to care for our patients and residents; as allowed for treatment, operations and payment functions; or as allowed or required by other applicable laws and regulations. Any other use or disclosure of PHI requires a specific authorization from the patient, resident or client.

If you think PHI is being improperly used, accessed or disclosed, report your concern to your local Privacy Officer or by using the CommonSpirit Reporting Process.

Q In the break room, I heard my coworker discussing the condition of a physician's spouse who is receiving treatments at our hospital. What should I do?

A Physicians and their families are entitled to have their health information kept confidential in the same manner as other patients. This situation may violate HIPAA and our policies. Report the issue to your manager or local Privacy Officer or use the CommonSpirit Reporting Process.

Q One of my family members is in the intensive care unit. May I look at her medical information to let other family members know how she is doing?

A No, you may not access or look up medical information for family members, or any patient, without a job-related reason. Being an employee of a health care facility does not give you greater access rights. To access a family member's health information, you must contact the Health Information Management (HIM) department for assistance with the proper process and necessary documentation required.

Q As a CommonSpirit employee, can I look at my own medical information?

A You must follow the same procedures required of any individual in our care by requesting access to your information from local Health Information Management (HIM), your designated release of information representative, or the patient portal. Being an employee of a health care organization does not give you greater access rights, even to your own medical information.

Relevant CommonSpirit Policies

- Permissible Uses and Disclosures of Protected Health Information
- Uses and Disclosures of Protected Health Information When an Authorization is Required
- Privacy Complaint and Breach Investigation Management
- Right of Access to the Designated Record Set
- Minimum Necessary Standard for Use and Disclosure of PHI

Job Shadowing

HIPAA allows:

- Health care systems to use and disclose PHI when conducting training programs for students, trainees or practitioners learning under supervision to improve their skills as practitioners.
- Students engaged in a program formally affiliated with CommonSpirit.

To remain compliant with HIPAA, shadowing activities must meet the following requirements:

- Education and orientation about privacy and security practices.

- Compliance with Data Asset Usage Policy.
- Adequate supervision to prevent actual or potential access to PHI.
- Written patient authorization from any patient whose PHI would be viewed, accessed or disclosed.

No video/audio recording or photography of any kind can occur during any type of job shadowing, and additional consents and authorizations are required.

Relevant CommonSpirit Policies

- Data Asset Usage Policy
- Shadowing, Tours and HIPAA Implications

Social Media Guidance

We do not want patients to worry about their privacy before, during or after their visit to one of our facilities. We must protect – both during and after the work day – any information about a patient that employees access, use or otherwise learn about while performing their jobs. Do not:

- Post or share any patient-related information on any social media platforms, including private pages or private groups.
- Take photographs or videos of patients on a personal cell phone or post any patient-related images to the internet, even if you believe the patient cannot be identified.
- Discuss patients or hospital/clinic events, including patient information or employee information, in internet chat rooms or on any internet site, including social media forums, even if the information is publicly known outside our health system.
- Use personal cell phones to send or receive patient information.
- Use personal cell phones or data devices except on breaks from regular work assignments and in non-patient care areas.

Relevant CommonSpirit Policies

- Social Media: Guidelines and Best Practices For Your Personal Social Media Use

Standard 5

Use Our Resources Wisely to Protect Our Assets, Reduce Our Environmental Impact and Increase Our Public Health Footprint

Protecting our Assets

CommonSpirit is committed to protecting our assets, including our financial resources, supplies, equipment and reputation. Employees are accountable for making wise and ethical decisions so that our assets are used to support our healing ministry. As responsible stewards of our resources, you are responsible for:

- Following this guide, as well as all policies and procedures.
- Keeping accurate and reliable financial records and reports.
- Using organizational equipment, supplies, materials and services for authorized purposes only, and protecting assets from loss, theft and misuse.
- Using the CommonSpirit Reporting Process to report any improper use of organizational assets.

