



BaylorScott&White  
HEALTH

*Code of Conduct*

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OUR COMMITMENT TO INTEGRITY

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## Letter from the Chief Executive Officer



Baylor Scott & White Team Members,

As we care for those who put their trust in us, it is our people who set us apart. We are all united by our Mission, Vision and the personal Commitments we make to those we serve. Together, these components contribute to a culture focused on delivering high-quality care when, where and how customers want it.

The Code of Conduct reflects our commitment to the highest ethical standards and integrity in everything we do. Anyone who acts on behalf of Baylor Scott & White is expected to understand and abide by it. Importantly, the Code of Conduct is an example of how we put our Values into practice:

**We serve faithfully** by doing what's right with a joyful heart.

**We never settle** by constantly striving for better.

**We are in it together** by supporting one another and those we serve in all we do.

**We make an impact** by courageously taking initiative and delivering exceptional experiences.

The Code of Conduct is an example of how we put our Values into practice.

Our Mission reminds us of our faith-based roots and the imperative of promoting the well-being of all individuals, families and communities. With each day, you are adding to the next chapter of Baylor Scott & White's legacy of service to our communities.

With appreciation for all you do,

A handwritten signature in black ink that reads "Pete".

**Peter J. McCanna**  
Chief Executive Officer  
Baylor Scott & White Health

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# Letter from the Interim Chief Corporate Ethics & Compliance Officer



Fellow Team Members,

Baylor Scott & White Health is committed to serving our patients and members in ways that enable us to deliver experiences that go beyond the traditional expectations of healthcare. In alignment with our Value, *We serve faithfully*, we must operate in full compliance with both state and federal requirements that govern our highly regulated industry.

Our commitment to our communities is unwavering. Regardless of your role, integrity matters. You must always act ethically and consistent with regulatory requirements. There may be instances, however, when you encounter situations where the appropriate next step or steps may not be clear. That's when the Code of Conduct ("Code") and the Office of Corporate Ethics & Compliance should be trusted resources for you.



While the Code won't address every situation you face, it can serve as a helpful tool for guiding your decisions and interactions with others. Understanding and complying with the Code is an essential attribute of being a Baylor Scott & White team member.

In the event you need help, we have a dedicated team standing by ready to support you. The Office of Compliance Corporate is available to help you with regulatory and compliance concerns. You can reach us by phone at 214-820-8888 or by email at [Compliance@BSWHealth.org](mailto:Compliance@BSWHealth.org). Alternatively, you can also call the Compliance HelpLine at 1-866-245-0815 to report anonymously, 24 hours a day.

Thank you for everything you do to support and strengthen our culture of ethics and compliance at Baylor Scott & White.

A handwritten signature in black ink that reads "Margaret".

**Margaret von Sehrwald**  
Chief Corporate Ethics & Compliance Officer  
Baylor Scott & White Health

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# Introduction



Every day, the decisions and actions made by each individual working for or on behalf of Baylor Scott & White Health and its controlled affiliates (“BSWH”) create and sustain BSWH’s image and reputation. Our actions, both individually and collectively, are watched closely by consumers, regulators and the public at large. Each person’s behavior on the job reflects his or her commitment to ethical, respectful and honorable behavior; to being honest and truthful in performing our work; to treating others with fairness, dignity and respect; and to doing the right thing.

The BSWH Code of Conduct (“Code of Conduct”) outlines the principles by which we carry out our daily work activities at BSWH. The principles set forth in the Code of Conduct apply to all BSWH trustees, officers, employees, medical staff physicians and advanced practice professionals<sup>1</sup> and will be applied consistently at all levels of our organization. In addition, the Code of Conduct applies to vendors, contractors and anyone who works on behalf of BSWH or conducts business with BSWH.

