

Code of Ethical Conduct

“Working Together To Provide Exceptional Health Care”



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All associated policies are located on page 10 under the [Reference Guide](#).

Corporate Compliance policies and educational material can be accessed via the Intranet under the Captain Integrity icon, as presented below:



A MESSAGE FROM THE PRESIDENT AND CEO OF GARNET HEALTH



Our commitment to providing exceptional healthcare has earned us the respect and trust of our patients and the communities we serve. Garnet Health takes pride in maintaining this trust by acting with honesty, integrity, and transparency in all that we do.

I am pleased to share with you this Code of Ethical Conduct (Code), which will help guide us through rules, behaviors, and responsible decision making in the workplace. We strive to provide the highest quality patient care, protect patient privacy, and work honestly and fairly with our business partners and government regulators.

I encourage you to review this Code, adhere to all Garnet Health policies, and speak-up without fear of retaliation, whenever you see a potential problem or an opportunity to improve. Our Code can help when you need guidance on compliance related issues. We all play an integral role in maintaining these values and in ensuring the quality of care we provide to our patients.

Adherence to the Code promotes the reputation of Garnet Health in the community and ensures that we are compliant with applicable federal and state laws. You can file a confidential, anonymous report by calling the Compliance Hotline at (845) 333-HERO (4376) or access the web-based reporting option at www.hotline-services.com.

A successful Compliance Program requires active participation by everyone. Garnet Health is committed to ethical behavior as evidenced by our Mission, Vision, and Values:

Mission

Improve the health of our community by providing exceptional health care.

Vision

We are caring professionals driven by standards of excellence who go above and beyond to provide an exceptional patient care experience.

Values

- Patients and families first
 - Respect and Civility
- Honesty, integrity and transparency in action
 - Operational excellence
- Teamwork, collaboration and communication
 - Accountability
- An impeccable, healing environment

Thank you for your role in carrying out our mission every day, and for earning the trust of all who rely on us for an exceptional patient care experience.

Sincerely,

Jonathan Schiller/ President & CEO

We all have a duty to know, understand, and comply with the requirements and policies of Garnet Health, regardless of whether they are referenced in this Code.

WHAT IS A CODE OF ETHICAL CONDUCT?

A Code of Ethical Conduct is a tool to help create and maintain a culture of integrity and accountability, which is vital to achieving our mission and vision. It is a set of rules that clearly and concisely outline the types of behaviors that are expected in the workplace.

TO WHOM DOES THE CODE OF ETHICAL CONDUCT APPLY?

The Code of Ethical Conduct (Code) applies equally to all Board members, executives and employees of Garnet Health, including medical/professional staff, contractors, volunteers, residents, students, and any other entity or individual performing functions on behalf of Garnet Health. We shall all adhere to both the spirit and language of the Code at all times and maintain a high level of integrity and honesty in all of our conduct and activities in accordance with the highest professional and ethical standards as it relates to the operations of Garnet Health.

The Code of Ethical Conduct supports our commitment to maintaining the highest professional and ethical standards in how we conduct our business.

OUR PRINCIPLES OF CONDUCT

The foremost principle guiding Garnet Health is to “**Do the Right Thing.**” We are committed to conducting all of our business dealings in compliance with applicable laws, regulations, and policies, while avoiding any impropriety, dishonesty, or wrongdoing. We believe adhering to the principles of the Code will allow us to create and reinforce a corporate culture embracing compliance and maintaining our reputation as a leader in providing exceptional patient care.

Those acting on behalf of Garnet Health have a duty to conduct themselves in a manner that will maintain and strengthen the public’s trust and confidence in the integrity of Garnet Health and take no actions incompatible with their obligations to Garnet Health. With regard to professional conduct, those acting on behalf of Garnet Health will practice:

Integrity - by maintaining a quality of being honest, having strong moral principles, and “Doing the Right Thing”

Stewardship - by exercising custodial responsibility for our intellectual, financial, material, and human resources

Compliance - by complying with federal and state laws and regulations and Garnet Health policies and procedures related to our duties and responsibilities

Confidentiality - by protecting the privacy and security of Garnet Health information (i.e. patient records, employee files, and other confidential information).

