



# Code of Ethics and Business Conduct

# *Mission*

Our team positively improving the wellness and health of you and your family through excellent and compassionate healthcare.

# *Vision*

Skilled and dedicated people delivering high-quality, patient-centered care that improves lives and communities.  
Every person. Every time.





Ethics, integrity, responsibility — these are three of Health First's core business principles. These principles anchor us in our mission to provide excellent and compassionate healthcare. Just as a compass provides direction, the Code of Ethics & Business Conduct was developed to be a guide on your journey with Health First. Its purpose is to help you better understand how we conduct business and to emphasize our commitment to ethical behavior while we strive to improve the wellness and health of our communities.

The healthcare industry is always changing, and we understand that laws and regulations are often complex. You have a moral and ethical duty to alert your leader if you feel something isn't right or have a concern. All associates can make good faith reports with confidence and without the fear of retaliation or intimidation. When in doubt, the Corporate Integrity Department is here as your partner and ethical compass. We are here to help you navigate any potential issues and work with Legal, Quality or Associate Experience to guide you in your journey, so that together we can continue to deliver quality health care and exceptional customer experience to those we serve.

Sincerely,

A handwritten signature in black ink, appearing to read "Tim Norton II".

Tim Norton II  
System Vice President  
Chief Legal & Integrity Officer





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# Purpose

The Code of Ethics & Business Conduct (hereinafter referred to as “the Code”) is a key element of our Compliance Program. The Code and its underlying principles apply to all Health First-related parties including, but not limited to: all associates, employed physicians, executive leadership, members of the Board of Trustees, members of the medical staff, consultants, vendors, and other business partners.

While the Code is designed to provide overall guidance, it is not intended to address every situation. Accordingly, the Code supplements — not replaces — Health First policies and procedures. As you read this Code, it is the expectation that you will use the guidelines to drive behavior and incorporate the principles into everyday tasks.

## Caring for Our Customers

### We Respect Our Customers

Our customers, patients, and members, have the right to excellent, compassionate, high-quality, person-centered health, and wellness services at all our Health First facilities. These rights are the essence of our Mission.

Health First does not discriminate against any person based on race, color, national origin, disability, genetics, sex, religion or age in admission, treatment or participation in its programs, services, and activities.

If you ever question whether a customer is being properly treated or have any concern related to the care provided, you must promptly notify your leader or Corporate Integrity as appropriate to seek guidance.

### We Protect Sensitive Information

Health First’s policy is to treat all customer information with the utmost discretion and confidentiality. We prohibit improper access, use or disclosure in accordance with the confidentiality requirements of Florida and federal laws and regulations. This includes any information that could identify patients, members, caregivers, or employees, not just their name or picture.

To prevent unauthorized disclosures:

- We do not access confidential customer information or share it with anyone unless there is a work-related need to know
- We abide by the Health First policy regarding the use of social media and do not post or discuss confidential information or material
- We are careful with the use of mobile devices, due to their portability and accessibility to critical data. An approved encryption method is necessary when using personal or Health First-owned mobile devices

It is the duty and obligation of all persons subject to the Code to report any known or suspected violation of privacy and security of a customer’s Protected Health Information (PHI).

## We Maintain Computer and Network Security

As the delivery of health care becomes more reliant on technology, it is critical that Health First guards the confidentiality of customer information. To help keep information secure:

- Never share your password
- Lock or log off computers when you are finished or are away from the computer
- Do not open a link or email attachment from an unknown or unexpected source
- Encrypt all confidential information before transmitting outside of Health First

## Supporting a Positive Work Environment

### We Maintain a Positive Work Environment

Health First’s policy is to provide a positive and safe working environment. Therefore, we:

- Are committed to Equal Employment Opportunities (EEO) and do not discriminate based on race, color, religion, sex, national origin, age, disability or genetics or any other status protected by law
- Support and maintain a workplace free of alcohol, drugs, and tobacco use
- Address inappropriate and disruptive behavior such as:
  - Offensive comments, gestures, jokes, and other intimidating language
  - Unwelcome sexual advances, including verbal or physical conduct of a sexual nature that interferes with an individual’s work performance or creates an intimidating, hostile or offensive work environment
  - Workplace violence of any kind

Leaders are expected to set the example and must ensure that ethical and compliant behavior is never sacrificed during the pursuit of business objectives. Leaders must help promote a culture of compliance within Health First to achieve high standards of ethics and compliance. This kind of culture encourages anyone in the organization to ask questions or express concerns without fear of retaliation or intimidation of any sort.