Baylor Scott & White Health has a comprehensive, values-based Compliance Program, which exists to help all BSWH trustees, officers, employees, physicians and advanced practice professionals follow the applicable policies, procedures, laws and regulations. The BSWH Office of Corporate Ethics & Compliance is committed to being a trusted partner in fostering integrity, transparency, accountability and a culture of compliance that honors the reputation, Mission, Vision and Values of Baylor Scott & White Health. The Code of Conduct is the foundation of the Compliance Program because it sets the tone for our personal and business behavior. Because the Code of Conduct rests on our Mission and Values, it is an integral part of our daily activities and supports our more than 110 years of caring for our patients, our communities and each other. Continuing to uphold the Code of Conduct will preserve the integrity of Baylor Scott & White Health and the trust and confidence the public has placed in each of us.

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<sup>1</sup> **Advanced Practice Professional** is defined as a licensed, certified non-physician healthcare provider who actively renders direct patient care and possesses delegated prescriptive authority, is credentialed and privileged and whose service is billed as an independent billing provider, as recognized by Medicare and Medicaid, within BSWH (i.e., Advanced Practice Registered Nurse, Physician Assistant).

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# Mission, Vision and Values



## MISSION

Founded as a Christian ministry of healing, Baylor Scott & White Health promotes the well-being of all individuals, families and communities.

## VISION

Empowering you to live well.

## VALUES

- We serve faithfully
  - by doing what's right with a joyful heart.
- We never settle
  - by constantly striving for better.
- We are in it together
  - by supporting one another and those we serve in all we do.
- We make an impact
  - by courageously taking initiative and delivering exceptional experiences.

**STANDARD OF CONDUCT:** Baylor Scott & White Health has a commitment to deliver high-quality, safe care. The BSWH Safety and Quality Plan supports this and provides a roadmap to achieve excellence for our patients and members.

The guiding principles for this work are:

- Achieve zero preventable harm
  - Build a culture of safety
  - Excel at patient experience
  - Listen to the patient's perspective
  - Prioritize based on data
  - Target select national rankings
  - Develop standard performance/process improvement method
  - Leverage the electronic health record across the continuum
  - Promote appropriate transparency
  - Disrupt through digital technology
  - Maintain focus on outcomes and effective System standards
  - Enhance the resiliency of team members
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- ▶ We will commit to providing high-quality care and are encouraged to take an active role in continuous quality improvement with the ultimate goal of relieving suffering, restoring health and promoting wellness for our patients and health plan members.
  - ▶ We will communicate effectively and maintain positive relationships with patients, members, families and customers, by explaining our role in their care and by responding to each patient's clinical needs and requests in an open, honest and respectful manner.
  - ▶ We will consider the safety and security of patients, members and staff in all of our activities and address any outcome of care, including any unanticipated outcomes, by taking appropriate action and following the problem to resolution.
  - ▶ We will require that admissions, transfers and discharges are medically appropriate and performed in accordance with all legal requirements. In the event of a medical emergency, we will not consider a patient's ability to pay or current hospital fiscal conditions in discussions and decisions concerning admissions, transfers or discharges.
  - ▶ We will provide patients with care only within the scope of clinical privileges granted to us by the appropriate BSWH facility.

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# Patient and Member Rights



**STANDARD OF CONDUCT:** We believe that all patients and members have the right to privacy, safety, security and confidentiality.

- ▶ We will respect the rights and dignity of each patient and member.
- ▶ We will respond to patient and member questions, concerns and needs in a timely and sensitive manner.
- ▶ We will provide care, treatment and services that safeguard the patient's personal dignity and demonstrate respect for the cultural, psychosocial, spiritual and personal values and beliefs of each patient or member.
- ▶ We will include patients in clinical and ethical decisions about their care, treatment and services.
- ▶ We will honor the patient's visitation preferences and inform the patient if family or guest visitation must be restricted.
- ▶ We will create a patient care environment that is free from unlawful discrimination and harassment for any reason including race, ethnicity, color, national origin, religion, sex, disability, veteran status, age, genetic information, sexual orientation, gender identity or any other protected characteristic under applicable law.
- ▶ We will protect the patient from real or perceived mental, physical, sexual or verbal abuse and from neglect or exploitation from anyone, including physicians, advanced practice professionals, staff, other patients, visitors or family members. We will immediately report any alleged abuse, neglect or exploitation to a supervisor.
- ▶ We will provide reasonable privacy to patients for interviews, examinations and procedures.
- ▶ We will accommodate, within reason and to the extent possible, a patient's request for a person of the same sex to perform an examination or procedure or provide a chaperone who is an authorized health professional.
- ▶ We will protect patients and respect their rights during research investigations and clinical trials involving human subjects.
- ▶ We will accept patient referrals and admissions based on the patient's clinical needs and our ability to render the needed services.