Reporting - any activity reasonably believed to violate federal or state laws or regulations or Garnet Health policies and procedures.

Our Code is to provide guidance so that you can respond properly when compliance-related issues arise. It is designed to assist in the performance of your job within appropriate moral, ethical and legal standards.

OUR COMMITMENT TO COMPLIANCE

Garnet Health is committed to providing our patients with quality medical care in accordance with high clinical, oethical, business, and legal principles. Our

commitment includes promoting patient engagement; cost effective and high quality care; and providing exceptional health care. All Garnet Health Staff must act in compliance with all applicable legal and ethical rules and strive to achieve the highest quality of care while avoiding even the appearance of wrongdoing.

Our Code is a critical component of our Compliance Program and it is the responsibility of all Board members, executives and staff of Garnet Health, including medical/professional staff, volunteers, vendors and other persons affiliated or doing business with Garnet Health, to act in a manner consistent with this Code and to hold others accountable to its terms and related policies. Garnet Health aspires to the highest ethical standards of conduct.

The Corporate Compliance department carries out the day-to-day implementation of the Compliance Program. The Corporate Compliance Officer leads the compliance department and reports to the Garnet Health President/CEO and the Audit and Compliance Committee of the Board to ensure transparency exists in the compliance program.

Management has a special responsibility to set the right ethical tone. Management must show commitment to compliance and quality healthcare, create a work environment in which concerns can be raised and openly discussed without fear of retaliation, and promote honesty, integrity and transparency in action.

If you have any questions or concerns about this Code of Ethical Conduct, or about any other matter regarding the Garnet Health Compliance Program, or if you wish to report a compliance concern, please contact the Corporate Compliance Officer at (845) 333-7188 or the Anonymous Compliance Hotline at (845) 333-HERO (4376).

RIGHTS & RESPONSIBILITIES

Leadership Responsibilities

Garnet Health leaders shall set the example and act as a role model in every regard. Our leaders:

- Help their team members understand what is expected of them under the Code and other applicable laws, regulations and policies.
- Create an environment that promotes the highest standard of ethics and compliance.

- Maintain an open-door policy and encourage employees to raise concerns, while ensuring that no one who reports a suspected violation of law or Garnet Health policy in good faith is subject to retaliation.
- Take prompt and appropriate action when a potential violation of law or Garnet Health policy arises.



Staff Rights & Responsibilities

Every person deserves to be treated respectfully and fairly.

You have the right to:

- Work in a safe and respectful environment.
- Be free from discrimination and harassment.
- Report complaints or concerns without fear of retaliation.

You have a responsibility to:

- Treat everyone with respect and work together
- Provide the same high quality of care and treatment to all patients.
- Maintain confidentiality and security of patient information.
- Lead by example, understand, and apply the principles and terms of the Code every day, in all interactions.
- Assume ownership and accountability for your own actions and behaviors.
- Speak to colleagues directly, in a positive and professional manner, when their behavior is inconsistent with the Code.
- Report inappropriate behaviors to any member of management or to the Compliance Office.
- Report to a member of management or Human Resources any discriminatory or harassing conduct in the workplace that you become aware of or witness.

Patient and Family: Rights and Responsibilities

All individuals shall respect and honor the rights and responsibilities of patients. Patient rights and responsibilities are posted throughout the organization in all public and patient care areas.

Patients and Families have the right to:

- Be treated with dignity and respect by everyone in Garnet Health.
- Be free from discrimination and harassment.
- Receive, appropriate, accessible and equitable care.
- Report complaints or concerns without fear of retaliation.
- Have their protected health information maintained in a private and secure manner

Patients and Families have the responsibility to:

- Treat everyone, including staff, volunteers and other patients, with respect. Special consideration will be taken when a patient is cognitively impaired.

