Code of Conduct

Building our Culture

"It is not what we say, it is what we do every day."

Effective June 5, 2013
Message from the President and Chief Executive Officer of Hartford HealthCare

At Hartford HealthCare, we are committed to delivering the best patient care and our values: Integrity, Caring, Excellence, and Safety are the foundation. Together, we are working toward our vision to be nationally recognized for excellence in patient care and most trusted for personalized coordinated care. With our family of skilled, dedicated staff, we know we can be one of the best health care systems in the nation.

We focus on integrity in all that we do at Hartford HealthCare. We have a Code of Conduct that incorporates our values and Standards of Conduct that describe behaviors we expect all of our employees, volunteers, staff and board members to follow. The Standards are intended to assist you in navigating your relationships with patients, colleagues, business partners, and the government. Please review and familiarize yourself with these Standards of Conduct.

We understand that you may confront difficult questions or decisions in your work here at Hartford HealthCare, and you should feel comfortable asking questions or seeking advice about this Code of Conduct, internal policies, rules or regulations, ethical behavior, business practices or safety. Please talk to your manager, your Human Resources representative, the Chief Compliance Officer or the Legal Department. You can even report a concern through our anonymous hotline, the ComplianceLine at 1-855-HHC-OCAP.

Following our Code of Conduct will preserve the integrity of our Organization and help achieve our vision of excellence.

Sincerely,

[Signature]

Elliot Joseph
President & CEO
Hartford HealthCare Corporation
# Table of Contents

Introduction to the Standards of Conduct ........................................ Page 4
Our Values .................................................................................. Page 5
Your Responsibilities ................................................................. Page 5
Additional Responsibilities of Managers and Supervisors ........ Page 5
Resources for Getting Answers ....................................................... Page 6
Duty to Report ............................................................................. Page 6
  Reporting a Violation ............................................................... Page 6
  Hartford HealthCare's ComplianceLine ................................... Page 6
  Anonymity and Confidentiality .............................................. Page 6
  Non-Retaliation ...................................................................... Page 6

Standards ...................................................................................... Page 7
Standard: Quality of Patient Care .................................................. Page 7
  Dignity and Respect ............................................................... Page 7
  Safety .................................................................................... Page 7
  Access to Quality Care ........................................................... Page 7
  Emergency Treatment ............................................................. Page 7

Standard: Privacy & Confidentiality .............................................. Page 7
  PHI ....................................................................................... Page 8
  Personal Information ............................................................ Page 8
  Proprietary Information ......................................................... Page 8
  Security .................................................................................. Page 8
  Social Media ........................................................................ Page 8

Standard: Personal Conduct and Business Ethics ...................... Page 9
  Conflicts of Interest ............................................................... Page 9
  Gifts and Gratuities ............................................................... Page 9
  Discrimination ...................................................................... Page 9
  Stewardship ........................................................................ Page 9

Standard: Compliance with Laws and Regulations ................... Page 9
  Fraud, Waste and Abuse Laws .............................................. Page 10
  Environmental Safety ........................................................... Page 10
  Government Investigations ..................................................... Page 11
  Tax Exempt Status ................................................................ Page 11

Standard: Financial Reporting ..................................................... Page 11
  Financial Records .................................................................. Page 11
Hartford HealthCare Corporation Code of Conduct

**Introduction:** The Standards described in our Code of Conduct (the "Code"), along with our Values, mission statement, and policies serve as guidance to promote ethical, honest, and lawful actions for you, as part of our HHC Community. Additional information can be found in policies, procedures and guidance disseminated throughout our health care system. This Code and its related policies may not address every possible situation or circumstance you may encounter, so it is up to you to use good judgment and seek help whenever you need it or have questions. Talk to your supervisor or contact Human Resources, the Office of Compliance, Audit and Privacy or the Legal Department if you have questions.

Please keep the following in mind as you read these Standards:

- A **Member** is a corporate related entity of Hartford HealthCare Corporation.
- **Hartford HealthCare (HHC)** refers to the Hartford HealthCare Corporation and any and all Members, subsidiaries, and joint ventures in which HHC, a Member or a subsidiary has a majority interest.
- **HHC Community** includes all HHC employees, contracted individuals with the role and responsibility of an employee, medical directors, section, department and division chiefs, members of the board of directors and board delegated committees, officers, executive leadership, volunteers and trainees.
- **OCAP** refers to the HHC Office of Compliance, Audit and Privacy.

