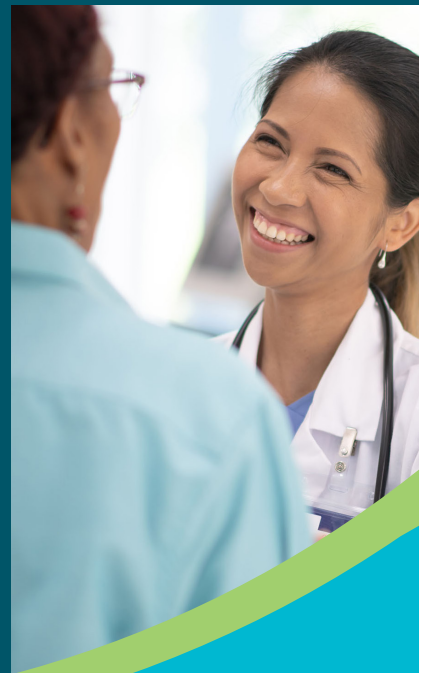


PHOEBE PUTNEY
HEALTH SYSTEM

Code of Conduct



TO MAKE EVERY LIFE WE
TOUCH BETTER.

Table of Contents

A Message from Our CEO and CCO	2	Service without Inducement	8
Our Mission and Values.....	3	• Gifts, Entertainment and Business Meals	
Service with Integrity	3	• Permitted and Non-Permitted Items	
• Making the Right Decision		Service without Conflict.....	11
• See It. Say It. Fix It.		• Avoid Conflicts	
• Living Our Mission and Values		• Disclose and Withdraw	
• Ethical Decisions Guide		Serving Responsibly	12
• Commitment to Federal Programs		• Protection of Assets and Information	
Service that Meets Our Standards	4	• Vendors	
• Standards Apply to All of Us		• Communication	
• Policies and Procedures		• Media Inquiries	
• Managers' Responsibility		• Document Retention	
• Phoebe's Compliance Charter		• Safe Environment	
• Pre-Clearance		Respect Each Other	13
Service with Transparency	5	• Equal Opportunity Employment	
• See It. Say It. Fix It.		• Legal Employment	
• Culture of Transparency		• Drugs and Alcohol	
• No Retaliation		• Harassment	
• Compliance & Ethics Line		• Health and Safety	
Service with Honesty	6	• Thoughtful Service	
• Medical Records		• Marketing & Communication	
• External Reports		Q&As	14
• Billing		Compliance Support.....	18
• False Claims Act / Deficit Reduction Act		• Compliance & Ethics Department	
• Bribes and Kickbacks		• Contact the Compliance & Ethics Line	
• Government Inquiries		• Other Resources	
• Fair Competition		Ethical Decisions Guide.....	19
Service to Others	7	Code of Conduct Highlights	20
• Service with Compassion			
• Teamwork			
• Privacy and Security			
• Golden Rule			
• Social Media and Technology			
• Inappropriate Behavior			
• Diversity and Inclusion			
• Positive Workplace			
• Safe and Drug-Free Workplace			
• Positive Workplace			

The Compliance Department seeks to serve others with integrity, compassion, and respect - creating a culture of doing the right thing every day. We are committed to making compliance an instinctive part of the healthcare system's operations.

Terminology

In this Code of Conduct, the terms "Phoebe," "the company," "we," "us" or "our" refer to Phoebe Putney Health System, Inc. and/or its subsidiaries or affiliates.



A Message From our CEO and CCO

Every member of the Phoebe Family is a key part of delivering on our Vision to “make every life we touch better.” To ensure that Vision comes to life every single day, we’ve developed a Code of Conduct that applies to all employees, contractors, vendors and affiliates. This Code of Conduct is foundational to how we deliver care and should serve as a trusted resource as we make decisions on how to operate with intention and integrity in a highly regulated healthcare environment. We each share the duty to live by this Code and to take action, such as raising a hand or asking the tough questions when something just doesn’t seem right.

Our Code of Conduct is our first source for operational guidelines and standards protocol. However, if you ever have questions or see behaviors that don’t live up to these standards, you should talk to your supervisor, report the behavior to our Compliance & Ethics Department or call Phoebe’s Compliance & Ethics Line.

To make every life we touch better, we must do things the right way. We have to hold ourselves and each other to a higher standard in all we do. On behalf of the Phoebe Family, thank you for your commitment to living our Code and to always doing what’s right for our patients, for each other and for our organization.

Scott Steiner

President & Chief Executive Officer
Phoebe Putney Health System

Jonathan McGuire

Chief Compliance & Privacy Officer
Phoebe Putney Health System

Our Mission & Values

Our mission is to empower every member of the Phoebe Family to safeguard the health of our communities – embracing a culture that delivers great patient experiences, innovative treatments, and access to superior care.

As we seek to improve the quality of our patients' lives, serve our communities and provide an exceptional environment for our employees and physicians, we are guided by Phoebe's Values, which are five core values:

- **Safety is fundamental.** Zero harm is our number one priority one. Always.
- **Service is a calling.** This is not just a job. This is our life's work – it's what we love and what we are meant to do.
- **Commitment is our promise to always get better.** We don't settle for "that's how it's always been done." We learn from our past and build a better tomorrow.
- **Compassion is our core.** For us, it's not a catch phrase, it's who we are.
- **Community is our focus.** We're a part of the places we serve. Our families, our friends, our neighbors – they are our singular focus. Together, we rise.

The Compliance Department seeks to serve others with integrity, compassion, and respect – creating a culture of doing the right thing every day. We are committed to making compliance an instinctive part of system operations.

How does Phoebe's Code of Conduct support its Mission?

Each of us is responsible to act in a manner that reflects Phoebe's Mission. This Code is meant to help us conduct business in a legal, ethical manner that is consistent with our Mission, Vision, and Values, and guide our understanding of Phoebe's compliance structure, key policies and procedures, and certain applicable laws and regulations.

Phoebe has issued specific policies and procedures intended to guide our conduct in the areas in which we do business. If you are unsure about which policies and procedures or laws and regulations apply to your activities, consult your supervisor, the Compliance & Ethics Department, or the Legal Department. We hold our employees, our physicians, and all third parties conducting business on behalf of Phoebe to the same standards and expect them to comply with Phoebe's policies and procedures, all applicable laws and regulations, and this Code.

Code of Conduct Standards / Service with Integrity

Every day, Phoebe employees are united by our vision to "make every life we touch better." This common thread makes working for Phoebe a special experience and brings us together with one common goal.

In order for every patient, physician, and employee to experience this difference, it is essential that every Phoebe employee uphold the Codes of Conduct.

These four core Standards define what it means to be a Phoebe employee. You simply cannot work here without committing to them.

We do the right thing the first time, every time.

As Martin Luther King Jr. said, "The time is always right to do what is right," and each Phoebe employee has an obligation to do the right thing the first time, every time. Doing the right thing is your responsibility and nobody has the authority to instruct you to deviate from these Standards. Contact the Compliance & Ethics Line if you feel anyone has asked you to violate these Standards.

We see it, say it and fix it.

At Phoebe, if we see a problem, we "say it" by identifying it to others, and we "fix it." Doing the right thing means standing up for Phoebe's Mission, Vision and Values even when it is not convenient. If you see something that is wrong, say it and fix it. We must all hold each other accountable for doing the right thing, and you have the full support of Phoebe when you do.

We get help when the right choice is not clear.

If you need help or are unclear about what to do, you have the responsibility to get help. Use the Ethical Decision Guide, (a Q&A guide) at the back of this Code of Conduct when you are confronted with a tough choice. If your situation is not included in the Guide, you also can talk with your supervisor, any compliance employee, or contact the Compliance & Ethics Line.

We are committed to meeting federal healthcare program requirements.

