McLeod Health

CODE OF CONDUCT

Our Guide to Excellent Work, Excellent Care, and Shared Responsibility

This Code of Conduct reflects McLeod Health's commitment to ethical behavior, patient-centered care, accountability, professionalism, and compliance.

A Letter from the President / CEO



Dear Colleagues,

Every day, our patients, families, and communities place their trust in us. That trust is earned through every interaction, decision, and act of compassion, integrity, and professionalism.

This Code of Conduct reflects our shared commitment to doing what is right for our patients, our colleagues, and our communities. More than a collection of policies or requirements, it provides guidance for how we care for others, work together, make decisions, and represent McLeod Health.

No Code can anticipate every situation. Use this document as a resource, ask questions when you are uncertain, and speak up when something does not seem right. We are committed to a culture where concerns can be raised without fear of retaliation and where integrity is everyone's responsibility.

Each of us plays an important role in protecting the trust placed in McLeod Health. Thank you for the compassion, professionalism, and dedication you demonstrate every day. By working together and living our values, we will continue to earn the confidence of those we serve and fulfill our mission of improving the health and well-being of our communities.

We truly are better together.

Sincerely,
Donna

INTRODUCTION

At McLeod Health, people are the heart of this organization.

Every decision you make, every interaction you have, and every process you follow should support McLeod's mission: to improve the health and well-being of those we serve by providing excellence in health care. This includes the way you care for patients, support families, work with others, protect information, manage resources, and represent McLeod.

This Code of Conduct serves as a practical guide for how you do excellent work, not just a list of rules. It helps you understand the standards that support good judgment, patient safety, respectful teamwork, ethical business practices, and trust in McLeod.

The Code applies to everyone who is part of the McLeod workforce, including employees, medical staff members, Board members, volunteers, students, and contractors. Each person has a role in creating the kind of workplace where people feel respected, concerns are addressed timely, and patients receive excellent care.

Because no Code can address every possible situation, you are expected to ask questions when something is unclear. A supervisor, manager, or the Compliance Office can help. Asking for guidance early is part of making responsible decisions. You are also expected to speak up when something does not seem right. Reporting concerns helps McLeod protect patients, support the workforce, improve processes, and maintain the trust placed in us.

This Code reflects who we are and who we strive to be – an organization built on the four core values of Caring, Person, Quality and Integrity. When we follow the Code, we help create a safer workplace, stronger teams, and better care for every patient.

Our Code of Conduct is guided by the following principles:

- **Integrity:** We act honestly and transparently in all interactions.
- **Respect:** We treat patients, colleagues, and the communities we serve with dignity and compassion.
- **Excellence:** We strive for the highest quality in patient care and operational performance.
- **Accountability:** We take responsibility for our actions and outcomes.
- **Compliance:** We adhere to all applicable laws, regulations, and McLeod policies.

Before acting, ask yourself:

Is this decision in the best interest of the patient?
Is it honest, fair, and respectful? Does it support safety, quality, and trust?
Would I be comfortable explaining this decision to my leader, my team, or the patient's family?
Do I need to ask for guidance before moving forward?

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LEADERSHIP RESPONSIBILITIES

Leading with Integrity.

Leaders at every level of the organization have a special responsibility to bring the Code to life – to promote a culture of integrity, compliance, and accountability. In addition to meeting the expectations outlined throughout this Code of Conduct, leaders are expected to model ethical behavior, foster an environment of trust and respect, and **encourage open communication**.



Leaders must **ensure that workforce members understand their responsibilities, receive appropriate education and resources, and feel comfortable raising questions or reporting concerns without fear of retaliation.** This means setting the example, **creating a safe place** for questions and concerns, listening to feedback from the team, supporting team members, and helping workforce members understand how the Code applies to their daily work.