Environmental Responsibility

Advancing the care and stewardship of the planet is part of our commitment to the common good. Local, national and global communities must nurture a sustainable and healthy environment. As a responsible corporate citizen, CommonSpirit is committed to:

- Expanding and strengthening environmental actions to meaningfully improve the outcomes of our health care ministry.
- Seeking proactive solutions to enhance the health and well-being of all, while avoiding adverse impacts to people and the environment.
- Minimizing and managing adverse impacts where avoidance is not possible, while seeking meaningful alternatives to promote the greater good.
- Enhancing and expanding partnerships and stakeholder engagement at all levels of society to build resilience and reinforce common goals that are life-affirming and mitigate environmental risk.

The ecological crisis we now face, with climate change being one of the most evident manifestations, is serious and urgent. CommonSpirit's efforts to see everything as connected – called integral ecology – underlies our commitment to addressing poverty and inequality among all people and to protecting and conserving our common home for present and future generations.

We promote a balanced approach to all social efforts to maximize patient, employee and community health and safety.

Social Responsibility

CommonSpirit is dedicated to advancing the care and stewardship of all people. This is a commitment to the common good, recognizing that local, national and global communities must promote social and economic justice. As a responsible corporate citizen, CommonSpirit will:

- Expand and strengthen social actions to meaningfully improve the outcomes of our health care ministry.
- Seek proactive solutions to enhancing the health and well-being of all, while avoiding adverse impacts to people.
- Minimize and manage adverse impacts where avoidance is not possible, while seeking meaningful alternatives to promote the greater good.
- Enhance and expand partnerships and stakeholder engagement at all levels of society to build resilience and reinforce common goals that are life-affirming and mitigate social risk.
- Seek to promote safety and security for colleagues, communities and society by addressing and preventing violence in all its forms. This includes directly prohibiting human trafficking within the organization and among all who interact with the organization.

Social responsibility is based on the concept that sustainable development must be founded on a "universal respect for, and observance of, human rights and fundamental freedoms for all" . CommonSpirit does not promote or contribute to violations of international human rights obligations and treaties. CommonSpirit will support the protection and fulfillment of human rights, including addressing, reducing and preventing the negative impacts of social determinants of health.

CommonSpirit promotes a balanced approach to all social efforts to maximize patient, employee and community health and safety.

Standard 6

Create an Environment that Promotes Community, Respects Dignity and Supports Safety and Well-being

Health and Safety

CommonSpirit facilities maintain a safe and healthy working environment. Employees:

- Must be adequately trained on and adhere to all safety policies and procedures.
- Must conduct themselves in a manner that minimizes health and safety hazards and promptly notify their manager of any actual or potential unsafe working conditions or practices.
- Must properly generate, store and dispose of biological, medical, chemical and other hazardous waste according to applicable laws and policies designed to protect human, environmental and community health.
- Who are authorized to operate incinerators, sterilizers, decontaminators and underground storage tanks (containing fuel for emergency generators) and other equipment containing chemicals must be adequately trained to operate devices according to all permits, regulations and applicable procedures.

Prohibitions on Discrimination, Harassment and Retaliation

CommonSpirit is committed to ensuring a safe, inclusive and collaborative work environment where employee talents, ideas and expertise are respected and encouraged. Consistent with our policies prohibiting discrimination, harassment or retaliation, the work environment must be free of discrimination, harassment, intimidation/bullying or retaliatory conduct. As an employee in any role, you are expected to comply with our policies and prohibitions on discrimination, harassment and retaliation in all aspects of your work with our organization.