We listen to our patients requests and follow their choices with respect to their clinical care, as required by law.

We are responsible for informing patients about their proposed plan of care, including the risks, benefits and alternatives available to them. We respect patients' rights to make informed decisions about treatment, as well as to establish and have followed advance directives. Patients are free to choose their service providers, including but not limited to, physicians and ancillary service providers.

Non-Discrimination

Garnet Health prohibits any form of discrimination of any type in the provision of services. No person shall be discriminated against. Garnet Health will operate within the bounds of federal and state law without discrimination in all employment practices.

WORKPLACE CONDUCT & EMPLOYMENT PRACTICES

General Guidance

Garnet Health has adopted Standards of Performance and Behavior. We are held accountable to:

- Maintain a professional appearance; adhere to the dress code
- Visibly wear your identification badge at all times, above the waist
- Keep your work area tidy and clean

- Walk our customers to their destination
- Provide directions to anyone who appears lost or asks for assistance
- Introduce ourselves with a friendly smile and state our name, position and what our purpose is
- Smile and make conversation with customers in corridors, cafeteria lines, and while transporting them to their destination

Our Commitment to Diversity and Inclusion

At Garnet Health, we believe in a diverse and inclusive environment, one that is grounded in our dedication to the health and well-being of all people. Respecting, nurturing, and encouraging diversity of thought, background, and experience contribute to positive work environments that result in exceptional patient care. We embrace the diversity of our coworkers, physicians, vendors and patients.

We never harass or discriminate on the basis of creed, sexual orientation, ancestry, ethnicity, citizenship, marital status, familial status, military status, political beliefs, status as a victim of domestic violence, race, color, religion, sex, national origin, age, disability, genetic information, gender identity or expression, union affiliation, socio-economic status, veteran status or any other characteristics protected by law. We embrace diversity because it is our culture, and it is the right thing to do. We are also committed to providing reasonable accommodations to staff who have qualified physical or mental disabilities.

Garnet Health staff are required to demonstrate tact and respect for the diversity of their workplace and shall maintain a professional work-place atmosphere free from all forms of harassment, exploitation, or intimidation.

Employment of Relatives/Anti-Nepotism

Garnet Health prevents work arrangements that are conducive to preferential treatment within an employment relationship between related parties defined as relatives, members of the same household, or those with personal intimate relationships.

Garnet Health prohibits work arrangements which allows:

- Related parties to be employed within the same department
- Direct or indirect management by a related party

Sanction Screening

Garnet Health will not knowingly employ, appoint, elect, contract or bill for any individual or entity that has been listed as debarred, excluded or is otherwise ineligible for participation in federal or state health care programs.

Garnet Health screens all employees, medical staff, contractors, vendors and others with whom Garnet Health does business with to provide reasonable assurance they are authorized to participate in federal and state healthcare programs.

Inappropriate Behavior

Garnet Health is committed to creating and maintaining an environment that is professional in nature and emphasizes dignity and respect in the work place. Inappropriate behavior is conducting oneself in a way that is undesirable, unsuitable or improper. To assure quality and promote a culture of safety, intimidating, bullying and disruptive behaviors will not be tolerated.

We require everyone affiliated with Garnet Health to perform their job duties and responsibilities in a law-abiding manner while exhibiting teamwork, respect, and civility.