Leaders are responsible for promoting compliance with applicable laws, regulations, accreditation standards, organizational policies, and the Code. They are expected to **address concerns promptly, seek guidance when appropriate, and take reasonable steps to prevent, detect, and respond to misconduct within their areas of responsibility.** Leadership decisions should always reflect the organization's mission, values, commitment to quality, and dedication to ethical business practices.

Leaders have an additional responsibility to model these expectations, communicate them clearly, and promptly address concerns brought forward by members of the team.

OUR COMMITMENT TO PATIENTS AND EACH OTHER

Patient Care and Safety

McLeod is committed to providing safe, compassionate, high-quality and patient-centered care to every individual we serve. We are committed to creating an environment in which every patient and family feel welcomed, respected, informed, and involved in their care.

Each workforce member plays an important role in creating a safe and supportive environment. Our commitment to patient care and safety includes:

- Respecting the rights, dignity, privacy, and confidentiality of every patient.
- Communicating and treating others with compassion, courtesy, professionalism, and respect.
- Providing care without discrimination.
- Performing only those duties within your scope of practice.
- Providing medically necessary, evidence-based care.
- Supporting patient participation in care decisions.
- Maintaining a safe environment and following infection prevention and patient safety practices.
- Maintaining accurate, timely, complete, and truthful clinical documentation that supports the care provided.
- Collaborating to continuously improve quality, patient safety, and the patient experience.
- Speaking up when safety may be at risk and promptly reporting concerns, incidents, errors, unsafe conditions, or near misses without fear of retaliation.
- Following applicable laws, accreditation standards, organizational policies, and professional requirements.
- Immediately seeking assistance when a situation exceeds your level of training or authority.

Emergency Care and EMTALA

McLeod is committed to ensuring that every individual who seeks emergency care receives an appropriate medical screening exam (MSE) without inappropriate delay, as well as any necessary stabilizing treatment or appropriate transfer in accordance with the Emergency Medical Treatment and Labor Act (EMTALA). Discouraging, delaying, or otherwise interfering with an individual's access to emergency care is strictly prohibited. Workforce members are expected to understand their responsibilities under EMTALA and to promptly report any suspected violation or concern.

OUR COMMITMENT TO PATIENTS AND EACH OTHER

A Respectful Workplace

McLeod is committed to creating a workplace where everyone feels safe, respected, and supported. All workforce members are expected to treat each other, patients, and visitors with dignity, courtesy, and professionalism. This includes addressing disagreements professionally and resolving conflicts in a constructive manner.

Harassment, discrimination, bullying, retaliation, intimidation, and disruptive behavior are simply not tolerated in any form – spoken, written, physical or electronic. Retaliation against anyone who raises a good-faith concern or participates in an investigation is prohibited and will be met with serious consequences, up to and including termination.

McLeod supports equal opportunity for all people and does not allow discrimination based on race, color, religion, national origin, age, sex, disability, or any other protected status. Employment decisions are based on qualifications, performance, and legitimate business needs.



Drug-Free Workplace

McLeod also maintains a drug-free workplace. Workforce members must not report to work under the influence of illegal drugs, misused controlled substances, or alcohol. The illegal use, possession, sale, distribution, or diversion of controlled substances on McLeod property is strictly prohibited.

You are expected to report to work fit for duty and able to perform your responsibilities safely and effectively. If you observe behavior suggesting that an individual may be impaired or unable to safely perform their duties, you should promptly report your observations to a supervisor.

OUR COMMITMENT TO PATIENTS AND EACH OTHER

Environmental Health and Safety

McLeod is committed to providing a safe, healthy, and secure environment for patients, workforce members, visitors, and the community. We achieve this by following safety practices, using equipment properly, and working together to identify and reduce risks.

