Please note that the Code of Business Conduct does not create any contract of employment, express or implied, between Froedtert Health or any of its affiliated organizations and any individual.
A message from Cathy Jacobson to the employees, providers, business partners and colleagues of Froedtert Health:

As an organization, we are committed to honest and ethical behavior and to conduct our business with integrity. Throughout our history, as we have served our patients and our community, we have earned a reputation for honor and integrity. Our business is built on this trust and this reputation. It’s about sustaining a place where we are all proud to work; it’s about who we are as an organization.

The practice of behaving honestly, ethically and with integrity is an individual responsibility. We make decisions about how to conduct ourselves every day as we go about our work. Each of us is accountable for the actions that we decide to take.

To help you with the legal and ethical questions you may encounter in your daily work, we have prepared the Froedtert Health Code of Business Conduct. The organization’s corporate policies, coupled with the Code of Business Conduct, sets the standards and expectations to help us all do the right thing.

With your help, I am confident that Froedtert Health will continue to be an outstanding corporate citizen in every community we serve, and our reputation for integrity will endure. Thank you for joining me in this effort.

Cathy Jacobson
President and CEO, Froedtert Health
Introduction

The purpose of the Code of Business Conduct (Code) is to set forth a code of ethical behavior designed to help improve patient outcomes by respecting each patient's rights and conducting business in an ethical manner. It is a set of rules that describe how all people employed or working with Froedtert Health and its affiliates conduct business. These rules help you to know that you are doing the right thing.

Froedtert Health expects staff, and those organizations we do business with, to use these rules of behavior when making decisions and performing their daily work or duties for Froedtert Health.

This Code is general, which means you will need to read Froedtert Health policies and procedures to get more details. You may find yourself in a situation that is not covered in this Code. Therefore, if you have any questions or concerns about a situation, an activity or what you are reading in the Code, you should contact the Froedtert Health Compliance Department.

In this Code, you will read about the following topics:

• Conducting Business Practices with Respect, Honesty and Integrity
• Compliance with the Law
• Background Checks
• Compliance Education and Training
• Reporting Compliance Concerns
• Response to Internal and External Investigations
• Retaliation
• Protecting Confidential Information
• High-Quality Patient Care and Service
• Emergency Treatment
• Environment and Safety
• Giving Free Supplies, Equipment or Services
• Discrimination and Harassment
• Physician Relationships
• Conflicts of Interest
• Gifts or Tips
• Billing and Claims
• Proper Use of Company Property and Assets
• Accuracy, Retention and Destruction of Documents and Records
• Enforcement and Corrective Actions
Conducting Business Practices with Respect, Honesty and Integrity

I will perform my job duties honestly, with respect and integrity.

Everyone working at, or for, Froedtert Health is expected to do the right thing. This includes being honest with and respectful to: patients, direct reports, leaders, co-workers, business partners, vendors, the general public and one another. Froedtert Health expects that you will not lie, cheat, steal or do anything that would harm or injure the reputation of yourself or Froedtert Health.

Code of Corporate Ethics Policy FH-COM.032

Compliance with the Law

I will follow all laws, rules, regulations, policies and procedures that apply to me and my specific job duties.

Everyone must follow the laws, rules, regulations, policies and procedures that apply to their individual jobs. Just like outside of work there are laws that you must follow, such as traffic laws, health care is no different. These rules are in place to keep you, your coworkers and our patients safe. An example of a rule we must follow is that staff must not steal from our patients, other staff members or the organization. Staff is not expected to know every single health care-related law, but you are expected to know, understand and follow the laws that are relevant to your specific job duties. It is also important that all staff members know where to locate Froedtert Health policies and procedures and to ask for assistance if they need help finding them. If you are ever unsure about whether an action is in compliance with a law or policy, discuss it with your leader or the Compliance Department. If you are unsure of what to do in any situation, ask before you act.

Background Checks

I understand that Froedtert Health will conduct formal background and credentialing checks on all staff, medical staff members and certain vendors/contractors.

To reduce risk and promote a safe environment for patients, staff members and our organization, Froedtert Health strives to only hire or contract with those that share the same values and integrity. As a result, an appropriate background
Background and Exclusion Checks FH-HR.028

Compliance Education and Training

I will attend and/or complete all mandatory compliance related training and education.

We want staff to be competent and successful in their roles and completing education and training is an important element. Staff must take education and training seriously and complete all mandatory training in the timeframe allotted. Staff are also required to ask for clarification if they do not understand the education or what is required.

Reporting Compliance Concerns

I will immediately report any activities or conduct that I believe violates Froedtert Health standards, policies, laws and/or regulations.

Anyone, who in good faith, believes that an activity is illegal, unethical or does not comply with the organization’s policies and procedures is responsible for immediately reporting the concern. Failure to report suspected violations or noncompliance can be viewed as misconduct and may warrant corrective action up to and including termination of employment. The concern can be reported to his or her department leader or vice president or to the Compliance Department.