Phoebe hospitals treat patients who are covered by Medicare, Medicaid, and other federal healthcare programs. Federal healthcare programs have many requirements that are designed to ensure taxpayer dollars are spent only on care that is needed and of appropriate quality. Phoebe is fully committed to following the requirements of all federal healthcare programs.

What the Standards Mean to Me:

- My decisions support Phoebe's Values.
- I am responsible for my decisions and doing the right thing.
- I raise issues that are inconsistent with our Values.
- I use the Ethical Decision Guide when the right decision is not clear.
- I solve problems.
- I comply with federal healthcare programs.

Service that Meets Our Standards

When you strive to provide excellent service, standards are important. Standards are the lines over which we will not cross even if it would be convenient. The Code of Conduct helps us identify, learn, and use those standards in our daily decisions.

We Are All Required To:

- Read and certify your understanding of the Standards within 30 days of employment and annually.
- Use the Standards in your daily decisions.
- Follow Phoebe policies.
- Talk about the Standards and their application with your supervisor or manager.
- Contact the Compliance & Ethics Line or Compliance & Ethics Department with questions.
- Report violations.
- Participate in training on these Standards.

Additional Actions for Managers:

- Set the right ethical tone in your work areas.
- Explain how your decisions are based on our Values and these Standards.
- Answer questions and support employees who raise good faith concerns.
- Seek guidance when the right action is unclear.

Phoebe's Compliance & Ethics Program reflects our values.

Phoebe's Compliance & Ethics Department's scope is reflected in the Compliance Program's Corporate Compliance Charter. The Charter was voluntarily adopted by Phoebe Putney Health System Board of Directors, through the Audit Committee, hospital and physician group boards and Phoebe leadership to further. Phoebe's commitment to compliance, high ethical standards and corporate Mission, Vision and Values.

The Charter requires every Phoebe employee to:

- Follow the Code of Conduct as a condition of employment.
- Participate in annual ethics training and specialized compliance training tailored to our job duties.
- Work with Phoebe's Legal and Compliance & Ethics Department teams to resolve issues of concern.
- Contact the Compliance & Ethics Line if issues of concern are not resolved timely or to our satisfaction.

The Standards apply to all of us.

These Standards apply to every Phoebe employee, as well as the corporate board of directors, governing boards, and contractors when they are acting on behalf of Phoebe. Failure to follow or report a suspected violation of these Standards, Phoebe policies and procedures, or federal healthcare program requirements, may result in disciplinary action, up to and including termination. Within your first 30 days as a Phoebe employee and each year thereafter, you are required to certify you have read and understood these Standards. Many of our contractors also are required to sign a certification. If you have questions about your responsibilities, contact your supervisor or compliance employee.



"Compliance, to me, is a culture – a way of life. All staff, no matter the role, are required to maintain education regarding Compliance & Ethics on a yearly basis, as well as sign a contract stating they will maintain compliance."

– **Terri Barnard**

Nurse Manager, Phoebe Digestive Health Center

"Our Code of Conduct is the backbone of our Safety First culture and our journey toward becoming a Highly Reliable Organization (HRO). It champions transparency, ethical care, and empowers every team member to Speak Up for Safety. If something doesn't feel right, anyone can Stop the Line—no fear, no hesitation. Phoebe's non-punitive culture identifies errors as learning opportunities rather than grounds for blame. This culture of openness reflects our unwavering commitment: safe, ethical treatment for every patient, every time."



– **Stephanie Baron, MSN, RN**

SVP, Chief Quality Officer | Administration

The full text of the Corporate Compliance Charter is available on Phoebe Connect, under Policies and Procedures. Supervisors and managers are responsible for ensuring their employees and contractors strictly comply with the Charter.

If you feel that following the Standards would result in an incorrect or unethical result, you must seek a written pre-clearance from the Chief Compliance Officer before proceeding. To seek pre-clearance, email PhoebeCompliance@phoebehealth.com.

The Chief Compliance Officer will consider your request and advise you on how to proceed.

See it. Say it. Fix it.

See it...

- Speak up if you see or think you see something that violates this Code. You cannot look the other way.

Say it...

- to your coworkers. You should feel comfortable speaking up to your coworkers. Sometimes, all we need is a simple reminder.
- to your manager. If you do not feel comfortable talking to your coworkers, turn to your manager. Managers are responsible for creating a workplace where employees are comfortable raising issues without fear of retaliation. If your manager asks you to do something inappropriate or something that would violate these Standards, go “one over” your manager or call the Compliance & Ethics Line. Your concerns will be investigated, and retaliation will not be tolerated.
- to your human resources representative. Issues involving employment matters should be taken to human resources.
- to your Chief Compliance Officer. Your Chief Compliance Officer is available to answer your questions and discuss your concerns. Your compliance department is also available to assist you if you want to speak to someone you know in the department.
- to the Compliance & Ethics Line. If you do not feel you can address your concern within your department, call the Compliance & Ethics Line at **1-844-606-1766** or phoebehealth.ethicspoint.com. The Compliance & Ethics Line is available to guide you and answer your questions or to report a concern.

Fix it...

- When you see and say an issue, do not forget to help fix it. Many issues can and should be corrected on the spot. In some cases, the solution may require action by your manager or others, and everyone is required to help resolve any concerns.

Transparency supports our values.

In order to improve, we must be transparent, particularly when we make a mistake. When we identify mistakes, we can learn from them, but if we do not identify mistakes, we miss out on lessons learned. Phoebe employees should feel comfortable raising their hands and saying, “I made a mistake,” and managers are responsible for promoting an environment where problems are raised and – most importantly – solved without fear of retaliation.

Phoebe’s culture of transparency is supported throughout the system.

The commitment to non-retaliation comes straight from Phoebe Putney Health System Board of Directors, Phoebe Putney Memorial Hospital Board of Directors, Phoebe Sumter Medical Center Board of Directors, Phoebe Worth Medical Center Board of Directors and is administered by the Chief Compliance Officer. When someone raises a good faith concern, calls the Compliance & Ethics Line, or cooperates with an investigation or corrective action, retaliation against that person is not permitted. Phoebe takes reports of retaliation very seriously. If you feel you have experienced retaliation, immediately report it to the appropriate manager, who is not involved in the issue, or contact the Compliance & Ethics Line. Any time there is an allegation of retaliation, the allegation will be investigated, and appropriate steps will be taken to protect those who report in good faith.

The Compliance & Ethics Line works.

If you contact the Compliance & Ethics Line, your call will be answered by a third party 24 hours a day, seven days a week, after hours, and on weekends. The advisor will ask you specific questions to better understand your concerns. If the caller discloses his or her name, but requests confidentiality, the Compliance & Ethics Line will keep this information confidential to the extent permitted by law.

The Compliance & Ethics Line will inform you when the investigation is complete.

“Our integrity defines us. As healthcare professionals, let us commit to a culture where respect, accountability, and ethical behavior guide every decision we make. Our Code of Conduct should serve as a promise to ourselves, to each other, and to those we serve.”



– Andrea Albritten, PHR, SHRM-CP
System Director, Human Resources

1-844-606-1766

phoebehealth.ethicspoint.com

The Compliance & Ethics Line is a simple,
confidential way to report any
possible concerns,

24 hours a day, 7 days a week.

PhoebeCompliance@phoebehealth.com

Service with Honesty

Our word is our bond, and we do not take that lightly. Our community depends on us to provide ethical service. It depends on providers, like us, to do the right thing by honestly performing and billing for services.

We recognize the law is a minimum standard of behavior – not a maximum – and we follow the spirit of the law. It is a good business practice to ensure our behavior is not so close to the line that someone else might question whether it is lawful.

We Are All Required To:

- Tell someone if you see an error or something false and fix it.
- Not sign your name unless you know the statement is true.
- Not sign other people's names or share passwords.
- Raise possible dishonesty with your manager, the Compliance Department, or the Compliance & Ethics Line.
- Compete fairly.