Every workforce member shares responsibility for maintaining a safe environment by:

- Using equipment, chemicals, medications, and other materials safely, responsibly, and according to organizational policy and manufacturer instructions, as applicable.
- Following infection prevention practices, such as hand hygiene, isolation, and the use of personal protective equipment (PPE) when required.
- Handling medical waste, hazardous materials, pharmaceuticals, and other regulated supplies per organizational policy.
- Following emergency procedures during disasters, codes, and other urgent situations.
- Maintaining a secure environment by following security procedures and promptly reporting suspicious activity, violence, threats, unauthorized individuals, or weapons concerns.
- Participating in required safety education, drills, and emergency preparedness activities.
- Promptly reporting incidents, injuries, hazards, or other unsafe conditions.

Relationships with Other Health Care Organizations

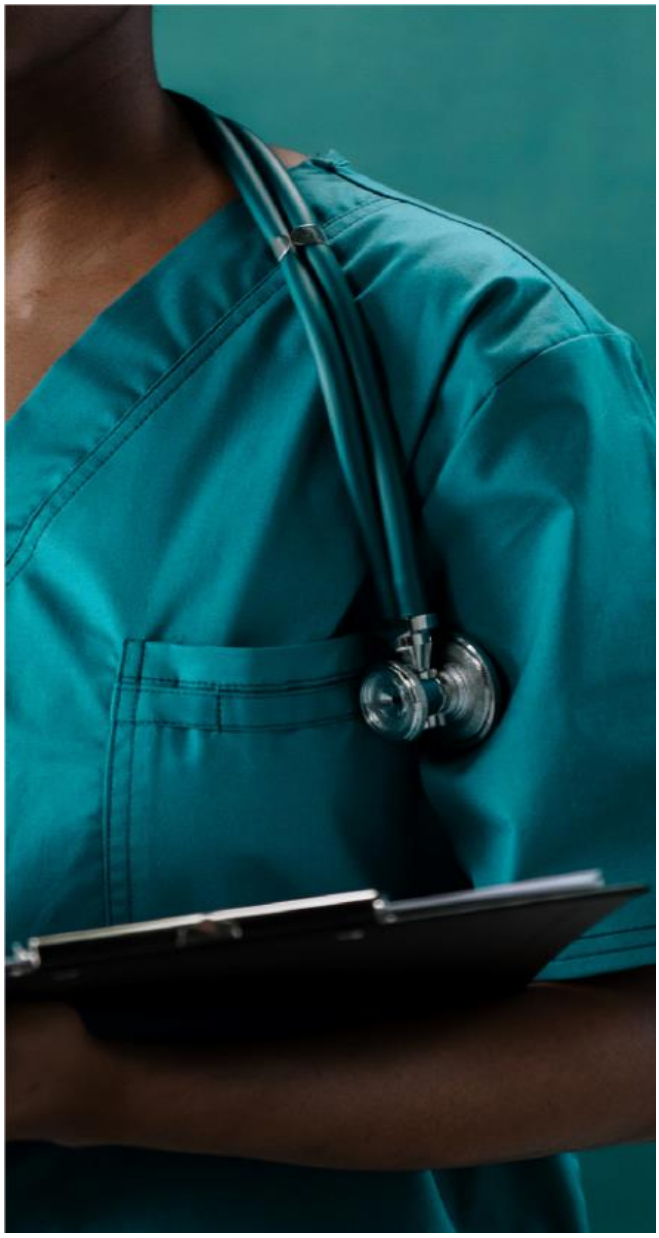
McLeod works collaboratively with other health care providers, organizations, educational institutions, emergency responders, and community partners to improve patient care, strengthen the healthcare workforce, and promote the health of the communities we serve. These relationships are built on professionalism, integrity, mutual respect, and a shared commitment to quality care.

McLeod supports these relationships by:

- Building collaborative and professional relationships with healthcare providers and partner organizations to improve the health of the communities we serve.
- Supporting coordinated and continuous patient care across healthcare settings.
- Supporting educational partnerships that advance clinical training and workforce development.
- Conducting all professional relationships with honesty, integrity, and ethical business practices.

