



Navicent Health

Everything about us is all about

YOU.



CODE OF CONDUCT

2018 Edition



Message from our CEO



The Code of Conduct is a vital part of how we achieve our mission and vision. As an organization we define ourselves by our values. The Code helps us make decisions that support those values.

While the Corporate Compliance Department oversees and guides the organization with regard to compliance matters, we all share the same mission and vision.

Navicent Health is a unique and remarkable health care system bringing together the finest health care facilities, services and professionals. As an important part of the Navicent team, you represent the best in quality health care for our community. Throughout our history, we have served our patients and our community and in the process earned a reputation for honor and integrity. Every person here plays a role, directly or indirectly, in the patient's experience by putting our patients at the center of everything we do.

Navicent Health, its affiliates and subsidiaries are dedicated to conducting business honestly and ethically wherever we operate. We have a comprehensive, values-based Compliance Program, which is a vital part of the way we conduct ourselves. Our commitment to maintaining the highest standards of behavior is why our communities entrust us with their care. To live up to this commitment, we must be driven by our values and ongoing commitment to comply with all laws and regulations applicable to the health care environment.

The Code of Conduct provides guidance to ensure our work is done in an ethical and legal manner. The Code is based on our strong belief in the importance of integrity. It emphasizes the shared common values and culture which guide our actions. The Code of Conduct contains resources to help employees resolve questions about appropriate conduct in the work place. While it cannot cover every situation you may encounter, we hope you will find it to be a useful resource tool in addressing issues that may arise during the course of your workday. When the best course of action is unclear, we urge you to seek the guidance of your supervisor, another member of management at your facility, Human Resources, or a member of the Corporate Compliance team. If you prefer, you may choose to call the Navicent Health Helpline to assist you in resolving your issue in a confidential manner. The Board of Directors of Navicent Health firmly supports our policy on non-retaliation. You have assurance there will be no retribution for asking questions or raising concerns about the Code or for reporting possible improper conduct.

No Code of Conduct can substitute for each individual own internal values, integrity and pride. Thank you for your ongoing commitment to our organization and for your support of our values and principles that carry out our mission of placing our patients at the center of everything we do.

A handwritten signature in black ink that reads "Ninfa M. Saunders". The signature is written in a cursive, flowing style.

Dr. Ninfa M. Saunders, FACHE
President /Chief Executive Officer

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Our Mission, Values and Vision



Our Mission:

Together, we elevate health and well-being through compassionate care.

Our Vision:

Partners for life, care you trust.

Our Values:

*Integrity
Respect
Ownership
Caring*

Navicent Health is committed to maintaining the highest professional and ethical standards in the conduct of its business. The Code of Conduct establishes and discusses policies that control acceptable business practices for all employees, leaders and managers, physicians, board members, volunteers, contractors, vendor, and agents of Navicent Health (this group of individuals and organizations will be referred to collectively as “Employees and Associates” throughout this Code of Conduct – and the obligations discussed in this Code generally apply equally to all individuals and organizations within this group). At Navicent Health, we are committed to acting honestly and ethically in all of our business dealings, and to full compliance with Federal health care program requirements, and other laws and regulations governing our organization.



We are called upon to model and promote our Values of Integrity, Respect, Ownership and Caring in all of our actions in the workplace.

As Employees and Associates of Navicent Health, we must all do our part to achieve and sustain these Values. It is the responsibility of every Employee and Associate to conduct themselves in a manner that reflects the highest ethical standards and attests to our commitment to comply with all applicable laws, regulations, company policies, and procedures. Every Employee and Associate working for or on behalf of Navicent Health has an obligation to be aware of the Federal and State regulations as well as the organizational policies that govern their work. 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 requires additional guidance for those directly involved with the particular area to have sufficient direction. To provide additional guidance, we have developed a comprehensive set of compliance policies and procedures which may be accessed on the Navicent Intranet under the tab Policies and Forms.



INTEGRITY. I WILL...