"Artificial intelligence has the potential to revolutionize hospital care by streamlining diagnostic processes, enabling faster and more accurate detection of

diseases, and personalizing treatment plans based on patient data. To ensure ethical and effective implementation, Phoebe will prioritize transparency, adherence to HIPAA regulations for patient privacy, and collaboration between medical professionals and AI systems."

– Ross Youngdale
System Director of Technology & Security
Services, Information Systems

We are honest in what we write, say, and do.

When we make a statement or sign our names to any document, we are confirming that the statement is true.

We do not back-date documents, make up entries, or make it appear as though we documented something we did not. We do not sign other people's names to documents, and we do not share each other's passwords.

Our patients depend on us and their physicians to accurately document their medical records. We make every effort to ensure medical record entries are clear and complete and reflect accurately the care provided to a patient. We do not exaggerate or lead others to document in a certain way. If we add to a record, we note the addition as a late entry, in accordance with hospital policy.

We ensure all external reports are filed on time and are complete, accurate, and understandable. These include cost reports, tax reports, plans of correction, and reports to private accrediting bodies. When we say we will do something, we follow up to make sure it is done. Our financial records conform to generally accepted accounting principles, and we never attempt to hide expenditures, funds, assets, or liabilities.

We are honest in our bills for services.

We make every effort to submit accurate and truthful bills for our services, and we bill only for services that were actually provided, properly documented, and coded.

We ensure our bills meet federal healthcare program requirements, and we do not knowingly submit bills that are inaccurate. If personal knowledge is required to fill out a form, we fill it out only if we have personal knowledge. If we see a billing error, we involve a manager, Chief Compliance Officer, or the Compliance & Ethics Line.

We investigate and correct the error prior to submitting the bill. If we have already billed, we correct the underlying problem and make appropriate refunds. If we are not sure how to correct the error, we report it to a manager, the Chief Compliance Officer, or the Compliance & Ethics Line.

The Federal False Claims Act and Deficit Reduction Act protect government programs including Medicare and Medicaid, from fraud and abuse. Phoebe complies with these and all laws, and has policies to detect, report, and prevent waste, fraud, and abuse, as well as provide protection for whistleblowers.

If you see a false claim or report, fix it before it is submitted.

If it has already been submitted, contact your manager, the Chief Compliance Officer, or the Compliance & Ethics Line.

We prohibit financial incentives to provide care.

We never offer, give, or receive anything of value in hopes of inducing referrals or as a reward for referrals from other businesses. The “anything of value” does not have to be just money. It can also be services, gifts, entertainment, or be anything else that has value to the recipient. We never offer, accept, or give bribes or kickbacks. We never compensate anyone based on referrals. If you believe that someone has offered, requested, or received a bribe or kickback, or has provided something of value in exchange for referrals, contact the Compliance & Ethics Line. See the section about “Permitted Gifts and Entertainment” on page 9 for additional requirements.

We respond to government inquiries.

As a good corporate citizen, Phoebe cooperates with

government inquiries. At the same time, we consult with the Legal department and our Chief Compliance Officer and Privacy Officer before responding to any non-routine requests to make sure contacts with government entities are handled properly. We are always clear and truthful in what we say to those who make inquiries. We never alter or destroy records if we are aware of an existing or potential government inquiry or private lawsuit.

We compete fairly.

Being innovative means we do not need to compete against others unfairly. We do not seek to gain an edge through unfair competition. We do not illegally obtain or use proprietary information from competitors, nor do we use deceptive means to gain such information.

Service to Others

We provide service with compassion.

We strive to treat all our patients equitably and with compassion, dignity, and respect. We work daily to address implicit and explicit bias, and we recognize that every patient deserves fair and just opportunity to attain their highest level of health, regardless of conditions in which they are born, grow, live, work, play, and age. We respect cultural differences and embrace the opportunity to care for patients from all walks of life. We involve our patients in decisions affecting their care, and we disclose unanticipated outcomes to patients and their families. We obtain their consent for treatment or participation in research, and we confirm all available options are explained.

We value teamwork.

Healthcare is a service industry, and teamwork and collaboration are essential to providing excellent service and solving problems—no matter how big or small. We work together to achieve the common goal of serving our patients.

We protect the right to privacy.

We release information to vendors or others only in accordance with proper procedures. We take steps to prevent identity theft by protecting social security numbers and other personal data, and securing our systems from unauthorized access. We access health and personal information and share it with coworkers only when authorized to do so and for the purpose of doing our jobs. Sometimes our coworkers become our patients, and when this occurs, we afford our coworkers the same privacy rights as every other patient.

We all learned the golden rule as children, and it still applies today. We treat each other as we want to be treated. It is as simple as that.

We Are All Required To:

- Treat each other the way we want to be treated.

Additional Actions for Managers:

- Create an environment in which we can honor and respect each other.

What if I have a dispute with my manager?

Your human resources representative will help with employment matters involving personality disputes, diversity and the workplace. Your Chief Compliance Officer and the Compliance & Ethics Line are available to assist if you have ethics and compliance concerns.

We are responsible with Social Media and Technology.

We never post patient information or photographs to a web site, social media page or public forum without their authorization – even if the patient is not identified. We do not use our personal devices to text patient healthcare information for any reason unless otherwise allowed by Phoebe policy. We do not take or transmit photographs of patients except as required for patient care and within the requirements of our policies, or when authorized in writing by the patient.

Personal devices are not to be used during work, including but not limited to earbuds, FaceTime/video calls, and social media platforms.

All Policies are available in PolicyStat, located on Phoebe Connect.

We have positive physician relationships.

We treat our employed and affiliated physicians with respect, and they have the obligation to treat us with respect. We report inappropriate behavior by physicians and vice versa. If you are aware of any behavioral issues, contact your Chief Compliance Officer or the Compliance & Ethics Line.

We are committed to diversity, equity, and inclusion at all levels of our organization.

At Phoebe, we strive to cultivate a diverse, equitable, and inclusive environment, one that is grounded in our dedication to the equitable health and well-being of all people. Respecting, nurturing, and encouraging diversity of thought, background, and experience contribute to positive work environments that result in exceptional patient care and enhanced employee engagement. We're committed to equity in hiring, promotions, and opportunities. Acknowledging and removing obstacles that impede the advancement of health equity is paramount to our vision to make every life we touch better. We condemn all forms of harassment and discrimination based on race, ethnicity, religion, gender, sexual orientation, gender identity or expression, national origin, age, disability, veteran status or any other characteristic protected by law. We embrace the diversity of our workforce and our community because we understand that we are better together.

"Ensuring that all employees feel welcome, valued, and heard is a top priority at Phoebe because we understand that diversity and inclusion make us stronger as a healthcare community."



— Jennifer Williams, PhD, VP
Chief Community Engagement & Health Impact Officer

We have a safe and drug-free workplace.

The health and safety of our patients is our primary concern. We follow health and safety policies and regulations that apply to our work and the guidance provided by the facility's safety officer.

This includes following procedures for handling and disposing of hazardous materials. We access and handle prescription drugs, controlled substances and other medical supplies only as authorized and administer them only by physician order. We must not be under the influence of alcohol or illegal drugs on company property or during work time. Employees are required to report any unsafe situations to their facility safety officer and supervisor.

Service without Inducement

We do not let perks cloud our decisions.

All gifts, entertainment, and business meals provided or received must be reasonable and small enough they do not influence our decisions. We never offer or accept anything of value in exchange for referrals or other business.

We communicate to vendors, physicians, patients, customers and others that our values restrict what we can give and receive because we want our services and business relationships to stand on their own. We do recognize that certain items are appropriate and do not present a risk of influencing our decisions. Each employee needs to be sure that even permitted items do not damage our reputation or our integrity under the circumstances. If you are unsure, contact your Chief Compliance Officer or the Compliance & Ethics Line before offering or receiving such items.

