

PURPOSE

This Code of Conduct is intended to assist us in carrying out our day-to-day activities within appropriate moral, ethical, and legal standards. The Code of Conduct is a critical component of our overall Compliance Program. We have developed the Code of Conduct to ensure that we provide quality patient care and meet our ethical standards.

T.J. Regional Health intends to maintain a patient care and business environment that is compliant with legal and regulatory requirements and that operates according to the highest professional and ethical standards. We require members of the hospital's workforce, defined below, to hold this same high standard as they care for patients and conduct their work activities at or for the hospital. This Code of Conduct sets out standards that have been adopted by the hospital board of directors and officers or that are established by laws and regulations that apply to the hospital. It has been designed to assure that every workforce member will be aware of what is expected of them when they do their work. Many of the requirements summarized in this Code of Conduct are addressed more fully in the hospitals' policies, or in training and materials made available by the TJRH compliance program. The standards discussed in this Code of Conduct apply to all of the hospitals' workforce members, including the hospitals' leaders, employees, medical staff members, credentialed practitioners, contracted service providers, volunteers and others who work at or for the hospital. Individuals subject to this Code of Conduct are required to:

- Read the Code and sign the attached acknowledgement card;
- Understand any Code requirements that impact their duties and responsibilities at TJRH;
- Conduct themselves in a manner that is consistent with standards and requirements outlined in this Code; and
- Report any issues of suspected non-compliance with the Code of Conduct to their direct supervisor, their medical staff leader or the Compliance Officer so that the issues can be investigated and resolved.

We will thrive and prosper only if our reputation for honesty, integrity, quality service and excellent care is beyond question. We must be honest and truthful in all our dealings and avoid doing anything that is illegal or that might appear improper. Remember that we share in the continuing responsibility to serve our patients and communities and to maintain our good name and reputation in all that we do.

CODE OF CONDUCT

A Guide to Our Corporate Compliance Program

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**Neil Thornbury, Chief Executive Officer
T.J. Regional Health, Inc.**

Dear Colleagues:

T.J. Regional Health is committed to providing our patients and the residents of south central Kentucky with exceptional patient-centered care. Our primary endeavor is to serve our community with healthcare that is compassionate, ethical, and of the highest quality. The high quality of care that we strive to provide is made possible by the employees, physicians, volunteers, vendors, and business associates who are committed to our mission of ensuring the health and wellness of the communities we serve and the healthcare professionals who serve them.

To assist us with upholding our mission and maintaining our ethical standards, the Board of Directors of T.J. Regional Health has adopted a Corporate Compliance Program, which includes this Code of Conduct.

The T.J. Regional Health Code of Conduct is intended to provide guidance while serving as a resource to ensure our work is done in an ethical, legal, and compliant manner. As a commitment to our patients and their families, we will ensure our workplace environment supports transparency and integrity. Each employee, physician, volunteer, vendor, and business associate is responsible for abiding by the standards set forth in this Code of Conduct.

As the CEO, I encourage you to review this Code of Conduct carefully and to partner with us, and all of our team members, in supporting the core values that are critical to the continued provision of Total Local Care.

Sincerely,

A handwritten signature in black ink, appearing to read "Neil Thornbury". The signature is fluid and stylized, with a large, sweeping flourish at the end.

**Neil Thornbury
Chief Executive Officer, T.J. Regional Health, Inc.**

INTRODUCTION

T.J. Regional Health’s ethical heritage is founded in its mission statement and our commitment to embrace all who seek care within the boundaries of our institution. Throughout T.J. Regional Health, our core values are central to everything we do. It is our belief that these values represent excellence in the workplace. We have the opportunity to demonstrate our values in serving our patients and their families, in creating a quality work environment, in investing in the communities we serve and in planning for our future. Because of this, we depend on the consistent and persistent implementation of our values by every person in our system.

