

Commitment to Integrity



Main Line Health®

Our Mission, Vision and Values

MISSION: To provide a comprehensive range of safe, high quality health services, complemented by related educational and research activities, that meet the health care needs and improve the quality of life in the communities we serve.

VISION: Be the health care provider of choice in our communities by eliminating harm, achieving top decile performance, delivering equity for all ensuring affordability.

VALUES:

- Keep our patients, employees, and medical staff **safe**.
- Deliver **high quality, compassionate care**.
- Foster an environment of **diversity, respect, and inclusion**.
- **Innovate**, embrace change, and do the right thing.
- Work together as a **system** to achieve common goals.



Main Line Health®

Dear Fellow Employee:

Main Line Health is committed to improving the quality of life in our community by providing comprehensive, cost-effective, state-of-the-art health services to our patients. To fulfill this commitment, we strive to ensure that we provide quality healthcare in an ethical and legal manner. Our commitment to excellence and integrity means doing the best job we can in the right way.

The Main Line Health Standards of Conduct provides guidance to ensure that we conduct ourselves ethically and honestly at all times. It emphasizes the shared values that guide our actions. It directs us to resources we can use to help resolve any questions regarding appropriate conduct in the workplace. Please review it thoroughly. We are counting on you to commit to its spirit, as well as to its specific provisions.

If you have questions regarding these Standards or encounter any situation that you believe violates its provisions, you should discuss your concern with your supervisor. Alternatively, you can contact the Main Line Health Compliance Office or use our toll-free, anonymous reporting system, *ComplyLine* (1.844.9COMPLY or mainlinehealth.alertline.com). *ComplyLine* is available 24 hours a day, seven days a week. As long as you report your concerns honestly and in good faith, you are protected from any retaliation.

These Standards were designed to be consistent with the Main Line Health Mission, Vision and Values and reflects our commitment to assuring that our actions consistently reflect our words. In this spirit, we expect all members of Main Line Health to adhere, without exception, to these Standards.

No set of standards can substitute for common sense, individual judgment and personal integrity, nor cover every situation encountered in our daily conduct. It is the shared responsibility of everyone at Main Line Health to support a culture of integrity. So, if you encounter a situation or are considering a course of action that may be technically within the guidelines of the Standards, but feel a sense of uneasiness regarding the contemplated action, "Do the Right Thing" call the Compliance Office or access *ComplyLine*.

As a valuable member of our healthcare team, we ask you to assist us, and all of your Main Line Health colleagues in supporting the values articulated in the Standards.

Sincerely,

Steve Higgins
Board Chair

John J. Lynch, III
President and CEO

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Preamble—Compliance, a Shared Responsibility

One of our goals at Main Line Health is to be a good corporate citizen. This means complying with the law and acting ethically. Nothing should compromise our commitment to integrity. We want to be proud of our values and our reputation for high standards of business conduct.

Compliance with laws and regulations is a shared responsibility among our board, staff and employees. Each individual is responsible for upholding our commitment to ethical and legal business practices. So too is each individual responsible for learning the details of the policies, practices, and laws and regulations applicable to your particular work. You are also responsible for seeking guidance where and when you need it. To assist you in that effort, we have prepared these Standards of Conduct that summarizes some of our most important policies and standards.

Who is Covered by the Standards?

These standards apply to all Main Line Health employees, staff, board members, members of the medical staff and specified health professionals practicing in Main Line Health facilities, volunteers and students.

Your Responsibility

Your responsibility is to read and understand the Standards and comply with this and any other laws, regulations or industry guidance that might apply. It's also your responsibility to ask questions if you don't understand a particular rule or have a concern about how a rule is applied. The Compliance Office is available for consultation and questions can be posed anonymously by using *ComplyLine* (1.844.9COMPLY or mainlinehealth.alertline.com).

Our goal is to prevent the occurrence of illegal or unethical behavior, to stop any such behavior as soon as we are made aware of it and to discipline those who engage in illegal or unethical behavior. We all have a duty to report any known or suspected violations of these Standards. You can discuss your concerns with your supervisor or the Compliance Office via *ComplyLine*.