What constitutes a gift?

A gift is any item of value – including marketing items such as T-shirts, flowers, and gift baskets – if the recipient is not expected to pay for the item.

What constitutes entertainment?

Entertainment is attendance at any event, such as a sporting event, concert, or play where the recipient is not expected to pay for the entrance fee or ticket.

What constitutes a business meal?

A business meal is any meal where the purpose of the meal is to discuss Phoebe business.

What if I receive something that is not permitted?

If an item is not permitted by these Standards, it should be returned with an explanatory note. The only items that do not need to be returned are perishable items, such as food or flowers. Perishable items may be donated to a charity or shared in the work area. If returning the gift would create an awkward situation, please call the Compliance & Ethics Line.

The best "thank you" any vendor can give us is to provide excellent service at a reasonable price. We do not want anyone to have the impression we are using our position at Phoebe for personal gain or that we cannot be objective. Our decisions should be based solely on what is best for Phoebe and the patients we serve.

We Are All Required To:

- Learn our standards on gifts and entertainment.
- Communicate our standards to others.
- Return items or seek advice if gifts or entertainment do not meet these Standards.

Additional Actions for Managers:

- Set an example by knowing and implementing the Gifts Policies in your work areas.

Permitted Gifts and Entertainment. The following items are permitted, but they must be reasonable and appropriate under the circumstances and all requirements of Phoebe policy must be met.

Occasional gifts:

- Purchased personally by a Phoebe employee for a Phoebe employee.

Example: A manager may personally purchase a gift card to a bookstore for an employee. However, the manager should disclose the gift is from him or her personally to avoid confusion. Personal gifts must be of modest value and for ethical purposes.

- Purchased by Phoebe for a patient with a retail value that does not exceed policy limits and is not cash or its equivalent. Contact your Chief Compliance Officer before proceeding.

Example: A hospital may provide a \$15 T-shirt to the parents of a newborn.

- Purchased by Phoebe for a vendor or customer, or received from a vendor or customer, with a retail value that does not exceed \$50 per item per employee and \$100 in total per year and is not cash or its equivalent. For purposes of the Standards of Conduct, EMS providers and contracted employees are considered vendors.

Examples: An accounting firm may purchase a \$50 clock for a retiring Phoebe employee. A vendor may provide a \$100 fruit basket to the radiology department if the basket is shared among employees.

- Purchased by Phoebe for a physician in limited circumstances as long as the value of the item is within the non-monetary compensation limit, and the item is not cash or its equivalent. Contact your Chief Compliance Officer before proceeding.

Example: A hospital may buy gift baskets valued at \$100 for each member of its medical staff to celebrate Doctors' Day. The hospital must log the value on each physician's non-monetary compensation log and it may not exceed the limit.

- Received by a Phoebe employee from a physician as long as the amount does not exceed \$50 per item per employee and \$100 in total per year, and the item is not cash or its equivalent.

Example: A physician may provide each nurse on the unit a \$50 gift certificate redeemable to purchase a holiday turkey.

Occasional business meals:

- Purchased by Phoebe for a Phoebe employee.

Example: A lab manager may take his staff to lunch to celebrate the completion of a project.

- Purchased by Phoebe for a vendor or customer or received from a vendor or customer.

Example: A computer hardware vendor may take the information security director to lunch to discuss the performance of the hardware.

- Purchased by Phoebe for a physician, or received from a physician, in limited circumstances. Contact your Chief Compliance Officer before proceeding.

Example: A chief nursing officer may take the physician who serves as medical director of the ICU to lunch to discuss infection control rates. The physician's medical directorship agreement must state that the physician will attend meals from time to time to discuss the physician's duties.

Occasional business entertainment:

- Purchased by Phoebe for a Phoebe employee.

Example: The hospital may host an employee picnic.

- Purchased by Phoebe for a vendor or customer, or received from a vendor or customer, as long as the cost paid per employee does not exceed \$100 per vendor or customer in total per year, and the vendor or customer attends the event with the employee to discuss business.

Example: A vendor may take a quality manager to a museum event with a ticket price of \$50.

- Purchased by Phoebe for a physician or received from a physician in limited circumstances. Contact your Chief Compliance Officer before proceeding.

Example: The hospital may host an annual physician appreciation dinner that meets the requirements of the Compliance & Ethics department policy.

"I am proud to stand behind our Code of Conduct as a daily reminder of who we are and what we stand for. At the heart of our work is a commitment to serve others with compassion, act with integrity, and communicate with honesty and transparency in every interaction. Our Compliance Department is an essential partner in this mission – guiding us, educating us, and ensuring we uphold the highest standards for our patients, our colleagues, and our community. Together, we create an environment where 'making every life we touch better' is the only way we do things."

– Kelsey Reed, DNP, MHA, MSN, FNP-C, FACHDM
Vice President & Chief Nursing Officer, Phoebe Sumter Medical Center



Gifts and Entertainment that are not permitted

- Gifts received from patients. We may not accept or solicit gifts from patients in any form.

Example: A patient may not tip a nurse.

- Free healthcare items or services of any value purchased for or provided to patients, physicians, or government officials, unless specifically permitted by Phoebe policy.

Examples: A hospital may not provide a certificate for free non-preventive healthcare services to a Medicare beneficiary. However, a hospital may donate a free mammogram to a charity because it is a preventive healthcare service.

A patient may not give an employee tickets to a concert as a thank you.

- Trips purchased for or received from a vendor, customer, patients, government officials or physicians, unless the travel is part of a signed contract, such as training for maintenance of purchased equipment or software.

Examples: A vendor may not take an employee to the Super Bowl to discuss business. A vendor may not pay for a trip for an employee to visit the vendor and evaluate its products.

- Cash, traveler's checks, money orders, stock, negotiable instruments, honorariums, or other cash equivalents provided to or received from patients, vendors, customers, physicians, or government officials, except as remuneration for a service provided pursuant to a written agreement.

Example: A hospital may not provide a \$50 American Express gift card to a physician.

- Items solicited by the recipient, prohibited by the recipient's policies or that would violate the law.

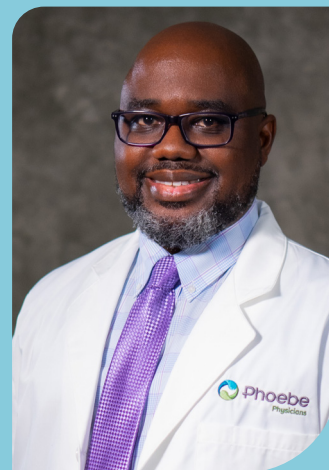
Example: A hospital may not provide tickets to a concert to a physician who requests them.

- Items provided to or received from anyone being considered during a pending purchasing decision.

Example: A vendor may not provide a bottle of wine to the materials manager who is considering buying supplies from the vendor.

"Following our code of conduct helps us stay true to the mission, vision and values of our organization. Our code of conduct truly defines who we are as an institution."

– **Derek Heard, MD**
Family Medicine,
Primary Care



Other examples of items that are NOT permitted:

- An OB unit may not provide a \$100 blanket as a gift to a new mom because it exceeds the \$15 limit.
- A vendor may not provide a \$100 bottle of wine to an employee because it exceeds the \$50 limit.
- The CEO may not take the medical director to dinner every week to discuss his duties because this is not occasional and therefore not reasonable.
- Phoebe will not pay for a department manager to take his employees to lunch every week to discuss their work. This is not reasonable.
- A hospital may not provide a \$25 gift certificate to a patient. This exceeds the \$15 limit.
- A vendor may not sponsor a hospital event or an open house for a Phoebe facility. This would likely exceed the \$50 limit and may create a real or perceived conflict of interest.