- Do the right thing even when no one is looking.
- Ensure my actions are consistent with what I say.
- Act to the greater good and not in my own self interest.
- Take responsibility for my own actions, right or wrong, while earning trust.
- Represent myself in a positive and professional manner.
- Hold myself to the highest possible standards.

RESPECT. I WILL...

- Actively listen and seek to understand.
- Treat others the way I want to be treated.
- Understand and suspend my own judgements and preconceived biases.
- Honor the dignity of everyone with whom I interact.
- Honor the beliefs and differences of others as unique individuals.
- Strive to be gracious in honoring the contributions of others.

OWNERSHIP. I WILL...

- Own my mistakes and use them as learning opportunities.
- Have the professional courage to stop the process by appropriately questioning and challenging.
- Encourage and create the opportunity for the development of team members to maximize their full potential.
- Take responsibility for my own development and improvement.
- Be open to change, challenge the status quo and be committed to achieving the best result possible.
- Recognize that disagreement is healthy & encouraged, but once a decision is made, I will proactively support it.

CARING. I WILL...

- Be “in the moment” in all my interactions.
- Be kind, compassionate and empathetic.
- Be a positive and contributing member of a team.
- Show appreciation and recognition of my team, coworkers and others.
- Smile, make eye contact and be pleasant.
- Proactively respond to the needs of others.

LEADERSHIP RESPONSIBILITIES

While all Navicent Health Employees and Associates must follow the Code of Conduct, our leaders and managers set the example in every respect. We expect everyone in the organization with supervisory responsibility to exercise that responsibility in a manner that is respectful, compassionate, thoughtful, and compliant with legal requirements and Navicent Health policies. We expect each manager to create an environment where all team members are encouraged to raise concerns and propose ideas. It is also our expectation that managers will ensure team members have sufficient information to comply with laws, regulations, and policies, as well as the resources to resolve ethical dilemmas. All managers must create an environment that promotes the highest standard of ethics and compliance. The culture must encourage everyone in the organization to share concerns when they arise. We must never sacrifice ethical and compliant behavior in the pursuit of business objectives.

COMPLIANCE PROGRAM

The Chief Compliance Officer is responsible for the direction, implementation, and day-to-day operation of the Compliance Program. Our Compliance Program is in place to ensure that compliance with laws and regulations is a system-wide priority. The program includes developing resources including policies and procedures, training programs, audit plans, and communication tools. It also provides support by operating the Navicent Health Helpline, conducting program assessments, and providing advice.

The Information Security and Privacy Officer has the statutorily mandated responsibilities to promote protection of our patients' medical and financial information, and to assure that our privacy and security policies and practices are consistent with Federal and State legal and regulatory requirements. The Information Security and Privacy Officer also investigates potential privacy violations and conducts audits to ensure that we are compliant with applicable regulatory requirements.

The Compliance Department is assisted in its efforts by the Navicent Health Compliance Committee, which is composed of members of Senior Management from relevant Navicent Health departments and from Navicent Health affiliates. This oversight committee ensures that the Compliance Program elements will operate consistently and will be thoroughly communicated across the organization to all Navicent Health affiliates and entities. This Compliance Committee meets on a regular basis to discuss ongoing audits and compliance-related projects and to ensure that all compliance initiatives are executed properly. The Compliance Committee and the Chief Compliance Officer report Compliance Program activities and progress to, and discuss significant compliance-related concerns with, the Compliance Committee of the Navicent Health Board of Directors.

MONITORING AND AUDITING

The Compliance department establishes an annual Work Plan that is reviewed by and approved by the Compliance Committee of the Navicent Health Board of Directors. This plan is developed based on the Office of Inspector General (OIG) Annual Work Plan and specific areas of concern as they arise internally or within the health care industry. Compliance audits are focused on ensuring that all applicable laws and regulations are being followed. Any identified under/overpayments from any source that are discovered will be handled appropriately, including refunding overpayments that are identified.