Relevant CommonSpirit Policies

- No-Retaliation Policy
- Anti-Discrimination and Harassment-Free Workplace

Human Trafficking

CommonSpirit's Human Trafficking Response Program equips physicians, advanced practice providers and staff to identify patients who may be victims of human trafficking or other types of abuse, neglect and violence, and to provide trauma-informed, healing-centered care to affected patients and families. This includes victim-centered intervention assistance, such as warm referrals (i.e., personal introductions) to community agencies and continued care that promotes healing and recovery. If you have concerns that a patient may be affected by abuse, neglect or violence, including labor trafficking or sex trafficking, refer to the Abuse, Neglect, and Violence CommonSpirit policy (located in the Human Trafficking Response Program link below). To learn more about human trafficking, see the CommonSpirit educational course, *Human Trafficking 101: Dispelling the Myths,* in the CommonSpirit learning management system.

Relevant CommonSpirit Policies

- Human Trafficking (HT) Response Program

CommonSpirit facilities maintain a safe and healthy working environment. Employees must adhere to all safety policies and procedures.

Standard 7

Properly Disclose and Manage Situations that Pose Potential or Actual Conflicts of Interest

Conflicts of Interest

Conflicts of interest occur when personal interests or activities influence or appear to influence our ability to act in the best interests of CommonSpirit. Actions or relationships that could create a conflict of interest must be disclosed in writing, in advance, and managed appropriately according to policy. CommonSpirit employees must properly disclose and cooperate in the management of situations that pose potential or actual conflicts of interest.

Gifts and Gratuities

CommonSpirit defines a gift as an item of value, including cash; cash equivalents, such as a gift certificate or a voucher; grants; scholarships; educational funding; meals, lodging and transportation; and tickets to a sporting, cultural or community event, including any fees associated with that event. Accepting gifts from vendors can create the perception that decisions are made based on personal benefit rather than what is in the best interests of CommonSpirit. This perceived conflict of interest can undermine the trust of patients and community members.

Improper gift giving and receiving may also violate the federal Anti-Kickback Statute, which prohibits individuals and entities from knowingly offering, paying, soliciting or receiving remuneration (anything of value, or "kickbacks") to induce or reward referrals of items or services paid for by federally funded programs. If a vendor's gift causes concern, talk with your manager and local Corporate Responsibility Officer to review the facts and circumstances of the situation.

Relevant CommonSpirit Policies

- Gifts and Gratuities To and From Business Sources Policy (includes a FAQ)

Outside Activities and Employment

If you own or have any type of employment or consulting arrangement with an outside entity (including vendors), the arrangement must be disclosed to your manager for review and approval. If your manager approves, any consulting or other business activities must be conducted on your personal time (not work time) using non-CommonSpirit resources, and must not conflict with or affect your work performance.

Relevant CommonSpirit Policies

- Payments and Arrangements Between Business Sources and Employees Policy

Vendor Relations

Business relationships with vendors must be conducted fairly and in the best interests of CommonSpirit, without inappropriate personal ties to or bias toward vendors. Employees must disclose to their manager any personal relationships and business activities with contractors, vendors and referral sources or referral recipients.
Use the CommonSpirit Reporting Process to:

- Ask questions if you are concerned about a contractor relationship.
- Report attempts by contractors to inappropriately influence business activities.

Participation on Outside Boards of Trustees/ Directors

CommonSpirit encourages employees to be active in their communities. This may include serving on the boards of charitable, community and civic organizations. You must not accept a position on a board if that participation conflicts, or may conflict, with the interests of CommonSpirit. If you choose to accept such a position when there is or may be a conflict of interest and appropriate steps are not taken to mitigate or manage the conflict, such action will be treated as a violation of the Conflicts of Interest Policy. If you have any questions as to whether such a conflict exists, check with your manager or your local Corporate Responsibility Officer.

When serving on outside boards:

- Do not participate in actions on matters that might affect the interests of CommonSpirit.
- Do not identify yourself as speaking on behalf of CommonSpirit unless permitted to do so by the conflict of interest management plan.
- Conduct outside board service on your personal time, not work time, using non-CommonSpirit resources. Outside board service must not conflict with or affect your work performance.