We avoid conflicts of interest.

In our work, we have a duty to put the interests of Phoebe before our own. We avoid conflicts of interest where someone might question whether we are acting for Phoebe's benefit or for personal gain. Managers and those who work regularly with vendors are required to annually report any actual or potential conflicts of interest by completing the Conflict of Interest Disclosure Form. In addition, any time a potential conflict arises, we are required to update our annual Conflict of Interest Disclosure by completing a new form and seeking guidance from the Compliance & Ethics Department before proceeding. If you have questions about whether a situation presents a conflict, contact the Compliance & Ethics Department.

We disclose and withdraw when conflicts arise.

If we are ever in a situation where someone might question our loyalty to Phoebe or there is the appearance of a conflict, we disclose it and withdraw ourselves from making a decision on the matter. We disclose it to Phoebe by completing a Conflict of Interest Disclosure Form, and we disclose it to others involved in the situation. We then withdraw from the selection of a vendor or the other decision by letting someone else make the selection.

For example, perhaps you are tasked with buying the linens at your hospital. Your best friend from college happens to sell linens. Even if your friend offers the best deal, the appearance of a conflict triggers the requirement to disclose the relationship to your manager and complete a Conflict of Interest Disclosure Form. In this situation, the Compliance & Ethics Department would advise that the hospital obtain bids for the service and that someone, other than you, should make the purchasing decision. That way, the decision maker is someone who does not have the appearance of a conflict.

Failure to disclose and withdraw from conflicts of interest can result in disciplinary action up to and including termination.

You scratch my back, and I scratch yours?

If you buy a boat from your neighbor who owns a healthcare consulting business, you have a financial relationship with your neighbor. You will need to disclose this financial relationship if your facility considers contracting with his company. Also, you need to ensure you are not involved in the bid selection process involving your neighbor. The appearance of a quid pro quo relationship is inappropriate and may raise concerns under the Anti-Kickback Statute.

To avoid a question about our integrity, we must be able to identify potential conflicts, disclose them, and withdraw ourselves from making decisions where it may appear we are not being objective.

We Are All Required To:

- Report any family relationships with others in the organization.
- Identify situations where it could appear to an outsider that our own personal interests conflict with Phoebe's interests.
- Disclose the situation to our manager and complete a Conflict of Interest Disclosure Form.
- Withdraw myself from making decisions that have the appearance of a conflict.

Examples of Potential Conflicts:

- Employment with an entity that competes, contracts with, or is a supplier of Phoebe.
- A financial or ownership interest in an entity that competes with Phoebe.
- Using Phoebe property, information or position for personal gain.
- Taking opportunities for ourselves that are discovered through our jobs.
- Outside jobs or positions that conflict with our work at Phoebe.
- Purchases for Phoebe must not involve individuals or entities with whom you have a personal purchasing relationship or vice versa.
- Buying from vendors or making any business decisions that involve friends or family.
- A supervisory or reporting relationship to family or those with whom we are personally involved.

Serving Responsibly

We protect assets and information.

We have an obligation to our patients to use our resources responsibly and only for Phoebe business purposes. We spend Phoebe funds wisely and eliminate waste. We use Phoebe's physical assets such as computers, supplies, vehicles, machinery, and workspace for Phoebe business, and we protect these assets from loss, damage and theft. We do not waste supplies, equipment, space, capital or time. We also protect Phoebe's non-physical assets, such as strategic plans, plans for acquisitions and divestitures, non-public financial information, trademarks, processes, know-how, and other proprietary information. We keep information confidential and disclose it only to those who are authorized to know. We take precautions by avoiding discussions of sensitive matters over cell phones, password protecting computers and documents, and performing virus checks before downloading a file or installing a program. In the event that electronic media or equipment is discovered to be lost or stolen, the IT Help Desk, the PPHS Chief Compliance & Privacy Officer, the PPHS Security Officer, as well as the Director of Security, should be notified immediately.

We expect our vendors to follow these Standards.

Vendors, suppliers, contractors, consultants, business partners, and others with whom we do business are vital to our success. We expect them to adhere to this Code of Conduct and to always treat us with the same respect, fairness, and professionalism that we demonstrate to them. If we entrust them with confidential information, we expect them to uphold that trust. We are careful about who we partner with. We look into the background of our vendors and confirm they are not excluded from federal program participation before working with them. We pay only reasonable fees for services, and we do not engage consultants who make unrealistic promises.

Our payments to vendors do not incentivize them to recommend practices that lead to excessive utilization or reimbursement. We do not allow others to use the Phoebe name to advertise their products or promote their interests above the interests of Phoebe or our patients. We will terminate our arrangements with vendors who do not follow our Code of Conduct when working with Phoebe.

Resources permit us to care for patients and operate our business. We eliminate wasteful spending, fraud, and other concerns that deplete our resources. We ensure our resources are used to support Phoebe's mission and are utilized in ways that support our values and the interests of our shareholders.

We Are All Required To:

- Protect Phoebe assets.
- Communicate efficiently and effectively.
- Refer media requests to the Marketing Department.
- Retain documents as required.



"Phoebe Putney Health System associates are committed to leading the way to excellence with the highest standard of ethics and integrity. Our pledge serves as the foundation for establishing a strong reputation of a quality system in the healthcare industry. We take it seriously that our compliance to the standards, and all regulatory requirements, are ensuring a safe environment for healing, working, and gathering. Our actions and decisions speak to the highest level of respect, care, and lifting the human spirit. Not only do we reassure our Code of Conduct beyond the associates who work within our system, but to all who act on Phoebe's behalf."

– Dianna Grant, SVP, CMO
Phoebe Putney Health System

Equal Opportunity Employment

We are committed to providing a workplace that is diverse and free from improper discrimination and harassment. We hire and promote employees based on their ability to demonstrate excellence in their work and dedication to meeting our patients' needs. Our interactions with one another should always be fair, objective, and professional. Each of us is responsible for supporting fair employment values by complying with applicable labor and employment laws, including anti-discrimination and privacy laws. We will make reasonable accommodations for individuals with physical or mental disabilities, in accordance with applicable laws. If you have questions or concerns about unlawful discrimination or harassment in the workplace, bring these issues to Human Resources. Anyone found engaging in unlawful discrimination or harassment will be subject to corrective action, up to and including termination of employment.

Legal Employment

Credentials communicate to our patients and physicians that we are qualified to do our jobs. We maintain all credentials, licenses and certifications that are necessary to perform our jobs. Employees in positions that require professional licenses, certifications, or other credentials are responsible for keeping their licenses, certifications, or other credentials current and active. If you are found to have falsified credentials, licensure, or certification for yourselves or others, you will be subject to corrective action, up to and including termination.

Drugs and Alcohol

The health and safety of our patients is our primary concern. To protect our patients, employees, physicians, vendors, and third parties, we maintain an alcohol- and drug-free work environment. Whenever employees are working, operating Phoebe vehicles, or otherwise performing services for Phoebe, we are prohibited from:

- Using, possessing, buying, selling, manufacturing, distributing, dispensing or transferring illegal drugs.
- Being impaired by the influence of prescribed drugs.
- Being under the influence of illegal drugs or alcohol.
- Possessing or consuming alcohol.
- Participating in drug diversion.

If you think someone is under the influence of drugs/ alcohol or suspect drug diversion, report it immediately to the Compliance & Ethics Line at 1-844-606-1766 or the Compliance & Ethics Department at 229-312-6735.

Harassment

We should all feel safe while at Phoebe. Therefore, we will not tolerate violence, threats of violence, or any form of unlawful discrimination or harassment, including sexual harassment, in the workplace.

Anyone who experiences or witnesses unlawful harassment should report the incident to Human Resources immediately. Similarly, supervisors who learn of any such alleged incident or concern should report it to Human Resources immediately.