Both overt and passive behaviors undermine team effectiveness and can compromise the safety of patients. All intimidating, bullying and disruptive behaviors are unprofessional and will not be tolerated. Below outlines examples of such behavior; however is not an all-inclusive list:

- Verbal outbursts and physical threats
- Refusing to perform assigned tasks
- Lack of cooperation or unavailability to other practitioners for exchange of pertinent patient care information or resolution of patient care issues
- Reluctance or refusal to answer questions, return phone calls or pages, or displaying impatience at such
- Using condescending language or voice intonation
- Use of foul or offensive language
- Bullying or any behavior meant to intimidate, belittle or demean another
- Any behavior meant to demean, offend, humiliate or embarrass, including social media posts and texting

- Any disparaging remarks and behaviors based on any protected characteristics i.e.; race, religion, gender, and gender identity (not an all-inclusive list)
- Sexual or other forms of harassment, including unwelcome sexual advances, requests for sexual favors, or other verbal or physical conduct of a sexual nature which has the purpose or effect of substantially interfering with the individual's work performance or creating an intimidating, hostile or offensive work environment
- Deliberate destruction or damage to Garnet Health property and or individuals property
- Causing physical injury to another or displaying aggressive behavior that creates a reasonable fear of physical injury to another or causes emotional distress
- Using one's position, title or level of seniority in any way as a means to intimidate others or to achieve personal gain

Any person who witnesses anyone engaging in behavior that is disruptive and bullying in nature is required to report such behavior to the Human Resources department.

Smoke Free Campus/Workday

Garnet Health promotes the protection of workplace health and safety. To provide a safe working environment and protect the health of all Garnet Health employees, patients, visitors, volunteers, contractors, physicians and students, smoking is prohibited on Garnet Health property.

Employees may not smoke during the workday, including on paid and/or unpaid breaks and meal periods. We are committed to providing a workplace that is safe, healthy, smoke-free and in compliance with all applicable laws and regulations.

Drug & Alcohol Free Workplace

Garnet Health is committed to maintaining a drug free and alcohol free workplace and expects all staff to arrive and remain free of the influence while on the job.

It is the responsibility of each staff member to promptly report any of the following:

1. Knowledge of another staff member in a condition which impairs them and potentially risks the welfare of others.
2. Suspects the use, purchase, possession, sale, theft, distribution, diversion or transfer of alcohol or illegal drugs or the unauthorized dispensing of legal drugs by a staff member.

We are committed to the health and safety of our employees, patients, visitors, volunteers, contractors, physicians and students.

OUR COMMITMENT TO GOVERNMENT REGULATORS

Cooperation in Government Investigations

Garnet Health cooperates fully with government inquiries. If any employee receives an inquiry, subpoena or other legal document regarding Garnet Health business, the employee shall contact the Corporate Compliance Officer and/or General Counsel.

Honest and Lawful Conduct

Garnet Health staff must avoid illegal conduct, both in business and personal matters. No person shall take any action that violates any statute, rule, or regulation. All staff must also comply with this Code, Garnet Health compliance policies and procedures; strive to avoid the appearance of impropriety; and, never act in a dishonest or misleading manner. If you are unsure of how this specifically applies to your responsibilities, please do not hesitate to speak with your Supervisor/Manager/Director or the Corporate Compliance Officer.

Everyone is expected to uphold the practices and principles related to his/her respective position and regulatory bodies.

Cost Reporting & Financial Records

Garnet Health receives reimbursement under federal and state health care programs. These programs require us to submit complete and accurate reports of our costs of operation and other information.

All financial information must fairly represent actual business transactions and conform to generally accepted accounting principles or other applicable rules and regulations. Garnet Health maintains a high standard of accuracy and completeness in the documentation and reporting of all financial records. These records serve as a basis for managing our business and are important in meeting our obligations to patients, employees, suppliers and others. These records also are necessary for compliance with tax and financial reporting requirements.

Anyone with knowledge of inaccurate or false financial records must promptly report them to their Supervisor, the Chief Financial Officer or the

Anonymous Compliance Hotline (845) 333-HERO (4376).

Accurate Billing & Coding of Services

Garnet Health has an obligation to our patients, third party payors, and the federal and state governments to exercise diligence, care and integrity when submitting claims for payment for services rendered. To uphold this obligation, we make every effort to submit accurate and truthful bills for our services, and we bill only for services that were actually provided, properly documented and coded. We ensure that our bills meet federal and state health care program requirements, and we do not submit bills that are exaggerated, fictitious or up-coded.

