



CODE OF CONDUCT

**Policy No. A.E2
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Introduction

Redlands Community Hospital and its affiliated entities¹ (collectively, “RCH”) is an integral part of our local communities. RCH is committed to continuing its responsibility for providing patients with care and services consistent with RCH’s mission, vision and values. We are collaborative, caring, ethical, transparent, and accountable to the community.

Consistent with our mission, vision, and values, the Members of RCH strive to understand what our surrounding communities need and want, along with our commitment to improving the quality of human life. Ultimately the purpose of RCH and its Members is to help the people of our communities on their path to better health.

This Code of Conduct will provide every employee, volunteer, board member, physician and contractor (collectively, “Members”) with the standards we must follow to maintain the trust of our community and commitment to our mission and values. This Code of Conduct provides our Members tools to keep us compliant with applicable State and Federal Laws.

Directors and Managers Have a Heightened Responsibility

Directors and Managers have a heightened responsibility and are expected to abide by, and assist their staff in abiding by, this Code of Conduct. Directors and Managers are to exhibit leadership qualities of Character, Change, Communication, Capacity and Collaboration. By doing so, each Director and Manager can role model the appropriate behaviors or actions necessary for complying with this Code of Conduct. Directors and Managers must support the values and mission of RCH and its Code of Conduct consistently to avoid stifling communication and innovation. There is no

¹ Redlands Affiliated entities include Redlands Community Hospital Hospice, Redlands Community Hospital Home Health, The Nancy Varner Center for Women’s Health, Redlands Family Clinic, Redlands Perinatal Clinic, and Yucaipa Family Clinic.

individual at RCH that can request or require any member to deviate from this Code of Conduct.

We Communicate Effectively

Our Members must communicate in an open, honest and respectful way. Communication that is unprofessional, discourteous, and/or potentially embarrassing shall not be communicated by telephone, email, or memo or other written document. To avoid confusion, all RCH Communications to the community or media must be referred to RCH's Public Relations Department at extension 5533.

If you See it, Report It!

This Code of Conduct requires all Members to **"See it, Report it!"** By doing so, we can fix the problem.

As Theodore Roosevelt once said, ***"In any moment of decision, the best thing you can do is the right thing, the next best thing is the wrong thing and the worst thing you can do is nothing."***

While this Code of Conduct cannot answer questions for every situation a Member may encounter, this Code of Conduct will provide all of us with the core values to make decisions ethically, with integrity, and with transparency.

This Code of Conduct is Important

This Code of Conduct is so important, adherence and acknowledgment of this Code of Conduct is a condition of employment and service.

If you believe following any of the standards in this Code of Conduct would result in an incorrect or unethical outcome, you are required to seek clarification from the Compliance Director before proceeding. The Compliance Director will consider your request and advise you on how to further proceed.

If you are not sure what to do, consult the Ethical Decision Making Model at the end of this policy. If you are still unsure what to do, consult a Director, Manager, a Member of the Executive Team, or the Compliance Director to assist you.

Our staff and community Members are our greatest assets. We thank you for your ongoing support of RCH and its values of integrity, ethics, accountability and transparency.

IF YOU SEE IT, REPORT IT!
Integrity Line 888-893-9017 or www.mycompliance.com (ID Type "RCOM")

I. We are Committed to Care that Meets Our Standards

We believe patients are entitled to quality care delivered in a considerate, respectful and cost effective manner. All patients have the right to be free from abuse and neglect. The integrity of patient care is based on the needs of the patient and not on financial consideration. Patients have the right to make their own health care decisions after disclosure of all relevant clinical information.

We Treat Patients Right Every Time, All the Time

All RCH Members must consistently treat patients with care, concern and respect. Patients are entitled to prompt and courteous responses to their requests and to their needs for treatment or service, consistent with RCH's capacity, stated mission, and applicable laws. Everyone is expected to abide by RCH's policies and procedures which include, but are not limited to, quality care, care that is reasonable and is medically necessary, and patient rights.