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# Confidentiality



**STANDARD OF CONDUCT:** Baylor Scott & White Health is committed to protecting the privacy, security and confidentiality of all medical, financial and business information that is generated during the normal course of healthcare business. Baylor Scott & White Health is committed to honoring each patient's and member's right for Protected Health Information (PHI)<sup>2</sup> to be kept confidential.

- ▶ We will maintain patient and member confidentiality as required by laws, regulations and BSWH policy or Medical Staff Bylaws/Rules.
- ▶ We will not share confidential information,<sup>3</sup> whether medical, financial or business information, either during or after employment or association with BSWH, except with permission from BSWH and as authorized and required by laws, regulations and BSWH policy or Medical Staff Bylaws/Rules.
- ▶ We will not, for personal gain or curiosity, even for personal family situations, use confidential information obtained by virtue of our position with BSWH.
- ▶ We will treat as confidential all quality assurance, peer review and healthcare services review information in accordance with laws, regulations and BSWH policy or Medical Staff Bylaws/Rules.
- ▶ We will limit conversations regarding patients and members to clinical settings or appropriate business-related areas (e.g., nursing units, conference rooms) and use caution when discussing information over the telephone.
- ▶ Other than for treatment, we will only make the minimum necessary amount of PHI accessible when legitimate needs exist.
- ▶ We will honor and respect the privacy of patients and members and not reveal or discuss patient-related information except with healthcare personnel involved in their care or with payors and others authorized to review patient or member information in the course of treatment, payment, healthcare operations or other authorized activities.
- ▶ We will protect the individual's right to privacy and confidentiality regardless of the individual's identity.
- ▶ We will report violations or possible violations of patient and member privacy or security to our supervisor, any of the BSWH Health Information Management departments, the Office of Corporate Ethics & Compliance or to the Compliance HelpLine for investigation and appropriate follow-up actions.

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<sup>2</sup> **Protected Health Information (PHI)** — Information, including demographic data and genetic information, whether oral or recorded in any form, that relates to the past, present or future physical or mental health or condition of an individual, or the provision of healthcare to an individual, or the past, present or future payment for the provision of healthcare to an individual, and that identifies the individual, or for which there is a reasonable basis to believe can be used to identify the individual. Individually identifiable information includes many common identifiers (e.g., name, address, birth date, Social Security number).

<sup>3</sup> Employees' terms and conditions of employment, such as wages, hours and benefits, are not considered confidential information unless so designated in a signed executive agreement.

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# Employee Relations and Professional Behavior



**STANDARD OF CONDUCT:** Baylor Scott & White Health's mission is accomplished through its people, a team of individuals with many diverse skills and competencies. Every member of the team is important. It is the responsibility of all those affiliated with Baylor Scott & White Health to maintain the mutual respect, understanding, trust and cooperation necessary for effective teamwork.