Introduction

These Standards are organized into 6 Principles: Legal Compliance, Business Ethics/Business Relationships, Confidentiality, Conflicts of Interest, Protection of Organizational Assets and Research. Each Principle is further subdivided into specific standards that address the topic in more detail.

Principle 1. Legal Compliance:

Main Line Health business activities are conducted in accordance with all federal and state laws and regulations governing healthcare operations.

STANDARD 1.1 ANTITRUST

Antitrust laws are designed to regulate competition and prevent unfair business practices. Examples of conduct prohibited by antitrust laws include: 1) agreements to control prices among competitors and agreements to divide up territories or markets; 2) boycotts of certain suppliers or customers; and, 3) unfair trade practices including bribery, misappropriation of trade secrets, deception and intimidation.

All Main Line Health personnel must refrain from discussing or exchanging (both orally or in writing) any information concerning prices, rates, salaries, marketing plans, strategic plans, market share or market evaluations or any other confidential information not normally shared with competitors.

The Main Line Health Legal Department should be consulted if there is any question whether certain information can be shared outside the organization.

STANDARD 1.2 FRAUD AND ABUSE

The fraud and abuse laws are designed to prohibit and punish activities that promote: 1) the submission of false, fraudulent or misleading claims to the government or any third party payer for services that were not delivered, were not medically necessary or otherwise do not comply with program or contractual requirements; 2) payment, directly or indirectly, for patient referrals; or, 3) making false representations of any type to receive payment for services.

All claims for services delivered in Main Line Health facilities must be supported by proper documentation and be coded according to nationally accepted standards. All legitimate overpayments are promptly refunded to the appropriate payer.



STANDARD 1.3 POLITICAL ACTIVITY/LOBBYING

All Main Line Health employees, staff and board members must refrain from any activities that might jeopardize the status of Main Line Health as a non-profit, tax-exempt entity. Prohibited activities include contributing, donating or committing Main Line Health financial or non-financial resources, property or services to any political candidate, organization, committee or individual for any political activity. "Resources" includes facilities, work time, systems, telephones or the health system's business address. Individuals may personally contribute or participate in a particular political campaign or organization but they must do so as an individual and not as a representative of Main Line Health.

Where it may be helpful and relevant, Main Line Health or our representatives may provide information, testimony or recommendations on legislation or regulations that impact healthcare or our provision of healthcare services to our community.

STANDARD 1.4 ENVIRONMENTAL

Each one of us is responsible for observing the safety and health rules and practices that apply to our work and for compliance with environmental, health and safety laws and regulations. While at work, we must:

- Observe posted warnings and regulations;
- Take the necessary precautions to protect ourselves and our co-workers, including wearing the appropriate clothing and protective equipment;
- Report any unsafe condition immediately;
- Report any accident or injury immediately; and,
- Follow all proper practices related to waste disposal, emissions and use of toxic materials.

STANDARD 1.5 DISCRIMINATION

Main Line Health is committed to the fair and equal treatment of all individuals, both those we employ and the patients we serve.

Specifically, discrimination on the basis of race, religion, color, sex (including pregnancy, gender identity, gender expression, and sexual orientation), parental status, national origin, ancestry, age, disability, political affiliation, military service, relationship status or any other classification protected by federal, state or local law is prohibited. Our equal employment policy requires that decisions related to hiring, firing and promotion be based on the individual's ability, qualifications, experience and job performance. No form of discrimination in the employment process will be tolerated.

Sexual harassment also will not be tolerated in the workplace.

Patients will receive the same care and treatment regardless of race, religion, color, national origin, ancestry, age, disability, sex (including pregnancy, gender identity, gender expression and sexual orientation), parental status, political affiliation, military service, or relationship status. Employees as well as members of the medical staff are expected to provide care to all patients in a non-discriminating manner. Patients are expected to accept care from their assigned caregivers without regard to the caregiver's age, gender, race, ethnicity, sexual orientation, religion, physical appearance, or economic class.