COMPLIANCE AND ETHICAL CONDUCT

Compliance and ethical conduct are everyone's responsibility. Every workforce member is expected to follow this Code of Conduct, organizational policies, and all applicable laws, regulations, and professional standards.



The Code of Conduct

This Code of Conduct establishes the principles and standards that guide our decisions, actions, and relationships. It applies whenever we care for patients, interact with each other, conduct business, or represent McLeod.

The Code provides guidance so that we consistently:

- Make ethical decisions consistent with our mission and values.
- Treat patients, families, colleagues, and business partners with dignity, respect, and professionalism.
- Protect patient safety, privacy, confidentiality, and the trust placed in us.
- Comply with applicable laws, regulations, accreditation standards, organizational policies, and professional responsibilities.
- Speak up when questions or concerns arise about possible misconduct or unethical behavior.

No Code of Conduct can anticipate every situation or answer every question. When faced with uncertainty, workforce members are expected to seek guidance, ask questions, and make decisions that reflect McLeod's mission, values, and commitment to doing the right thing.

COMPLIANCE AND ETHICAL CONDUCT

The Compliance Program

McLeod's Compliance Program promotes a culture of integrity by helping prevent, detect, and respond to compliance and ethical concerns. Through education, monitoring, auditing, investigation, and corrective action, the Program helps ensure that we conduct our work in accordance with our mission, organizational policies, and applicable laws and regulations.



The Compliance Program is designed to:

- Provide education and guidance when workforce members have questions about ethical or compliance-related issues to ensure they understand and can meet their compliance responsibilities.
- Promote ethical decision-making and compliance with organizational standards.
- Respond to and investigate reported non-compliance and ensure that appropriate corrective action is taken when non-compliance occurs.
- Foster a culture where questions, concerns, and timely good-faith reporting are encouraged.
- Monitor compliance risks and business practices to identify opportunities for improvement.
- Reduce legal, regulatory, financial, and operational risks while protecting patients, workforce members, and the organization.



COMPLIANCE AND ETHICAL CONDUCT

Laws and Regulations

Compliance with applicable federal, state, and local laws and regulations protects our patients, preserves public trust, safeguards healthcare resources, and supports McLeod's mission. This includes laws related to patient care, HIPAA, billing, coding, fraud and abuse, safety, employment, and business operations. Every workforce member is responsible for understanding and complying with the laws, regulations, organizational policies, and professional standards that apply to their specific role. When questions arise, you should seek guidance before taking action.

False Claims Act ("FCA")

McLeod is committed to submitting accurate and truthful claims for payment and maintaining complete and accurate documentation to support the services provided. The knowing submission, or causing the submission, of false or fraudulent claims, falsification of records, or any activity intended to improperly obtain payment from government or private healthcare programs is strictly prohibited. You are expected to report any suspected false claims or billing irregularities, such as services that were not provided, were not medically necessary, were incorrectly coded, or were not adequately documented.

Fraud, Waste, and Abuse

McLeod is committed to safeguarding healthcare resources by preventing fraud, waste, and abuse. You must use organizational resources responsibly, accurately document services and resources used, and avoid practices that result in unnecessary costs, improper payments, or misuse of healthcare funds. Suspected fraud, waste, or abuse must be reported immediately.

Physician Self-Referral ("Stark Law")

McLeod complies with all applicable physician self-referral laws. Financial relationships with physicians and other referral sources are structured and maintained in accordance with applicable legal requirements. Workforce members involved in contracting, referrals, or financial arrangements are expected to consult the Legal or Compliance Offices before entering into or modifying such arrangements.

Federal Anti-Kickback Statute ("AKS")

McLeod strictly prohibits offering, soliciting, paying, or accepting anything of value – such as gifts, meals, and entertainment – to improperly influence referrals, purchasing decisions, contracting decisions, or other business involving federally reimbursed healthcare services. Business decisions are based on quality of care, patient needs, and legitimate business considerations – not financial incentives.