Patients Have the Right to Self-Determination and to be Free of Abuse and Neglect

Patients must be informed of their right of self-determination. Competent adults and legal representatives of patients have the right to participate in and make their own health care decisions after receiving, from their physicians, appropriate disclosure of their diagnosis, prognosis and treatment alternatives. A patient and/or his or her legal representative has the right to accept medical care or to refuse treatment to the extent permitted by law, and to be informed of the medical consequences of such refusal. Questions concerning a patient's competence or the right of another person to act on a patient's behalf should be handled in accordance with RCH policy. Members may not discriminate against patients who exercise their right to self-determination or on the substance of their specific health care decisions.

Patients also have the right to be free from abuse and neglect and receive compassionate care with respect.

Other policies addressing our commitment to care that meets our standards including those regarding admission, transfer and discharge, resolution of conflict include, but may not be limited to:

Patient Rights and Responsibilities
Causes for Disciplinary Action
Abuse – Child – Adolescent

Exclusion from Patient Care
Abuse – Adult Disabled Elder
Informed Consent

II. We are Committed to Integrity and Honesty

RCH and its Board Members are defined by our values and implemented by our Members. As part of those values, RCH and its Board believe everyone must do the right thing, the first time, every time. The success of RCH and its Members is all about doing the right thing for the long term.

Our commitment to integrity and honesty requires RCH and its Members to avoid any implication of illegal or unethical actions or behaviors. Specifically our commitment to Integrity and Honesty require we avoid any business agreements or actions that violate the Anti-Kickback Laws (“AKS”), violate any Stark Laws, or otherwise giving or receiving incentives or gifts of value.

This standard also requires that all Members who provide patient care document truthfully and honestly. Documenting truthfully and honestly helps RCH capture the information necessary for proper billing and coding. Our documentation may never reflect care and services not provided. By adhering to these documentation standards, we ensure that the taxpayer dollars supporting Federal healthcare programs are properly spent.

The Anti-Kickback Law

The State and Federal anti-kickback laws prohibit any healthcare institution, employee, contractor, volunteer or Board Member from giving or receiving any gifts of value to induce referrals.

RCH and its Members are prohibited from taking or giving financial or other incentives to get patients or otherwise provide care. Members and their immediate family² shall not accept or give something of value to any individual or company to induce referrals or give something of value to any individual or company for referrals. Something of value does not have to be cash. Something of value may be a service, tangible gift, or entertainment. RCH and its Members are committed to fair competition and comply with all anti-kickback laws. Violation of state or federal anti-kickback laws

Administrative Policy A.G1 “Giving & Receiving of Gifts” will guide all Members on when it is not, and when it ***may*** be acceptable to receive a gift. It is clear that no Member may accept a gift ***as an individual*** from any patient, family member, or vendor (who may or may not be a referral source). Please refer to the corresponding policy.

If you are unsure what may be a proper or improper gift to give or receive, if you

² Immediate family members include any spouse, birth or adoptive parent, child, sibling, stepparent, stepchild, stepbrother, stepsister, father-in-law, mother-in-law, son-in-law, daughter-in-law, brother-in-law or sister-in-law, grandparent or grandchild and spouse of grandparent or grandchild.

have received a gift you are unsure whether or not you can accept, or if a physician or an immediate family member of the physician may be receiving questionable financial or other incentive consult with a Director, Manager or the Compliance Director.

Accuracy and Timeliness of Documentation

The Members of RCH are expected to be honest in what they write, say, and do. Our patients depend on all clinical staff Members to accurately document their care in the clinical record accurately and as contemporaneously to events as possible. Our patients expect that the care delivered is medically necessary and that no staff member is documenting care or information that is inaccurate or otherwise untruthful. Any corrections to a clinical record that are necessary to preserve the integrity of the record must be made in accordance with hospital policy.

Other non-clinical Members, including billing Members, will ensure that no reports to outside agencies such as Cost Reports, tax filings, plans of corrections or reports about RCH's tax-exempt status contain false or misleading information. Additionally, any such filings must not attempt to hide expenditures, funds, assets, or liabilities.