Any allegation of harassment or discrimination will be investigated and sanctions applied according to our human resources policies.

STANDARD 1.6 EMERGENCY TREATMENT

Main Line Health complies with all aspects of the Emergency Medical Treatment and Active Labor Act (EMTALA). All individuals who seek treatment in our emergency departments or other areas of the hospital requesting examination and treatment for an emergency medical condition will be seen and evaluated regardless of the individual's ability to pay or their insurance coverage. Individuals with emergency medical conditions will receive stabilizing treatment and no patient will be transferred in an unstable condition unless the patient requests the transfer, a physician (or in the absence of a physician a qualified medical practitioner in accordance with hospital policy) certifies in writing that the benefits of the transfer outweigh the risks to the patient and the transferring facility agrees to the transfer.

STANDARD 1.7 PHYSICIAN REFERRALS

Federal and state laws and regulations govern relationships between hospitals and physicians who may refer patients to those facilities. Any relationship with a physician must be properly structured and diligently administered to avoid implicating one of these laws or regulations.

We do not pay physicians for referrals. Patients are admitted to our facilities based on their medical condition and our ability to care for them.

We do not accept payments for referrals we make to other organizations. No one within Main Line Health is permitted to accept or request anything of value in return for referring a patient to another provider. And, when we make referrals to other providers, we do not take into account the volume or value of referrals that organization has made to us.

STANDARD 1.8 CODING AND BILLING FOR SERVICES

Our medical records are abstracted and coded by specially prepared and trained individuals using nationally recognized standards and rules. To ensure a high degree of accuracy, coders are continuously evaluated and audited and receive ongoing specialized training. All coding is based on the documentation present in the medical record.

Main Line Health has implemented procedures and systems to facilitate accurate billing to government payers, third party insurers and patients. These procedures and systems were developed to conform to Federal and state laws and regulations and to support the accurate billing of all medical services.

Main Line Health staff and employees are prohibited from knowingly presenting or causing to be presented any claim for payment that contains false, fraudulent or fictitious information.

STANDARD 1.9 INELIGIBLE PERSONS/ SANCTIONED INDIVIDUALS

Main Line Health does not contract with, employ or bill for services rendered by an individual or entity that is excluded or ineligible to participate in federal healthcare programs. Individuals suspended or debarred from federal contracts or individuals convicted of criminal offenses related to the provision of healthcare services or items are similarly excluded from employment with Main Line Health.

We routinely search the Department of Health and Human Services' Office of Inspector General's, the General Services Administration's, and the Pennsylvania Department of Health's lists of excluded and ineligible persons.

Principle 2. Business Ethics/Business Relationships:

All Main Line Health employees, officers and board members will conduct business on behalf of Main Line Health with honesty and integrity and will not engage in any activity intended to defraud or otherwise harm an individual, business or organization.

STANDARD 2.1 HONEST COMMUNICATION

Our commitment to the highest standards of business ethics and integrity require that we accurately and honestly represent the interests of Main Line Health. We should not make false or misleading statements or engage in any activity intended to defraud anyone of property, money or services.

STANDARD 2.2 GIFTS AND GRATUITIES/ BUSINESS COURTESIES

There are legitimate reasons to accept or provide occasional business courtesies. However, to preserve and protect our reputation and to avoid the appearance of impropriety, Main Line Health employees and staff should adhere to the following guidelines when considering an invitation by a vendor or supplier or accepting a gift from a vendor or supplier:

- Invitation to an occasional sporting or entertainment event at a vendor's expense is acceptable in order to further develop business relationships provided that the value of the sporting or entertainment event is not excessive;
- In no event are travel costs and overnight lodging acceptable;
- Such invitations must be infrequent with respect to any individual or organization; and,
- Vendor gifts of nominal value are acceptable and to the extent possible should be shared with co-workers. Gifts of significant value, however, must be returned.

Main Line Health employees and staff are expressly prohibited from soliciting favors of any kind, kickbacks or other inducements or remuneration from current or potential business associates.