COMPLIANCE AND ETHICAL CONDUCT

Laws and Regulations

HIPAA Privacy and Security

McLeod is committed to protecting the privacy, confidentiality, integrity, and security of patient information. Workforce members may access, use, or disclose protected health information ("PHI") only when authorized by law, organizational policy, or their job responsibilities. Accessing your own medical record or the record of a family member, friend, coworker, or any other individual without an authorized business or clinical purpose is prohibited and may result in disciplinary action, up to and including termination of employment, loss of privileges, termination of a contractual relationship, or other appropriate action, as applicable.

Workforce members are also responsible for protecting confidential information in all forms, including verbal, written, electronic, and mobile communications.



Government Investigations and Regulatory Inquiries

McLeod cooperates fully with authorized government agencies and regulatory authorities. Any government subpoena, audit, investigation, regulatory inquiry, or request for information must be promptly reported to your leader, the Compliance Office, Legal Services, or Administration.

All workforce members are expected to cooperate fully with audits, investigations, regulatory reviews, and other compliance activities. Information provided must be truthful, complete, accurate, and must never be altered, concealed, or destroyed. No workforce member should respond independently to a government inquiry or produce organizational records without first notifying the Compliance Office, Legal Services, or Administration.

COMPLIANCE AND ETHICAL CONDUCT



Pam Elliott
Corporate Chief Compliance Officer

Making a Report

You have a responsibility to speak up if you know or suspect this Code of Conduct, organizational policy, applicable law, regulation, or ethical standard has been violated. Any concern involving possible unethical, illegal, unsafe, or non-compliant conduct should be reported promptly. Concerns may be reported to a supervisor, Administration, the Compliance Office, or anonymously using the Compliance Hotline.

Options for reporting:

- Call the Chief Compliance Officer at 843-777-2858.
- Email the Chief Compliance Officer at pelliott@mcleodhealth.org.
- Send an email from the Compliance / HIPAA tab on The Compass.
- Call the Compliance Hotline at 1-888-679-3531 .
- Scan the hotline QR code from The Compass, Hotline Posters, or here…

The hotline is operated by a third-party vendor and is available 24 / 7 by telephone or QR code. This allows you to report anonymously, if you choose to do so.

When reporting a concern, it's helpful to include:

- What happened and where and when it happened.
- Who was involved or may have witnessed what happened.
- Whether patient safety, privacy, billing, or workplace conduct may be affected.
- Any documents or details that may help with the review.

As an organization, we want to learn from our mistakes. At McLeod, we understand that well-meaning people will sometime make mistakes when working in complex, fast-paced and challenging environments. We seek to understand "What happened?" not "Who is to blame?"

Non-Retaliation

McLeod encourages workforce members to ask questions, seek guidance, and report concerns in good-faith. Retaliation against any individual who reports a concern, participates in an investigation, or assists with a compliance review in good-faith is strictly prohibited. Anyone who believes they have experienced retaliation should promptly report the concern through the same reporting channels described in this Code. Any confirmed retaliatory action will be met with severe consequences, up to and including termination.

PROTECTING OUR ORGANIZATION

We are accountable not only for what we do, but also for how we do it. This includes protecting confidential information, communicating honestly, avoiding conflicts of interest, safeguarding organizational resources, and conducting business with integrity.

Confidentiality

Patients, workforce members, vendors, and business partners entrust McLeod with sensitive and confidential information. Protecting that trust requires safeguarding information and using it only for legitimate business purposes. Confidential information includes PHI, workforce member information, financial information, contracts, legal matters, strategic plans, and other non-public information.

Your responsibility includes:

- Accessing confidential information only when needed for your job.
- Sharing confidential information only with authorized individuals.
- Avoiding conversations about confidential information in public or unsecured areas.
- Respecting confidentiality even after your employment or relationship with McLeod ends.
- Reporting suspected breaches of confidentiality.