## We Maintain Required Licenses and Professional Credentials

Health First only allows individuals with current and valid licenses and credentials to perform the functions within their scope of practice. Health First is required to screen all current and prospective associates, physicians, and vendors against governmental listings to ensure that excluded individuals are not employed and excluded entities do not do business with Health First.

## Protecting Health First's Interests

### We Use Care with Proprietary Information

Certain business information about Health First strategies and operations is proprietary and must remain confidential. Therefore, we:

- Safeguard and preserve Health First's resources and assets, including time, materials, supplies, property, buildings, equipment, information, electronic communication, mail systems, and other assets
- Use company resources for company purposes only and not for personal benefit or non-company purposes
- Comply with requirements of software copyright licenses related to software programs used in fulfilling job requirements
- Do not install software on Health First equipment for personal use

### We Avoid and Disclose Possible Conflicts of Interest

A conflict of interest arises when a set of circumstances creates a risk that professional judgments or actions regarding a primary interest is influenced by a secondary interest. While we recognize events or relationships that might create the potential for a conflict of interest are an inevitable aspect of conducting our business, the interests of Health First must be considered. Associates must avoid any outside financial interest that might influence or appear to influence job-related decisions or actions. These interests may include, but are not limited to:

- A personal or family interest or paid work in any enterprise that conducts business with Health First
- Investment in another business, such as a nursing home, laboratory or medical practice that competes or contracts with Health First
- Advisory Board positions and external employment

All potential conflicts of interest must be promptly disclosed to Corporate Integrity.

## We Limit Political Activities

The law limits the organization's political participation. Therefore, we:

- Allow associates to freely participate in political activities, as long as they are carried out on the associate's own time and at his or her own expense
- Do not use Health First funds or resources generated by not-for-profit entities to contribute to or support political causes, campaigns, or candidates, or for gifts or payments to any political cause, party, or affiliated organization. This includes financial and non-financial resources such as using work time to solicit for a political cause or loaning of Health First property for use in a political campaign

## Ensuring Fair and Ethical Business Practices

### We Follow All Laws and Regulations

Health First is committed to providing all healthcare services in accordance with applicable federal, state, and local laws and regulations. This includes those that govern Medicare Part C and D, and any other guidance provided by the Centers for Medicare & Medicaid Services (CMS) or the U.S. Department of Health and Human Services.

Therefore, you:

- Are responsible to know, understand and abide by all laws, regulations and Health First policies and procedures which apply to your position, job, or assignment
- Must refrain from conduct that may violate any laws pertaining to fraud, waste, and abuse of government funds
- Must report any suspected violations through the proper channels for investigation

### We Ensure Accuracy of Records and Reporting

Federal and state laws have been enacted to prevent the submission of false claims and to reduce the likelihood of potential fraud, waste, and abuse. We must keep accurate records and make truthful representations in all business matters. Therefore, we:

- Do not falsify documents or make false records
- Do not make payment with the intention or understanding that any part of the payment or receipts are to be used for an unsupported purpose
- Maintain accounts based on generally accepted accounting principles
- Retain records based on Health First policies and keep them for the legally required time frames

## We Cooperate with and Document Government Inquiries and Investigations

We operate in a highly regulated industry, and governmental agencies may request information from us. It is a violation of the law and Health First's policy for any associate to knowingly make a false or misleading statement to a government official or program. Associates should cooperate and be courteous to government inspectors or investigators and never lie, conceal, destroy, or alter any documents, or make misleading statements.

If you receive a request for information from a government investigative agency, enforcement agency or subpoena, you should immediately take the following steps:

- Notify your leader and the Chief Operating Officer of the operational area; and
- Contact Legal and Corporate Integrity

## We Interact with Vendors and External Parties with Integrity

Health First's policy is to treat all customers and outside parties with respect and fairness, and to avoid even the appearance of favored treatment. With that in mind, Health First maintains a policy when it comes to the giving and receiving of business courtesies — it is best avoided. Therefore, we should:

- Make sure that offering business courtesies such as meals, refreshments or entertainment does not violate any federal or state healthcare law, regulation, the Code, or the standards of conduct of the recipient's company or organization
- Avoid offering business courtesies if it might create the appearance of being improper
- Not give or offer to give government employees any item, service, entertainment, transportation, or gift

If there is any doubt about what these standards are, you should be sure to ask Corporate Integrity.

## We Exercise Good Judgment and Discretion When Accepting Gifts

There are strict legal and regulatory consequences under government programs related to accepting items in exchange for preferential treatment. Associates are expected to follow Health First policies and should never accept anything, even of minimal value, if the item is offered with the expectation the person offering the item or service will receive preferential treatment in return. Nor is it permissible to accept any off-site

accommodation or travel for vendor-promotional training unless it is first approved by the operational area Director or Vice President, as well as Corporate Integrity.

