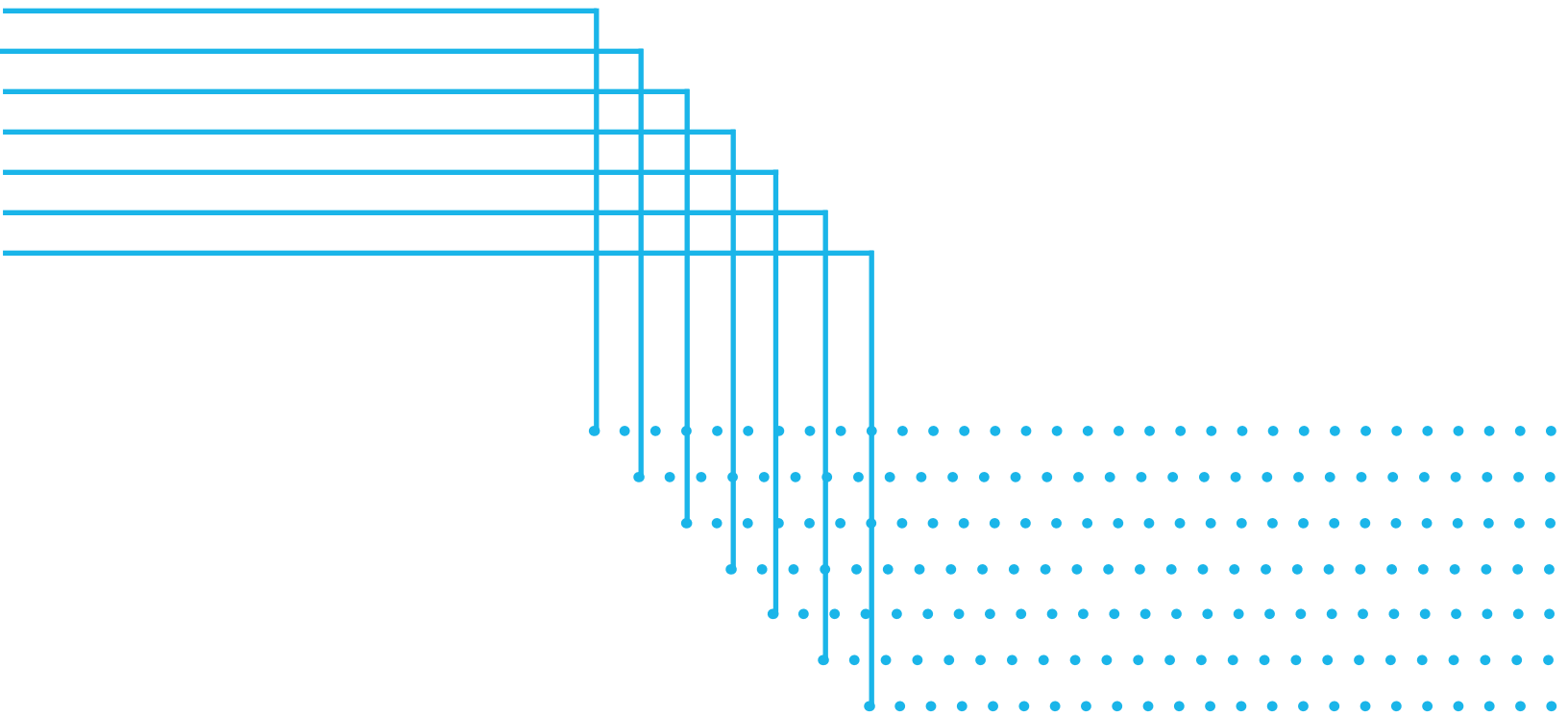


Code of Conduct



COOKEVILLE REGIONAL
MEDICAL CENTER

It's the Way **WeCARE**

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REVISED 4-23

MISSION

Building Healthier Communities

VISION

Exceptional Care to Every Patient Every Day

VALUES

It's the Way

WeCARE

W – Working Together

- We create a culture of teamwork where we value and nurture our greatest assets – our physicians and staff – and build an environment of mutual trust, respect and best practices.

E – Excellence

- We consistently exceed expectations by representing the highest ethical and moral standards.

C – Compassionate Care

- We put others first in a spirit of warmth and friendliness that respects the dignity of all.

A – Accountability

- We remain financially strong and committed to ensuring sustainability as part of our community responsibility.

R – Regional

- We lead our region's healthcare with integrity, innovation, education and service.

E – Empowerment

- We empower our physicians and staff to do the right thing.

PURPOSE OF OUR CODE OF CONDUCT

Our Code of Conduct provides guidance to all CRMC colleagues and assists us in carrying out our daily activities within appropriate ethical and legal standards. These obligations apply to our relationships with patients, affiliated physicians, third-party payers, subcontractors, independent contractors, vendors, consultants, and with one another.