Accurate and timely documentation is dependent on the attention of our providers who treat patients in our facilities. It is expected that all providers will provide complete and accurate information in a timely manner. When a billing error is identified, we involve a manager and/or the Corporate Compliance Officer. We investigate and correct the error prior to submitting the bill. If we have already billed, we correct the underlying problem and make appropriate refunds.

The Federal False Claims Act and Deficit Reduction Act protect government programs including Medicare, Medicaid and TRICARE from fraud and abuse. Garnet Health complies with these and all laws and has policies to detect, report and prevent waste, fraud and abuse, as well as provide protection for whistleblowers.

Medical Necessity: Reasonable and Necessary Services

While physicians and other appropriately licensed healthcare professionals are able to order any services that are appropriate for the treatment of their patients, Medicare and other government and private healthcare plans will only pay for those services that meet appropriate medical necessity standards. If a patient requests or consents to a service that is not covered by insurance, the patient should be informed the service is not covered prior to the furnishing of such service. Garnet Health may then bill the patient directly.

Compliance with Medicare and Medicaid Anti-Referral Laws (Anti-Kickback)

Federal and state laws make it unlawful to pay or give anything of value to any individual on the basis of the

value or volume of patient referrals. In accordance with federal and state law, Garnet Health will not solicit, offer, pay, or receive payment from physicians, providers or anyone else, whether directly or indirectly, for referrals. All referral decisions shall be made based solely on medical necessity and quality of care concerns.

Obligation to Disclose - Overpayments

Garnet Health will ensure that all incidents that are required to be reported under federal and state reporting laws, rules, and regulations are reported timely to an appropriate governmental agency. The Compliance Office will conduct periodic reviews to monitor compliance with these mandatory reporting requirements including, but not limited to:

- Ensuring that any overpayment from Medicare is disclosed and refunded as required by law; and
- Ensuring that probable violations of law are reported to an appropriate law enforcement agency

Garnet Health has a zero tolerance policy with respect to billing for improper claims.

Under federal law, all identified overpayments must be refunded to the government payer within 60 days of identification. Failure to do so can result in fines and other penalties. Payments received to which Garnet Health is not entitled, will be reported and refunded in accordance with the applicable law.

OUR BUSINESS ACTIVITIES

Compliance with Laws, Regulations and Garnet Health Policies

Providing healthcare to our communities is an enormous responsibility. If each of us abides by this Code and the laws, rules, regulations, and policy and procedures that apply to us, we will do our part to see that Garnet Health operates with integrity. If you are unsure of how this Code specifically applies to your responsibilities, please do not hesitate to speak with your direct supervisor or contact the Compliance Office.

Communication Systems & Electronic Media

All Garnet Health communication systems are to be used for business purposes only and are the property

of Garnet Health. These systems include, but are not limited to, computers, e-mail, Intranet/Internet access, fax machines, telephone and voicemail. Use of these systems are for work related operations and should not be used for personal purposes. There are designated break times and break rooms to complete such tasks.

Users who abuse Garnet Health communication systems or use them for unauthorized non-business purposes may lose these privileges and be subject to disciplinary action, up to and including termination.

Standard Communication Etiquette

Telephone

- Identify yourself and your department /function when making or answering a call
- Be friendly and courteous
- Give your full attention to the caller
- Know how to transfer a call and put someone on hold; ask permission before putting someone on hold and thank the caller for waiting
- Be willing and able to take calls and take messages
- Assist the caller in whatever way you can

E-mail

- Use ENCRYPT in the subject line if you are sending PHI externally
- Do not send an e-mail when you are upset or frustrated
- Use the spelling and grammar check function on your computer
- Always use clear, informative language in the subject line
- Keep messages as brief as possible
- Only “reply all” when it is absolutely necessary
- Respond to e-mails in a timely manner

Conflicts of Interest

In our work, we have the duty to put the interest of Garnet Health before our own. The term ‘conflict of interest’ refers to a situation in which the personal or professional interests or activities of a person performing duties on behalf of Garnet Health may influence, or appear to influence the objectivity of that person in discharging his/her obligation to Garnet Health. We avoid conflicts of interest where someone might question whether we are acting for the benefit

of Garnet Health or for personal gain.