Mission

T.J. Regional Health will promote and provide for the health and wellness of the communities we serve and the healthcare professionals who serve them.

Vision

TJ Regional Health will utilize available resources to anticipate and exceed the healthcare needs of the region with a focus on quality and compassion.

Values

- ❖ Service
- ❖ Excellence
- ❖ Resources
- ❖ Value
- ❖ Innovation
- ❖ Compassionate Care
- ❖ Ethics

T.J. PLEDGE

I WILL SHOW COMPASSION:

- ▶ see all patients, family members, visitors, coworkers, physicians, and anyone else at T.J. as my customer
- ▶ recognize that each and every interaction I have at T.J. Regional Health matters
- ▶ show kindness and compassion towards my customers at all times
- ▶ be sensitive to the personal and private needs of every customer

I WILL COOPERATE WITH OTHERS:

- ▶ maintain zero tolerance for abusive behavior
- ▶ listen and be willing to accept fault when I make a mistake
- ▶ never underestimate the power of an apology
- ▶ refrain from blame and judgment
- ▶ bring a sense of calm to stressful situations

I WILL COLLABORATE WITH OTHERS:

- ▶ value myself and every coworker as an equal part of one GREAT team working together
- ▶ treat others in a way that I would like to be treated
- ▶ participate only in conversations that are courteous, respectful, and reflect positively on my teammates and T.J. Regional Health
- ▶ foster a calm and pleasant atmosphere, and refrain from gossip, rumors, and insults
- ▶ speak honestly, seek truth, and act with integrity towards my teammates
- ▶ value the uniqueness and expertise that each team member contributes to the whole
- ▶ meet the need of the moment, regardless of whether or not it is considered part of my job

I WILL COMMUNICATE:

- ▶ smile - at everyone
- ▶ always introduce myself, my role, and my purpose
- ▶ use body language, eye contact, and tone of voice that shows respect in every interaction
- ▶ follow the 10/5 rule: always acknowledging people at 10 feet away with a smile and always greeting people at 5 feet away
- ▶ escort any customer in need (visitors, patients) to their destination

I WILL ADAPT TO CHANGE:

- ▶ be a part of the solution when I am presented with a challenge
- ▶ embrace change and set the example for those around me
- ▶ accept openly when there are changes that T.J. Regional and/or I have no control over
- ▶ manage the expectations of others by explaining duration and next steps as often as needed

I WILL BE A CHAMPION:

- ▶ serve with passion
- ▶ view myself as an owner of T.J. Regional Health and act accordingly
- ▶ take responsibility for the physical appearance of T.J. Regional Health, including my work area
- ▶ go out of my way to daily thank and compliment my customers and coworkers
- ▶ dare to make a difference and be exceptional
- ▶ constantly try to improve myself and T.J. Regional Health
- ▶ speak positively about T.J. Regional, while at work and in public places outside of work

PATIENT RELATIONS

PATIENT CARE

T.J. Regional Health's main concern is for the well-being, comfort, and dignity of our patients. All patients are provided with service and care that is medically necessary and appropriate without regard to race, color, creed, sex, religion, national origin, sexual orientation, marital status, age, veteran status, disability, source of payment, or ability to pay. Patients will always be treated with sensitivity, respect, and professionalism.

PATIENT RIGHTS

Upon admission to T.J. Regional Health, each patient is provided with a written statement of patient rights, which all employees are required to honor. This statement, which is also posted conspicuously in public areas throughout the organization, includes information for the patient and, as appropriate, their family or representative on their rights to make decisions regarding medical care. The information includes their right to have all information necessary, to include proposed plan of care, risks, benefits, and alternatives available to them, to make informed consent on all non-emergency procedures or treatment. This statement also explains the patient's right to establish advanced directives.

EMERGENCY TREATMENT

T.J. Regional Health complies with the Emergency Medical Treatment and Active Labor Act (EMTALA) in providing emergency services without the regard of ability to pay or insurance status, even if the patient is enrolled in a managed care plan that requires prior authorization. Financial information may only be obtained after the immediate needs of the patient are met.