Compliance Reporting, Hotline and Non-Retaliation Policy FH-COM.025

Froedtert Compliance Hotline: 414-259-0220
Compliance Email Address: comphotl@froedtert.com
Response to Internal and External Investigations

I am committed to cooperating with all internal and external investigations in an efficient and professional manner. I know to seek immediate guidance from my supervisor or the Compliance Department if contacted about/during an investigation.

Internal Investigations: Individuals are expected to cooperate with internal investigations, audits or reviews related to compliance with the laws or organizational policies.

External Investigations: Froedtert Health will cooperate and respond appropriately to any authorized government investigation, asserting all protections afforded by law. Froedtert Health believes that it is in the mutual interests of everyone involved that governmental inquiries be addressed to, and handled by, a leader and Corporate Compliance, or legal counsel designated by Froedtert Health. If a staff member is presented with a letter, subpoena or other legal document, or if someone from a governmental agency comes to a department, the staff member should immediately contact his or her manager or the Froedtert Health Legal Department.

Retaliation

I will not retaliate against a patient, staff member or any other person who, in good faith, raises a concern about noncompliance.

Froedtert Health leaders and staff will not retaliate against colleagues, patients or any other person, who in good faith raises a concern about noncompliance or unethical behavior. If someone feels as though they have been retaliated against, it is their duty to report that to the Compliance Department or Senior Leadership.

Compliance Reporting, Hotline and Non-Retaliation Policy FH-COM.025

Protecting Confidential Information

I will protect and secure all patient, staff and other confidential business information.

Patient Information: Froedtert Health is committed to maintaining the privacy and security of our patient’s information which includes, but is not limited to verbal, written or electronic information including patient lists, medical records, billing information, etc. Therefore, no Froedtert Health staff member, medical staff member, student, volunteer, vendor or business partner has a right to access, use or disclose any patient information other than what is necessary to perform his or her job duties. Only use the minimum amount necessary to meet the intended purpose or carry out the job function. Froedtert Health
has the right to monitor, without notice, all access, use and disclosures of its protected health information and systems.

Staff and Other Confidential Business Information: Froedtert Health has information about strategies and operations that are valuable to the organization. Confidential business information (nonpublicly available) includes, but is not limited to: staff employment/payroll information, pricing or cost data, information pertaining to acquisitions, affiliations and mergers, financial data, research data, strategic plans, marketing strategies and contract information. Froedtert Health staff have no rights or ownership to the information and are obligated to protect and safeguard all Froedtert Health business information. Froedtert Health may monitor the access, use or disclosure of its confidential business information at any time and without notice.

Confidentiality Policy FH-COM.062

**High-Quality Patient Care and Service**

I will provide safe and high-quality care and service to our patients.

Froedtert Health strives to assure that the services provided at the hospitals and clinics meet or go above standard levels of quality and patient safety. The organization and our staff are committed to providing quality care to our patients. Everyone should treat patients with respect and dignity and provide care that is necessary and appropriate. Staff will not discriminate (because of race, religion, national origin, ability to pay or any other factor) in admitting, transferring or discharging patients or in the care provided. Care is centered around the patient’s health care needs and by their wishes.

**Emergency Treatment**

I will provide a medical screening and treatment to all persons who are seeking emergency medical treatment, regardless of ability to pay.

We provide an emergency medical screening exam and necessary stabilization to all patients, regardless of their ability to pay. We will not delay the medical screening and necessary treatment to stabilize the patient in order to seek financial and demographic information. We do not admit, discharge or transfer patients with emergency medical conditions simply based on their ability or inability to pay. Patients are only transferred to another facility at the patient’s request or if the patient’s medical needs cannot be met at the facility.

Emergency Medical Treatment and Active Labor Act (EMTALA) Policy CPM.0150 (FMLH), 80100-121 (CMH), SJH.ADM.019 (SJH)
**Environment and Safety**

I will work to provide an environment where the health and safety of our patients and staff come first.

Our organization promotes an environment that protects patients and staff from infection, injuries and illnesses. Staff are expected to have a positive attitude about safety and to attend safety training required for their job duties. We focus on creating processes and practices that encourage safety and quality. We also support open and honest reporting when events or any unsafe condition or practice occurs, so that we can prevent the same incident from happening again.

**Giving Free Supplies, Equipment or Services**

I will not attempt to influence patients, governmental officials, medical staff members or any other person with an offer of money, services, supplies or equipment.

Froedtert Health staff must never offer or give money or gifts to governmental officials. Gifts to medical staff members, vendors, business partners and/or any other person should be of nominal value and should not be given in order to influence them. Staff cannot offer free or discounted supplies, equipment or services to patients without the patient having a financial need assessment completed or if it’s within the guidelines of the corporate policy. Giving of free supplies, equipment or services can be viewed by the government as an incentive to influence the patient to use only our health care services.

*Free Services or Supplies for Patients FH-COM.034*

**Discrimination and Harassment**

I will treat all people equally and fairly and will not harass or discriminate against another individual.

Froedtert Health is committed to fostering an environment of equality where all individuals are treated with dignity, fairness and respect. We are further committed to providing an environment where all individuals are protected from discrimination on the basis of: race, color, national origin, age, disability, and sex including discrimination based on pregnancy, gender identity and sex stereotyping. Any individual who feels he/she has been subjected to discrimination, harassment or intimidation should immediately report the incident to a leader, Human Resources representative or the Corporate Compliance Hotline.