The Code is intended to be comprehensive and easily understood. In some instances, the Code deals fully with the subject covered. In many cases, however, the subject discussed has so much complexity that additional guidance is necessary for those directly involved with the particular area to have sufficient direction.

In those cases, employees are encouraged to seek the counsel of their supervisors or the Compliance Officer or other appropriate source.

LEGAL AND REGULATORY COMPLIANCE

General

CRMC healthcare services are provided pursuant to appropriate Federal, state, and local laws, regulations and conditions of participation. Such laws, regulations and conditions of participation may include subjects such as certificates of need, licenses, permits, accreditation, access to treatment, medical record-keeping, access to medical records and confidentiality, patients' rights, terminal care decision-making, medical staff membership and clinical privileges, corporate practice of medicine restrictions, and Medicare and Medicaid program requirements. The organization is subject to numerous other laws in addition to these healthcare regulations and conditions of participation.

We will comply with all applicable laws and regulations. All colleagues, medical staff members, privileges practitioners, and contract service providers must be knowledgeable about and ensure compliance with all laws, regulations and conditions of participation and should immediately report violations or suspected violations to a supervisor or member of management, the Hotline, or the Compliance Officer.

CRMC will be forthright in dealing with any billing inquiries. Requests for information will be answered with complete, factual, and accurate information.

During a survey or inspection, you must never conceal, destroy, or alter any documents; lie; or make misleading statements to the agency representative. You should not attempt to cause another colleague to fail to provide accurate information or obstruct, mislead, or delay the communication of information or records relating to a possible violation of law.

In order to ensure we fully meet all regulatory obligations, CRMC colleagues must be informed about stated areas of potential compliance concern. The Department of Health and Human Services, and particularly its Inspector General, has routinely notified healthcare providers of areas in which these government representatives believe insufficient attention is being accorded government regulations. We should be diligent in the face of such guidance about reviewing these elements of our system to ensure their correctness.

Dealing with Accrediting Bodies

CRMC will deal with all accrediting bodies in a direct, open and honest manner. No action should ever be taken in relationships with accrediting bodies that would mislead the accreditor or its survey teams, either directly or indirectly.

The scope of matters related to accreditation of various bodies is extremely significant and broader than the scope of this Code of Conduct. The purpose of our Code of Conduct is to provide general guidance on subjects of wide interest within the organization. Accrediting bodies may be focused on issues both of wide and more focused interest. In any case, where CRMC determines to seek any form of accreditation, all standards of the accrediting group are important and must be followed.

PATIENTS

Patient Care and Rights

Our mission is to provide high quality, cost-effective healthcare to all of our patients. We treat all patients with warmth, respect and dignity and provide care that is both necessary and appropriate. We make no distinction in the admission, transfer or discharge of patients or in the care we provide based on age, gender, disability, race, color, religion, or national origin. Clinical care is based on identified patient healthcare needs, not on patient or organization economics.

Upon admission, each patient is provided with a written statement of patient rights. This statement includes the rights of the patient to make decisions regarding medical care and conforms to all applicable state and federal laws.

We seek to involve patients in all aspects of their care and obtain informed consent for treatment. As applicable, each patient or patient representative is provided with a clear explanation of care including, but not limited to, diagnosis, treatment plan, right to refuse or accept care, care decision dilemmas, advance directive options, estimate of treatment costs, organ donation and procurement, and an explanation of the benefits, risks, and alternatives.

Patients are informed of their rights to make advance directives. Patient advance directives will be honored within the limits of the law and our organization's mission, philosophy, and capabilities.

In the promotion and protection of each patient's rights, each patient and his or her representatives will be accorded appropriate confidentiality, privacy, security and protective services, opportunity for resolution of complaints, and pastoral care or spiritual care.

Patients are treated in a manner that preserves their dignity, autonomy, self-esteem, civil rights, and involvement in their own care. CRMC maintains processes to support patient rights in a collaborative manner, which involves the facility leaders and others. These structures are based on policies and procedures, which make up the framework addressing both patient care and organizational ethics issues. These structures shall include informing each patient, or when appropriate the patient's representative, of the patient's rights, in advance of furnishing or discontinuing care. Additionally, the facilities have established processes for prompt resolution of patient grievances, which include informing patients of whom to contact regarding grievances and informing patients regarding the grievance resolution.

CRMC colleagues receive training about patient rights in order to clearly understand their role in supporting them. Compassion and care are part of our commitment to the communities we serve. We strive to provide health education, health promotion, and illness-prevention programs as part of our efforts to improve the quality of life of our patients and our communities.

Emergency Treatment

We follow the Emergency Medical Treatment and Active Labor Act ("EMTALA") in providing emergency medical treatment to all patients, regardless of ability to pay. Provided we have the capacity and capability, anyone with an emergency medical condition is treated and admitted based on medical necessity. In an emergency situation or if the patient is in labor, financial and demographic information will be obtained only after appropriate medical screening examination and necessary stabilizing treatment (including treatment for an unborn child) has been administered. We do not admit, discharge or transfer patients simply on their ability or inability to pay.