Patients will only be transferred to another facility if the patient's medical needs cannot be met at T.J. Regional Health and appropriate care is knowingly available at another facility. Patients may only be transferred after they have been stabilized and are formally accepted by the alternate facility.

HEALTH INSURANCE PORTABILITY AND ACCOUNTABILITY ACT OF 1996 (HIPAA)

HIPAA is federal legislation designed to limit gaps in insurance coverage and to improve the privacy of personal health information. HIPAA consists of the Privacy Rule and the Security Rule.

Under the HIPAA Privacy Rule, all medical records and any other information that has the potential to identify an individual, in any form, whether electronic, or paper, or oral is

considered protected health information (“PHI”). This includes any information that relates to the past, present, or future physical or mental health or condition of an individual; that care has been provided to an individual; or the past, present or future payment for the provision of health care to an individual.

Under HIPAA, individuals have significant rights to understand and control how their PHI is used, including the following:

- The individual must be provided with the Notice of Privacy Practices which is a written explanation of how T.J. Regional Health may use and disclose their PHI;
- T.J. Regional Health must make reasonable efforts to use or disclose only the minimum necessary amount of PHI in order to care for the individual;
- The individual must be provided the opportunity upon making a request to see and to get copies of their records; to request amendments to their records; and to obtain an accounting of how their information has been used by T.J. Regional Health;
- The individual must authorize the use and disclosure of their PHI for any non-routine disclosures and most non-health care purposes; Individuals have the right to withhold or revoke their authorization at any time and to request restrictions on the uses and disclosures of their information; and
- The individual has the right to file a formal complaint with T.J. Regional Health, or with the Department of Health and Human Services, Office of Civil Rights, when they believe that T.J. Regional Health has violated the HIPAA Privacy Rule or T.J. Regional Health policies and procedures.

The HIPAA Security Rule sets forth protections for PHI that is stored or transmitted electronically. The standards are grouped into four general categories and require T.J. Regional Health to:

- Implement administrative safeguards such as policies, procedures, and staff training materials to educate employees on protecting patient privacy;
- Implement physical safeguards which may include access controls, screen savers, locked filing cabinets, visitor sign-in sheets, etc...; and
- Implement technical security measures such as the use of passwords, automatic log off of computers when not in use, use of encryption, etc....

To ensure we protect our patients’ rights to privacy, the following guidelines apply:

- Access to Protected Health Information is limited to those permitted by law and hospital policy
- Use only legitimate means to collect the information and, whenever practical, obtain it directly from the individual concerned
- Maintaining computer passwords and access codes in a responsible and confidential manner

- Ensure that patient information is not discussed in any public area, including elevators and dining areas
- Ensure that all written (electronic/paper) records are kept secure either by locked cabinets/doors, turned away from the public view, by use of security screens, etc...
- Utilize encryption protocols for laptops and any e-mail that contains PHI

BUSINESS PRACTICES

BILLING FOR SERVICES

We will bill (*insurance companies or individuals*) appropriately based on services received. All claims will be prepared and submitted honestly and accurately in full accordance with the law. All claims processed and submitted reflect reasonable and necessary services ordered by appropriately licensed medical professionals who are participating providers. In addition, all claims shall have adequate supporting documentation in the patient's medical record.

We encourage our patients to be knowledgeable for their healthcare, including financial responsibility for services received. When a question regarding an invoice or charge arises, the account will be reviewed promptly by a trained employee or supervisor to seek a resolution. If inaccuracies are discovered in the bills that have already been sent, the Business Office will take immediate steps to alert the payer, correct the bill, and refund as needed.

We do not waive insurance co-payments or otherwise provide financial benefits to patients in return for admission. Under certain circumstances, T.J. Regional Health may provide for appropriate financial arrangements (such as allowing monthly payments over time or charity care) to patients based purely on their financial need.