TRAINING AND EDUCATION

Navicent Health provides initial orientation and continuing compliance education for all new and existing Employees, and for many Navicent Health Associates. All Employees and Associates must complete required compliance training. The Compliance department utilizes system-wide, computerized training programs as well as one-on-one training. This allows us to provide and monitor compliance training for all Employees and Associates. Additionally, our system allows us to tailor compliance education to specific departmental needs and to monitor training participation and effectiveness.

Your Responsibility

You are responsible for the following:

Assuring your actions meet the requirements set forth by the Navicent Health Code of Conduct

Carrying out all job responsibilities in an ethical and professional manner

Understanding Navicent Health values and asking questions whenever you have concerns about the ethical nature of a situation

Reporting potential or suspected violations of Navicent Health standards and policies

Acknowledging receipt and agreeing to comply with the Code of Conduct, understanding that violations will result in disciplinary action, up to and including termination

Completing annual educational requirements on compliance issues

Adhering to the Code of Conduct as part of your annual performance evaluation

If you have any questions regarding these standards, it is your responsibility and obligation to seek guidance from a member of management, a Human Resources representative, or the Chief Compliance Officer.



When evaluating an uncertain situation, try asking yourself these questions:

Could it violate any state or federal law or regulation?

Does it violate the Navicent Health Code of Conduct?

Do I feel good about my decision or actions?

Does it uphold Navicent Health Values?

Does it seem fair and just?

Would I feel proud for others to know?

REPORTING

All Navicent Health Employees and Associates are required to report concerns about possible non-compliance to Navicent Health. This obligation to report concerns may be met by notifying any Navicent Health manager or leader, or by contacting the Compliance Department or the Navicent Health Chief Compliance Officer. (Navicent Health managers and leaders are further obligated to notify the Chief Compliance Officer about any reported concerns.) The Compliance Department oversees a compliance hotline program (the “NH Helpline”) that may be used by Employees and Associates to report concerns about possible Navicent Health non-compliance, and to seek guidance about compliance-related questions. The NH Helpline is a toll free number ((888) 380-9008). Employees and Associates may call the NH Helpline anonymously, and Navicent Health makes every effort to maintain, within the limits of the law, the confidentiality of the identity of any individual who seeks guidance or reports concerns about possible misconduct. NH Helpline calls are logged and investigated by the Compliance Department. Any potential issues are elevated and handled appropriately. Summaries of NH Helpline call information and investigations are shared with the CEO, the Navicent Health Compliance Committee, and the Compliance Committee of the Navicent Health Board of Directors on a regular basis as appropriate, in a manner that protects, as discussed above, the confidentiality of the identity of the caller. In investigating all NH Helpline calls, the Compliance Department may involve the appropriate departmental staff based on the perceived violation.

NON-RETALIATION POLICY

Navicent Health policies strictly prohibit any form of retaliation against an Employee or Associate who in good faith reports a concern about possible or actual non-compliance. Federal and State laws also prohibit retaliation. The Board of Directors of Navicent Health assures protection to all employees against any type of retaliation for good-faith reports of suspected or actual violations of the Code of Conduct. This protection applies whether reports are made to anyone in management, to Human Resources, to the Chief Compliance Officer, to the NH Helpline, or to an appropriate government agency. No Navicent Health supervisor, manager, Employee or Associate is permitted to engage in retaliation, retribution, or any form of harassment directed against an Employee or Associate who in good faith reports a concern.



Quality of Care and Patient Safety

QUALITY OF CARE AND PATIENT SAFETY

Our primary mission is to provide quality health care services to all of our patients in a safe, healing environment. We treat all patients with respect and dignity and provide care that is both necessary and appropriate. In the admission, transfer, or discharge of patients, and in the care we provide, we do not discriminate based on gender, race, color, creed, national origin, ancestry, sexual orientation or source of payment for care. While we strive to render care in an efficient manner, clinical care decisions are not based on patient financial means or business economics.