Garnet Health staff must disclose all possible conflicts of interest involving themselves or their immediate family members. If you believe a conflict of interest exists or if you have a question about whether an outside activity might constitute a conflict of interest, you must consult with the Corporate Compliance Officer.

Use of Social Media and Technology

Garnet Health staff will not post patient information or photographs to a website, social media page or public forum – even if the patient is not identified. We do not use our personal devices to text patient healthcare information for any reason unless otherwise allowed by Garnet Health policy. We do not take or transmit photographs of patients except as required for patient care and within the requirements of our policies.



Confidential Business Information

We have an obligation to protect all Garnet Health confidential information from unauthorized use. Confidential information covers anything related to Garnet Health operations that is not publicly known, such as:

- personnel lists and data;
- patient lists and clinical information;
- financial data;
- marketing strategies;
- supplier and subcontractor information;
- proprietary computer software; and
- passwords or identifiers.

Sharing or failing to protect your unique passwords or identification is a breach of Information Technology policies and is subject to disciplinary action, up to and including termination. We are all required to protect Garnet Health confidential information.

Protecting and Securing Patient Information

We are obligated to protect the privacy, security, and confidentiality of patient health information. Protected Health Information (PHI) can include patients' names, addresses, phone numbers, medical diagnoses, family illnesses and other personal information. Federal and state law require us to keep this information confidential.

In compliance with federal and state HIPAA privacy and security laws, Garnet Health staff:

- Will not access, use or disclose patient information; except as necessary to perform his/her job function.
- Will only access, use and disclose the minimum necessary amount of patient information needed to perform his/her job.
- Will not discuss patient information with others without a job related reason to do so.
- Will not share user IDs or passwords to any electronic systems containing such information.

All Garnet Health staff shall keep patient information confidential, unless authorized by the patient or permitted by law. If anyone is unsure of the rules governing the release of patient related data, they are encouraged to acquire appropriate guidance from the Corporate Compliance Officer, or other knowledgeable party before the release of any information.

Garnet Health staff who know of or suspect a situation in which confidential patient or business information has been compromised have a duty to report it to the compliance office.

Anyone affiliated with the unauthorized access or inappropriate disclosure of patient information will be subject to disciplinary action up to and including termination of employment or contract. Individuals may also be subject to civil or criminal penalties.

Emergency Treatment

Garnet Health follows the Emergency Medical Treatment and Active Labor Act (EMTALA) in providing an appropriate medical screening examination within the capability of the Emergency Department. This includes the ancillary services routinely available, to determine whether or not an emergency medical condition exists, regardless of ability to pay or any other discriminatory factor.

Receipt of Gifts, Gratuities & Business Courtesies

Garnet Health staff members shall not solicit or accept personal gifts, business courtesies or services from patients, visitors, vendors, or business associates as doing so may be an actual or perceived conflict of interest. Gifts that are intended to influence or may be reasonably perceived as having the potential to

influence an individual in the scope of his/her duties are prohibited. Gifts must never be provided, regardless of value, with the purpose of influencing relationships, business outcomes or referral of business.

Cash gifts or cash equivalents, such as gift certificates, are prohibited. However, a modest perishable gift such as a floral arrangement, box of cookies, candy or similar food may be accepted and then shared by staff members.

If you have questions, please consult with the Corporate Compliance Officer.

Supply Chain Ethics

All individuals involved with purchasing or other supply chain-related activities must act, and be seen to act, with integrity and professionalism.

All individuals should continuously work to improve supply chain policies and procedures, to improve their supply chain knowledge and skill levels, and to share leading practices.