ACCURACY OF BUSINESS RECORDS

A substantial portion of our business involves reimbursement under federal and state government programs that require the submission of cost reports. Compliance with the federal and state laws relating to all cost reports is a top priority. These laws and regulations define what costs are allowable and non-allowable, as well as define the appropriate processes to claim reimbursement for the cost of services provided to program beneficiaries. Given the complexity, all issues related to the completion and settlements of these cost reports must be communicated to T.J. Regional Health's Finance Department.

Managers are responsible for establishing appropriate internal controls within their area of purview to safeguard TJRH assets, ensure the accuracy of financial records and reports, and maintain accurate reporting of all transactions. The integrity of TJRH's financial records is

critical to effective hospital operations and is a key factor in maintaining the confidence and trust of our employees and patients and other stakeholders. Employees are expected to observe the hospitals' rules and practices for safeguarding not only the hospitals' assets, but also the property entrusted to us by our patients.

RECORD RETENTION AND DISPOSAL

Medical and business records are retained in accordance with the law and TJRH record retention policy. Documents can be in the form of paper (i.e., letters, memos), electronic information (i.e., e-mail, computer files), and any other medium that contains information about patients and the organization or its business activities. It is important to retain and destroy records appropriately, according to the TJRH policy. You must not tamper with records, nor remove or destroy records prior to the specified date.

FRAUD AND ABUSE REGULATIONS

Federal False Claims Act

The Federal False Claims Act prohibits misconduct, pertaining to submissions of false claims to the government. This Act makes a person or entity civilly or criminally liable if they knowingly present or cause to be presented, a false or fraudulent claim, record or statement for payment and approval; conspire to defraud the government by getting a false or fraudulent claim allowed or paid; use a false record or statement to avoid or decrease an obligation to pay the government.

The following actions are prohibited by T.J. Regional Health:

- Billing for supplies or services not delivered or delivered in less than promised amounts.
- Misrepresenting or overcharging for products or services actually provided.
- Duplicate billing for services actually rendered.
- Falsely certifying that services were medically necessary or failure to perform a service.
- Seeking to increase reimbursement by improper billing procedures such as "upcoding" or "unbundling".
- Accepting of overpayments from the government.

Whistle Blower

To assist the government in their mission to prevent fraud and abuse, they have established guidelines to allow for any person who possesses information regarding falsified billing to file a case in the federal court and sue, on behalf of the government, those entities that engaged in the fraud. These suits are called "qui tam" suits. The person coming forward is called a "whistleblower". Once the suit is filed, the Department of Justice then decides on behalf of the government whether to join the whistleblower in prosecuting these cases. If the case is successful, the whistleblower may share in the recovery amount.

In addition, the False Claims Act provides a remedy for whistleblowers who are discharged, demoted, suspended, or discriminated against by his or her employer in retaliation for filing a case. If the court determines that a whistleblower was terminated or otherwise retaliated against for filing a lawsuit, the employee is entitled to reinstatement at the same level and other compensation requirements.

Anti-Kickback

The federal law is broadly written to prohibit T.J. Regional Health personnel and representatives from knowingly and willfully offering, paying, asking for, or receiving money or other benefit, directly or indirectly from third parties in connection with items or services billed to federal programs.

Payment may include not only kickback payments and bribes, but also rebates, refunds, educational grants and other benefits to customers. Certain legally permitted practices, such as group purchasing agreements and price reductions to health plans, among others, are excluded from this prohibition.

Examples of inappropriate action include:

- Receiving a gift in return for purchasing a product from a vendor
- Rental of space or equipment at below fair market value

Patient Referrals Act (“Stark”)

Our physicians and other health care providers make patient referrals solely based on the patient’s clinical needs and the abilities of the referred provider to render such services. We do not accept nor pay for referrals.