We Screen for, Monitor, and Prohibit Agreements that Violate Stark Laws

Federal Stark Law prohibits, with limited exceptions, physicians or their immediate family Members from receiving financial gain or other compensation when that financial gain or compensation may influence any of the following: (1) the selection of drugs, devices, supplies, equipment or services for purchase by RCH from vendors or suppliers in which the Medical Staff physician, or his or her family member, has a financial interest; or (2) RCH's contract negotiations with, a vendor or supplier in which the Medical Staff physician, or his or her family member, has a financial interest or that will result in personal financial gain to the Medical Staff physician, or his or her family member. Potential issues may also arise when a physician or an immediate family member are employees, officers or directors of the Hospital.

Travel and Entertainment Policy
Corporate Compliance Policy

Causes for Disciplinary Action
Conflicts of Interest

III. We are Committed to Transparency

The Members of RCH that are responsible to bill for patient care services, shall make every effort to submit bills that are truthful and accurately reflect the medical care delivered. RCH Members will not bill any private or government entity for services that were either not provided or medically necessary. RCH Members will not bill for any

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Integrity Line 888-893-9017 or www.mycompliancereport.com (ID Type "RCOM")

services, even if provided, if the documentation does not adequately support such billing. RCH will not submit bills that are upcoded, unbundled or otherwise exaggerated. RCH and its Members will respond promptly and honestly to government and regulator requests for information consistent with their authority.

We do not Submit False or Inaccurate Claims for Payment

The Federal False Claims Act (FCA) and the Deficit Reduction Act of 2005 (DRA) were enacted to protect the government from Medicare and Medicaid fraud and abuse. These laws are meant to detect, report and prevent waste. Violations of the FCA are criminal and may result in fines, imprisonment, and/or exclusion from Medicare and Medicaid programs. The FCA prohibits submission of a false or fraudulent claim to the government for reimbursement. The law does not care whether or not RCH intended to submit the false claim or submitted an incorrect claim by error. Therefore, it is imperative that claims to the government contain accurate and truthful information.

Clinical Members must record all entries in RCH's clinical care records timely and accurately so those entries fairly represent the care and services delivered to patients. Clinical records must never contain false or misleading information.

Financial records and reports must accurately and consistently reflect performance operational outcomes. Financial records must comply with Generally Accepted Accounting Principles, regulations from the Centers for Medicare and Medicaid Services, the Internal Revenue Service and other applicable State and Federal entities.

We Audit for, and Correct, any Claims that may not be Accurate

Members must comply with all internal audit procedures of RCH. Proper auditing helps to ensure the integrity of clinical and financial records. Such audits will also ensure the absence of "off the books" transactions which are prohibited by this Code of Conduct.

If you see a potential or actual false claim or report, or know that documentation entered into a clinical record or financial record is not accurate, we must fix any discrepancy before any billing or other documentation is submitted to any government entity. When a billing, clinical or financial documentation error is noted or suspected, the RCH Member(s) will at a minimum notify a Director or Manager, the Compliance Director or will report it to the Integrity Line by Phone or make an On-line report via the web.

If the bill has not been submitted, the bill will be corrected before submission if

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there is an error. If the bill was already submitted, we will investigate the submission and make any corrected billing and/or file any reports as required by law. If any repayment is necessary, RCH will follow the Refunding of Overpayments to Federal Healthcare Programs Policy.

We Respond Promptly and Honestly to Government and Regulator Requests for Information

If an RCH Member is contacted by a representative of any government agency such as the Office of the Inspector General, Attorney General, FBI, HHS or other enforcement agency, or any regulatory agency such as the California Department of Health Services, Center for Medicare and Medicaid Services or The Joint Commission, the Member should immediately consult with his or her supervisor for guidance to ensure that the government agency receives full cooperation and that the information provided to the agency is truthful and accurate.