EMTALA qualifying patients will only be transferred to another facility at the patient's request or if the patient's medical needs cannot be met at the CRMC facility (e.g. we do not have the capacity or capability) and appropriate care is knowingly available at another facility. Patients may only be transferred in strict compliance with the EMTALA guidelines.

Patient Information

We collect information about the patient's medical condition, history, medication, and family illnesses to provide quality care. We realize the sensitive nature of this information and are committed to maintaining its confidentiality. We do not release or discuss patient-specific information with others unless it is necessary to serve the patient or required by law.

CRMC colleagues must never disclose confidential information that violates the privacy rights of our patients. No CRMC colleague, affiliated physician, or other healthcare partner has a right to any patient information other than that necessary to perform his or her job.

Subject only to emergency exceptions, patients can expect their privacy will be protected and patient-specific information will be released only to persons authorized to receive it by law or by the patient's written consent.

THIRD-PARTY PAYERS

Coding and Billing for Services

We will take great care to assure all billings to government payers, commercial insurance payers and patients are true and accurate and conform to all pertinent Federal and state laws and regulations. We prohibit any colleague knowingly presenting or causing to be presented claims for payment or approval which are false, fictitious, or fraudulent.

We will operate oversight systems designed to verify that claims are submitted only for services actually provided and that services are billed as provided. These systems will emphasize the critical nature of providing complete and accurate documentation of service provided. As part of our documentation effort, we will maintain current and accurate medical records.

Any subcontractors engaged to perform billing or coding services must have the necessary skills, quality control processes, systems, and appropriate procedures to ensure that all billings for government and commercial insurance programs are accurate and complete. CRMC prefers to contract with such entities that have adopted their own ethics and compliance programs. Third- party billing entities, contractors, and preferred vendors under contract consideration must be approved consistent with corporate policy.

Cost Reports

We are required to submit certain reports of our costs of operation. We will comply with Federal and state laws relating to all cost reports. These laws and regulations define what costs are allowable and outline the appropriate methodologies to claim reimbursement for the cost of services provided to program beneficiaries. Given their complexity, all issues related to the completion and settlement of cost reports must be communicated through or coordinated with our Accounting Department.

BUSINESS INFORMATION AND INFORMATION SYSTEMS

Accuracy, Retention, and Disposal of Documents and Records

Each CRMC colleague is responsible for the integrity and accuracy of our organization's documents and records, not only to comply with regulatory and legal requirements but also to ensure records are available to support our business practices and actions. No one may alter or falsify information on any record or document.

Medical and business documents and records are retained in accordance with the law and our record retention policy. Medical and business documents include paper documents such as letters and memos, computer-based information such as e-mail or computer files on disk or tape, and any other medium that contains information about the organization or its business activities. It is important to retain and destroy records only according to our policy and the law. You must not tamper with records, nor remove or destroy them prior to the specified date.

Information Security and Confidentiality

Confidential information about our organization's strategies and operations is a valuable asset. Although you may use confidential information to perform your job, it must not be shared with others unless the individuals have a legitimate need to know this information and have agreed to maintain the confidentiality of the information. Confidential information includes: personnel data maintained by the organization; patient lists and clinical information; patient financial information; passwords, pricing and cost data, information pertaining to acquisitions, divestitures, affiliations and mergers; financial data; details regarding federal, state and local tax examinations of the organizations or its joint venture partners; research data; strategic plans; marketing strategies and techniques; supplier and subcontractor information; and proprietary computer software. If your relationship with CRMC ends for any reason, you are still bound to maintain the confidentiality of information viewed during your employment. This provision does not restrict the right of a colleague to disclose, if he or she wishes, information about his or her own compensation, benefits, or terms and conditions of employment.

Our clinical and business processes rely on timely access to accurate information from our computer systems. Your password acts as an individual key to our network and to critical patient care and business applications, and must be kept confidential. It is part of your job to learn about and practice the many ways you can help protect the confidentiality, integrity and availability of electronic information assets.

Electronic Media

All communications systems, including electronic mail, Internet access, and voice mail, are the property of the organization and are to be primarily used for business purposes. Highly limited reasonable personnel use of CRMC communications systems is permitted; however, you should assume these communications are not private. Patient or confidential information should not be sent through the Internet until such time that its confidentiality can be assured.

CRMC reserves the right to periodically access, monitor, and disclose the contents of e-mails, and voice mail messages. Access or disclosure of individual employee messages may only be done with the approval of the Counsel general of the hospital.

Colleagues may not use internal communication channels or access to the Internet at work to post, store, transmit, download, or distribute any threatening materials knowingly, recklessly, or maliciously false materials, or obscene materials including anything constituting or encouraging a criminal offense giving rise to civil liability, or otherwise violating any laws. Additionally, these channels of communication may not be used to send chain letters, personal broadcast messages or copyrighted documents that are not authorized for reproduction; nor are they to be used to conduct an external job search or open miss-addressed mail.