Examples of inappropriate action include:

- Considering the volume of referrals the other facility has made to T.J. Regional Health prior to referring a patient to them
- Offering discounts to a physician in exchange for referrals to our facility

Our policy is to inform patients of their options as to home health, hospice, durable medical equipment, behavioral health, and other ancillary health care services to promote patient freedom of choice in selecting any services that the patient may require. However, physicians are prohibited from referring patient to other health care providers in which they (or family members or owned entities) have certain financial or compensatory interests.

ANTITRUST

Antitrust laws are designed to create a level playing field in the marketplace and to promote fair competition. Our competitors are other hospitals and facilities in markets where we operate.

No one shall, without the written consent of TJRH, disclose any confidential information obtained during the course of employment. This includes, but is not limited to: TJRH's processes, techniques, computer software, equipment, copyrights, research data, clinical and pharmacological data, marketing and sales information, personnel data, patient medical records, patient lists, financial data and any plans that have not been published or disclosed to the general public.

Examples of inappropriate action include:

- Discussing services, rates, or proposals with competitors
- Disclosing terms of supplier relationships
- Conditioning the sale of one product on the requirement that the patient also buy another product or service
- Refusing to interact/deal with suppliers who sell to or benefit from competitors
- Failure to exercise caution in marketing new medical procedures

Also, it is not acceptable to obtain proprietary or confidential information about a competitor through illegal means.

Examples of inappropriate action include:

- Providing confidential information illegally removed from a former employer's facility
- Seeking information that would require someone to violate a confidentiality agreement with a prior employer

CONFLICT OF INTEREST

T.J. Regional Health personnel has a duty to be loyal and good stewards to the organization. It is the responsibility of all board of directors, executive members, employees, physicians, and volunteers to refrain from outside or personal interests that influence your ability to make objective decisions in the course of your workplace responsibilities. In addition, outside demands of any nature should not hinder or distract you from your job performance or cause you to use facility resources (i.e., time, computers, supplies, etc...) for non-work related purposes.

T.J. Regional Health employees and physicians have a responsibility to make full disclosure of interests that might result in or have the appearance of a conflict. Employees and physicians may not use their positions to profit personally or to assist others in profiting in any way at the expense of T.J. Regional Health or by using information not available to the general public.

Examples of inappropriate action include:

- Acting as a director, partner, consultant, or employee of a firm which provides services, supplies, or equipment to T.J. Regional Health. This generally means you should not have a business relationship with suppliers

- Using T.J. Regional Health property for non-work related activities
- Purchase or lease of real estate which may increase in value because it is known the T.J. Regional Health may have an interest in the property

Gifts, Gratuities, and Business Courtesies

Gifts and entertainment represent a sensitive area since these activities may create a potential conflict of interest or be interpreted by others as an attempt to influence a situation.

Employees may not accept any gifts whatsoever from any patient, patient's family, vendor, supplier, patient referral source, or patient discharge facility or service, except for nominal gifts (e.g., basket of fruit, candy, flower, etc...) received through the normal course of acceptable business practice.

Examples of inappropriate action include:

- Taking a tip from a patient
- Accepting a free vacation from a vendor

SOLICITATION

In order to prevent disruption in daily operations, interference with work and inconvenience to other employees, solicitation for any cause (selling of any products, distribution of literature) during working time is not permitted. Neither may an employee who is not on working time, such as an employee who is on lunch or break, solicit to an employee who is on working time for any reason. Whether on working time or not, no employee may distribute solicitation literature in any patient care areas.

Persons not employed by the organization are prohibited from soliciting at any T.J. Regional Health facilities. Any solicitation for charitable purposes must be approved by the CEO.