As the delivery of health care changes, this Code may be modified at any time which will be published for you. There may be other HHC or Member policies that apply to matters covered by this Code, including but not limited to, medical staff policies on EMTALA, Privacy and Security policies and Human Resources policies. In the event that more than one policy applies to a situation, all such policies will be applied to the fullest extent possible. If there is a conflict or gap in the individual policy provisions, the provision of the policy that is most consistent with the values of HHC and compliance with the law will be applied.
Our Values

This Code of Conduct is based on HHC's values: Integrity, Caring, Excellence, and Safety.

INTEGRITY: We Do the Right Thing
Our actions tell the world what HHC is and what we stand for. We act ethically and responsibly in everything we do and hold ourselves accountable for our behavior. We bring respect, openness and honesty to our encounters with patients, families and coworkers and support the well-being of the communities we serve.

CARING: We Do the Kind Thing
Every HHC Community member touches the lives of the patients and families in our care. We treat those we serve and each other with kindness and compassion and strive to better understand and respond to the needs of a diverse community.

EXCELLENCE: We Do the Best Thing
In HHC, only the best will do. We work as a team to bring experience, advanced technology and best practices to bear in providing the highest-quality care for our patients and families. We devote ourselves to continuous improvement, excellence, professionalism and innovation in our work.

SAFETY: We Do the Safe Thing
Patients and families have placed their lives and health in our hands. At HHC our first priority - and the rule of medicine - is to protect them from harm. We believe that maintaining the highest safety standard is critical to delivering high-quality care and that a safe workplace protects us all.

Your Responsibilities: The foundation of HHC is our commitment to provide quality care to our patients and to the communities we serve. As members of the HHC Community, we are each responsible for upholding these same high standards in all aspects of our work and our professional relationships. Our expectations of you are included in our Standards as well as in our policies.

Additional Responsibilities of Managers and Supervisors: Managers and supervisors have the important responsibility of shaping a values-based culture within our organization. Therefore, the following are additional responsibilities that are expected of those employees:

- Stay current with regulatory changes.
- Ensure your department obtains necessary licenses, permits and approvals.
- Assist your department in determining the appropriate person to notify when staff has compliance, privacy or other related questions.
- Ensure that your department staff completes all mandatory trainings at the start of employment and subsequent mandatory annual and other periodic trainings.
Resources for Getting Answers: To ask for guidance or to report a concern, there are several options to choose from as noted below. HHC encourages the resolution of issues through the proper channels.

RESOURCE CONTACT INFORMATION

Your Manager.....................................................Refer to your Department Directory
Your Member Compliance Liaison..................Refer to your Member Directory
Human Resources....................................................Refer to your Member Directory
The ComplianceLine........1-855-HHC-OCAP or www.HHC.OCAPComplianceLine.com
The HHC Office of Compliance, Audit and Privacy (OCAP).....................(860) 972-1269

Duty to Report

Reporting a violation: You have an important role in helping us comply with laws, regulations and HHC policies. When you discover a problem or suspect something is wrong, it is your individual responsibility to report the activity to the appropriate person within our organization.

Hartford HealthCare's ComplianceLine: Contact HHC's ComplianceLine any time at 1-855-HHC-OCAP (1-855-442-6337) or via the internet at www.HHC.OCAPComplianceLine.com.

Anonymity & Confidentiality: When contacting the ComplianceLine, you may choose to remain anonymous. HHC maintains, to the full extent of the law, the confidentiality of any individual who reports concerns or possible misconduct.

HHC takes all reports to the ComplianceLine very seriously and handles each one on a case-by-case basis. Internal investigations of reported concerns are handled in a manner that is as confidential as possible. After filing a report you may contact the ComplianceLine to provide additional information and/or request a status update.

Non-Retaliation: It is your responsibility to report any concerns or inappropriate actions you know about. Consistent with our Values, HHC maintains a Non-Retaliation Policy that prohibits retaliation against any HHC Community member who reports an incident in good faith. Retaliation is subject to discipline, up to and including termination from employment and/or suspension of medical staff privileges, as applicable, in accordance with our policies.
STANDARDS

STANDARD: QUALITY OF PATIENT CARE

HHC is committed to providing high quality care and value to our patients. As an HHC Community member, you are expected to follow our Standards below.

Dignity and Respect: We deliver services with dignity and respect for each person, including a patient’s family members. Examples of such behaviors include acting in the best interests of patients, maintaining a positive, customer-focused attitude and responding to requests for information while safeguarding privacy and security. We respect our patients’ dignity and provide comfort and convenience with courtesy. We respect our patients’ spiritual and cultural beliefs.

Safety: We are committed to maintaining a safe health care environment. We follow clinical care guidelines that we have adopted. We explain the outcome of treatment and procedures to patients and family members.