Navicent Health has a comprehensive program to promote the quality of patient care and measure its effectiveness. There are increasingly numerous measures that relate in some way to the quality of patient care. These include the Conditions of Participation of the Centers for Medicare and Medicaid Services (CMS), all applicable Accreditation standards and surveys, and the consensus measures of the National Quality Forum. Navicent Health entities compare the quality of their services against national standards and benchmarks in an effort to identify ways to continually improve the quality of care we provide and to establish standards of care that reflect best practices.

Each patient receives a statement of Patient Rights and Responsibilities and a Notice of Privacy Practices. These documents explain the rights of patients to make decisions regarding their medical care, the right to refuse or accept treatment, the right to make an informed decision, and the right to privacy of their health information. These documents conform to applicable state and federal laws, including the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the Health Information Technology for Economic and Clinical Health Act of 2009 (HITECH). We provide a treatment environment where patients and their families understand their individual illnesses and make informed decisions concerning their medical care. Patients receive care from appropriately licensed and credentialed professionals. We honor patient wishes regarding resuscitation or advance directives within the limits of the law and the organization's capabilities. We also strive to provide health education, health promotion, and wellness programs as part of our efforts to improve the quality of life of our patients and communities.

We recognize and respect the diverse backgrounds and cultures of our patients and make every effort to equip our caregivers with the knowledge and resources to respect each patient's cultural heritage and needs.



Confidentiality of Patient Information

HIPAA and HITECH (along with the Omnibus Final Ruling) are federal laws designed to protect the privacy and security of patients' protected health information (PHI). In compliance with HIPAA, as well as applicable state regulations, we only use, disclose or discuss patient-specific information with others when it is necessary for treatment, payment or health care operations, or when such disclosure is authorized by law. We protect the integrity and confidentiality of PHI, whether in oral, written or electronic form. We employ extensive safeguards for both paper and electronic medical and financial records to ensure that PHI is not inappropriately used or disclosed. Furthermore, Navicent Health abides by all federal and state regulations in regards to Breach Notification. If PHI is inappropriately used or disclosed in a manner that constitutes a breach, Navicent Health will perform detailed and diligent analysis, and as necessary will notify the patients affected, as well as any other parties as specified by law.



Patient's Trust

Our patients trust us with their confidential medical and financial information. All Navicent Health personnel have a role to play in following the privacy and information security policies and maintaining the confidentiality of PHI. This includes:

Accessing only the minimum information needed to do your job

Getting permission from your supervisor before removing patient information from Navicent Health and keeping it secure until it is returned or appropriately destroyed

Keeping passwords confidential and not sharing them with others

Securing and encrypting mobile devices, such as laptops, flash drives, external hard drives, and personal devices (cell phones and tablets) that contain PHI or confidential Navicent Health information

Not posting passwords on a computer monitor or your name badge

Reporting any lost or stolen patient information immediately to the Navicent Health Information Security and Privacy Officer by calling (478) 633-6990 or to the Navicent Health Helpline by calling: (888) 380-9008

Reporting any potential security breach of Navicent Health electronic systems to the Navicent Health Information Security and Privacy Officer by calling (478) 633-6990 or to the Navicent Health Helpline by calling: (888) 380-9008

FULL COMPLIANCE WITH LAWS AND REGULATIONS

Navicent Health is committed to full compliance with all applicable laws, regulations and Federal health care program requirements. Every Employee and Associate of Navicent Health is obligated to understand the laws, regulations, Federal health care program rules and Navicent Health policies that apply to their day to day work, and to assure that their work activities at Navicent Health are consistent with these legal, regulatory and policy requirements. Most requirements are summarized in following sections of this Code, and in many cases are addressed more fully in Navicent Health policies. Navicent Health Employees and Associates are expected to familiarize themselves with the Code and relevant Navicent Health policies, and to ask questions as needed so that they understand and can help Navicent Health assure full compliance.