Colleagues who abuse our communications systems or use them excessively for non-business purposes may lose these privileges and be subject to disciplinary action.

Financial Reporting and Records

We have established and maintain a high standard of accuracy and completeness in the documentation and reporting of all financial records. These records serve as a basis for managing our business and are important in meeting our obligations to patients, colleagues, shareholders, suppliers, and others. They are also necessary for compliance with tax and financial reporting requirements.

All financial information must reflect actual transactions and conform to generally accepted accounting principles. No undisclosed or unrecorded funds or assets may be established. CRMC maintains a system of internal controls to provide reasonable assurances that all transactions are executed in accordance with management's authorization and are recorded in a proper manner so as to maintain accountability of the organization's assets.

AFFILIATED PHYSICIANS

Any business arrangement with a physician must be structured to ensure precise compliance with legal requirements. Such arrangements must be in writing and approved by CRMC Administration and Board of Trustees.

In order to ethically and legally meet all standards regarding referrals and admissions, we will adhere strictly to two primary rules:

We do not pay for referrals.

We accept patient referrals and admissions based solely on the patient's clinical needs and our ability to render the needed services. We do not pay or offer to pay anyone - colleagues, physicians, or other persons - for referral of patients. Violation of this policy may have grave consequences for the organization and the individuals involved, including civil and criminal penalties, and possible exclusion from participation in federally funded healthcare programs.

We do not accept payments for referrals we make.

No CRMC colleagues or any other person acting on behalf of CRMC is permitted to solicit or receive anything of value, directly or indirectly, in exchange for the referral of patients. Similarly, when making patient referrals to another healthcare provider, we do not take into account the volume or value of referrals that the provider has made (or may make) to us.

WORKPLACE CONDUCT AND EMPLOYMENT PRACTICES

False Claims Act

CRMC will ensure that all employees, including management, and any contractors or agents are educated regarding the federal and state false claims statutes and the role of such laws in preventing and detecting fraud, waste and abuse in federal health care programs. False claims laws are instrumental in combating fraud and abuse in government health care programs, such as Medicare and TennCare. False claims laws do this by granting the authority to the government to bring civil actions to recover penalties and damages when healthcare providers submit false claims. These laws also permit lawsuits brought by lay people (qui tam suits), typically employees or former employees of healthcare facilities that submit false claims.

There is both a federal and state false claims statute. Please refer to Hospital Wide policy EC064 for more detailed information concerning the False Claims Act and its provisions.

Conflict of Interest

A conflict of interest may occur if your outside activities or personal interests influence or appear to influence your ability to make objective decisions in the course of your job responsibilities. A conflict of interest may also exist if the demands of any outside activities hinder or distract you from the performance of your job or cause you to use CRMC resources for other than CRMC purposes. It is your obligation to ensure you remain free of conflicts of interest in the performance of your responsibilities at CRMC. If you have any question about whether an outside activity might constitute a conflict of interest, you must obtain the approval of your supervisor before pursuing the activity.

Diversity and Equal Employment Opportunity

Our colleagues provide us with a wide complement of talents, which contribute greatly to our success. We are committed to providing an equal opportunity work environment where everyone is treated with fairness, dignity, and respect. We will comply with all laws, regulations and policies related to non-discrimination in all of our personnel actions. Such actions include hiring, staff reductions, transfers, terminations, evaluations, recruiting, compensation, corrective action, discipline, and promotions.

No one shall discriminate against any individual with a disability with respect to any offer, or term or condition, of employment. We will make reasonable accommodations to the known physical and mental limitations of otherwise qualified individuals with disabilities.

Harassment and Workplace Violence

Each CRMC colleague has the right to work in an environment free of harassment and disruptive behavior. We will not tolerate harassment by anyone based on the diverse characteristics or cultural backgrounds of those who work with us. Degrading or humiliating jokes, slurs, intimidation, or other harassing conduct is not acceptable in our workplace.

Any form of sexual harassment is strictly prohibited. This prohibition includes unwelcome sexual advances or requests for sexual favors in conjunction with employment decisions. Moreover, verbal or physical activity of a sexual nature that interferes with an individual's work performance or creates an intimidating, hostile, or offensive work environment has no place at CRMC.

Harassment also includes incidents of workplace violence. Workplace violence includes robbery and other commercial crimes, stalking cases, violence or threats of violence directed at the employer or an employee, terrorism, and hate crimes committed by current or former colleagues. As part of our commitment to a safe workplace for our colleagues, we prohibit colleagues from possessing firearms, other weapons, explosive devices, or other dangerous materials on CRMC premises. Colleagues who observe or experience any form of harassment or violence should report the incident to their supervisor the Human Resource Department, a member of management, Corporate Compliance Officer, or the HOTLINE.