Other policies addressing our commitment to transparency may include, but not be limited to:

Conflict of Interest Policies	Employment of Relatives
Use of Outside Patient Resources	Medicare/Medicaid Billing Manuals
Corporate Compliance Policy	Internal Auditing Procedures
Reporting and Refunding of Overpayments to Federal Healthcare Programs	

IV. We are Committed to Avoiding Conflicts of Interest

RCH Members will not engage in any activity which may conflict with the interests of RCH. All RCH Members must disclose actual or potential conflicts upon hire/credentialing and every two years thereafter.

RCH Members must at all times seek to promote, enhance, and protect the interests of RCH, and avoid taking any action which may be adverse to the interest of RCH.

RCH Members must be alert to any situation which may involve even the appearance of a conflict of interest and must disclose that situation promptly to a Director, Manager or the Compliance Director.

RCH does not permit, with very limited exceptions, the following (this list is not all inclusive):

1. Members taking advantage of their position to obtain personal benefits when dealing with contractors, suppliers and competitors;

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2. Members taking personal advantage of a business opportunity that may be or appears to be of interest to RCH without the approval of his or her supervisor;
3. Members conducting business on behalf of RCH with any other company in which the employee has an interest without first disclosing that interest to his or her supervisor;
4. Members doing business on behalf of RCH with any relative without first disclosing that relationship to their supervisors;
5. Members engaging in outside activities during working hours and using RCH equipment, supplies or information in connection with their outside activities without prior supervisor approval; and/or
6. Members having relationships outside of the work place with patients where the RCH employee will receive a financial or other benefit from the patient or the patient's family. For example, RCH Members should refrain from accepting job offers, from offering to provide personal assistance to a patient outside of RCH, or from offering or accepting work to provide personal assistance to a patient outside of RCH. The Member should not offer or accept any other type of arrangement, (financial or otherwise) that benefits the RCH Member. These types of relationships are called "dual relationships."
 - a. "Dual relationships" pose a risk to patient welfare, compromise the performance of the Member's professional and ethical responsibilities, and may subject the Member and/or RCH and its Board to potential liability. Special circumstances may arise, however, in which patient welfare is not harmed and other interests are not adversely affected. Under such circumstances approval may be granted to Members requesting a dual relationship. An example of a special circumstance might be a Member having a personal or financial relationship with a patient that existed before the individual became a patient at RCH that he or she wishes to continue.
 - b. All such "dual relationships" must be reported to a Director, Manager or the Compliance Director.

RCH, does not allow the hiring, promotion, or transfer of any employee where the end result will be that an employee will be supervising a Member of his or her own family.

RCH may allow self-employment or employment by other companies for its

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employees only if it does not adversely affect the employee's job performance or create a conflict of interest. Any such self-employment or employment that may create a conflict of interest for RCH must be disclosed to Human Resources or the Compliance Director.

All financial arrangements with any actual or potential referral source must be approved by the Chief Executive Officer who will be responsible for obtaining reviews by legal counsel as necessary. All such arrangements, including but not limited to contracts for personal services, leases, recruitment arrangements and loans, shall be subject to review by the Compliance Director, Chief Executive Officer and/or legal counsel.

If you are unsure if any act or behavior is inconsistent with this standard, you may use the Ethical Decision Making Model contained in this Code of Conduct to help you. You may also consult with any Director, Manager, Human Resources or the Compliance Director.

Conflict of Interest Policies
Use of Outside Patient Resources
Employee Conflicts of Interest

Employment of Relatives
Corporate Compliance Policy

V. We are Committed to Caring for One Another

RCH is committed to providing an efficient and productive working environment. Members must perform their job duties safely, competently and efficiently in a manner that protects RCH's interests, our patients and our co-workers. RCH requires its Members to maintain a working environment free from harassment, violence, threats of violence, unlawful discrimination bullying, illegal and/or mood altering drugs, cannabis, alcohol and threats of or acts of violence. Members should report any actual or suspected violations of employees' rights and obligations to Human Resources. All reports will be treated in a confidential manner unless mandated by law.

We are Committed to Teamwork and TeamSTEPPS

RCH values teamwork. Healthcare is a service industry. Thus, it is required all RCH Members collaborate and communicate together to achieve the common goal of quality patient care and a work environment grounded in mutual respect. Additionally Members will treat our affiliated physicians with respect and, as such, affiliated physicians will treat RCH Members with the same respect.