- ▶ We will treat everyone with fairness, dignity and respect.
- ▶ We will require that all employment actions be made without regard to race, ethnicity, color, national origin, religion, sex, disability, veteran status, age, genetic information, sexual orientation, gender identity or any other protected characteristic under applicable law.
- ▶ We will strive to provide an environment for all individuals that is free from workplace violence or any form of verbal, physical, or sexual harassment or intimidation.
- ▶ We will recognize that an environment free from disruptive or intimidating behavior fosters higher cooperation and an overall safer workplace. Employees and physicians will engage in behavior that is respectful of each other. Professionalism from each member of the healthcare team will be on display at all times.
- ▶ We will not condone disruptive conduct (behavior which violates accepted rules of civil behavior and professional etiquette or violates legal standards of conduct), intimidating behavior (overt actions such as verbal outbursts and physical threats) or passive activities such as refusing to perform assigned tasks or exhibiting uncooperative attitudes during routine activities.
- ▶ We will honor mutual respect across all professional relationships and in each type of work environment and maintain the fairness, dignity, trust and cooperation necessary for effective teamwork.
- ▶ We will prohibit unauthorized sales for any type of product or service to anyone on BSWH premises unless specifically authorized by BSWH.
- ▶ We will not make any official comment on behalf of BSWH and/or its personnel, clinical staff or facilities, whether on television, radio, newspapers, magazines, the internet or in any other public forum, unless directed by Baylor Scott & White Health Media Relations.
- ▶ We will provide opportunities for professional and career growth for our staff to enhance professional satisfaction and pride of work.
- ▶ We will report to a supervisor or the Office of Corporate Ethics & Compliance any practice or condition that may violate any rules, regulations or safety standards.
- ▶ We will support a Fair and Consistent Culture to be accountable for our own actions and behaviors, to enhance our commitment to patient safety and to encourage us to speak up when there is a patient safety concern.

**STANDARD OF CONDUCT:** Baylor Scott & White Health is committed to providing a safe and secure environment for patients, members, visitors, employees, physicians, advanced practice professionals and other service providers.

- ▶ We will comply with and abide by all applicable environmental, health and safety laws, regulations and BSWH policies.
- ▶ We will perform our work in a manner so that no reasonably avoidable harm is caused to self, patients, members or other staff.
- ▶ We will immediately advise our supervisor if, as a result of work, we are injured or contract an occupational illness.
- ▶ We will promptly report to a supervisor any accidents or “near misses” involving injury to any patient, visitor, employee or any other service provider.
- ▶ We will alert the appropriate departments and personnel if unsafe conditions or practices are observed in the work environment.
- ▶ We will strive to provide an environment that is free from violence. Any weapons not allowed by law are strictly prohibited.
- ▶ We will comply with applicable laws and regulations and dispose of medical waste and hazardous material appropriately.
- ▶ We will promptly report all spills or accidents involving medical waste or hazardous materials to a supervisor and take immediate action to help prevent harm.
- ▶ We will inspect work areas for health and safety risks, enforce all safety rules and regulations, eliminate or report risks to management and maintain knowledge of health and safety procedures.
- ▶ We will train employees in health and safety policies and precautions.
- ▶ We will follow BSWH policy or applicable Medical Staff Bylaws/Rules regarding illegal drugs, alcohol or the inappropriate use of prescription drugs that could lead to impairment in the workplace.
- ▶ We will safely store, transport and secure all drugs and pharmaceuticals and will promptly report any missing or diverted drug(s).

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## Protection and Use of Information, Properties and Assets



**STANDARD OF CONDUCT:** Baylor Scott & White Health is committed to protecting its resources, including cash, equipment, supplies, information and other property against loss, theft, destruction and misuse. These resources are of great value to Baylor Scott & White Health and enable Baylor Scott & White Health to fulfill its mission of serving the healthcare needs of the community.

- ▶ We will correctly use and care for all BSWH property and equipment entrusted to us.
- ▶ We will require that any use of BSWH resources and information will not be used either directly or indirectly for personal gain.
- ▶ We will comply with software licensing agreements, which govern the use of the software.
- ▶ We will not permit making unauthorized copies of BSWH computer software or using personal software on BSWH computer equipment.
- ▶ We understand that BSWH electronic communications systems, including computers, email, internet, intranet, software, telecommunication, wireless devices, voicemail and other automated information systems, are the property of BSWH and should be used primarily for BSWH business-related purposes.
- ▶ We understand that the use of technology to send offensive, discriminatory or harassing messages is prohibited.
- ▶ We will maintain inventory and keep all supplies secure.
- ▶ We will dispose of all surplus or obsolete property and equipment according to established BSWH policies and procedures.
- ▶ We will not share our user IDs or passwords or allow anyone to perform any activities using our access or credentials.
- ▶ We will obtain approval of leadership prior to any public disclosure of proprietary or confidential data/information (e.g., use in presentations, documents, discussions, articles).