Invitations by Main Line Health staff to current or potential business associates to attend a social or educational event may be acceptable provided the purpose of the event is not to improperly influence business relationships, business outcomes or referral sources. During these events, business must be discussed, and invitations must be infrequent with respect to any individual or organization.

STANDARD 2.3 GIFTS FROM PATIENTS

Employees of Main Line Health are prohibited from soliciting or accepting tips, personal gratuities or gifts from patients. Gifts of nominal value from patients that can be shared among staff, for example, cookies or candy, are acceptable.

If the patient or a family member is interested in making a monetary gift, the Main Line Health Development Office can assist the patient or family member in the donation process.

STANDARD 2.4 WORKSHOPS, SEMINARS, VENDOR SPONSORED TRAINING

Offers from vendors to sponsor workshops, seminars or training sessions are acceptable provided there is a legitimate educational need for the event. It is the responsibility of the department manager to determine the appropriateness of sponsorship offers and to document the training subject matter and attendees.

Gifts or subsidies from vendors and industry sources to underwrite the cost of an educational conference or a professional meeting is permissible provided the gift or subsidy is paid to Main Line Health and not directly to an employee or staff member. And, control over the content and educational objectives of the meeting is strictly the purview of Main Line Health and not the vendor.

STANDARD 2.5 CONTRACTING/CONTRACT NEGOTIATION

All those involved in negotiating contracts on behalf of Main Line Health must adhere to the following guidelines:

- Business activity with vendors, contractors and suppliers must be conducted at “arms length” meaning the transaction is arrived at freely, without undue pressure or influence from either party;
- All data used in the negotiation process must be accurate, current and complete;
- Conflicts of interest must be disclosed and resolved according to our conflict of interest policy; and,
- Contracting with any individual or company that has been convicted of a criminal offense related to healthcare or is debarred, excluded or otherwise ineligible to participate in federal healthcare programs is prohibited.

STANDARD 2.6 MARKETING

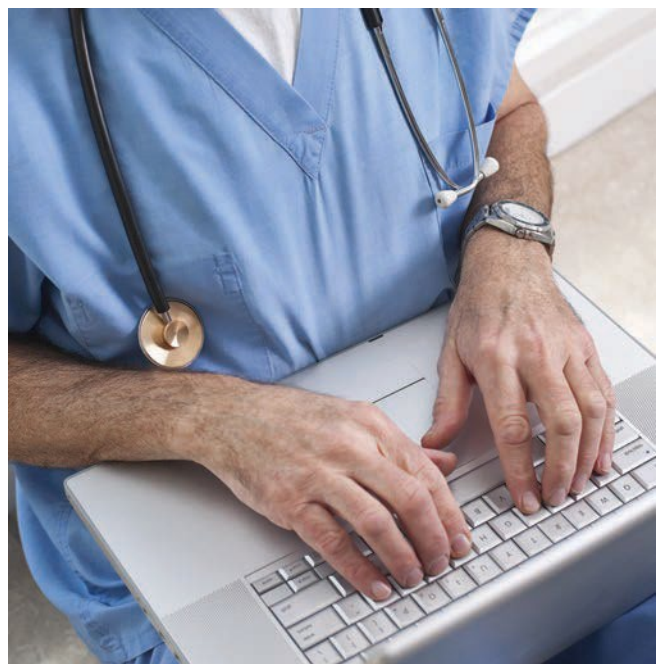
Main Line Health offers factual, fully informative and non-deceptive information in all our marketing and advertising materials. Our marketing and advertising activities are used to educate the public, provide information to the community and increase awareness of our services.

Principle 3. Confidentiality:

All Main Line Health employees, officers and board members have a special duty to protect and safeguard confidential, sensitive and proprietary information.

STANDARD 3.1 PATIENT INFORMATION

During the course of our activities, we have access to many types of information, including protected health information (PHI) or information specific to our patients. The Health Insurance Portability and Accountability Act of 1996 (HIPAA) established certain minimum standards for the use, access and control of this information. In general, all information about patients should be kept confidential and used only by those who need the information to treat the patient, get paid for treating the patient and for some limited health care operations uses. Appropriate precautions should be taken to prevent the unauthorized access to or use of medical records and all patient information. Specific questions related to the use, access or control of patient information should be directed to the Compliance and Privacy Office.