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We Believe Everyone should be Treated Fairly

RCH is an equal opportunity employer. Employees will be recruited, hired, promoted, transferred, demoted and terminated on the basis of their skills, experience and performance without regard to age, race, color, religion, national origin, creed, gender, gender identity, sex, sexual orientation mental disability, physical disability, veteran status, and/or marital status. Any employee who believes he or she has been unlawfully discriminated against should promptly report the facts of the incident to his or her supervisor or Human Resources.

RCH strictly prohibits unlawful harassment, including sexual harassment. Sexual harassment includes sexual advances, requests for sexual favors, or any sexually offensive verbal, visual or physical conduct. Harassing conduct of any kind will not be tolerated. Any employee who believes he or she has been unlawfully harassed should promptly report the facts of the incident to his or her supervisor or to the V.P. of Human Resources.

We Only Retain Properly Screen and Credential Individuals and Companies

RCH requires that all Members be qualified and properly licensed, certified and/or credentialed to provide services to patients. RCH requires its Members to maintain any license, certification, and/or credential required necessary to perform his or her job functions. RCH prohibits any Member to work with an expired or revoked license, certification, and/or credential.

RCH and/or its Members are prohibited from hiring, contracting, or allowing any individual or company to do business with or on behalf of RCH who are excluded from participating in federal healthcare programs by the Office of the Inspector General, Government Services Administration, State Medicaid Plans and/or most any other entities that receive federal funding for operations. RCH will screen Members routinely, but no less than monthly, for exclusions.

Other policies addressing our commitment to caring for each other, may include, but not be limited to:

Drug Free Workplace
Workplace Violence
Licensure & Certification Tracking/Verification

Unlawful Harassment
Injury Illness Prevention Program

VI. We are Committed to Caring for Our Resources

RCH and its Members are committed to caring for our environmental, social, and economic footprint both at a local and global level. RCH and its Members do our best to recycle appropriately, use and maintain electronic records to reduce the use of paper, and, to the extent possible, destroy documents and electronic data in a manner that protects the privacy of patients and staff and protects the environment.

RCH Members must properly store and dispose of medical, drug, and chemical waste in accordance with RCH's environmental policies that are designed to protect human health, the environment and the surrounding community.

RCH Members are required to operate sterilizers and underground storage tanks (containing fuels for emergency generators) pursuant to all permits and applicable procedures.

Other policies addressing our commitment to caring for our resources may include, but not be limited to:

The Environment of Care Manual
Safety Policy

Safety Policies of Each Department
Causes for Disciplinary Action

VII. We are Committed to Keeping Confidential Proprietary Business Information

RCH prohibits its Members from disclosing confidential proprietary business information to unauthorized persons.

Members may learn about trade secrets, commercially sensitive information, and financial information about RCH. Members are prohibited from disclosing confidential or proprietary information to unauthorized persons unless he or she is authorized to do so. Examples of confidential or proprietary business information include earnings estimates, expansion or curtailment of operations, an increase or decline in business, a merger or acquisition proposal or agreement, contracts, borrowing, litigation, unusual management developments, or purchases or sales of substantial assets.

RCH and its Members shall protect the non-physical assets such as strategic plans, plans for acquisitions, trademarks, and other on-public information safe by password protecting computers, securing documents, and avoiding discussions of sensitive information or emailing of the same over unsecured networks or mobile devices.

Other policies addressing our commitment to keeping confidential proprietary business information include, but may not be limited to:

Patient Privacy Manual
Social Media (Electronic Communications)

VIII. We are Committed to Patient and Employee Privacy

RCH wants to ensure that patient and employee privacy is maintained in accordance with both State and Federal laws including HIPAA and HITECH (Health Information Technology for Economic and Clinical Health). RCH has multiple systems in place to protect individual privacy and expects its Members to comply with the rules for managing Protected Health Information (PHI) and the privacy of the employees.