The consequences of non-compliance can often be severe both for Navicent Health and for the Employee or Associate who may be involved in instances of non-compliance. Possible legal consequences include criminal and civil fines and penalties, loss of provider status with government healthcare programs, and in severe cases, even conviction and imprisonment. Non-compliance may also lead to termination of employment or other relationship (e.g., contract, vendor or medical staff) with Navicent Health.

EMERGENCY TREATMENT

Navicent Health complies with the Emergency Medical Treatment and Labor Act (EMTALA) in providing a medical screening examination and necessary stabilization to all patients, regardless of their ability to pay. Provided we have the capacity and capability, anyone with an emergency medical condition will be treated. In an emergency situation or if the patient is in labor, we will not delay the medical screening and necessary stabilizing treatment in order to seek financial and demographic information. We do not admit, discharge or transfer patients with emergency medical conditions simply based on their ability to pay or any other discriminatory factor. Patients with emergency medical conditions will be transferred to another facility only if the transfer is in compliance with our EMTALA policies, and state and federal requirements. All of our personnel and physicians who work in our Emergency Department must be knowledgeable about EMTALA rules and applicable Navicent Health policies.



Financial Relationships with Physicians

NO PAYMENTS FOR REFERRALS OR IMPROPER INDUCEMENTS

Navicent Health does not pay or provide any compensation in exchange for referrals. No Employee or Associate shall solicit or receive, offer to pay or be paid for remuneration of any type (including but not limited to bribes or kickbacks) in return for referring or recommending their referral of any individual to another person, hospital, or medical facility for services; or in return for the purchase of goods or services. Since there are numerous laws which clearly prohibit payment in return for referrals, every agreement involving compensation between Navicent Health and any physician or other referral source must be reviewed by Office of the General Counsel prior to execution.



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 (including but not limited to employees, physicians, or other health professionals) for the referral of patients.

Navicent Health does not make payments or provide non-cash benefits (i.e. office space) to any health professional or physician

providing services to the hospital unless the arrangement has been approved through the corporate approval process. No employee or any other person acting on behalf of NH is permitted to ask for or receive anything of value, directly or indirectly, in exchange for the referral of patients. In situations where NH employees are in a position to make referrals, they shall make such referrals solely based on what is best for the individual seeking treatment and without regard to the number of referrals any physician or health professional has made to NH.

Business arrangements with physicians are subject to strict legal requirements, and must be appropriately structured and documented in compliance with the law and Navicent Health policies. All transactions with physicians require review and approval by the appropriate NH service line executive, the Office of General Counsel, the Chief Compliance Officer, the Chief Financial Officer and, in certain instances, the Chief Executive Officer. No payment or benefit may be provided to a physician unless the requirements of this paragraph are met, or a written exception is received from the Office of the General Counsel and the Chief Compliance Officer.

Navicent Health does not pay or provide benefits to patients to induce them to seek care at Navicent Health. We do not provide "professional courtesy" discounts to members of the medical staff or their families. We do not allow hospital charges owed by an affiliated physician to be waived, in whole or in part. We only waive insurance co-payments and provide other reductions in the cost of care in accordance with NH policies (e.g., after a showing of financial need).

We accept patient referrals and admissions based solely on the patient's clinical needs and our ability to render the needed services.



ACCURATE BILLING AND CODING SERVICES

Navicent Health bills only for services rendered. We take great care to assure that all billings to the government, third-party payors and patients are accurate and conform to all applicable federal and state laws and regulations. We prohibit any Employee or Associate of Navicent Health from knowingly presenting, or causing to be presented, claims for payment or approval that are false, fictitious or fraudulent.

Strict federal and state laws and regulations govern documentation, coding and billing for services provided to insured patients. We are committed to full compliance with applicable Federal health care program requirements. Navicent Health expects all Employees and Associates involved in providing coding and billing for health care services to be familiar with the applicable billing requirements under government programs and private health care



plans. Navicent Health Employees and Associates have an obligation to ensure that all bills submitted to patients' government programs and other payors are accurate and complete; are for items and services that were provided; and are properly supported by clinical documentation. Any Navicent Health Employee or Associate who discovers an error or inaccuracy in any claim submitted for payment for health care services, should alert his or her supervisor, another Navicent Health manager, or the Compliance Department or Chief Compliance Officer immediately.