Health and Safety

All CRMC facilities must comply with all government regulations and rules, CRMC policies, and required facility practices that promote the protection of workplace health and safety. Our policies have been developed to protect you from potential workplace hazards. You should become familiar with and understand how these policies apply to your specific job responsibilities and seek advice from your supervisor or the Safety Officer whenever you have a question or concern. It is important for you to advise your supervisor or the Safety Officer or Employee Health of any serious workplace injury or any situation presenting a danger of injury so timely corrective action may be taken to resolve the issue.

Substance Abuse and Mental Acuity

To protect the interests of our colleagues and patients, we are committed to an alcohol and drug-free work environment. All colleagues must report for work free of the influence of alcohol and illegal drugs. Reporting to work under the influence of any illegal drug or alcohol; having an illegal drug in your system; or using, possessing, or selling illegal drugs while on CRMC work time or property may result in immediate termination. We may use drug testing as a means of enforcing this policy.

It is also recognized individuals may be taking prescription or over-the-counter drugs, which could impair judgment or other skills required in job performance. If you have questions about the effect of such medication on your performance, or you observe an individual who appears to be impaired in the performance of his or her job, consult your supervisor.

License and Certification Renewals

Colleagues and individuals retained as independent contractors in positions which require professional licenses, certifications, or other credentials are responsible for maintaining the current status of their credentials and shall comply at all times with Federal and state requirements applicable to their respective disciplines. To assure compliance, CRMC may require evidence that the individual has a current license or credential status.

CRMC will not allow any colleague or independent contractor to work without valid, current licenses or credentials.

Personal Use of CRMC Resources

It is the responsibility of each CRMC colleague to preserve our organization's assets including time, materials, supplies, equipment, and information. Organization assets are to be maintained for business related purposes. As a general rule, the personal use of any CRMC asset without the prior approval of your supervisor is prohibited. The occasional use of items, such as copying facilities or telephones, where the cost to CRMC is insignificant, is permissible. Any community or charitable use of organization resources (for example, meeting rooms or event space), must be approved in advance by the CEO and the Marketing and Communications Department. Any use of organization resources for personal financial gain unrelated to the organization's business is prohibited.

Relationships Among CRMC Colleagues

In the normal day-to-day functions of an organization like CRMC there are issues that arise which relate to how people in the organization deal with one another. It is impossible to foresee all of these, and many do not require explicit treatment in a document like this. A lavish gift to anyone in a supervisory role would clearly violate organization policy. Another situation, which routinely arises, is a fund-raising or similar effort, in which no one should ever be made to feel compelled to participate.

Hiring of Former and Current Government and Fiscal Intermediary Employees

The recruitment and employment of former or current U.S. government employees may be impacted by regulations concerning conflicts of interest. Hiring employees directly from a fiscal intermediary requires certain regulatory notifications. Colleagues should consult with the Human Resources Department or the Corporate Compliance Officer related to such recruitment and hiring.

SUBCONTRACTORS, SUPPLIERS AND EDUCATIONAL INSTITUTIONS

We must manage our subcontractor and supplier relationships in a fair and reasonable manner, consistent with all applicable laws and good business practices. We promote competitive procurement to the maximum extent practicable. Our selection of subcontractors, suppliers, and vendors will be made on the basis of objective criteria including quality, technical excellence, price, delivery, adherence to schedules, service and maintenance of adequate sources of supply. Our purchasing decisions will be made on the supplier's ability to meet our needs, and not on personal relationships and friendships. We will always employ the highest ethical standards in business practices in source selection, negotiation, determination of contract awards, and the administration of all purchasing activities. We will not communicate to a third-party confidential information given to us by our suppliers unless directed in writing to do so by the supplier. We will not disclose contract pricing and information to any outside parties. (The subject of Business Courtesies, which might be offered by or to subcontractors or suppliers, is discussed on pages 10 and 11 of this Code.)

CRMC's relationship with an educational institution will have a written agreement, which defines both parties' roles and the hospital's retention of the responsibilities for the quality of patient care.

Sanctioned Individuals

The organization has policies and procedures in place to ensure we do not contract with, employ or bill for services rendered by an individual or entity that is excluded, suspended, debarred, or ineligible to participate in Federal health care items or services and has not been reinstated in a Federal health care program after a period of exclusion, suspension, debarment, or ineligibility, provided that we are aware of such criminal offense. We routinely search the Office of Inspector General and General Services Administration's lists of such excluded and ineligible persons.

Research

We follow high ethical standards in any research conducted by our physicians and professional staff. We do not tolerate intentional research misconduct. Research misconduct includes making up or changing results of copying results from other studies without performing the research.

All patients asked to participate in a research project are given a full explanation of alternative services that might prove beneficial to them. They are also fully informed of potential discomforts and are given a full explanation of the risks, expected benefits, and alternatives. The patients are fully informed of the procedures to be followed, especially those that are experimental in nature. Refusal of a patient to participate in a research study will not compromise his or her access to services.