Every Member is expected to protect electronic data by properly protecting and not sharing passwords to access PHI or other business records. The Information Systems Department has in place proper software to prevent malicious attacks and viruses from hacking our systems. RCH Members are prohibited from downloading software or programs without first receiving clearance from Information Systems. RCH Members should not open attachments from unknown sources.

We Protect Patient Information

RCH Members are not to discuss PHI or employee private information in public areas or with other individuals who have no need for the information. When discussing PHI even with another healthcare provider, RCH Members are required to release only the minimum information necessary to support the continuity of care. PHI may only be released for treatment, payment or healthcare operations unless specifically authorized by a patient or patient's legal representative to disclose otherwise.

RCH Members are expected to appropriately use Social Media and other technology. RCH and its Members are strictly prohibited from posting any patient information on any social media or other website. Members may not post confidential business information or confidential employee information on any social media or other website.

We Protect Employee Personal Information

RCH Members, especially those members in Human Resources, shall protect employee privacy consistent with the applicable California Labor Code. Additionally, RCH Members shall not share employee personal information, including any medical information, with anyone absent a regulatory or legal authority allowed access to such information.

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Other policies addressing our commitment to keeping patient and employee information confidential include, but may not be limited to:

Patient Privacy Manual

California Privacy Laws

IX. We are Committed to Maintaining Our Tax-Exempt Status

RCH prohibits its Members from engaging in any activity which threatens the tax-exempt status of RCH.

Members shall not engage in any activity which involves the use of RCH's resources or property for any private use or benefit. Transactions entered into must be in the best interest of RCH and negotiated at arms-length for fair market value. RCH must follow all Internal Revenue Service Guidelines to maintain its tax exempt status.

RCH has an obligation to the community and its Board Members to use our resources only for RCH business purposes and to spend RCH funds wisely and eliminate waste. All of RCH's assets are protected from loss, damage and theft.

Other Policies Addressing Our Tax Exempt Status:

RCH Board Policy on Political Campaigning
Conflicts of Interest

X. No Retaliation

RCH will not retaliate or punish any Member who communicates any actual or potential violation of this Code of Conduct. The only exception reporting violations in bad faith.

Both the State and the Federal government have laws protecting "whistleblowers" or individuals who report violations of this Code of Conduct. However, these laws may not protect you if you file a report in bad faith.

Filing any report for an actual or potential violation of this Code of Conduct in bad faith will result in appropriate disciplinary action. A report is made in bad faith if:

1. The reporter makes up untrue facts in retaliation to another individual with the purpose or effect of getting that individual in trouble; or
2. The reporter purposefully and intentionally misrepresented the facts for any other reason.

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If you believe you have been retaliated against, or you believe a report was made in bad faith, consult with any Director, Manager, Human Resources or the Compliance Director.

XI. Ethics and Compliance Support

We want and encourage all Members to report, in good faith, the actual or potential violations of this Code of Conduct. All reports will be taken seriously and fully investigated in a timely manner.

Calling the Integrity Line by Phone or reporting On-line via the web works. Calling and reporting to the Integrity Line by Phone or reporting to the On-line via the web assists all RCH Members in complying with the laws and regulations that apply to RCH's operations and business dealings.

If you are unsure if any act or behavior is inconsistent with any standard in the Code of Conduct, you may use the Ethical Decision Making Model to help you. You may also consult with any Director, Manager, or the Compliance Director.

If you see something that actually or potentially violates this Code of Conduct promptly report it! You may report to any Director, Manager, to the Integrity Line by Phone, On-line via the web, or directly to the Compliance Director.

To Report actual or potential violations of the Code of Conduct:

Call the Integrity Line: 888-893-9017

Report on-line: www.mycompliancereport.com
Click "Begin New Report" bottom left of the page.
In the access ID field type in "RCOM"

Call the Compliance Director: 909-478-7936

Mail a Letter: Redlands Community Hospital
CONFIDENTIAL TO: Compliance Director
350 Terracina Boulevard
Redlands, CA 92373-0742

IF YOU SEE IT, REPORT IT!
Integrity Line 888-893-9017 or www.mycompliancereport.com (ID Type "RCOM")

XII. Reporting is to an Independent Third Party

Reports to the Integrity Line are answered by live operators 24-hours a day, 7 days a week, 365 days per year. The company hosting the Integrity Line is **NOT** able to trace your calls or track your physical location. They will take your report even if you do not want to tell them who you are.