If we identify that we have been paid incorrectly, we take appropriate steps to correct errors, and to report and return overpayments, in a timely manner.

ACCURACY OF RECORDS AND REPORTS

Navicent Health is committed to ensuring that records are available to support our business practices and actions. Each Navicent Health Employee and Associate is responsible for the integrity and accuracy of the clinical and business records that they create and/or manage for Navicent Health. No Navicent Health Employee or Associate may falsify information on any record or document or make alterations to such information except in accordance with Navicent Health policy.

Medical records must be as accurate and complete as possible. Employees and Associates may correct errors in medical records only according to the appropriate procedures. Any changes or entries made out of time sequence should be clearly dated and initialed. All Navicent Health supporting documentation related to our coding and billing of patient care services to third-party payors must be accurate, timely, reliable and properly maintained in accordance with Navicent Health document retention policy.

In addition, Navicent Health responds timely and accurately to any billing inquiries. We answer requests for information with complete, factual and accurate data. We cooperate with all government inspectors and their agents. We maintain documentation in support of patient care services billed to government and third-party payors in accordance with our document retention policy.

We take great care to assure that all billings to the government, third-party payors and patients are accurate and conform to all applicable federal and state laws and regulations.



Code of Conduct

WORKPLACE CONDUCT AND EMPLOYMENT PRACTICES

Navicent Health expects all Employees and Associates to treat co-workers and patients with respect and courtesy. Navicent Health will not tolerate discrimination or harassment based on factors, identified in the box to the left, against any Employee, Associate or patient, and will discipline or discharge those who violate this policy. See Navicent's Statement of Nondiscrimination at www.navicenthealth.org and then push the link marked "Our Policies" at the top left of the page.

Navicent Health maintains a positive work environment that supports our values and policies. We provide an inclusive work environment where everyone is treated with fairness, dignity and respect. Freedom from harassment specifically includes freedom from unwelcome



sexual advances, requests for sexual favors or other verbal, graphic or physical conduct of sexual nature.

Navicent Health is committed to an alcohol, drug, and smoke free work environment. Navicent Health hospitals, facilities, and properties, including all parking lots, sidewalks and green space areas, are entirely smoke free.

In order to ensure the safety of all Navicent Health Employees, Associates and patients, any Employee or Associate who has been directed by a physician to take a prescription drug that may adversely affect or impair performance on the job must report that circumstance to the immediate supervisor. If you believe a medication, either prescribed or over the counter, may impair your judgment or job performance, you must notify your supervisor.

Consistent with the overall mission of Navicent Health as a company, our Human Resources department can arrange for confidential counseling for drug or alcohol dependence problems through the Employee Assistance Program. No Employee with an alcohol and/or drug abuse problem will have his or her job jeopardized by a request for counseling or treatment if the individual requests help prior to an event or incident subjecting the employee to disciplinary action.

The rules and regulations governing health care operations are often complex and, at times, may be difficult to understand. Some violations of health care laws and regulations can result in civil and criminal penalties. Ignorance of the law does not excuse Navicent Health or its employees from full compliance, and therefore it is our responsibility to seek answers promptly when questions arise. Any questions regarding federal or state regulatory requirements should be directed to the Office of General Counsel or the Office of Corporate Compliance.

COOPERATION IN GOVERNMENT INVESTIGATIONS

Navicent Health cooperates fully with government inquiries. If any Employee or Associate receives an inquiry, subpoena or other legal document regarding Navicent Health business whether at home or in the workplace, from any governmental agency, the Employee or Associate must notify his or her Navicent Health supervisor and the Office of General Counsel. We are always clear and truthful in responding to those who make inquiries. We never conceal, destroy or alter any documents, lie or make misleading statements to a government representative. Employees are not obligated to speak to or answer any non-routine questions from a government representative without first consulting the Office of General Counsel.

