

CODE OF ETHICS

DOING THE RIGHT THING... THE CHOICE IS YOURS



CORPORATE COMPLIANCE PROGRAM



Goshen Health

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Dear Colleague:

As a representative of Goshen Health, you have the opportunity to positively impact the lives of customers on a daily basis. This organization fully supports you in making decisions that promote outstanding care of the individuals we serve. The guidelines in this booklet – our Code of Ethics and Conduct – are designed to help you make the best choices possible.

Please take advantage of the information provided and rely on it as a guide to help you “do the right thing.” This means performing your job responsibly and acting in a way that encourages exceptional patient care. Ultimately, the goals of our organization’s Code of Ethics and Conduct are providing high-quality care, supporting outstanding Colleague performance, and upholding “zero tolerance” for unethical behavior.

Randy Christophel
President and CEO

MISSION

The mission of Goshen Health is to improve the health of our communities by providing innovative, outstanding care and service, through exceptional people doing exceptional work.

VISION

Goshen Health will be the trusted partner for care, inspiring health and wellness for all.

VALUES

COMPASSION and commitment to serve with empathy.

ACCOUNTABILITY with integrity and action.

RESPECT through treating others as you wish to be treated.

EXCELLENCE in all we do.

MANAGEMENT'S RESPONSIBILITY

While everyone who works for Goshen Health must contribute to the creation and maintenance of an ethical environment, our executives and leadership personnel assume special responsibility for fostering a work climate that will bring out the best in all of us. You can count on us to do everything in our power to meet Goshen Health's Code of Ethics and Conduct and we are counting on you to do the same. We are confident that our trust in you is well placed and we are determined to be worthy of your trust. Please feel free to consult your direct leader or any member of management if you have a question or concern regarding proper conduct or compliance issues.

- Goshen Health Management

CODE OF ETHICS AND CONDUCT

Adherence to Federal and State Government regulations

It is the policy of the Goshen Health Board of Directors to require compliance with the laws and regulations of the United States and the State of Indiana, and to assure that the functions of Goshen Health, its subsidiaries and its affiliates are pursued in a manner consistent with the letter and the spirit of the laws.

Administer and record health care services

Patient care must be necessary, appropriate and well-documented. We must ensure the medical necessity of the care provided and verify patient eligibility. In addition, we will accurately record all services provided, documenting physician authorization when necessary. Improper coding of services and care provided (i.e., upcoding, fragmentation, use of obsolete or inappropriate coding) will not be tolerated and will result in immediate sanctions (i.e., disciplinary action, termination, substantial fines).

Always obey the law

We will conduct our business in accordance with all applicable laws and regulations. Compliance with the laws does not compromise our ethical responsibility. Rather, it provides the minimum, absolute, essential condition for performance of our duties.

Carefully bid, negotiate and perform contracts

If you are involved in proposals, bid preparations or contract negotiations, you must be certain that all statements, communications and representations to prospective partners or suppliers are accurate and truthful. Once awarded, all contracts must be performed in compliance with the specific terms of the contract. Goshen Health is committed to compliance with federal and state laws and regulations. It's required that all Colleagues and contracting agents read and be familiar with the Corporate Compliance Program and indicate in writing their intention to act in compliance with the program. If you buy goods or services of Goshen Health or are involved in the procurement process, you must treat all suppliers uniformly and fairly. In deciding among competing suppliers, YOU must objectively and impartially weigh all facts and avoid even the appearance of favoritism. Established routines and procedures should be followed in the procurement of all goods and services.

Generate accurate billing and claims

Goshen Health, to the best of its ability, will generate billing and claims accurately reflecting that services rendered are supported by relevant documentation and are submitted in compliance with applicable laws, rules, regulations and program requirements. We will use our best efforts to not make or present improper, false, fictitious or fraudulent claims to any government or private health care program, Colleague, department or agency.

Improper or fraudulent activity can include:

- Cost Report Falsification
- Misrepresentation of Services
- Duplicate Billing
- Multiple Coverage and Secondary-payor Fraud
- False Claims and Statements
- Non-approved Treatment or Equipment Usage
- Improper Coding (i.e., upcoding, unbundling)
- Non-ordered/Non-performed Testing Submission
- Improper Physician and Other Referral (Stark I & 11, Anti-kickback)
- Improper Discounting

If you become aware of the submission of improper, false, fictitious or fraudulent claims, it is your obligation to report this immediately to your direct leader or call the ValuesLine at 1 (800) 273-8452.