Reports to the hosting company may also be made On-line via the web. Again, reports will be accepted 24-hours a day, 7 days a week, and 365 days per year. The company **does not** use cookies or track your location or IP address.

All reports to the Integrity Line, regardless if a phone call or an on-line report, come to a secure and confidential case management system. The system may only be accessed by the Compliance Director to further promote confidentiality. The Compliance Director will promptly review and begin investigating your report and manage the investigation through the confidential Case Management System.

Whether you report by calling, or on line, if you report anonymously you will be provided with a unique ID number to call back or to log back in to see if your report is being investigated or the outcome if the investigation is completed. If you report and we are given contact information for you, we will call or email you to update you on the status of your concern.

When reporting, please have as much information as possible so the Compliance Director may adequately address your concern. Even if you report anonymously, if the Compliance Director would like additional information, he/she can communicate through the Integrity Line with you. You then can get this information/communication by checking back in with your unique ID number.

As with any report, the Compliance Director will keep the confidentiality of any reporting Member to the fullest extent possible. There may be a legal reason a Member's name would be disclosed. However, these circumstances are very limited and the Compliance Director will never release a name unless there is a legal reason requiring such disclosure.

Conclusion

This Code of Conduct sets forth RCH's guidelines and expectations about proper job related conduct. However, this Code of Conduct cannot anticipate every situation that a Member may encounter.

Failure to follow the standards in this Code of Conduct will result in disciplinary action, up to, and including termination, failure to report suspected or actual violations of the Code of Conduct and/or filing reports that are malicious or in bad faith will result in disciplinary action up to and including termination.

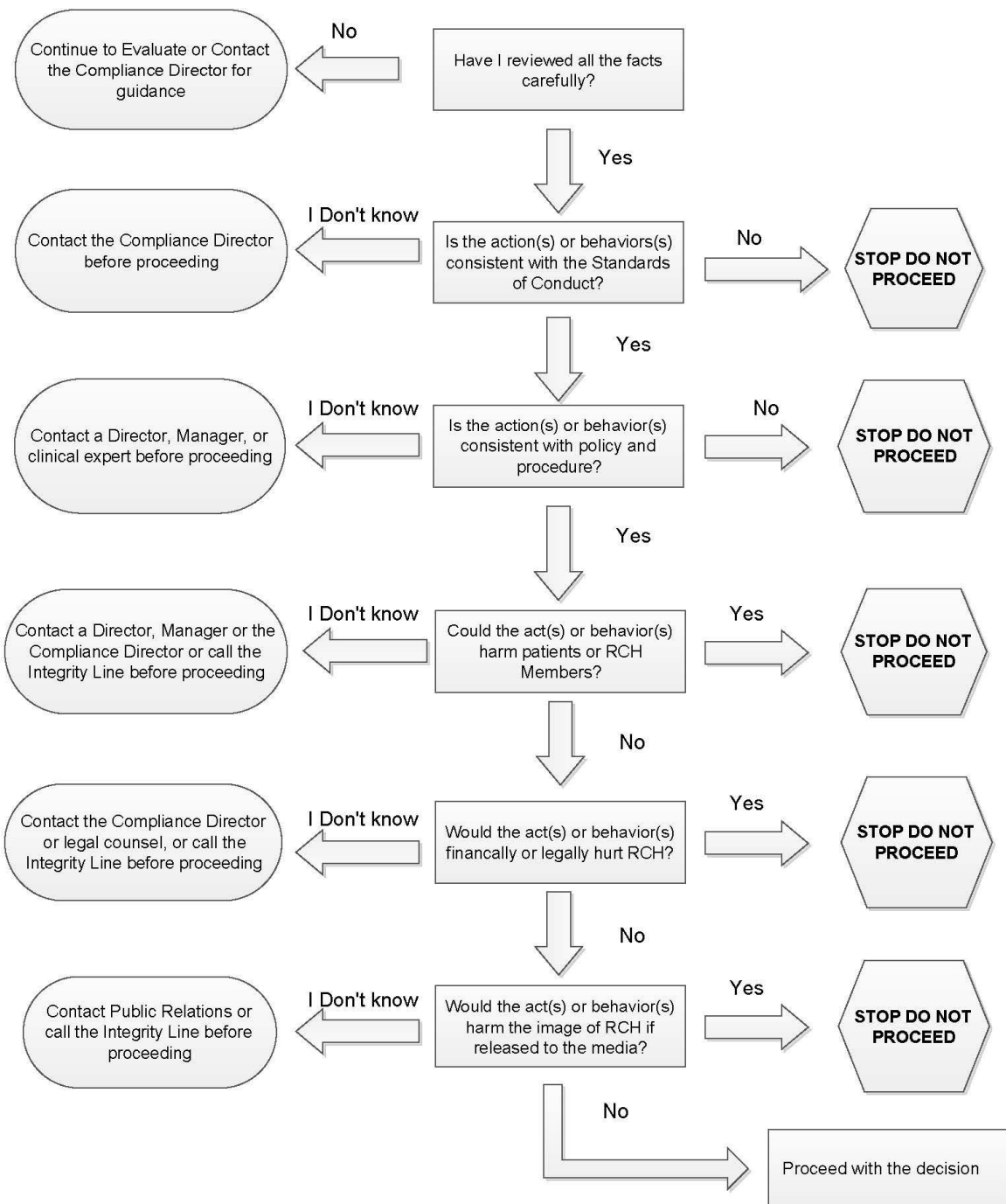
Any Member can seek the advice of a Director, Manager or the Compliance Director for guidance if this Code of Conduct does not provide adequate direction. If a Member feels he or she is or if the employee is being pressured to compromise his or her behavior, whether by another employee, a physician, a supplier, a competitor or a patient, report it!