Access to Quality Care: We are committed to providing optimum, cost-effective care, and that are medically necessary to our patients. We respect our patients’ right to be involved in their plan of care and commit to keeping our patients informed of treatment plans and available treatment alternatives. Our health care professionals will provide medically necessary services to patients in a safe and effective manner, supported by proper documentation that supports the services provided.

Emergency Treatment: When an individual presents at the hospital, HHC will provide the health care services required under the law regardless of their ability to pay. We follow the Emergency Medical Treatment and Active Labor Act ("EMTALA") in providing an emergency medical screening examination and necessary stabilization to all patients, regardless of their ability to pay.

EMTALA is a federal law that requires a hospital to provide a screening exam to a patient who presents to determine whether an emergency medical condition exists, regardless of the patient's ability to pay for the services and to stabilize the patient prior to any transfer.

STANDARD: PRIVACY & CONFIDENTIALITY

HHC is committed to protecting the privacy of the health information of our patients. We are also committed to informing patients about their rights with regard to their protected health information (PHI). We also respect the personal information of our employees. Through confidentiality agreements, we protect the information of our business partners in accordance with laws and standards.
**PHI:** You are expected to safeguard the PHI of patients and respect our patients' confidentiality by using PHI only when it is necessary to serve the patient or as permitted or required by law. There are several state and federal laws, as well as HHC privacy policies, to protect PHI. One important law is the privacy and security regulations under the Health Insurance Portability and Accountability Act ("HIPAA"). HIPAA is a federal law that requires covered entities, such as health care providers, to protect the privacy and security of PHI. Patients have certain rights regarding their PHI. You should familiarize yourself with HHC's policies and procedures and Notices of Privacy Practices to protect the privacy and security of PHI. Your Member privacy liaison, the Chief Privacy Officer and the Legal Department are available if you have questions or need further guidance related to HIPAA.

You should be aware that if your friends or colleagues are in the hospital, and you are not involved in their care, you should not access their PHI. You may only access this type of information if you need it to fulfill your job responsibilities. Report any known violations of patient privacy to the appropriate person within HHC.

**Personal Information:** We treat salary, benefits, and personnel files as confidential and only access this information for authorized business purposes. Contact your manager or the appropriate person when you have questions about maintaining confidentiality or releasing information.

**Proprietary Information:** We do not reveal confidential information related to HHC business or operations, including financial data, business strategy, and proprietary information, unless it is to an authorized person and for a legitimate business reason. If you receive a request from the media for HHC's information, you should not provide it. Instead, refer the media to the identified HHC contact person.

**Security:** You are expected to follow all security policies, including using and maintaining your own log-in credentials and system passwords in a responsible and confidential manner. You are also expected to use your badge to identify yourself as an HHC Community member and to comply with all HHC security policies and procedures.

**Social Media:** HHC Community members may use social media in various platforms such as Facebook, LinkedIn, Twitter, blogs, etc., during their personal time. During such use, you are expected to follow all HHC policies, including privacy and confidentiality and not let your use of social media interfere with your job responsibilities. You should not post any information, pictures, or comments regarding a patient of HHC or any of your colleagues.
STANDARD: PERSONAL CONDUCT AND BUSINESS ETHICS

HHC is committed to creating and maintaining a workplace that is professional, ethical and respectful. All members of the HHC Community are expected to follow our standards of personal conduct. Be honest and respectful and adhere to ethical standards when dealing with colleagues, staff, patients and their families, the public, auditors and government officials and any others with whom HHC does business. Abusive and disruptive behavior is not tolerated.

Conflicts of Interest: HHC Community members are expected to act in the best interest of the organization and its patients at all times. HHC Community members should avoid any outside activities that distract or negatively impact their job performance. An individual’s position as an HHC Community member should not be used for personal gain or to assist others unfairly at the expense of HHC. A conflict of interest may occur if outside activities or personal interests influence, or appear to influence, the ability to make objective decisions in the course of performing your responsibilities on behalf of HHC. Employees, officers, agents and board members of HHC should disclose any situations where there is an actual and/or potential conflict of interest.

HHC has a Conflict of Interest and Conflict of Commitment Policy that you should review and follow. Any questions about whether an outside activity might be a conflict of interest should be directed to OCAP, the employee’s Department Head, Human Resources, the Legal Department, or, for medical staff members, to the applicable Medical Staff Office.

Gifts and Gratuities: HHC Community members should not accept money, gifts, services, entertainment or other things of value which may influence your actions relating to HHC. HHC has policies on gifts and gratuities and vendor interaction that you should follow.