*Harassment Free Workplace Policy FH-HR.018*
Physician Relationships

It is important that those staff members who interact with physicians are aware of the requirements of laws, regulations and policies that address relationships between facilities and physicians. This knowledge is especially important if you have a role in making payments to physicians for services rendered, leasing space, recruiting physicians to the community or arranging for physicians to serve in leadership positions in facilities. Any business arrangement with a physician must be in writing and must be reviewed and approved by the Froedtert Health Legal Department.

Conflicts of Interest

I will disclose the existence and nature of any actual or possible conflicts of interest between my personal interests and the interest of the organization.

All relationships and decisions must be in the best interest of our patients and the organization. Never influence or make decisions that result in our own personal financial benefit or our immediate family members’ financial benefit. This can occur when a staff member has authority to negotiate, recommend or influence a business decision. All staff members should report potential conflicts of interest to the Corporate Compliance Department.

Conflict of Interest for Froedtert Health Employees (excluding Employed Providers) FH-COM.045, Conflict of Interest for Providers FH-COM.005, and Conflict of Interest and Excess Benefit Transactions FH-COM.001

Gifts or Tips

I will not solicit or accept money or other items of value from our patients, patient family members, vendors and/or others.

All Froedtert Health staff are to use good judgment when accepting gifts. The offer of money, gifts, services and entertainment should never influence a decision, selection of a vendor or affect the care of a patient. Staff must never accept cash directly, but instead direct those contributors to the respective hospital foundation. Staff may only accept gifts from patients or patient family members when they are of nominal value or when they can be shared with their department and/or coworkers. Nominal gifts include: flowers, cookies, etc. Staff may not accept any gifts from vendors, regardless of the value, unless it meets one of the approved exceptions in the Froedtert Health Gifts from Vendors Policy.

Gifts from Vendors FH-COM.022
Billing and Claims

I will accurately and appropriately document and bill for the services provided by me or my service line.

Froedtert Health takes great care to assure that all billings to the government, third-party payors and patients are accurate and conform to all applicable federal and state laws and regulations. We prohibit any employee or agent of Froedtert Health from knowingly presenting, or causing to be presented, claims for payment or approval that are false, fictitious or fraudulent. Strict federal and state laws and regulations govern third-party billing of our insured patients. Froedtert Health is committed to full compliance with federal health care program requirements, including preparing and submitting accurate claims consistent with such requirements. We monitor and verify that claims are submitted accurately and appropriately. Some examples of compliant billing practices are:

- Submitting charges that accurately represent the care, services and supplies provided to patients.
- Including written documentation in the Legal Health Record that supports the services they provide and bill for.
- Claims are correctly prepared and submitted in accordance with regulations, organizational and departmental policy whether the activities are performed by Froedtert Health staff or an outsourced vendor.
- Monitor billing activities to detect any deliberate or accidental occurrences of incorrect billing.

All staff should be aware of and refer to the Hospital Billing Compliance Policy and Professional Billing Compliance Policy. These policies outline the False Claims Act and describe how the government protects individuals who report fraud and abuse.

Hospital Billing Compliance Policy FH-COM.035 and the Professional/Physician Coding and Billing, Quality Assurance and Compliance Policy FH-HIM.007

Proper Use of Company Property and Assets

I will protect the organization’s equipment, supplies, property and other assets against loss, theft, destruction and misuse.

Part of the job of every staff member is to keep the costs of health care down. One way to assist in doing that is to protect our organization’s assets. Staff should only use supplies and equipment (including electronic technology, storage and applications) for Froedtert Health business and never for personal
use or benefit. We must make sure that we secure things of value. We must take precautions so our equipment and supplies are not lost, stolen, compromised or misused.

**Accuracy, Retention and Destruction of Documents and Records**

I am committed to both retaining and maintaining timely and accurate patient and business records.

Each staff member is responsible for the integrity and accuracy of our organization’s documents and records, not only to comply with regulatory and legal requirements but also to make sure records are available to support our business practices and actions. No one may alter or falsify information on any business or patient record or document. Records must be retained and destroyed in accordance with the law and our record retention policies.

*Record Retention (See Facility Policies)*

**Enforcement and Corrective Action**

I may be subject to corrective and/or legal actions if I do not follow laws and/or Froedtert Health Policies that apply to my job and my job duties.

All Froedtert Health staff must carry out their job duties in accordance with Froedtert Health standards of staff conduct and performance, as stated in policies and procedures, and as required by law. Staff members who violate Froedtert Health standards, policies and/or procedures may be subject to corrective action and potential external reporting as required under State and/or Federal guidelines/rules. Illegal actions may involve law enforcement and/or legal action as applicable. The specific actions taken will depend on the nature and severity of the violation.

*Corrective Action FH-HR.001*

**Summary**

Abiding by the Code of Business Conduct, Froedtert Health Policies and Procedures, as well as state and federal laws, is critical to maintaining a safe and thriving environment. Seriously consider the manner in which you conduct yourself at work, and always choose to do the right thing by our patients, our staff and the organization.