Marketing & Corporate Communications

Garnet Health engages in communications, marketing and advertising activities to educate the public, provide information to the community, and to increase awareness of our services. We share only truthful information in these communications.

Any media inquiries from reporters or the general public should be referred to the Marketing & Corporate Communications Department at (845) 333-2391, other than the one word condition of a patient, per policy. Garnet Health staff should never release information without the permission of the Marketing & Corporate Communications Department.

Record Retention, as required

Garnet Health retains documents and other communications for the appropriate and legally required length of time. We never destroy documents before the permitted destruction date or if the Legal/Risk Management department has requested we retain them.

Good Faith Reporting

All individuals are required and have an obligation to report in good faith, any actual or suspected violations of the Code, Garnet Health policies, federal or state law, and unethical or illegal conduct. Staff must also

report any other compliance related issues, including conflicts of interest, fraud, or other misconduct, of any type relating to the operations of Garnet Health.

Executives, directors, managers, and supervisors have a special duty to adhere to the principles of the Code, to encourage their subordinates to do so, and to recognize and report suspected violations. Garnet Health has established procedures that allow individuals to safely and anonymously report unethical and illegal actions without fear of reprisal.

Garnet Health has established procedures that allow individuals to safely report violations, illegal and unethical actions, without fear of retaliation. Acts of intimidation or retaliation targeted to any member of Garnet Health who reports violations to this Code will not be tolerated. Such action will result in disciplinary action, up to and including termination.

Non-Intimidation/Non-Retaliation

Garnet Health strictly prohibits intimidation or retaliation against an individual who reports a known or suspected violation of the Code, Garnet Health policies or federal or state law. We are committed to ethical and legal conduct that is compliant with all relevant laws and regulations. We correct wrongdoing wherever it may occur in the organization. Each employee has an individual responsibility to report any activity that appears to violate applicable laws, regulations, this Code or Garnet Health policies. We are committed to providing an environment that allows reporting in good faith without fear of retaliation.

Garnet Health has zero tolerance for retaliating against anyone for raising or reporting a concern in good faith.

Garnet Health will investigate and take appropriate action with respect to all alleged/suspected acts of retaliation or intimidation.

You are encouraged to utilize the three step reporting process:

1. Discuss with a member of Management
2. Contact a member of the Compliance Office
3. Anonymously report using the Compliance Hotline tools:

- Call **(845)-333-HERO (4376)** or report online at <https://www.complianceresource.com/hotline/>



Responding to Potential Compliance Issues

Garnet Health is committed to investigating all reported concerns promptly, thoroughly and confidentially, to the extent possible and appropriate. The Corporate Compliance Officer directs and reports on investigations of compliance concerns.

CORPORATE CITIZENSHIP, RESPONSIBILITY AND SUSTAINABILITY

Garnet Health always looks for ways to improve the overall experience for our patients, as well as improve efficiency and reduce overall costs. Sustainability initiatives offer significant environmental and financial benefits that can help our system thrive in the future.

Our Approach to Sustainability and Anticipating Societal Impacts

Garnet Health works very closely with the community it serves to address and anticipate societal impacts and public concerns. Approaches include the following:

- Routine community two-way forums including face-to-face meetings- general public and specialty/ population specific sessions, electronic means- email, social media, blogs, web-interface to identify service offerings
- Collaborating with the community to improve services including reducing readmissions and primary care medical home
- Community-strategic analysis/assessments
- Comprehensive supply-chain management processes
- Environmental risk/ building / construction assessments / impact; annual Environment of Care Plans addressing utilities, security, fire safety and emergency management (recognized as a leader in regional preparedness activities)
- Waste Management/ recycling efforts
- Leader involvement in local/ regional community/ professional boards and volunteer activities
- Collaboration with community and government agencies

Environmental Compliance

We reduce our consumption of natural resources and our impact on the environment. We have an active recycling program and work to reduce our carbon footprint. We use electronic medical records that improve patient care and reduce waste. We ensure that we properly dispose of hazardous materials and that we maintain all certifications required to use such materials.

