Code of CONDUCT 2024



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From Cone Health **LEADERSHIP**

Cone Health is committed to serving our communities by creating unsurpassed health care experiences. Cone Health's reputation for quality stems from providing exceptional patient care, as well as from the integrity of our business practices. In short, our core values dictate not only high standards of care for the people and communities we serve, but a resolute commitment to doing the right thing each and every time.

Please review the information contained in this Code of Conduct to understand what is expected of every Cone Health team member. Keep this document close at hand, so that you can refer to it easily should you ever have a question or need guidance.

The most important part of any compliance effort is not the rules but the people who take them to heart. Each of us has a personal responsibility to ensure that business practices are conducted in a manner that reflects the highest standards of honesty and integrity. If you become aware of any situation that might conflict with the Code of Conduct, or that may violate applicable laws or regulatory requirements, you should report it without delay.

Our core values and our just culture encourage team members to report any concerns, mistakes or near misses and feel safe and supported in doing so. Our goal is to use these events for education and process improvement rather than focusing on blame.

You may report your concerns to your supervisor, notify Cone Health Audit and Compliance Services, or call the Compliance & Privacy Helpline at 1-855-809-3042 or by completing a web report at www.conehealthethicspoint.com. When calling the Helpline you may choose to remain anonymous. Cone Health does not tolerate retaliation against any team member who reports compliance concerns in good faith.

To summarize, an enterprise like ours cannot thrive if it does not inspire the confidence of patients, community members, vendors, third-party payers, government oversight agencies and numerous other important constituents. Your personal commitment to doing what is right is vital to that effort, so that we can sustain the mission of providing excellent health care to all the communities we serve.

Thank you for all that you do for Cone Health.

Sincerely,



Mary Jo Cagle, MD Chief Executive Officer



Mae Douglas Chair, Cone Health Board of Trustees

INTRODUCTION

Cone Health is committed to complying with all applicable laws and regulations and demonstrating high ethical standards in all that we do. Compliance is the responsibility of all Cone Health team members. Cone Health team members include board members, executives, employees, vendors, independent contractors, students, researchers, medical professionals, volunteers, and business partners. Anyone who works for or on behalf of Cone Health is required to follow all applicable laws, policies and this Code of Conduct.

Cone Health is committed to selecting and hiring well-qualified, service-minded people who will make the right decisions when faced with difficult situations. It is Cone Health's goal to be known for our commitment to quality, with caring team members working together in an environment of integrity. Therefore, team members should reflect Cone Health's values to the communities we serve. The Cone Health Purpose, Intent and Values as well

as the Cone Health iCARE Commitments provide the foundation for our Code of Conduct. As a result, it is important for you to be familiar with these expectations, which are listed on pages 5 and 6, to help you make the right decisions.

Your behavior and the decisions you make have an impact on our organization and the communities we serve. Refer to the Code of Conduct whenever you need guidance on appropriate actions in your work and whenever your intuition tells you that something doesn't feel quite right. We recognize that our organization is layered and complex and mistakes may happen. Your help in identifying issues and opportunities for improvement are an important part of our culture of compliance.



Our Commitments

We promise...

we are right here with you.

Brand Promise

Because we exist...

to connect health care and well-being.

Purpose

So that...

a tradition of health and well-being is woven into the fabric of our communities.

Vision

Our Strategic Priorities

HEALTHY COMMUNITIES

Improve the health and well-being of all our communities and



FUTURE READY WORKPLACE

Become a future focused organization through evolving our culture, developing our people, and leveraging our capabilities

TRANSFORMATION TO VALUE

Transform our clinical and business models to excel in value-based care



CONSUMER-DRIVEN BRAND EXPERIENCE

Design and establish our Brand Experience to foster consumer loyalty and business growth

Our Values

Caring for Our Patients

We provide exceptional quality, compassionate care and service in a safe, respectful environment.

Caring for Each Other

We appreciate each other through honest communication and respect. We inspire ongoing learning, pride, passion and fun.

Caring for Our Communities

We engage our communities with integrity and transparency. We embrace our responsibility to promote health and well-being.



iCARE

Commitments to Care.

Communication

will create and engage in conversations of possibility.

Accountability i will honor my word.

i will assume the best of intentions and embrace differences.

i will own it, solve it, and celebrate it!

The Cone Health COMPLIANCE and INTEGRITY PROGRAM

Our Compliance and Integrity Program is overseen by the Cone Health Audit and Compliance Services department that includes the internal audit and compliance functions for the organization. Cone Health Audit and Compliance Services is a resource for Cone Health team members and supports and encourages a culture of ethical decision-making to ensure operations align with laws, regulations, policies, procedures, guidelines, and standards. It is specifically designed to detect, prevent, and correct any violations of law or Cone Health policies.

The Cone Health Compliance and Integrity Program is comprised of seven elements that define how Cone Health prevents, detects, and corrects non-compliance. Each of these elements is detailed in the Cone Health Compliance and Integrity Program

document, which is available in the policy library on the Cone Health intranet. We encourage you to review these documents and become familiar with them.