PROTECTING OUR ORGANIZATION

Privacy and Security of Information

Workforce members are expected to protect information by following privacy, cybersecurity, and records management requirements whenever accessing, using, storing, transmitting, or disposing of information per organizational policy.

You can protect information by:

- Protecting the confidentiality, integrity, and availability of organizational information.
- Using passwords, devices, and technology securely.
- Accessing information only for legitimate work purposes.
- Safeguarding paper and electronic records.
- Not entering confidential information or PHI into unauthorized AI or other third-party technology platforms.
- Remaining alert to phishing attempts, suspicious emails, and other cybersecurity threats.
- Reporting suspected cybersecurity, privacy, or security incidents immediately.



Artificial intelligence and other emerging technologies must be used responsibly, ethically, in accordance with organizational policy, and only in ways that support patient care, privacy, security, and quality.



PROTECTING OUR ORGANIZATION

Conflicts of Interest

We avoid situations where personal interests could influence, or appear to influence, our professional judgment. Decisions are based on what is best for our patients, for McLeod Health, and for the communities we serve – not on personal interests or financial gain.

Examples of situations that may create an actual, potential, or perceived conflict of interest include:

1. accepting gifts, meals, travel, or entertainment from vendors;
2. providing outside consulting or other services to an organization that does business with or competes with McLeod;
3. having a family member employed by or financially connected to a vendor or business partner;
4. holding a financial interest in an organization that does business with McLeod; or
5. participating in a business decision involving someone with whom you have a personal or financial relationship.

These situations are not necessarily prohibited, but they must be disclosed so they can be appropriately reviewed and managed.

Workforce members are expected to help prevent conflicts of interest by:

- Promptly disclosing actual, potential, or perceived conflicts of interest as required by organizational policy.
- Avoiding the use of your position for personal, financial, or family benefit.
- Making business decisions fairly and transparently.
- Avoiding outside employment, financial interests, or personal relationships that could impair – or appear to impair – your objectivity.
- Asking for guidance when a personal, financial, or outside relationship could affect your professional judgment.

PROTECTING OUR ORGANIZATION



Communications and Marketing

McLeod's marketing and public communications are honest, accurate, and respectful. Patients, families, and the communities we serve must be able to trust the information we share.

We communicate honestly and responsibly by:

- Sharing information that is truthful and not misleading.
- Using accurate, objective, and appropriately supported information when describing our services, outcomes, quality, or capabilities.
- Protecting patient privacy in all marketing and public communications.
- Using patient stories, images, or testimonials only with proper permission.
- Using social media responsibly and avoiding statements that could be mistaken as representing McLeod unless authorized.
- Representing McLeod professionally and communicating in a manner that reflects our mission, values, and commitment to patient care.
- Speaking on behalf of McLeod only when authorized to do so.



Leaders have an additional responsibility to model these expectations, communicate them clearly, and promptly address concerns brought forward by members of the team.

FINANCIAL AND BUSINESS STANDARDS

McLeod is committed to managing its financial and business practices with integrity, accuracy, and accountability. Every workforce member plays an important role in protecting organizational resources, maintaining accurate records, and supporting responsible business decisions. These standards support responsible stewardship of organizational resources, protect patient trust, and help ensure compliance with legal and regulatory requirements.

Accurate Records

Accurate records help McLeod provide safe care, make informed decisions, and meet legal and regulatory responsibilities. Records must be complete, timely, truthful, and properly maintained.

You help maintain accurate records by:

- Documenting patient care, business activity, and financial information honestly, completely, and timely.
- Correcting records in accordance with organizational policy.
- Never altering, concealing, destroying, or falsifying records.
- Following McLeod policies for storing, retaining, and disposing of records.
- Protecting records from loss, misuse, or unauthorized access.
- Promptly reporting concerns about inaccurate or incomplete records.