Comply with Medicare and Medicaid billing and claims guidelines:

Billing data submitted to Medicare and Medicaid will follow the guidelines stated above and comply with all stated rules and regulations.

Maintain the integrity of physicians, agents, consultants and representatives

Business integrity is a key principle for the selection and retention of those who represent Goshen Health. Physicians, agents and representatives must certify their willingness to comply with our policies and procedures and must never be retained to circumvent our values and principles. Paying bribes or kickbacks, obtaining the proprietary data of a third party, or gaining inside information or influence are just a few examples of what could give us an unfair competitive advantage and result in violations of the law.

Promote a positive work environment

All Colleagues want and deserve a workplace where they feel respected, satisfied and appreciated. Colleagues will be hired, promoted and compensated according to their qualifications, performance and potential. Harassment or discrimination of any kind, especially involving race, color, religion, gender, age, national origin, sexual orientation, disability and veteran or marital status, is unacceptable in our workplace.


Protect confidentiality

We will in no way compromise the confidentiality of our patients' medical records, or patient and Colleague information of any kind. It is your obligation to immediately report any breach in confidentiality to your direct report, the Corporate Compliance Officer Chris Hutfless at (574) 364-2898, another member of management, or call the ValuesLine at 1 (800) 273-8452.

Refuse bribes, kickbacks and inappropriate referrals

The Medicare and Medicaid Anti-kickback statutes stipulate that no Colleague within a health care organization knowingly and willfully will offer, pay, solicit or receive compensation in connection with the referral of patients or acquisition of items for services. Specific violations include:

- Accepting or granting bribes or kickbacks (i.e., cash or "in kind" considerations such as subsidies, discounts, medical director ships, supplies or gifts);
- Granting direct or indirect improper rewards (i.e., bestowing anything of value) to a representative of a government agency, union, or current or prospective business relationship;
- Accepting or granting gratuities in any form designated to secure favorable treatment or discussion from/for Goshen Health;
- Accepting or granting inappropriate referrals



No Colleague or physician at Goshen Health may enter into any agreement or arrangement that calls for such action as described above. If you become aware of, or are involved in a situation involving bribery, kickbacks, or inappropriate referrals, it is your obligation to report it immediately to your direct report, the Corporate Compliance Officer Chris Hutfless at (574) 364-2898, another member of management, or call the ValuesLine at 1 (844) 782-0441.

Steer clear of conflicts of interest


It is your responsibility to act in the best interest of Goshen Health at all times. Avoid any relationship, influence or activity that might impair, or even appear to impair, your ability to make objective and fair decisions when performing your job such as:

- Acceptance of gifts, payment or services from those seeking to do business with Goshen Health;
- Purchase of goods or services by Goshen Health from a firm owned or controlled by a Colleague or a close relative of a Colleague;
- Ownership of, or substantial interest in, a company that is a competitor or supplier;
- Acting as a consultant to a Goshen Health customer or supplier

If you are in doubt as to the potential for conflict of interest, seek guidance from your direct report, the Corporate Compliance Officer Chris Hutfless at (574) 364-2898, another member of management, or call the ValuesLine at 1 (844) 782-0441.

Strictly adhere to all antitrust laws

Federal and state antitrust laws protect the integrity of our free enterprise system. These laws address agreements and practices resulting in the restraint of competition including boycotting suppliers, discussing pricing or patients with competitors, implementing unfair or deceptive business



practices, and misrepresenting services. Antitrust laws are vigorously enforced. Violations may result in severe penalties and significant fines for Goshen Health. There will be sanctions against Colleagues responsible for violating antitrust laws including substantial fines and prison sentences. If you are involved in any dealings with physician groups, suppliers or competitors, you are expected to know that U.S. antitrust laws may apply to your activities and you should consult with the Corporate Compliance Officer Chris Hutfless at (574) 364-289 prior to negotiating or entering into any arrangement.

Treat in an ethical manner those to whom Goshen Health has an obligation

We are committed to the ethical treatment of those to whom we have an obligation.