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# Conflicts of Interest



**STANDARD OF CONDUCT:** Baylor Scott & White Health is committed to dealing honestly, fairly and with integrity in all matters. A conflict of interest may occur if outside activities or personal interests influence or appear to influence an individual's ability to make objective decisions in the course of job responsibilities.

- ▶ We will avoid actual or perceived conflicts of interest between our own interests and our BSWH duties.
- ▶ We will not use our position or knowledge gained in our position in any way that we, any member of our family/significant other or business in which we have an interest, could receive personal benefit.
- ▶ We or a member of our family/significant other will not receive any substantial preferences from a person/organization that, to the best of our knowledge, does or wants to do business with BSWH or is a competitor of BSWH.
- ▶ We will not offer, accept or provide personal gifts or favors, such as tips, gift cards, meals, transportation, services, discounts, privileges or entertainment that create an actual or perceived conflict of interest.
- ▶ We will not accept any gifts, benefits, entertainment, or other favors from Industry. Industry is defined as pharmaceutical, biotechnology, medical device, equipment supply or healthcare service providers and their employees, representatives and other agents, acting both on and off-premises of a BSWH entity.
- ▶ We will maintain unbiased relationships with actual and potential BSWH vendors and contractors.
- ▶ We will exercise good faith and fair dealing in all transactions that involve our responsibilities to BSWH. We will not use any BSWH assets or resources for personal gain.
- ▶ We will report actual or perceived conflicts of interest to our supervisor and/or the Office of Corporate Ethics & Compliance.
- ▶ We will never accept gifts of money or cash equivalents, including gift cards, from patients, members or their families.
- ▶ We will not engage in any outside employment, consultation or other activities, which might compromise BSWH's strategic position or affect our objectivity, independence of judgment or conduct in carrying out duties and responsibilities to BSWH.
- ▶ We may accept financial or other support from vendor organizations for educational activities consistent with BSWH policy. All other vendor support (e.g., donations, gifts) will be directed to the appropriate BSWH Foundations.
- ▶ We will not provide or accept inducements, kickbacks, bribes, rebates or anything else of value to any party (e.g., physicians) with the intent to influence the referrals of patients or members.
- ▶ We will not provide or accept inducements for patients to access services payable by a government healthcare program (e.g., Medicare, Medicaid).

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# Compliance with Laws and Regulations



**STANDARD OF CONDUCT:** Baylor Scott & White Health is committed to high standards of business and professional ethics and integrity.

- ▶ We will conduct our activities in compliance with applicable laws, regulations, BSWH policy and Medical Staff Bylaws/Rules.
- ▶ We will promptly report a possible violation of law, regulation, BSWH policy or Medical Staff Bylaws/Rules to management, the Entity Compliance Liaison, Chief Compliance Officer or the Compliance HelpLine.
- ▶ We will not retaliate or take other negative action against an individual who in good faith reports a suspected violation or acts as a whistleblower pursuant to the Federal False Claims Act or other applicable law.
- ▶ We will require that all compensation arrangements or other agreements with individuals or organizations that may be possible referral sources (e.g., physicians, advanced practice professionals) will be in writing and approved through the BSWH review and approval process.
- ▶ We will require that marketing, advertising and sales communications be true, fair and accurate, and present statements about our services that can be substantiated and that comply with applicable laws and regulations.
- ▶ We will not knowingly employ or establish a business relationship with any individual or entity identified to be under sanction, exclusion, debarment, or disqualification from participating in any federal and/or state healthcare related program.
- ▶ We will comply with the Emergency Medical Treatment and Active Labor Act (EMTALA) and state transfer laws and provide medical screening examination to individuals who come to the hospital emergency department requesting examination or treatment for medical conditions.
- ▶ We will not use or provide BSWH assets to support a candidate for public office.
- ▶ We will maintain and dispose of all information, whether medical, financial or business, accurately and in accordance with all applicable laws, regulations and BSWH policy.
- ▶ We will report provider, patient, member and proprietary information accurately, honestly, completely and properly.
- ▶ We will prohibit the premature destruction or alteration of any document in response to, or in anticipation of, a request for those documents by any government agency or court.
- ▶ We will review and approve contracts through the Legal Department and require that execution of the contracts, agreements, engagements or other documents that legally bind BSWH is performed by an individual with such authority.
- ▶ We will only pursue business opportunities that are ethical, honest, lawful and forthright.