Relevant CommonSpirit Policies

- Conflicts of Interest Policy

Endorsement and Testimonial Guidance

Employees may not provide endorsements, testimonials or other forms of external communications on behalf of CommonSpirit or your local organization unless you have written approval in accordance with applicable CommonSpirit policies. You may not provide statements, testimonials or endorsements for use by a vendor, contractor, the media or other third parties except as allowed by CommonSpirit's Endorsements/ Advertisement Policy (see link below).

Q I have been asked to serve on a speaker panel at a vendor-sponsored event, what do I need to do?

A You must:

- Obtain the written approval of your manager, the CommonSpirit Senior Vice President of Marketing and Communications Officer and the Senior Vice President of Brand, or their respective designees.
- Confirm your participation in the event is not an explicit endorsement, but a collaborative partnership that improves patient care, operational performance, community health or environmental sustainability.
- Verify your presentation slide deck is branded as CommonSpirit and not co-branded.

Relevant CommonSpirit Policies

- Endorsements/Advertisement Policy

Employees may not provide endorsements or testimonials on behalf of CommonSpirit unless you have written approval.

Standard 8

Foster a Diverse and Inclusive Work Environment in Reverence to Our Employees, Partners and Those We Serve

Diversity, Equity, Inclusion and Belonging

CommonSpirit's commitment to Diversity, Equity, Inclusion and Belonging (DEIB) strengthens our ministry's values. We work to embed DEIB best practices in every aspect of our ministry – from the delivery of quality health services to employee and physician engagement, patient experience, clinical quality and safety, leadership development and culture. Our key goals include:

- Valuing and acknowledging the diversity of our employees, patients and the communities we serve.
- Acting with inclusion by creating a welcoming and kind engagement of those who share in the work of our health care ministry, celebrating everyone's gifts and voice.
- Ensuring fair and equitable health care practices for all people.
- Striving to create a sense of belonging by connecting our shared experiences as community, patients and employees for a safe and trusting environment.
- Sharing our collective commitment to health equity by removing barriers to a fair and just opportunity to be as healthy as possible.

Conclusion

CommonSpirit's values and standards of conduct, as found in this guide, serve as guiding principles for ethical behavior. It is our responsibility to understand and follow these standards of conduct. Contact your manager, Corporate Responsibility Officer or call the reporting hotline number: 1 (800) 845-4310 with questions or concerns. No retaliatory action will be taken against anyone who makes a good-faith report of a potential violation of the standards, guidelines and policies outlined in this guide. By promoting our values and ethics, we can strengthen our organization and live out the mission of CommonSpirit.

Appendix A: Acknowledgement and Certification

I acknowledge I have received an electronic or physical copy of the CommonSpirit Standards of Conduct: Our Values in Action Policy and Reference Guide.

- I agree to read it completely.
- I agree to discuss any questions or concerns regarding this guide with my manager or other appropriate CommonSpirit leader.
- As a policy document, I certify that I will comply with the standards and guidelines in this guide and any other standards or applicable policies set by CommonSpirit.
- I understand:
  - It is my responsibility to report any concerns regarding possible violations of these standards, guidelines or policies.
  - I may be asked to cooperate in an investigation of matters that may affect or relate to compliance with applicable standards, guidelines or policies and agree to do so.
  - Neither CommonSpirit nor the local organization I serve will retaliate against me for making a report in good faith.
  - CommonSpirit or the local organization I serve will conduct an excluded provider background check prior to my employment or association and periodically thereafter. CommonSpirit reserves the right to terminate my employment or other association if I am an excluded provider/individual.
  - This guide contains standards of conduct within CommonSpirit and is not a contract for employment or other services.
  - These standards may be amended, modified or clarified at any time, and I will receive periodic updates to these standards.

PLEASE PRINT

Name

Department, Board, Board Committee or Other Affiliation

Organization

Signature

Date

Your acknowledgment and certification above will be collected and retained. Consult with Human Resources or your local Corporate Responsibility Officer if you have any questions about this process.