- For our Colleagues, we are committed to honesty, fairness and just management; providing a safe and healthy working environment; and respecting the dignity due everyone
- For our patients and customers, we are committed to providing quality health care, delivered in a timely manner and at a reasonable price
- For the communities where we live and work, we are committed to good citizenship
- For our suppliers, we are committed to fair competition and the sense of responsibility required of a good customer

Work safely: protect yourself and your fellow Colleagues

Providing a drug-free, safe and healthy work environment is of the utmost importance. We are all responsible for compliance with environmental, health and safety laws and regulations. Observe posted warnings and regulations. Report immediately to the appropriate management any accident or injury sustained on the job, or any environmental or safety concern you may have.



FOR MORE INFORMATION

In order to support a comprehensive Corporate Compliance Program, Goshen Health has developed an educational program which provides Colleagues with information to raise their level of awareness and sensitivity to compliance with the laws and regulations governing our health care organizations. New Colleagues will receive this information during their orientation.

Upon completion of their education, all Colleagues will be asked to complete and sign the acknowledgment form at the back of this booklet which will be placed in their personnel file. Training for specific job duties will be required for all Colleagues who have been assigned responsibilities in specific areas. For more information, call our Corporate Compliance Officer Chris Hutfless at (574) 364-2898.



QUICK CHECKLIST. WHEN IN DOUBT, ASK YOURSELF...

Compliance with all of these rules of ethics and conduct can become very confusing. Common sense and sound judgment are your best guides in determining the appropriateness of the behavior and necessary course of action. However, if you find yourself in a situation where you are unsure of the ethical implications, ask yourself a few simple questions:

- Are my actions legal?
- Am I being fair and honest?
- Is this in the best interest of Goshen Health and the patients we serve?
- Will my actions stand the test of time?
- How will I feel about myself afterwards?
- How will it look in the newspaper?
- Will I sleep soundly tonight?
- What would I tell my child to do?
- Am I doing the right thing?

If you are still in doubt or need clarification, there are numerous resources available to assist you in meeting the challenges of performing your duties and responsibilities. Consult your direct report, the Corporate Compliance Officer Chris Hutfless at (574) 364-2898, another member of management, or call the ValuesLine at 1 (844) 782-0441.



OUR GOAL: ZERO TOLERANCE FOR FRAUD AND ABUSE

Goshen Health practices zero tolerance for fraud, abuse and other unethical behavior. It is so important to the integrity and future of our organization that we have set up various mechanisms to promote the highest ethical behavior. The Corporate Compliance Officer is dedicated to overseeing our organization's efforts. In addition, ethical expectations have been reinforced to members of management and their role in advising Colleagues has been strengthened.

Ethical behavior is expected of each and every Colleague. We have contracted with a third party to provide a confidential ethics consultation and reporting mechanism for our Colleagues — the ValuesLine. You are urged to use this resource whenever you have questions or concerns that cannot be readily addressed within your work group or through your direct report. Remember, there is never a penalty for using the ValuesLine 1 (844) 782-0441.

If you wish to discuss a matter of concern, please contact

Chris Hutfless
Corporate Compliance Officer

Goshen Health
200 High Park Ave.
Goshen, IN 46526
Phone: (574) 364-2898 Fax: (574) 364-2690

When you contact any of these sources, you will be treated with dignity and respect. Your communication and anonymity will be protected to the greatest extent possible. Your concerns will be seriously addressed and if not resolved at the time you call, you will be informed of the outcome.



Receipt and Acknowledgment

I acknowledge that I have received my personal copy of Goshen Health's Code of Ethics and Conduct. I understand that each Colleague, agent, consultant or representative is responsible for knowing and adhering to the principles and standards of the Code.

By typing my name in the box below, I agree my electronic signature is the legal equivalent of my manual/handwritten signature on this form.

Signature: _____

Print Name: _____

Colleague ID Number: _____

Date: _____



Goshen Health complies with applicable Federal civil rights laws and does not discriminate on the basis of race, color, national origin, age, disability or sex.

ATTENTION: If you speak Spanish, language assistance services, free of charge, are available to you. Call 1 (574) 364-1000 (TTY: 711 or 1 (800) 743-3333 to be connected with Relay Indiana).

Goshen Health cumple con las leyes federales de derechos civiles aplicables y no discrimina por motivos de raza, color, nacionalidad, edad, discapacidad o sexo.

ATENCIÓN: si habla español, tiene a su disposición servicios gratuitos de asistencia lingüística. Llame al 1 (574) 364-1000 (TTY: 711 o llame al 1 (800) 743-3333 para comunicarse con Relay Indiana).



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