All personnel applying for or performing research of any type are responsible for maintaining the highest ethical standards in any written or oral communications regarding their research projects as well as following appropriate research guidelines. As in all accounting and financial record-keeping, our policy is to submit only true, accurate, and complete costs related to research grants.

BUSINESS COURTESIES

General

This part of the Code of Conduct should not be considered in any way as an encouragement to make, solicit, or receive any type of entertainment or gift. For clarity purposes, please note that these limitations govern activities with those outside of CRMC. This section does not pertain to actions between CRMC and its colleagues or actions among CRMC colleagues themselves.

Receiving Business Courtesies

We recognize there will be times when a current or potential business associate may extend an invitation to attend a social event in order to further develop your business relationship. You may accept invitations, provided: (1) the cost associated with such an event is reasonable and appropriate, (2) no expense is incurred for any travel costs (other than in a vehicle owned privately or by the host company) or overnight lodging; and (3) such events are infrequent.

Business meetings at which food (including meals) may be provided are generally appropriate. Sometimes a business associate will extend training and educational opportunities that include travel and overnight accommodations to you at no cost to you or CRMC. Similarly, there are some circumstances where you are invited to an event at a vendor's expense to receive information about new products or services. Prior to accepting any such invitation, you must receive approval to do so consistent with CRMC policy and with the approval of Administration.

As a CRMC colleague, you may accept gifts with a total value of \$50.00 or less in any one year from any individual or organization who has a business relationship with CRMC. For purposes of this paragraph, physicians practicing at CRMC are considered to have such a relationship. Perishable or consumable gifts given to a department or group are not subject to any specific limitation, but must not be excessive. You may accept gift certificates, but you may never accept cash or financial instruments (e.g. checks, stocks). Finally, under no circumstances may you solicit a gift.

Extending Business Courtesies to Non-Referral Sources

No portion of this section, "Extending Business Courtesies to Non-referral Sources," applies to any individual who makes, or is in a position to make, referrals to CRMC.

There may be times when you wish to extend to a current or potential business associate (other than someone who may be in a position to make a patient referral) an invitation to attend a social event (e.g., reception, meal, sporting event or theatrical event) to further or develop your business relationship. The purpose of the entertainment must never be to induce any favorable business action. During these events, topics of a business nature must be discussed and the host must be present. These events must not include expenses paid for any travel costs (other than in a vehicle owned privately or by the host entity) or overnight lodging. The cost associated with such an event must be reasonable and appropriate. As a general rule, this means the cost will not exceed \$100.00 per person. Moreover, such business entertainment with respect to any particular individual must be infrequent, which, as a general rule, means not more than four times per year. With regard to the \$100.00 guideline, if circumstances arise where an entertainment event was contemplated prior to the event to meet the guideline but unforeseeably exceeded it, a report to that effect with the relevant as required by corporate policy. That policy requires establishing the business necessity and appropriateness of the proposed entertainment. The organization will under no circumstances sanction participation in any business entertainment that might be considered lavish. Departures from the \$100.00 guidelines are highly discouraged.

Also, CRMC may routinely sponsor events with a legitimate business purpose (e.g. hospital board meetings or retreats). Provided that such events are for business purposes, reasonable and appropriate meals and entertainment may be offered. In addition, transportation and lodging can be paid for. However, all elements of such events, including these courtesy elements, must be consistent with the corporate policy on such events.

It is critical to avoid the appearance of impropriety when giving gifts to individuals who do business or are seeking to do business with CRMC. We will never use gifts or other incentives to improperly influence relationships or business outcomes. Gifts to business associates who are not government employees must not exceed \$50.00 per year per recipient. You may give gift certificates but you may never give cash or financial instruments (e.g. checks, stocks). The CRMC's policy on business courtesies may from time to time provide modest flexibility in order to permit appropriate recognition of the efforts of those who have spent meaningful amounts of volunteer time on behalf of CRMC.

U.S. Federal and state governments have strict rules and laws regarding gifts, meals, and other business courtesies for their employees. CRMC's policy is to not provide any gifts, entertainment, meals, or anything else of value to any employee of the Executive Branch of the Federal government, except for minor refreshments in connection with business discussions or promotional items with the CRMC or facility logo valued at no more than \$10.00. With regard to gifts, meals, and other business courtesies involving any other category of government official or employee, you must determine the particular rules applying to any such person and carefully follow them.

Extending Business Courtesies to Possible Referral Sources

Any entertainment or gift involving physicians or other persons who are in a position to refer patients to our healthcare facilities must be undertaken in accordance with corporate policies. Please refer to the Hospital wide Business Courtesy Policy. We will comply with all Federal laws, regulations, and rules regarding these practices.