STANDARD 3.2 PROPRIETARY INFORMATION

During the course of our employment or service with Main Line Health, we may have access to confidential and proprietary information—information that is the property of the organization. Some of the types of information that fall into this category include: financial records, strategic and business plans, contract and payment information, salary information, and information relating to negotiations with third parties. Because the information is highly sensitive in nature, it should only be shared with those who need the information to perform their job.

Much of the information is important to our success as an organization and we need to take steps to insure the information is preserved and protected. Do not discuss confidential information in public areas where others may overhear. Use care when disclosing information via fax, hard copy, email or other means so that it is not inadvertently sent to the wrong party.

STANDARD 3.3 PERSONNEL ACTIONS

Personnel files, payroll information, salary and benefit structures should be treated as confidential as well. Release or sharing of such information beyond those who need the information to do their jobs would violate these standards.

Principle 4. Conflicts of Interest:

All Main Line Health employees, officers, board members, members of the medical staff and specified health professionals practicing in Main Line Health facilities have a duty to avoid conflicts of interest when conducting business on behalf of the organization.

STANDARD 4.1 CONFLICTS OF INTEREST

A conflict of interest exists if an outside business or other personal interest can affect your motivation or performance as a Main Line Health employee, officer, board member, member of the medical staff or specified health professional practicing in Main Line Health facilities. You must avoid any relationship, influence or activity that might impair, or give the appearance of impairing your ability to make objective decisions in doing your job. Examples of conflicts of interest include:

- Ownership by you or a family member, of a substantial business interest in a company that is a vendor, supplier or customer of Main Line Health;

- Having a financial interest in any business or entity that is a supplier, contractor or customer of Main Line Health;
- Serving as a director, trustee, officer or employee in an organization that competes with Main Line Health;
- Consulting with or accepting employment with a competitor, supplier or customer of Main Line Health;
- Using materials, equipment or other assets of Main Line Health for unauthorized purposes; or
- Accepting cash, gifts, entertainment or any benefit of more than modest value from any competitor, supplier or customer.

If you think an outside activity, financial interest or business relationship might pose a conflict or give the appearance of a conflict, you should discuss the situation with your manager. Refer to the Administrative Policy: Conflict of Interest and Confidentiality or contact the Compliance office with any questions. Depending on your particular situation, you may be asked to annually sign a Conflict of Interest Statement and disclose any conflicts.

Principle 5. Protection and Proper Use of Organizational Assets:

All Main Line Health employees, officers and board members will protect and preserve Main Line Health assets by making prudent decisions regarding use of those assets and by properly and accurately reporting the financial condition of the organization.

STANDARD 5.1 INTERNAL CONTROLS

Main Line Health has established control standards and procedures to ensure that assets are properly protected and managed and that all financial reports are accurate and reliable. We all share the responsibility for maintaining and complying with required internal controls.

STANDARD 5.2 INTELLECTUAL PROPERTY

Intellectual property includes scientific and technical knowledge, patents, trademarks and copyrights. Intellectual property, like any other assets of the organization, must be protected and should not be disclosed outside the organization.

STANDARD 5.3 ORGANIZATIONAL PROPERTY/ PERSONAL USE OF ORGANIZATIONAL ASSETS

All employees should protect Main Line Health assets and promote their efficient use. Theft, carelessness and waste have a direct impact on our ability to provide services to our community. All Main Line Health assets should be used for legitimate business purposes. Incidental and occasional personal use of telephones, computers and supplies is permissible. Please refer to the Main Line Health Administrative Policies and Procedures and Human Resource Policies and Procedures for more specific guidelines related to the use of specific organizational assets, e.g. computers.

STANDARD 5.4 FINANCIAL REPORTING

All financial reports, accounting records, research reports, expense accounts, time sheets, timekeeping records and any other business record must accurately reflect the true nature of the transaction. Improper accounting, documentation or financial reporting is contrary to the policy of Main Line Health and may be a violation of a law or regulations related to the healthcare industry.