No Member's concern is too small or unimportant if he or she thinks this Code of Conduct is actually or potentially violated. Members will find that by seeking guidance from a knowledgeable individual, a resolution can be found which will both meet the Member's concerns and consistent with this Code of Conduct.

Guide for Ethical Decision Making

Ethical Decision Making Model

When unsure what to do, consult this model as a guide. If you are still unsure, contact the Compliance Director, Director or Manager.
You may also call the Integrity Line at 888-893-9017 or go online to www.mycompliancereport.com



Contact the Integrity Line at 888-893-9017 or mycompliancereport.com

ADOPTION OF REDLANDS COMMUNITY HOSPITAL CODE OF CONDUCT

Responsibility for review and maintenance of this policy is assigned to: the Compliance Director.

APPROVED: 
James R. Holmes, President/CEO

EFFECTIVE DATE: January 15, 2021

REVIEWED: 2008, 2009, 2010, 2011, 2012, 2013, 2014, 2015, 2016, 2017, 2018, 2019, 2021

ACKNOWLEDGEMENT

**REDLANDS COMMUNITY HOSPITAL
CODE OF CONDUCT**

I have received a copy of this Code of Conduct, and I will retain a copy with my business files for future reference and guidance. I acknowledge that I have received training on this Code of Conduct. I have been given all the contact information for me to report any concerns or possible violations Redlands Community Hospital's Code of Conduct. I understand that I have a duty to report any suspected or actual violations of this Code of Conduct.

I also acknowledge that I have had the opportunity to ask questions, and that I understand the contents of this Code of Conduct as it relates to my duties and responsibilities.

I agree to follow the rules set forth in this Code of Conduct. I understand that if I fail to comply with the guidelines set forth in this Code of Conduct, or if I fail to report as required, I am subject to disciplinary action, up to and including termination.

Name: _____ Position: _____

Signature: _____ Date: _____

Department: _____

_____ Date: _____

Compliance Director or Representative Signature