Navicent Health recognizes people as our greatest asset.

We also recognize that the ability to deliver quality patient care is directly related to our employees, medical staff and our volunteers. A diverse workforce enables us to meet the needs of the diverse patient population that we serve.

The organization strives for diversity and is an equal opportunity work force.

Navicent Health does not allow harassment or discrimination against any individual with regard to race, color, religion, gender, age, national origin, sexual orientation, gender identity, disability, pregnancy, veteran status, genetic information or any other characteristic provided by law.



Navicent Health regularly pursues activities in support of its charitable purpose and ensures its resources are used to further the public good.



COMPLIANCE WITH TAX-EXEMPT REQUIREMENTS

Navicent Health is a charitable, tax-exempt entity. The organization provides health care services, medical training, education, research and community outreach activities, all of which benefit the community. We also provide significant free and discounted care to indigent patients and participate in federal and state medical assistance programs. Navicent Health regularly pursues activities in support of its charitable purpose and ensures its resources are used to further the public good. Navicent Health and its Employees and Associates avoid compensation arrangements in excess of fair market value, accurately report required information to appropriate taxing authorities and file all tax and information returns in a manner consistent with applicable laws.

USE OF NAVICENT HEALTH TECHNOLOGY

All technology systems are the property of Navicent Health and are to be used for business purposes.

Navicent Health permits reasonable and extremely limited personal use of technology systems. However, this usage is not private. Technology systems include, but are not limited to, computing devices, electronic mail, the intranet, Internet, fax, telephones and voice mail. Navicent Health reserves the right to access, monitor and disclose activity done via Navicent Health systems. Users who abuse these systems or use them for unauthorized, non-business purposes may lose these privileges and be subject to disciplinary action, up to and including termination.

Failure to comply with these policies may result in disciplinary action. Any questions regarding this policy should be directed to the Privacy Officer at (478) 633-6990.



MARKETING

Navicent Health engages in marketing and advertising activities to educate the public, provide information to the community, increase awareness of our services, and to recruit employees. Marketing practices at Navicent Health are conducted with truth, accuracy, fairness, and responsibility to our patients and to the community. Any materials produced by Navicent Health shall reflect only those services available and may include levels of licensure and accreditation attained. We comply with applicable federal and state laws, and as relevant, professional ethical guidelines related to marketing, advertising and communication activity. Third parties may not use or associate Navicent Health's name, symbols, logos or trademarks in an advertisement, press release or marketing material without the prior consent of the Corporate Communications department. Any media inquiries should be referred to the Corporate Communications department.

CONFLICTS OF INTEREST

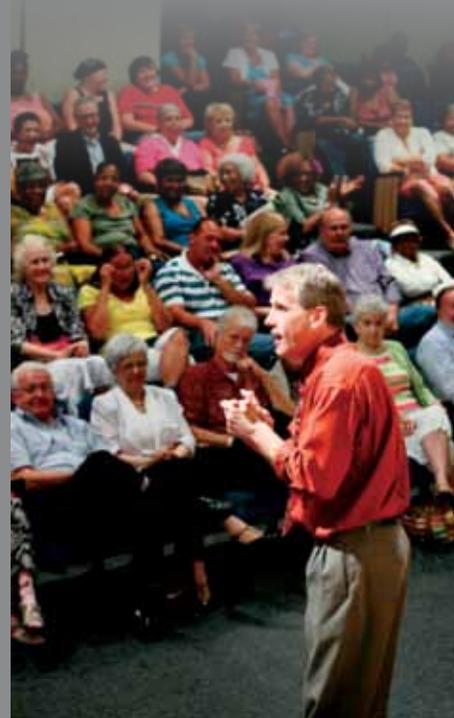
Each Navicent Health Employee, and many Navicent Health Associates have a legal duty of loyalty to Navicent Health. The term "conflict of interest" refers to situations in which financial or other personal considerations may compromise, or have the appearance of compromising, an individual's ability to make objective decisions in the course of the individual's job responsibilities. Navicent Health Employees and Associates must avoid any actions that may involve, or appear to involve, a conflict of interest with their obligations to Navicent Health. Employees and Associates must disclose all possible conflicts of interest involving themselves or their immediate family members (spouse, parents, brothers, sisters, and children).