## We Comply with Anti-Kickback and Stark Laws

The Federal Anti-Kickback Laws make it a criminal violation to offer or accept remuneration (i.e., something of value) directly or indirectly in exchange for the referral of any state or federal healthcare program (including Medicare and Medicaid) business, unless it falls within certain "safe harbors" specified under these laws. Therefore, any actions such as the giving or receiving of gifts or services that given even the appearance of being offered for potential referrals must be avoided. Any questions or concerns related to a specific transaction should be referred to Corporate Integrity.

The Stark Law, or federal Physician Self-Referral Law, seeks to remove incentives to overuse medical care that may result if a physician's treatment decisions are tied to financial gain. The law's purpose is to prohibit a physician from referring a customer for "designated health services" payable by Medicare or Medicaid to any entity that the physician or a member of his or her immediate family has a financial relationship. Another aspect of the Stark Law requires limits on the giving of business courtesies, such as gifts and entertainment, to potential referral sources. Business courtesies or other benefits that are intended to be offered, provided, or requested as an inducement to refer customers or business or as a reward for such referrals are prohibited. Any questions or concerns related to these laws should be referred to Legal or Corporate Integrity.

## We Abide by Antitrust Laws

Antitrust laws reflect the belief that a marketplace characterized by fair and vigorous competition will produce the maximum benefits for consumers and businesses. Federal and state antitrust laws are designed to encourage this competition by prohibiting agreements that restrain trade. Therefore, we must be alert to these competitive concerns, and take no action or enter into any discussion that could be interpreted as an effort to fix prices, divide markets with our competitors, boycott competitors or suppliers or otherwise restrain fully competitive trade. Any questions regarding antitrust issues should be directed to Legal or Corporate Integrity.

# Understanding the Compliance Program

## We Speak Up

As an associate, member of the Board of Trustees, vendor, or other business partner, you have the duty to “stop the line” and report concerns. This includes any suspected non-compliance, fraud, waste, abuse or violation of policies, procedures, or the Code. Reporting can be made anonymously, but regardless of the reporting mechanism, it is the strict policy of Health First that there can be no retaliation or intimidation against any party for good faith reporting. Whenever questions or concerns arise, the following resources are available:

## Legal, Privacy and Corporate Integrity

Timothy Norton II is System Vice President and Chief Legal & Integrity Officer, and can be reached at 321.434.7496 or [Integrity@HF.org](mailto:Integrity@HF.org)

## Corporate Integrity Hotline and Website



Use this QR code to reach the hotline website and report compliance concerns.

- A live operator is available 24/7 and can be reached at 1.888.400.4512
- Use [hf.ethicspoint.com](http://hf.ethicspoint.com) to submit a concern electronically
- All calls and website submissions are handled in confidence and may be placed anonymously

## We Maintain an Effective Compliance Program

The Compliance Program, approved through the Health First Board of Trustees, was developed to comply with all healthcare laws and regulations that apply to, or affect the business of, Health First, including the guidelines of the Office of Inspector General (OIG) and its

“Seven Elements of an Effective Compliance Program.” Executive Leadership remains actively engaged in oversight responsibilities. Compliance training and education is part of the required orientation and annual training for all Health First associates, employed physicians, and Board members. Please contact Corporate Integrity if you feel you or your team could benefit from additional Compliance or Fraud, Waste, and Abuse training. A strong compliance program lays the foundation for continuous improvement and risk reduction. It helps the organization meet federal and state regulations inherent to maintaining quality service and care to our customers.

### Seven Elements of an Effective Compliance Program

1. Written policies and procedures, including a code of conduct
2. Chief Compliance Officer and Compliance Committee
3. Education and training
4. Effective lines of communication
5. Auditing and monitoring
6. Disciplinary standards and a no-retaliation policy
7. Responding to offenses and corrective action

## We Adhere to the Code of Ethics and Business Conduct

Compliance with this Code and its underlying policies and procedures is required. You are accountable for knowing enough about compliance to recognize an issue when it arises, and you have the ethical responsibility to stop something that is wrong and report it.

It is important to remember we act as a guardian of Health First’s reputation, ensuring the public’s trust, as well as the trust of colleagues and peers. At times the ethical path or compliant solution may not be clear. If you are ever in doubt about the right course of action or observe an action inconsistent with the Code, regulations, or Health First’s policies, you are empowered to raise the issue with your leader and consult with Corporate Integrity to be your guide along your journey with Health First.