GOVERNMENT RELATIONS AND POLITICAL ACTIVITIES

The organization and its representatives will comply with all Federal, state and local laws governing participation in government relations and political activities. Additionally, CRMC funds or resources will not be contributed directly to individual political campaigns, political parties or other organizations, which intend to use the funds primarily for political campaign objectives. Organization resource include financial and non-financial donations such as using work time and telephones to solicit for a political cause or candidate or the loaning of CRMC property for use in the political campaign. The conduct of any political action campaign committee is to be consistent with relevant laws and regulations. In addition, political action committees associated with the organization will select candidates to support based on the overall ability of the candidates to support as a reflection of expected support of the candidate on any specific issue.

The organization will engage in public policy debate only in a limited number of instances where it has special expertise that can inform the public policy formulation process. When the organization is directly impacted by public policy decisions, it may provide relevant, factual information about the impact of such decisions on the private sector. In articulating positions, the organization will only take positions that it believes can be shown to be in the larger public interest. The organization will encourage trade associations with which it is associated to do the same.

It is important to separate personal and hospital political activities in order to comply with the appropriate rules and regulations relating to lobbying or attempting to influence government officials. No use of hospital resources, including e-mail, is appropriate for personally engaging in political activity. You may, of course, participate in the political process on your own time and at your own expense. While you are doing so, it is important not to give the impression you are speaking on behalf of or representing CRMC in these activities. You cannot seek to be reimbursed by CRMC for any personal contributions for such purposes.

At times, CRMC may ask colleagues to make personal contact with government officials or to write letters to present our position on specific issues. In addition, it is a part of the role of some CRMC management to interface on a regular basis with government officials. If you are making these communications on behalf of the organization, be certain that you are familiar with any regulatory constraints and observe them. Guidance is always available from Administration and the Corporate Compliance Officer as necessary.

MARKETING PRACTICES

Antitrust

Antitrust laws are designed to create a level playing field in the marketplace and to promote fair competition. These laws could be violated by discussing CRMC business with a competitor, such as how our prices are set, disclosing the terms of supplier relationships, allocating markets among competitors, or agreeing with a competitor to refuse to deal with a supplier. Our competitors are other health care systems and facilities in markets where we operate.

At trade association meetings, be alert to potential situations where it may not be appropriate for you to participate in discussions regarding prohibited subjects with our competitors. Prohibited subjects include any aspect of pricing, our services in the market, key costs such as labor costs, and marketing plans. If a competitor raises a prohibited subject, end the conversation immediately. Document your refusal to participate in the conversation by requesting your objection be reflected in the meeting minutes, if applicable, and notify the Corporate Compliance Officer of the incident.

In general, avoid discussing sensitive topics with competitors or suppliers, unless you are proceeding with the advice of the Corporate Compliance Office / Administration. You must also not provide any information in response to an oral or written inquiry concerning an antitrust matter without first consulting your supervisor or the Corporate Compliance Officer.

Gathering Information about Competitors

It is not unusual to obtain public information about other organizations, including our competitors, through legal and ethical means such as public documents, public presentations, journal and magazine articles, and other published and spoken information. However, you should avoid seeking or receiving information about a competitor through other non-public means if you know or have reason to believe the information is proprietary or confidential. For example, you should not seek proprietary or confidential information when doing so would require anyone to violate a contractual agreement, such as a confidentiality agreement with a prior employer.

Marketing and Advertising

We may use marketing and advertising activities to educate the public, provide information to the community, increase awareness of our services, and to recruit colleagues. We will present only truthful, fully informative, and non-deceptive information in these materials and announcements. All marketing materials will reflect services available and the level of licensure and certification.

ENVIRONMENTAL COMPLIANCE

It is our policy to comply with all environmental laws and regulations as they relate to our organization's operations. We will act to preserve our natural resources to the full extent reasonably possible. We will comply with all environmental laws and operate each of our facilities with the necessary permits, approvals, and controls. We will diligently employ the proper procedures with respect to handling and disposal of hazardous and biohazardous waste, including but not limited to medical waste.

In helping CRMC comply with these laws and regulations, we must understand how job duties may impact the environment, adhere to all requirements for the proper handling of hazardous materials, and immediately alert our supervisors to any situation regarding the discharge of a hazardous substance, improper disposal of medical waste, or any situation which may be potentially damaging to the environment.

CORPORATE ETHICS AND COMPLIANCE PROGRAM

Program Structure

The Corporate Ethics and Compliance Program is intended to demonstrate in the clearest possible terms the absolute commitment of the organization to the highest standards of ethics and compliance. The elements of the program include setting standards (the Code and Policies and Procedures), communicating the standards, providing a mechanism for reporting potential exceptions, monitoring and auditing, and maintaining an organizational structure that supports the furtherance of the program.

These elements are supported at all levels of the organization. There is a Compliance Committee. Members include Senior Management; Board of Trustee Representative; Medical Staff Representative; Medical Group Representative, Director of HIM, and others. Collectively, these individuals are responsible for the development of the Ethics and Compliance Program, including the creation and distribution of ethics and compliance standards; the development and delivery of ethics and compliance training; auditing and monitoring compliance with laws, regulations, conditions of participation and policies; and providing a mechanism for reporting exceptions.