Billing and Coding

McLeod is committed to fair, accurate, and ethical billing. Claims, charges, and payments must reflect the care and services provided and documented. Every workforce member who documents, codes, bills, or supports reimbursement activities shares a responsibility for ensuring the accuracy and integrity of the billing process.

You can support accurate billing and coding in your role by:

- Never knowingly submitting or causing the submission of false, inaccurate, or misleading claims.
- Billing only for services that are medically necessary, properly documented, and actually provided.
- Using accurate codes and ensuring the documentation supports these codes.
- Promptly correcting billing or coding errors when they are identified.
- Cooperating with billing, coding, documentation, and compliance reviews.
- Following Medicare, Medicaid, private insurance, and other payer requirements.
- Asking questions when billing or coding requirements are unclear.

FINANCIAL AND BUSINESS STANDARDS

Financial Integrity

McLeod is committed to maintaining accurate, complete, and transparent financial records.

Workforce members are expected to:

- Follow established financial controls, approval processes, accounting requirements, and organizational policies when handling financial transactions or organizational resources.
- Use organizational funds and resources responsibly and only for legitimate business purposes.
- Ensure expense reports, purchasing records, invoices, and other financial documents are accurate, complete, and supported by the appropriate documentation.
- Never approve or authorize a financial transaction unless you have the authority to do so.
- Cooperate with internal and external financial audits and reviews by providing complete, accurate, and timely information.
- Promptly report suspected financial irregularities or misuse of organizational funds or assets.

Business Relationships

McLeod works with vendors, contractors, suppliers, and business partners in a fair, ethical, and transparent way. These relationships support quality care, responsible business practices, and the trust placed in us by patients and communities.

Vendors and other business partners are selected based on objective factors, such as quality, cost, service, experience, and the needs of the organization. Business decisions must never be influenced by personal gain, gifts, favors, incentives, or outside relationships. Objective criteria are used when making purchasing, contracting, and other business decisions. McLeod expects vendors and other business partners to comply with applicable laws, contractual obligations, organizational policies, and compliance standards.

Workforce members are expected to report concerns about vendor misconduct, unethical business practices, or suspected violations of organizational policy.

FINANCIAL AND BUSINESS STANDARDS

Protection of Organizational Assets

You must use McLeod's property and resources responsibly and for legitimate business purposes. This includes equipment, supplies, technology, funds, facilities, vehicles, information systems, confidential information, and other organizational resources. It is your responsibility to protect these valuables from theft, loss, waste, damage, or misuse. You may not use organizational assets for personal benefit or unauthorized purposes, and you must promptly report damaged, lost, stolen, or misused organizational property.

As a healthcare system, we are entrusted with using our limited resources appropriately. It's important to remember that every dollar spent – whether for labor, for supplies, or to replace damaged equipment – is money intended to support our mission. We must spend it wisely!



Leaders have an additional responsibility to model these expectations, communicate them clearly, and promptly address concerns brought forward by members of the team.

EDUCATION, LEADERSHIP & ACCOUNTABILITY

All workforce members are required to complete Code of Conduct education during onboarding and annually thereafter. Leaders are expected to model the Code, support workforce members who ask questions, seek guidance, or raise concerns, and help maintain a culture of respect, safety, and accountability.

Continuous Improvement

McLeod is committed to ongoing evaluation and enhancement of its ethical and compliance framework. This Code will be reviewed periodically and updated as needed to reflect regulatory changes, emerging risks, and organizational priorities.

We Want Your Input

This Code is a guide, but it cannot account for every possible situation. Therefore, you are encouraged to ask questions, raise concerns, and share feedback. No one will be retaliated against for asking questions or raising concerns in good-faith.

Speaking up helps McLeod improve, protects our patients, and maintains our culture of integrity.

By completing the required education and acknowledging this Code, workforce members affirm their commitment to uphold these standards and seek guidance whenever questions arise.