BUSINESS WITH EXCLUDED INDIVIDUALS

T.J. Regional Health is committed to using good faith, reasonable efforts to not employ, allow to serve on its Board, contract with, or otherwise accept referrals from individuals or entities that are currently excluded, debarred or suspended from, or otherwise ineligible to participate in any Federal Health Care Program. If an individual is listed on the excluded list, T.J. Regional Health will cease all activities involved with this individual. This can include termination of employment, not accepting orders, prescriptions or referrals from such individual or entity, termination of a contractor's agreement.

POLITICAL ACTIVITIES

T.J. Regional Health's political participation is limited by law. Organizational funds or resources (i.e., employee's worked time, telephones, computers) may not be used to contribute to

political campaigns or political organizations. As private citizens, T.J. Regional Health employees may endorse or participate in the political process.

T.J. Regional Health may speak out on matters that impact our business. Periodically, the organization may ask our healthcare employees to correspond with legislative or governmental agencies to promote our interests on behalf of the organization.

If any employee is contacted by legislators, media outlets, or third parties regarding our position on public relation issues, please refer them to our Marketing Department.

LICENSURE

TJRH is licensed by the State of Kentucky and accredited by the Joint Commission on Accreditation of Healthcare Organization. These and other entities that regulate our organization have numerous requirements determining how our organization deliver services. Such laws and regulations include such issues as accreditation, licenses, permits, access and consent for treatment, medical staff membership and delineation of clinical privileges, certificate of need, access to medical records and confidentiality and Medicare and Medicaid. Employees are expected to familiar with the regulations governing their area and to stay knowledgeable of new developments.

TAX STATUS

TJRH is exempt from taxation by the federal, state and local governments. TJRH's sales tax exemption can be used only for legitimate hospital activities. Personal items may not be purchased through TJRH even if TJRH is reimbursed by the employ.

EMPLOYMENT RELATIONS

T.J. Regional Health has created and strives to maintain a work environment in which employees are treated with respect, diversity is valued, and opportunities are provided for development. We are committed to providing a fair and equal opportunity work environment. We believe in equal treatment in hiring, promotion, training, compensation, termination, and disciplinary action.

EMPLOYMENT/SCREENING

TJRH verifies the credentials and qualifications of all individuals applying for employment and hires only qualified individuals with appropriate expertise, licensure and experience. We will not hire or contract with any individual or entity who is excluded, suspended, debarred or otherwise ineligible to participate in the federal health care programs or has been convicted of

a criminal offense related to the provisions of health care items or services and has not been reinstated in the federal health care programs after a period of exclusion, suspension, debarment or ineligibility.

OUTSIDE OR DUAL EMPLOYMENT

Employees' primary employment obligation is to TJRH. Any activities, such as a second job or personal business, must not conflict with obligations to TJRH. Employees with secondary employment that may be perceived as a conflict of interest with their TJRH position must make such a disclosure to their supervisor.

NON-DISCRIMINATORY ENVIRONMENT

T.J. Regional Health is an equal opportunity employer and does not discriminate against employees or potential employees on the basis of race, color, creed, religion, sex, national origin, sexual orientation, veteran status, marital status, age, or disability. We will make reasonable accommodations to the known physical and mental limitations of our employees.

T.J. Regional Health will not tolerate discrimination, verbal or physical harassment, or abuse (whether or not sexually related) by providers, employees, supervisors, vendors, subcontractors, or visitors.

Examples of inappropriate actions include:

- Making derogatory comments or jokes of a sexual nature in the presence of fellow employees
- Failure to promote an otherwise qualified employee based on gender
- Refusal to hire a qualified individual because of physical disability when the person is able to perform assigned duties with reasonable accommodation

EMPLOYEE PRIVACY

TJRH respects the privacy and dignity of all staff. TJRH collects and retains employee personal information that is required for the effective operation of TJRH or that is required by law. TJRH has implemented policies and procedures that protect and limit access to employee personal information and comply with applicable laws that govern employee privacy. Employees are prohibited from accessing or otherwise using employees' records or information unless authorized to do so for legitimate business purposes.