Human Resources will promptly and thoroughly investigate any complaints and will take appropriate action. Anyone found to be engaging in unlawful harassment will be subject to corrective action, up to and including termination of employment.

Health and Safety

Each of us needs to do our part to keep the facilities clean and functioning well. We follow the health and safety policies and procedures that are designed to ensure we meet all applicable laws and regulations, as they apply to our workplace. If we witness an injury, accident, or dangerous situation, we need to report it to our supervisor immediately. It is important that we notify our supervisors immediately of any serious workplace injury or dangerous situation so that prompt action can be taken to resolve the issue.

Providing a healthy and safe environment extends beyond patient care and into our communities. Our facilities are part of our larger communities, and we are committed to their continued health as well. We are committed to conserving resources and reducing our ecological footprint by complying with environmental laws.

Thoughtful Service – We communicate effectively.

What we say and how we say it ultimately reflects on Phoebe. That's why we ensure all written and verbal communications – even emails – reflect the highest professional standards. We send messages only to those who need them, and we clearly state the purpose of the communication and what we seek in response. We do not use aggressive language or tone in our communications and should never write anything we would not want to read in the newspaper.

While we support everyone's right to free speech, employees must be careful when making verbal comments or social media comments that are derogatory toward a class or category of people, and that violate our Code of Conduct, Social Networking, and Equal Opportunity/ Non-Discrimination policies. Too often, people post things, comment on posts, or "like" posts without realizing the damage it can do to your reputation as a medical professional with a duty to treat everyone you care for with dignity and respect. In addition, social posts can create conflict in the workplace and can damage relationships with coworkers.

We refer the media to Marketing & Communications.

In order to avoid confusion, Phoebe communicates with the community in a clear, unified voice. Any media inquiries or requests to issue press releases or use our company logo should be referred to the Marketing & Communications department at 229-312-2148.

We retain documents as required.

We retain documents, email, and other communications for the appropriate and legally required length of time described in Phoebe's document retention policy. We never destroy documents before the permitted destruction date or if Phoebe's Legal department has requested we retain them.

Compliance & Ethics Line

1-844-606-1766 or Phoebehealth.ethicspoint.com

Q: If I make a report to the Compliance & Ethics Line, will I have to speak with a Phoebe employee?

A: No. The Compliance & Ethics Line is staffed by a third-party contractor with trained personnel. You do not have to provide your name. In order to investigate reports thoroughly, we may request additional information and we will always do our best to maintain confidentiality if you choose to provide your name.

Q: What issues should I report to the Compliance & Ethics Line?

A: Suspected or actual violations of Phoebe Compliance policies and procedures, applicable laws and regulations, and this Code should be reported. Examples of issues to be reported include: patient privacy concerns, improper gifts, bribes or kickbacks, falsification or destruction of information, healthcare billing concerns, financial reporting issues, conflicts of interest, and misuse of Phoebe funds or property.

Q: How long will it take to follow up on my complaint?

A: All concerns are investigated thoroughly within a reasonable time frame. Check back and provide the report number you are given because we may need additional information.

Q: Will individuals named in a Compliance & Ethics Line report be notified they have been identified in a Compliance & Ethics Line report?

A: Yes, individuals identified in a Compliance & Ethics Line report will be notified of the accusations against them. These individuals will be notified once it is determined that doing so will not unduly compromise the investigation. The notice will not include the identity of the individual who filed the report, unless disclosure is required by law.

Non-Retaliation

Q: What does it mean to file a Compliance & Ethics Line report in “good faith”?

A: A Compliance & Ethics Line report filed in “good faith” means that an employee believes a violation has occurred, and the violation is reported truthfully and without malice or ill intent.

Q: What is non-retaliation?

A: Phoebe prohibits retaliation, which is an adverse employment action and/or other adverse treatment, such as intimidation, threats, coercion, or discrimination against an employee who makes a report in good faith.

Quality Patient Care

Q: I think a nurse may have made a mistake in administering a drug to a patient. When I mentioned it to the nurse, she/he seemed annoyed and said she/he would handle it. I am not sure anything was done.

Should I do anything else?

A: If you are uncertain, keep raising the issue. Talk to your supervisor or report the issue to the Compliance & Ethics Line. Errors do occur in practice, but with care and attention from everyone, they can be prevented or corrected. Part of becoming a high reliability organization, every member of the Phoebe Family must be comfortable speaking up when they notice something that has the potential to impact safety. “Stopping the line” allows for clarifying questions, voicing concerns, and using the chain of command.

Patient Privacy

Q: Mary, my neighbor, was recently admitted to our facility. I saw another neighbor while shopping. She asked me if I knew how Mary was doing. How should I reply?

A: You cannot discuss Mary’s condition or the services she received. You have a professional obligation to respect and protect Mary’s privacy. You may only discuss patient treatment or other health information as permitted by Phoebe policies and procedures and this Code. This includes: any family members, significant others, or anyone with whom you have a personal relationship.

Q: Can I provide a copy of a patient’s most recent treatment information and lab values to another healthcare provider?

A: Yes. You can provide patient information to another healthcare provider for the purpose of treating a patient. Before doing so you need to verify the patient’s treatment relationship with the healthcare provider making the request. You may not release information to the patient’s employer (unless it is related to Worker’s Compensation), law enforcement, or coroner.

Business Relationships

Q: A patient wants to pay my son to do “odd jobs” around his home. Can I let my son take the job?

A: No. As a general rule, employees should avoid business relationships with patients. We do not want patients to think they will receive better or worse care if they “help” our employees and their families.

Q: A new vendor is willing to give our facility a discounted contract for service on a new copier for our facility if we sign with his company. I think the contract will save the company a lot of money. Can I consider using this vendor?

A: Yes. If you think that Phoebe would get a better deal with this vendor, bring it to your supervisor or Purchasing’s attention so the terms can be compared to other bids. Phoebe often has contracts with vendors and bases selection on price, quality, and service. However, you may not accept a discount or any other item of value from the vendor for personal use in exchange for helping the vendor secure Phoebe’s business.

Q: A vendor is offering to give me a free home computer just for signing a contract between Phoebe and his company. Am I allowed to accept the computer?

A: No. We should never allow personal gifts or discounts to influence our judgment in signing a contract. Phoebe selects its vendors based on price, quality, and service, not on gifts.

Gifts

Q: What does Phoebe consider a “gift”?

A: A “gift” includes any items, services, benefits, or anything of economic or personal value, which can include: gifts, business meals, entertainment, travel, or educational or promotional items, except for payments in exchange for properly contracted services to Phoebe.

Q: Can I invite physicians to a suite at a sporting event for a presentation and buffet?

A: No. While it is possible to conduct legitimate business at a sporting event, attendance at a sporting event is inherently entertainment. Providing entertainment to a referral source could create the appearance that the purpose of the event is to generate business by providing a valuable personal benefit. Accordingly, attendance at a sporting event, and other entertainment or recreational event is not permitted.

Q: May I provide a physician with a gift basket of food or wine?

A: Check the Gifts policies for specific guidance. Certain gifts are appropriate if they are inexpensive and are appropriately logged on our Gifts Log.

Q: I want to give another employee a present for her birthday. Do the Gifts policies apply?

A: No. These rules do not apply to interactions solely between Phoebe employees. The birthday gift would be acceptable as long as it is intended to be a genuine expression of personal esteem and does not influence business decisions.

Q: May I give a gift to a patient?

A: Generally, you should refrain from giving and receiving gifts from patients. Gifts should not be given to induce patients to use or continue to use Phoebe as a health care provider. Occasionally, you may give a gift to a patient, if it is permitted by the local Gifts policies.

Q: A vendor is trying to give me an expensive gift that obviously violates the Gifts policies. Is it OK to refuse a gift?