STANDARD 5.5 BUSINESS RECORDS

Everyone is responsible for the integrity and accuracy of our business records, not only to comply with regulatory and legal requirements but also to ensure records are available to support our business practices and activities. No one may alter or falsify information in any record or document. Medical and business documents include paper documents—letters, memos, reports, as well as computer based information like e-mails and electronic files.

Principle 6. Research:

All research conducted at Main Line Health will conform to all applicable federal and state laws and regulations.

STANDARD 6.1 RESEARCH, INVESTIGATIONS AND CLINICAL TRIALS

Any Main Line Health facility, staff member or physician applying for or performing research of any type must follow all applicable research guidelines and maintain the highest standards of ethics and accuracy in any written or oral communications regarding the research study. As in all accounting and financial recordkeeping, only true, accurate and complete financial reports should be prepared and submitted.

STANDARD 6.2 RESEARCH MISCONDUCT

Research misconduct will not be tolerated. Research misconduct includes activities such as falsifying or changing results, plagiarism, failing to properly identify and disclose researcher conflicts of interest and conducting research without Institutional Review Board (IRB) approval.

STANDARD 6.3 HUMAN SUBJECTS RESEARCH/ INFORMED CONSENT

All researchers engaged in human subjects research are expected to fully inform patients of their rights and responsibilities related to participating in a clinical trial or other investigation. Patients must be fully informed and voluntarily consent to participate. And refusal of a patient to participate in a research study must not in any way compromise the patient's ability to access services or treatments.

Summary

All of us, employees, management and board members, are expected to abide by this set of standards. The business affairs of Main Line Health should be conducted in a manner consistent with these standards as well. Activities or practices that don't conform to these standards or activities and practices that raise questions for you, should be discussed with a supervisor or manager. If that is not possible or you are uncomfortable for any reason with the response you receive, you have a duty to discuss the issue with the Compliance Office or to report the issue anonymously through *ComplyLine* (1.844.9COMPLY or mainlinehealth.alertline.com).

Reporting a Known or Suspected Violation

When do I report a known or suspected violation?

You should report a known or suspected violation of the standards of conduct, any law or regulation or policy immediately. Generally, you should report your concern to your immediate supervisor or manager. However, if for any reason that is not possible, you should access *ComplyLine* (1.844.9COMPLY or mainlinehealth.alertline.com) or call the Compliance Office directly to report your concern. All concerns submitted to *ComplyLine* can be made anonymously.

How do I report a known or suspected violation?

You should report the known or suspected violation in the way most comfortable for you. Talk to your manager or supervisor first, if possible. They may be able to quickly resolve your concern. Alternatively, *ComplyLine* is available for anonymous reporting 24 hours a day, seven days a week. You can also call the Compliance Office directly. And however you report, you must be able to provide sufficient information for the Compliance Office to investigate the concern.

Will my confidentiality be maintained?

If you report your concern through *ComplyLine*, your confidentiality is protected. In all other cases every effort will be made to keep your identity confidential if you request it.

What happens after a report is filed?

Once the report is filed and provided there is sufficient information to act on the report, the Compliance Office will begin an investigation. All employees are required to cooperate fully with investigations by the Compliance Office.

What happens after the investigation is complete?

If a problem is identified as a result of the investigation, the department involved is responsible for developing a plan of correction. The Compliance Office approves all corrective action plans. A summary of the issue and the outcome (including the plan of correction) is shared with the Main Line Health Compliance Committee, the Management Compliance Committee and the Audit Committee of the Main Line Health Board of Trustees.

Can I be adversely affected by reporting a known or suspected violation?

No adverse action or retaliation of any kind will be taken against any employee for reporting a concern in good faith. Main Line Health has an extensive non-retaliation policy that protects employees who, in good faith, report suspected problems.

COMPLIANCE OFFICE

Main Line Health
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Suite 250
Newtown Square, PA 19073

To access *ComplyLine*:

1.844.9COMPLY or **mainlinehealth.alertline.com**
mainlinehealth.org



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