DISRUPTIVE BEHAVIOR

Disruptive behavior is an undesirable method of interaction amongst team members. It interferes with patient care, causes distress among staff, affects morale and harms the work environment. In addition, disruptive behavior can reduce effectiveness and productivity, resulting in substandard or inadequate care. T.J. Regional Health exhibits a zero tolerance

policy with respect to those engaging in any form of disruptive behavior. We have a responsibility to model positive behaviors that reflect our core values and our culture of caring.

Some examples of disruptive behavior are:

- Yelling
- Angry outbursts
- Throwing objects
- Verbal abuse
- Willful disobedience

IMPAIRMENT AND SUBSTANCE ABUSE

T.J. Regional Health is an alcohol and drug-free work environment. Employees are expected to perform their professional responsibilities free from the effects of alcohol, drugs, or other substances which may hinder job performance or judgment. Employees suspected of being under the influence of drugs or alcohol must submit to appropriate drug or alcohol tests. An employee who performs an activity for T.J. Regional Health while impaired or otherwise under the influence of alcohol or illicit drugs shall be immediately suspended, and may be subject to further disciplinary action, including but not limited to termination of employment, if such employee refuses to participate in T.J. Regional Health's assistance program. Additionally, any professional employee or independent contractor discovered to be so impaired shall be subject to the applicable statutory reporting requirements.

SAFEGUARDING SUBSTANCES

A large majority of our employees have access to prescription drugs, controlled substances, and medical supplies, all of which are governed and monitored by specific regulations. Under no circumstances will these be diverted for personal use. These items must be handled and administered properly to minimize the risk for ourselves and our patients.

ENVIRONMENTAL HEALTH AND SAFETY

T.J. Regional Health provides each of its employees with a safe and healthy workplace in which applicable health and safety laws and regulations are observed. Employees are expected to abide by all safety rules and practices and assume responsibility for taking necessary precautions to protect themselves and their co-workers. Employees are also responsible for immediately reporting accidents and unsafe practices or conditions. This information will help us prevent incidents either from happening or from happening again.

USE OF ELECTRONIC MEDIA

All communication systems, electronic mail, Internet access or voice mails are the property of TJRH and are to be primarily used for business purposes. Limited responsible personal use of communications systems is permitted; however, TJRH reserves the right to monitor the use of

its electronic media resources and to take appropriate disciplinary measures in cases of misuse. Patient or confidential information should not be sent through the internet or Intranet until such time that its confidentiality can be ensured. Employees may not use communication systems to send harassing, threatening or obscene messages, send copyrighted documents that are not authorized for reproduction, conduct a job search or open misaddressed mail.

USING THE COMPLIANCE PROGRAM

T.J. Regional Health has established a Corporate Compliance Program, led by the Compliance Officer. The Corporate Compliance Program contains a Code of Conduct which outlines the appropriate behavior for all employees. The program is intended to help employees recognize, understand and fulfill their responsibilities and to prevent and detect violations. Employees are still expected, however, to take the initiative of asking questions and obtaining answers to those questions.

CORPORATE COMPLIANCE PROGRAM STRUCTURE

The Corporate Compliance Program is intended to demonstrate in the clearest possible terms the absolute commitment of TJRH to the highest standard of integrity, ethics and compliance. The Corporate Compliance Officer, appointed by the Chief Executive Officer of TJRH, has responsibility for the implementation of the Corporate Compliance Program. The Corporate Compliance Officer reports to an oversight committee comprised of members of the Board of Directors, and is assisted in coordination with the Legal and Human Resources departments.

DUTY TO KNOW AND UNDERSTAND

It is the duty of all employees and relevant third parties to know and understand the ethical standards, legal standards, and organizational policies applicable in performing their daily tasks. T.J. Regional Health's Corporate Compliance Program is designed to assist all employees to know and understand these ethical and legal standards through training and communication.