A: Yes! It is perfectly acceptable to decline a gift. You should explain that the gift is very generous, but it could create a conflict of interest. In addition, you should notify the Compliance & Ethics Department of the proposed gift.

“Transparency is a huge key to a successful Compliance program. I always encourage our teams to reach out and ask questions. Working with Compliance influences the strong operational procedures at Phoebe.”



– Stacey Barbee

Director of Business and Clinic Operations
Phoebe Worth Medical Center

Q: Can vendors give gifts to an entire group of employees?

A: Yes, it is acceptable, as long as the gift is intended for a team, department, or facility, aligns with local policies on accepting gifts from vendors, and is shared among the group. Some examples of acceptable gifts are holiday gift baskets, cookie trays, or a box of chocolates. Employees may also accept promotional items, such as office products with a vendor’s logo.

Conflict of Interest

Q: Am I allowed to have a second job?

A: Yes, as long as the second job does not conflict with your work at Phoebe. As stated in the Conflict of Interest policy, if you wish to have a second job, you need to disclose the potential job to your supervisor to ensure it will not impact your ability to fulfill your obligations to Phoebe, result in an improper benefit to you or Phoebe, or otherwise create a conflict of interest. You must also complete a Conflict of Interest form which will be reviewed by the Compliance & Ethics Department.

Q: Is it against the rules for members of my family to provide products or services to Phoebe?

A: Not necessarily. Your relationship to this person must not influence a purchasing decision. To avoid a possible conflict, you should inform both your supervisor and the Compliance & Ethics Department of any close personal or family relationship with a vendor or potential vendor before arranging to use their services.

Harassment and Discrimination

Q: One of my employees likes to tell jokes during down time. The jokes range from vulgar to sexual in nature. Is there anything I can do?

A: Yes. You should ask the employee to refrain from telling inappropriate or offensive jokes. If the employee does not stop the behavior, discuss the situation with Human Resources.

Q: I don't agree with my coworkers beliefs. How should I handle this?

A: We strive to cultivate a diverse and inclusive environment. Just because people don't agree doesn't mean they can't work well together. Tolerance is allowing the existence, occurrence, or practice of others' beliefs without interference.

Legal Employment

Q: What does it mean to be a U.S. Office of Inspector General (OIG) excluded individual or entity?

A: An OIG excluded individual or entity is a person or company that has been "excluded" from participating in healthcare programs funded by the U.S. federal government or state governments. Under U.S. law, anyone who hires an OIG excluded individual or company may be subject to civil monetary penalties.

Q: How does Phoebe identify excluded individuals?

A: Phoebe checks if individuals and entities involved in Phoebe's operations are on any publicly available government list of excluded individuals and entities, prior to, and during, the individuals' or entities' involvement in Phoebe operations.

Health and Safety

Q: What are Phoebe's Safety First Universal Skills (HRO)?

- A:
1. Focus Attention on Task
 2. Communicate Clearly
 3. Standard Work
 4. Have a Questioning Attitude
 5. Speak Up for Safety and Reliability

Q: I witnessed another employee dumping chemicals from a facility in the city drain. What do I do?

A: Chemicals can be harmful and must be handled and disposed of properly to protect the environment of our local communities. You should report the incident to your supervisor or designee at the facility.

Accurate Records

Q: What do I do if I see another employee make a mistake in a patient's medical record?

A: There are very specific procedures for correcting mistakes in a patient's medical record. You should review the incident with your supervisor and the employee who made the mistake. If you are not comfortable approaching your supervisor, you can always consult the Compliance & Ethics Department or contact the Compliance & Ethics Line. Phoebe prohibits retaliation against any employee who seeks help or files a report in good faith.

Q: I was told by my supervisor to process charges for services, even if the chart note did not support the level of service. What should I do? Where should I report this information?

A: You should discuss your concerns with your supervisor. If you are not comfortable approaching your supervisor, you can always consult the Compliance & Ethics Department or contact the Compliance & Ethics Line.

Q: A fellow RN called me from home after she completed her shift. She told me she forgot to enter a verbal order she received for a change in medication. The nurse asked me to log the change into the patient's chart and to use her initials. She said charts are often updated in this way and no harm is done. Is this okay?

A: No. While the nurse did the right thing by calling to report the chart error, the error should be promptly reported to the supervisor. You should never record an order you did not hear. Never sign someone else's signature or initials, and never use another employee's password. The employee who took the order can make the entry in the medical record as a late entry the next time the employee is in the facility.

Q: I reviewed a draft of an official financial report and noticed that some of the data was incorrect. Should I assume someone else will catch this mistake?

A: No. Please bring this information to the attention of your supervisor immediately. If an official statement is published with incorrect information, there can be serious consequences for Phoebe and those in charge of preparing the document.

Q: A employee or third party submitted an expense report for an event that never actually took place. What should I do?

A: Tell your supervisor, senior management, the Compliance & Ethics Department, or call the Compliance & Ethics Line. Incorrect expense reports can be a way to defraud Phoebe or to circumvent Phoebe's Compliance policies.

Investigations

Q: Someone called and said they were from a government agency. The person wanted specific patient information forwarded to them right away via fax. What should I do?

A: Certain government employees and their agents have the right to review patient information. However, these requests are usually in writing and are delivered in a formal manner. Politely ask the person to submit the request in writing through the proper channels. This will allow the request to be processed in accordance with applicable privacy policies.

Protection and Proper Use of Phoebe Assets

Q: I am a small business owner and perform consultations when I am not at Phoebe. Can I email clients and fax forms during my lunch break using Phoebe computers or fax machines?

A: No. All Phoebe assets and supplies are used to further Phoebe business. Employees should conduct outside business on their own time and with their own resources.

Q: My cousin works in the billing department of another healthcare company. Can we discuss our jobs when we are together?

A: There should be no problem, as long as you do not discuss proprietary, patient, or confidential information.

To avoid a conflict of interest, you should inform your supervisor of any close friends or family members employed by a competitor or nearby healthcare company and comply with Conflict of Interest policies.

Anti-Bribe and Anti-Kickback Laws

Q: An affiliated physician is short-staffed at his office practice. Is it okay for my administrative assistant to help him with scheduling and paperwork?

A: No. Providing office assistance to a potential referral source, such as an affiliated physician, at no charge, may be considered a kickback and a violation of Stark Law.

Q: A local surveyor, responsible for overseeing my facility, told me I could pay him an annual fee to limit the number of surveys we receive in the course of a year. Is it okay?

A: No. Paying a surveyor to survey you less frequently than normal is a bribe. If anything like this ever arises, refuse the request and contact a member of the Compliance & Ethics Department immediately.

Q: A consultant has been negotiating a government contract for Phoebe and asks me to reimburse him/her for a first-class airline ticket to an undisclosed location. Should I inquire about the nature of the trip?

A: Yes. While the trip may be legitimate, an incomplete expense report is a red flag that the consultant may have improperly provided something of value to a government official or employee. You should inquire further about the business reason for the trip, ask for a copy of the airline ticket or invoice, and contact a member of the Compliance & Ethics Department immediately if you suspect, or know, something is not right with the travel.

Q: A local nephrologist has asked to use one of Phoebe's conference rooms at no cost for a couple days. Is it okay to allow the nephrologist to use the space?

A: No, allowing the nephrologist to use the rooms at no cost can be considered a kickback.

Charitable Contributions

Q: I volunteer for a few organizations. Can I approach Phoebe for a donation?

A: Yes. Phoebe may make a charitable contribution if it is not given in order to induce or receive patient referrals or gain an unfair business advantage, and you obtain appropriate approvals in accordance with Phoebe's policies.

Q: Can my team make a contribution to a charitable organization or event that is sponsored or associated with a referral source or a government official?

A: It depends. Before you make any promises, you should obtain appropriate approvals in accordance with Phoebe policies.