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# Compliance with Billing and Coding Laws and Regulations



**STANDARD OF CONDUCT:** Baylor Scott & White Health is committed to fair and accurate billing that is in accordance with all applicable laws, regulations and BSWH policy.

- ▶ We will charge for healthcare services provided and bill only for services actually provided and documented in the patient's medical records.
- ▶ We will require payment of insurance copayments or deductibles.
- ▶ We will not provide discounts on any healthcare charges other than those provided by BSWH policy.
- ▶ We will not knowingly submit for payment or reimbursement a claim we know to be false, fraudulent, inaccurate, incomplete or fictitious.
- ▶ We will require that the services for which claims are submitted be documented for medical necessity.
- ▶ We will regularly review our records for credit balances or other overpayments and, as appropriate, promptly refund any amounts not due to BSWH.
- ▶ We will accurately record write-offs, deductibles, discounts, courtesy allowances, bad debt and charity allowances within applicable laws, regulations and policies.
- ▶ We are committed to updating the chargemaster and billing systems in a timely manner to maintain accuracy.
- ▶ We will respond to questions and complaints related to a patient's or member's bill in a direct and honest manner.
- ▶ We will exercise due care, including implementing controls to prevent, detect and correct actions that do not comply with applicable federal and state laws and BSWH policy, in reviewing and submitting claims to government and to private insurance payors that reflect truth and accuracy and conform to all applicable laws and regulations.
- ▶ We will report any suspected charging or billing irregularity to the appropriate supervisor or the Office of Corporate Ethics & Compliance.

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## Efforts to Eliminate Fraud, Waste and Abuse



Baylor Scott & White Health is committed to complying with the Federal False Claims Act (FFCA), the Federal Administrative Remedies for False Claims and Statements (FARFCS), the Texas Medicaid Fraud Prevention Act (TMFPA), the Patient Protection and Affordable Care Act (PPACA) and any other applicable False Claims laws. It is the responsibility of every BSWH employee, physician, advanced practice professional, contractor or agent to comply with such laws and prevent fraud, waste and abuse as part of our Compliance Program.

- ▶ We will follow the FFCA which prohibits “knowingly” making false claims for payment to the federal government. “Knowingly” is a broad term meaning:
  - Actually knowing that a claim is false;
  - Deliberately ignoring whether the claim is true or false; or
  - Recklessly disregarding whether the claim is true or false.
  
- ▶ We will maintain the highest ethical standards when taking action that implicates applicable False Claims laws. BSWH employees may be held individually accountable, criminally and/or civilly, under applicable False Claims laws for noncompliance with such laws.
  
- ▶ We will comply with applicable policies related to the development or submission of claims for reimbursement or the provision of patient care for which claims for reimbursement are filed with various public or private payors.
  
- ▶ We will promptly correct honest mistakes and errors when discovered.
  
- ▶ We will report any noncompliance or any violation of applicable False Claims laws when discovered and will not subject those who report any such concern or violation in good faith to retaliation or retribution.
  
- ▶ We can also report a discovery of noncompliance with the FFCA directly to the federal government consistent with the FFCA’s Qui Tam provisions. Baylor Scott & White Health will not retaliate against any BSWH employees, physicians or advanced practice professionals who either engage in lawful acts in furtherance of an action under the FFCA or other efforts to stop one or more violations of the FFCA.