All of these individuals or groups are prepared to support you in meeting the standards set forth in this Code.

Resources for Guidance and Reporting Violations

To obtain guidance on an ethics or compliance issue or to report a suspected violation, you may choose from several options. We encourage the resolution of issues, including human resources-related issues (e.g., payroll, fair treatment and disciplinary issues), at a local level whenever possible. You may want to use the human resources-related problem solving procedure at your facility to resolve such issues. It is an expected good practice, when you are comfortable with it and think it appropriate under the circumstances, to raise concerns first with your supervisor. If this is uncomfortable or inappropriate, another option is to discuss the situation with the Corporate Compliance Officer or another member of management at your facility or in your organization. You are always free to contact the Compliance Hotline at 1-855-528-4230.

CRMC will make every effort to maintain, within the limits of the law, the confidentiality of any individual who reports possible misconduct. There will be no retribution or discipline for anyone who reports in good faith a possible violation. Any colleague who deliberately makes a false accusation for the purpose of harming or retaliating against a colleague will be subject to discipline.

Personal Obligation to Report

We are committed to ethical and legal conduct that is compliant with all relevant laws and regulations and to correcting wrongdoing wherever it may occur in the organization. Each colleague has an individual responsibility for reporting any activity by any colleague, physician, subcontractor, or vendor that appears to violate applicable laws, rules, regulations, or this Code.

Internal Investigations of Reports

We are committed to investigating all reported concerns promptly and confidentially to the extent possible. The Corporate Compliance Officer will coordinate any findings from the investigations and immediately recommend corrective action or changes that need to be made. We expect all colleagues to cooperate with investigation efforts.

The federal False Claims Act also contains a provision that protects a whistleblower from retaliation by his employer. This applies to any employee who is discharged, demoted, suspended, threatened, harassed, or discriminated against in his or her employment as a result of the employee's lawful acts in furtherance of a false claim action. The whistleblower may bring an action in the appropriate federal district court and is entitled to reinstatement with the same seniority status, two times the amount of back pay, interest on the back pay and compensation for any special damages as a result of the discrimination, such as litigation costs and reasonable attorneys fees. The Tennessee False Claims Act also has a whistleblower provision. Like the federal False Claims Act, the Tennessee law includes provisions to prevent employers from retaliating against employees who report their employer's false claims.

CRMC takes issues regarding false claims and fraud and abuse very seriously. CRMC encourages all employees, management, and contractors or agents of CRMC to be aware of the laws regarding fraud and abuse and false claims and to identify and assist in the resolution of any issues immediately. CRMC encourages its employees, managers, and contractors to report concerns to their immediate supervisor when appropriate. If the supervisor is not deemed to be the appropriate contact or if the supervisor fails to respond quickly and appropriately to the concern, then the individual with the concern should discuss the situation with CRMC's Compliance Officer or with CRMC's Compliance Hotline (1-855-528-4230).

It is an employee's obligation to report any suspected violation of CRMC's policies, especially with respect to false claims and fraud and abuse. Whether it is reported to management, to the compliance officer or to the Compliance Hotline is at the discretion of the employee. Certainly the employee may also call the appropriate state or federal office if they so choose.

Corrective Action

Where an internal investigation substantiates a reported violation, it is the policy of the organization to initiate corrective action, including as appropriate, making prompt restitution of any overpayment amounts, notifying the appropriate governmental agency, instituting whatever disciplinary action is necessary, and implementing systemic changes to prevent a similar violation from recurring in the future at CRMC.

All violators of the Code will be subject to disciplinary action. The precise discipline utilized will depend on the nature, severity, and frequency of the violation and may result in any or all of the following disciplinary actions:

- ORAL WARNING;
- WRITTEN WARNING;
- WRITTEN REPRIMAND;
- SUSPENSION;
- TERMINATION;
- RESTITUTION.

Internal Auditing and Other Monitoring

CRMC is committed to monitoring compliance with its policies. Much of this monitoring effort is provided by *Internal Auditors*, which routinely conduct internal audits of issues that have regulatory or compliance implications. The organization also routinely seeks external means of ensuring and demonstrating compliance with laws, regulations, and CRMC policies. Additionally, facilities regularly conduct self-audits pursuant to compliance policies and procedures, and Responsible Executives routinely undertake monitoring efforts in support of those policies and compliance in general.

Acknowledgment Process

CRMC requires all colleagues to sign an acknowledgment confirming they have received the Code, understand it represents mandatory policies of CRMC and agree to abide by it. New colleagues will be required to sign this acknowledgment as a condition of employment. Each CRMC colleague is also required to participate in annual Code of Conduct training, and records of such training must be retained by each facility.

Adherence to and support of CRMC Code of Conduct and participation in related activities and training will be considered in decisions regarding hiring, promotion, and compensation for all candidates and colleagues. New colleagues must receive Code of Conduct within 30 days of employment.