We are proud to publish an annual sustainability report that describes Garnet Health’s sustainability efforts – its environmental, social and economic footprint.

CORPORATE COMPLIANCE OFFICE

The Garnet Health Corporate Compliance Office is located at 200 Midway Park Dr, Middletown, NY. Office hours are 8 am to 5 pm, Monday through Friday.

Walk-ins are always welcome or call the main office line at 845-333-7179 to make an appointment.

GARNET HEALTH COMPLIANCE RESOURCES

Corporate Compliance Officer & Director of Audit & HIPAA Privacy
(845)333-7188

Compliance Audit Manager
(845)333-7189

Compliance Coordinator
(845) 333-7179



Captain Integrity
dotheightthing@garnethealth.org
Anonymous Compliance Hotline
(845) 333-HERO (4376) or
www.hotline-services.com

REFERENCE OF GARNET HEALTH POLICIES, PROCEDURES AND TOOLS

Certain Garnet Health compliance policies are referenced in this Code. Other compliance policies are available via the Garnet Health intranet site or a hard copy can be obtained from a supervisor or the Compliance Office.

All policies are located on the intranet, you're your supervisor or the Garnet Health Corporate Compliance Office. Below are referenced policies in this Code; however, it is not an all-inclusive list.

- ◇ Access to PHI and BSI and Security and Confidentiality
- ◇ Advanced Beneficiary Notice/Outpatient Medical Necessity Validation
- ◇ Anti-Bullying & Zero Tolerance for Disruptive Behavior
- ◇ Billing and Collection
- ◇ Cellular Phones and Other Electronic Devices
- ◇ Compliance Hotline Operations
- ◇ Compliance Investigations
- ◇ Compliance Officer
- ◇ Conflict of Interest
- ◇ Corporate Compliance Program – Corporate Compliance Program
- ◇ Cost Report Preparation, Review & Submission
- ◇ De-Identification of Protected Health Information (PHI) and Limited Data Sets
- ◇ Disclosing Protected Health Information
- ◇ Diversity in the Workplace
- ◇ Drug and Alcohol Free Workplace – Drug and Alcohol Free Workplace
- ◇ Equal Opportunity Employer
- ◇ Ethical Code of Behavior
- ◇ Ethical Practices in Purchasing
- ◇ Employment of Relatives/Anti-Nepotism Policy
- ◇ EMTALA Policy and Procedures
- ◇ False Claims Acts and Whistleblower Protections
- ◇ Gifts Gratuities and Business Courtesies
- ◇ Harassment
- ◇ HIPAA Compliant Filing – Individuals Rights to Protected Health Information
- ◇ HIPAA Violation, Breach Notification and Discipline Policy
- ◇ HIPAA Privacy Policy
- ◇ HIPAA Notice of Privacy Practices Policy
- ◇ HIPAA Privacy/Security Reference Tool
- ◇ Leaders Orientation, On-Boarding and Continuation Education
- ◇ Media Communication
- ◇ Medical Center Orientation
- ◇ Medical Information Disclosure
- ◇ Medicaid Credit Balances
- ◇ Medical Staff Code of Conduct
- ◇ Non-Retaliation/Non-Intimidation for Good Faith Reporting
- ◇ Patient Identity Theft Red Flag
- ◇ Patient Rights and Responsibilities
- ◇ Professional Misconduct Reporting
- ◇ Records Retention and Destruction
- ◇ Sanction Screening for Participation in Federal and State healthcare Programs and Contracts
- ◇ Sexual Harassment Prevention in the Workplace
- ◇ Smoke Free Campus/Workday
- ◇ Social Networking
- ◇ Standards of Performance & Behavior
- ◇ Subpoena policy
- ◇ Suppliers Code of Conduct

We all work together to



“Do the Right Thing”

ETHICAL DECISIONS GUIDE