"The encouragement from leadership and processes that are in place speak to the importance of compliance to Phoebe and for our patients."



– Pamela King
Director, Farmworker Clinic,
PSMC Georgia Farmworker Program

Compliance Support

Phoebe's Compliance & Ethics Department

Phoebe has instituted rigorous standards for corporate governance, ethics and compliance.

Phoebe's Compliance Program promotes open identification, discussion, reporting and resolution of ethics and compliance issues without fear of retaliation.

The Compliance & Ethics Department is led by Jonathan McGuire, VP, Chief Compliance & Privacy Officer.

For more information about the Phoebe Compliance Program, visit Phoebe Connect and click on Compliance under the Departments tab.

Contact Us

Compliance & Ethics Department

- Coding & Billing Compliance
- Internal Audit
- Compliance & Patient Privacy

229-312-6735

PhoebeCompliance@phoebehealth.com

Phoebe's Compliance & Ethics Line:

The Compliance & Ethics Line is available 24 hours a day, 365 days a year. Callers to the Compliance & Ethics Line may remain anonymous, and those who choose to give their names will have their identity protected to the extent allowed by the law.

The Compliance & Ethics Line
can be reached by phone at
1-844-606-1766 or visit
phoebehealth.ethicspoint.com.

Other Resources

The Education Department:

- 229-312-9000

Human Resources:

- 229-312-4340

Marketing Department:

- 229-312-2148

Medical Records:

- PPMH & PSMC: 229-312-6000
- PWMC: 229-777-3872

Office of General Counsel: 229-312-4100

Patient Accounting:

- PPMH: 229-312-4256
- PSMC: 229-931-5079
- PWMC: 229-777-3948
- Physician Group: 229-312-5202

Patient Experience Guest Services:

- PPMH: 229-312-1321
- PSMC: 229-931-2630

Patient Portal Assistance:

- 229-312-5465

Patient Safety:

- 229-312-7233

Quality Improvement:

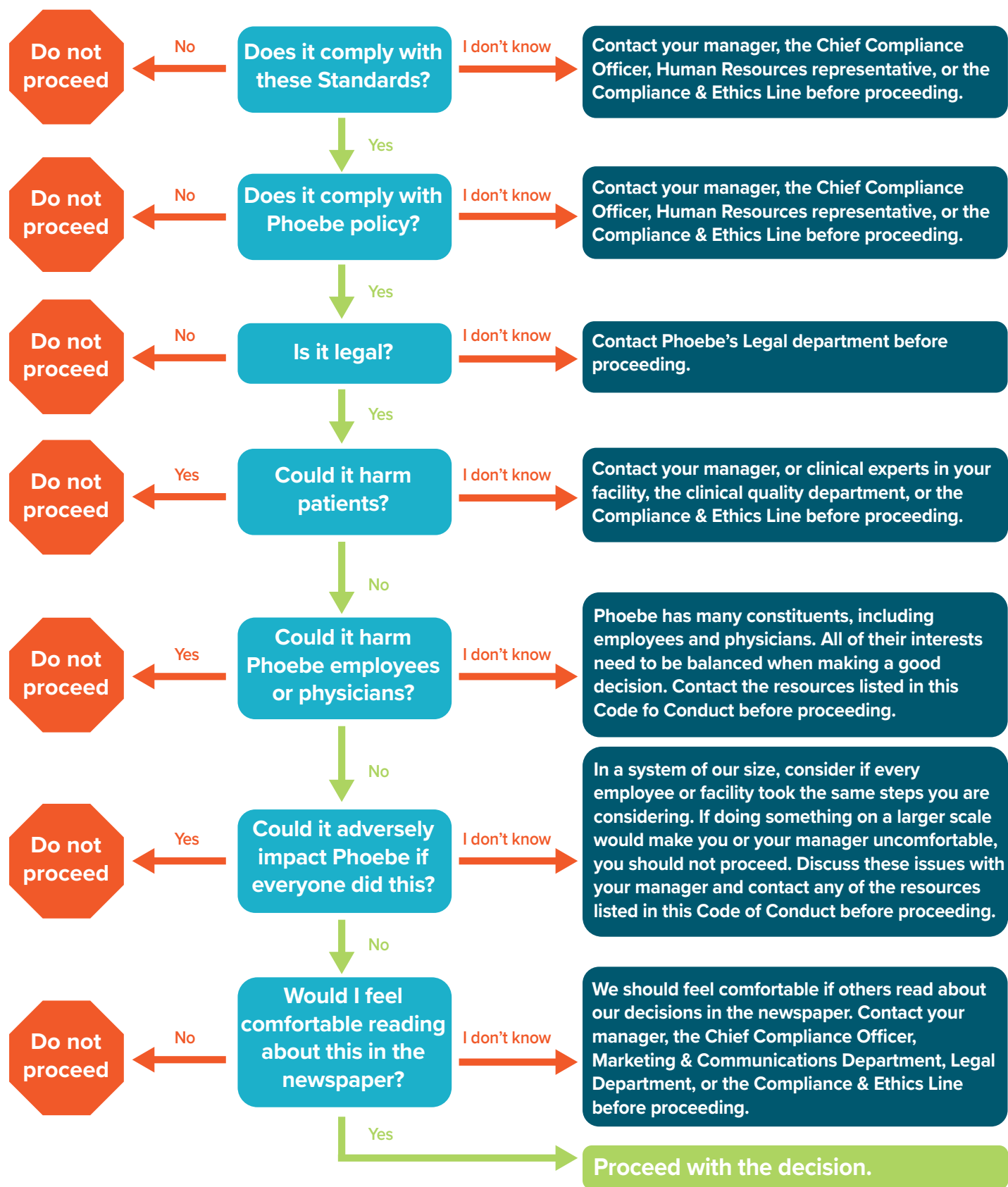
- 229-312-5488

Security:

- PPMH: 229-312-2500
- PSMC: 229-931-2400
- PWMC: 229-777-3889

Ethical Decisions Guide

Use this tool to assist you in making ethical decisions consistent with Phoebe's Mission, Vision, and Values:



Code of Conduct Highlights

The Compliance Department seeks to serve others with integrity, compassion, and respect – creating a culture of doing the right thing every day. We are committed to making compliance both an instinctive element and an integral part of system operations. This applies to employees, medical staff, vendors, agency contractors and volunteers.

Service with Integrity

See it, say it, and fix it. If we see something wrong, we report it or question it. We cannot look the other way.

Service that Meets our Standards

We follow Phoebe's policies and procedures as well as the requirements of all federal health care programs. Every employee must follow the Code of Conduct as a condition of employment.

Service with Transparency

Transparency means we are open and honest in our communications with each other and with the public. We learn from our mistakes and encourage a culture of transparency when we identify them.

Service with Honesty

We are honest in what we write, say, and do. Our patients depend on us and their physicians to document their medical records accurately and to submit accurate claims.

Service to Others

We treat others the way we want to be treated. Our community depends on us to provide safe and ethical health care.

At Phoebe, we are committed to diversity and inclusion at all levels of the organization and never discriminate based on characteristics protected by law. We do not tolerate retaliation when concerns are brought to the attention of coworkers or leadership.

Service without Conflicts

We avoid conflicts of interest where someone might question whether we are acting for Phoebe's benefit or for personal gain. Any conflicts should be disclosed for further review.

Serving Responsibly

We protect Phoebe's assets and information. We eliminate wasteful spending, fraud, and other practices that deplete our resources.

Report Concerns

Compliance & Ethics Line: 1-844-606-1766

24 hours a day | 7 days a week

Operated by a third party. Callers may remain anonymous.

phoebehealth.ethicspoint.com
Another way to submit a confidential report is through the website or app.



For General
Compliance Questions or
Compliance Support, please contact:

PhoebeCompliance@phoebehealth.com | 229-312-6735