Navicent Health Employees and certain Navicent Health Associates may not engage in any management or development activity that aids a competitor. It is understood that nursing staff, physicians and other health care professionals may provide routine technical services for other providers outside of Navicent Health as part of his or her livelihood. Generally, however, we must not work for or assist anyone including ourselves in the planning, design, sales, purchase or any implementation of any service that Navicent Health currently provides or has known plans to provide.

Navicent Health Employees (and Associates where required) may not own stock in, serve as a director or officer of, receive compensation from or provide consulting or other services to hospitals or firms in the health care industry and in competition with Navicent Health without written consent of the Office of General Counsel. Navicent Health Employees and Associates who deal with suppliers must do so in a reputable, professional and legal manner. Purchasing decisions will be made seeking the most technically efficient and cost-effective products and services, evaluated using consistent and unbiased standards. Discounts that are available to all Navicent Health employees may be accepted. You may not accept a gift if there is a business transaction, or renewal or expansion of an existing relationship under negotiation. Neither you nor any member of your family may accept cash or cash equivalents from any individual or organization with a current or potential relationship.

Business partners may extend training and educational opportunities that include travel and overnight accommodations at no cost to you or Navicent Health. Similarly, there may be some circumstances where you are invited to an event at a vendor's expense to receive information about new products or services.

Employees (and where required, Associates) must disclose possible conflicts of interest involving themselves or their immediate families to the Chief Compliance Officer or the Office of General Counsel.



Navicent Health engages in marketing and advertising activities to educate the public, provide information to the community, increase awareness of our services, and to recruit employees.



We always employ the highest ethical standards in business practices in source selection, negotiation, determination of contract awards and the administration of all purchasing activities.

RELATIONSHIPS WITH SUBCONTRACTORS AND BUYERS

We manage our consulting, subcontractor, supplier and vendor relationships in a fair and reasonable manner, free from conflicts of interest and consistent with all applicable laws and good business practices. We promote competitive procurement to the maximum extent practicable. We 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 comply with contractual obligations not to disclose vendor confidential information unless permitted under the contract or otherwise authorized by the vendor or required by law. In addition, we encourage our suppliers to adopt their own set of comparable ethical principles consistent with their industry's best practice.

DOCUMENT RETENTION

Navicent Health has established a written records retention and destruction policy for several reasons. See Work Instruction 151.3367. First and foremost, the policy helps ensure that Navicent Health records are maintained for the appropriate time period to facilitate patient care and comply with relevant statutes, regulations, contracts and accreditation standards. Second, the HIPAA security rule requires that covered entities establish an appropriate retention and destruction policy for electronic records. Third, compliance with a proper records retention policy will help establish a defense against any claim or allegation of improper destruction of records.

No Navicent Health Employee or Associate should ever destroy or alter any company documents in anticipation of a request for those documents from any government agency or court. If any Employee or Associate believes that such conduct has occurred, or may occur, the employee should immediately contact the Office of Corporate Compliance at (478) 633-1223, or the Navicent Health Helpline at (888) 380-9008. Calls to the Helpline will be treated confidentially.



Phone Reference Guide

Navicent Health Helpline

Toll-free: (888) 380-9008

Office of Corporate Compliance

(478) 633-1223

Fax: (478) 633-5378

Office of General Counsel

(Legal Department) (478) 633-6980

Corporate Audit Services Department

(478) 633-6830

Corporate Human Resources Department

(478) 633-1510

Corporate Communications

(478) 633-6952

Privacy Officer

(478) 633-6990



Navicent Health

*Everything about us
is all about **you.***

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