DUTY TO COMPLY

It is the duty of all employees to comply with the applicable laws, rules, regulations, and the Code of Conduct. Failure to do so may subject employees to disciplinary action.

DUTY TO REPORT ACTUAL OR SUSPECTED VIOLATIONS

Concerns regarding compliance with the Corporate Compliance Program and possible violations of the Code of Conduct or related policies and procedures are to be promptly reported to your

manager, administrator, the Executive Office, or Compliance Officer. In addition, a special toll free resource line that permits anonymous reports of non-compliance or possible violations has been established. We will make every effort to keep the identity of anyone reporting a suspected violation confidential to the extent permitted by law, unless doing so prevents us from fully and effectively investigating the suspected violation. Employees are expected to fully cooperate in any investigation of business conduct that may violate the Code of Conduct. Making a false report intentionally for personal gain is a violation of the Code of Conduct and will result in appropriate disciplinary action.

NO RETALIATION FOR GOOD FAITH REPORTING

The success of the Corporate Compliance Program depends on prompt, accurate reporting of violations and suspected violations without fear of retaliation. Employees will not be subject to reprisals for reporting, in good faith, actions that they believe violate the law or do not comply with the Corporate Compliance Program or Code of Conduct.

INTERNAL INVESTIGATIONS

TJRH is committed to investigating all reported concerns promptly and confidentially to the extent possible. The Corporate Compliance Officer will coordinate any finding and take prompt and appropriate corrective action. We expect all employees to cooperate with investigation efforts.

CORRECTIVE ACTION

Where an internal investigation substantiates a reported violation, appropriate corrective measures will be taken, including, but not limited to, notifying the appropriate governmental agency, instituting appropriate disciplinary action and implementing systemic changes to prevent similar violation from recurring in the future. Corrective action plans will be shared with all appropriate parties.

CONSEQUENCES OF NONCOMPLIANCE

Failure to comply with applicable laws and regulations, including federal healthcare program requirements, or with the requirements of this Code of Conduct or TJRH's policies and procedures, or to report violations or suspected violations, could pose significant risks to TJRH, our employees, as well as to the patients we serve. Examples of consequences to TJRH and/or employees for noncompliance include: exclusion from participation in federal health care programs, such as Medicare; criminal and/or civil fines and penalties; disciplinary action, up to and including termination.

IMPORTANT NUMBERS

Compliance Hotline	1-844-213-4857
Compliance Officer, John Thomas Rogers	1-270-651-4513 jrogers@tjsamson.org
Safety Officer, Jeff Ballard	1-270-651-4583 jballard@tjsamson.org
Human Resources, Ladonna Rogers	1-270-651-4668 lrogers@tjsamson.org

COMPLIANCE QUESTIONS

Integrity, common sense, and sound judgment are your best guides in determining if your personal actions meet the expected standards for ethical and lawful behavior. However, if you find yourself in a situation where you are unsure, ask yourself these questions:

- Is my action consistent with hospital practices and legal or regulatory requirements?
- Could my action give the appearance to others of impropriety or wrongdoing?
- Will the action bring discredit to any employees or to TJRH if disclosed fully to the public?
- Can I defend my action to my supervisor, other employees and to the general public?
- Does my action meet my personal code of behavior?

COMPLIANCE CODE OF CONDUCT

Acknowledgement and Certification

By signing below:

1. I certify that I have attended the employee-training program held on _____; and
2. I acknowledge that I received a copy of the T.J. Regional Health Code of Conduct, and
3. I certify that I have read and understand the Code of Conduct contained in above handbook; and
4. I hereby accept the responsibilities and obligations outlined in T.J. Regional Health Code of Conduct and the related policies; and
5. I understand that this Acknowledgement and Certification will be maintained in my personnel file; and
6. I understand that all employees shall have an on-going obligation to report concerns about compliance.

NAME: _____

DATE: _____

SIGNATURE: _____