Discrimination: We practice fair and equal treatment of employees, volunteers, patients, families and others by celebrating the diversity of all people, including race, ethnicity, gender, religious background and other differences. You are expected to abide by the Standards of this Code including reporting harassment, intimidation or violence of any kind that you witness in the workplace.

Stewardship: We safeguard HHC’s assets, including medical records, financial data, intellectual property rights, research data, business strategies and plans about HHC activities, and not use these assets for personal gain.

STANDARD: COMPLIANCE WITH LAWS AND REGULATIONS

HHC business is highly regulated and should be conducted in accordance with laws and regulations. Many laws and regulations pertain to patient referrals, physician relationships, billing and payment practices, vendor contracts, lobbying, environmental health, payor relationships and employment practices. Since health care delivery is highly regulated and some of these laws are very
complex, it is important that you attend trainings regularly. The Legal Department is also available to assist you in interpreting laws that apply to our business.

**Fraud, Waste and Abuse Laws:** Several laws describe activities that may constitute fraud, waste and abuse, including but not limited to, the False Claims Act, the Anti-kickback Statute and the Physician Self-Referral Law called the Stark Law. You should not knowingly submit false or misleading claims to the government or other third-party payers, or ignore knowledge you may have that a claim is false. Claims for health care services should be accurate and supported by appropriate documentation. All records should be retained in accordance with applicable HHC Record Retention Policies.

Members of the HHC Community should not give or receive anything of value in exchange for patient referrals. It is also important that our physicians not refer to any entity in which that physician or an immediate family member has a financial interest, as defined under the Stark Law, unless an exception exists. Additionally, we should also only employ individuals or contract with vendors that have not been excluded from participation in federal and state health care programs.

HHC supports compliance with federal and state laws by establishing its Office of Compliance, Audit and Privacy (OCAP). OCAP monitors and audits our payment practices to review proper medical claim submission and to prevent errors in coding or billing. OCAP assists in educating the HHC Community on the many laws and regulations through these Standards of Conduct, policies and training and education. All members of the HHC Community are encouraged to raise issues and concerns without fear of retaliation.

The False Claims Act is a federal law that makes it a crime for any person or organization to "knowingly" make a false record or to file a false claim for payment under any federal or state health care program. "Knowingly" means having actual knowledge that a claim is false or acting in deliberate ignorance or with "reckless disregard" as to whether a claim is false. Examples of false claims potentially include knowingly billing Medicare for services that were not provided, upcoding, or making false statements to obtain payment for services. The fines and penalties for violations include up to $11,000 per claim, treble damages and attorney fees. Providers may also be excluded from federal program participation for violations.

**Environmental Safety:** HHC promotes health, safety and environmental protection in health care facilities planning, administrative activities and research. You are expected to safely handle, store, and dispose of hazardous materials and waste if your job responsibilities include such work. Report to your supervisor or to the appropriate administrator immediately if you encounter an unsafe practice or condition.
Cooperation with Government Investigations: You should treat all government auditors and investigators with respect. Bring any requests for information, which may include subpoenas, civil investigative demands, audit requests or search warrants, to the attention of the Legal Department or OCAP (or your manager) as soon as possible.

Tax Exempt Status: HHC enjoys status as a tax exempt organization under Section 501(c)(3) of the Internal Revenue Code operated for charitable purposes. HHC provides health care services, charity care and medical education as examples of the types of activities that support our charitable purposes. To maintain this status, HHC follows certain laws and regulations that require it to pay only fair market value for goods and services, not to engage in private inurement nor in substantial lobbying activities. You should use our resources to promote our charitable purposes and not inappropriately advance the private or personal interests of an individual or other company. You are expected to avoid compensation arrangements in excess of fair market value.

HHC encourages its employees to participate in community and political affairs and to vote in elections. If you choose to participate in political affairs, please remember to be clear that you are acting as private citizens and not as representatives of HHC. If you choose to contribute to a political campaign, it should be as an individual and not as a representative of HHC.

STANDARD: FINANCIAL REPORTING

As good stewards, members of the HHC Community should strive to protect and preserve the assets of the organization through efficient and effective use of resources. Use of tax exempt earnings should be properly recorded by reporting the accurate nature of all financial transactions.

Financial Records: You should maintain a high level of accuracy and completeness in the documentation and reporting of our organization's financial records. It is important to follow HHC policies which address cost report compliance and our commitment to full, accurate and timely reports to regulatory agencies.

A Final Word

Please use the Code and HHC policies to guide your behavior and decisions as you carry out your daily activities. Your participation is critical to our success.