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# Compliance Concerns and Reporting Capabilities



All BSWH employees, physicians, advanced practice professionals, contractors and vendors must be familiar with the Baylor Scott & White Health Code of Conduct and be sensitive to any situation that could lead to actions that might conflict with the Code of Conduct. We all have a duty and responsibility for reporting perceived, actual or potential violations of laws, regulations, BSWH policy or the Code of Conduct.

You are encouraged to use the following steps to resolve any questions or concerns you may have:

- ▶ There may be times when you are unsure whether an activity or a situation is unethical or illegal. If you are not sure, discuss the issue with your supervisor first. Give your supervisor a chance to solve the problem. Your supervisor is likely most familiar with the laws, regulations and policies that relate to your work.
- ▶ If your supervisor is unable to find the answer, or if you are uncomfortable discussing the issue with your supervisor, you should:
  - Contact your supervisor's manager, another trusted leader in the organization, Human Resources or your [Entity Compliance Liaison](#); or
  - Contact the Baylor Scott & White Health Office of Corporate Ethics & Compliance at 214-820-8888 or [Compliance@BSWHealth.org](mailto:Compliance@BSWHealth.org); or
  - Contact the Compliance HelpLine toll free at 1-866-245-0815 or online at [ComplianceHelpLine.BSWHealth.com](http://ComplianceHelpLine.BSWHealth.com).

Please note that issues relating to inappropriate behavior of coworkers, employee relations or employment disputes and grievances should be directed to your local Human Resources (HR) representative. If such issues are received by the Office of Corporate Ethics & Compliance, they will likely be transferred to HR for review.

We have hired an outside company to take Compliance HelpLine calls and online reports. The operators of the Compliance HelpLine are trained to assist you in reporting questions and concerns. Calls and reports to the Compliance HelpLine will not be traced or recorded.

You may remain anonymous when using the Compliance HelpLine unless you choose to identify yourself, although being able to contact you may help in resolving your concern. If you do give your name, your identity will be protected to the extent allowed by law and to the extent that it does not hinder the investigation.

Calls and reports made to the Compliance HelpLine will be reviewed by the Baylor Scott & White Health Office of Corporate Ethics & Compliance and will be responded to fairly. All claims will be carefully investigated before any action is taken.

We will respect and protect the rights of anyone who is the subject of a Compliance HelpLine call or report.

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## Non-Retaliation/Non-Retribution Policy



Baylor Scott & White Health recognizes that a critical aspect of the Compliance Program is the establishment of a culture that promotes prevention, detection and resolution of instances of conduct that do not comply with the Code of Conduct and all applicable federal, state and local laws and regulations and BSWH policies. A non-retaliation/non-retribution policy has been established to protect employees and others who report problems and concerns.

No disciplinary action or retaliation will be taken against you when you report in good faith a perceived issue, problem, concern or violation to management, your Entity Compliance Liaison, Human Resources, the Office of Corporate Ethics & Compliance or the Compliance HelpLine, or act as a whistleblower pursuant to the Federal False Claims Act or other law. This "in good faith" requirement means that you actually believe or perceive the information being reported to be true.

The Federal False Claims Act provides protection for whistleblowers that are discharged, demoted, suspended, or in any other manner discriminated against in the terms and conditions of employment by their employer in retaliation for filing a False Claims Act action.

We value and respect each individual, and therefore you have the right to be treated fairly and with respect. The organization must make sure that you are treated that way. However, reporting does not protect you from civil, criminal or disciplinary action regarding your own performance or conduct.

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# Corrective/Disciplinary Action for Violation of Baylor Scott & White Health Code of Conduct



Any employee, physician or advanced practice professional who violates any law, regulation or BSWH policy, Medical Staff Bylaws/Rules or the Code of Conduct which could impair the organization's status as a reliable, honest and trustworthy healthcare provider is subject to corrective or disciplinary action under Human Resources Policies or Medical Staff Bylaws/Rules and Regulations and the Baylor Scott & White Health Corporate Compliance Program. This can include verbal or written corrective/disciplinary action, up to and including involuntary separation from employment or affiliation with BSWH, if warranted.

You should be aware that certain actions prohibited by BSWH policy also might violate laws resulting in personal criminal or civil prosecution.