It is impossible to create a Code of Conduct that will address every situation a team member may encounter during his or her career with Cone Health. When faced with a difficult situation, however, every team member should stop and determine the best response using the Code of Conduct outlined in this booklet and upheld by Cone Health.

Refer to the **Compliance and Integrity Program** for more information.

Defining the Cone Health Culture of Compliance, Ethics and Integrity

It is important for team members to understand the interrelationship between the three concepts of Compliance, Ethics and Integrity:

Compliance

- Knowing the rules
- Following the rules as they have been provided to you

Ethics

- Understanding the difference between right and wrong
- Choosing to do the right thing

Integrity

 Consistent application of doing the right thing even when no one is looking

Patient CARE, TREATMENT and SERVICES

Cone Health is committed to caring for our patients by providing exceptional quality and compassionate care in a safe and respectful environment. Patients will always be treated with dignity and respect. Cone Health provides each patient with information regarding his or her rights and responsibilities, and strives to protect those rights throughout care and treatment.

Cone Health has approved a Patient's Bill of Rights and Responsibilities with the expectation that observance of these rights will demonstrate a respect for patient values, and recognize personal dignity and the need for privacy in treatment. The Patient Bill of Rights applies to all care settings for inpatients and outpatients.

Cone Health team members can obtain a copy of the Patient Bill of Rights available in the Cone Health policy library.

For more information, refer to the following policies:

Patient Bill of Rights and Responsibilities

Guilford County Behavioral Health Center (GCBHC)

Patient Rights, Mental Health



PRIVACY and CONFIDENTIALITY

Consistent with HIPAA (Health Insurance Portability and Accountability Act), Cone Health team members will protect the confidentiality and security of patient information.

HIPAA permits the use of patient information for treatment, payment, and health care operations. Team members may have access to patient information solely to perform their job duties.

Accessing patient information, or any other type of confidential information, for non-job-related or personal use is strictly prohibited. This includes accessing your own record, or the medical record of a family member. A MyChart account should be utilized to access personal health records, or you may choose to contact the Health Information Department release of information office.

Protecting the privacy of our patients and team members also includes texting and using social media carefully. Text and social media should be used in a manner that is compliant with existing policies, programs, and applicable laws, including those governing protected health information, confidentiality, copyright, trademarks, and employee rights. This includes personal accounts and interactions, regardless of whether they are done on Cone Health time and/or using Cone Health resources.

Other types of business information should also be treated confidentially, such as employment and financial information. Any information learned or created by Cone Health team members must be treated confidentially, even after termination of employment. This protection extends to employee utilization of social media.

We respect and maintain the confidentiality of:

- Patient records (client identity, diagnosis, treatment, financial, psychosocial, and other personal or family information) because they are the property of Cone Health.
- People and Culture information, such as team member salaries, benefits and disciplinary actions.
- Financial, marketing, planning and other types of business information.

For more information, refer to the following policies:

HIPAA Minimum Necessary Requirement
Notice of Privacy Practices

Confidentiality

Amendment/Correction of Health Information

Release of Protected Health Information and Reportable Cases

Securing Electronic Protected Health Information

Use and Disclosure of PHI for Fundraising and Marketing

Use and Disclosure of PHI to Business Associates



Workplace **BEHAVIOR** and Equal Employment **OPPORTUNITY**

Cone Health is an equal opportunity employer. Cone Health does not discriminate or tolerate discrimination against any employee or applicant because of race, color, religion, gender, sexual orientation, gender identity/expression, veteran status, pregnancy, or any other basis protected by law.

It is Cone Health's policy to comply with all applicable federal, state, and local laws prohibiting discrimination and harassment, and ensuring equal opportunity. Cone Health is committed to providing a work environment that respects the rights, dignity, and cultural differences of team members. Harassment or abuse in any form (i.e., physical, mental, or verbal) is inappropriate and will not be tolerated.

Cone Health is committed to fair and lawful People and Culture (i.e., human resources policies and practices in recruiting, hiring, placement, promotions, transfers, demotions, discipline, rates of pay, discharge, and all other terms and conditions of employment). Our intent is to provide an environment that is free from all forms of unlawful discrimination and harassment. Our just culture encourages reporting of mistakes and near misses without fear. Our goal is to share what we learn to avoid future mistakes and improve processes.

Cone Health has an obligation to our patients and to the people of our communities to ensure that team members are fit for duty when they report for work. For this reason, the illegal use, sale, or transfer of drugs is prohibited. In addition, you should not possess or drink alcoholic beverages in the workplace or report to work, in any location, under the influence of drugs and alcohol. A violation in this area will be dealt with in a fair and consistent manner in accordance with our Drug and Alcohol Policy.

If you have any questions or concerns about Cone Health's policies on workplace behavior or equal employment opportunity, please talk to your leader or contact People and Culture at 336-832-8100.

For more information, refer to the following policies:

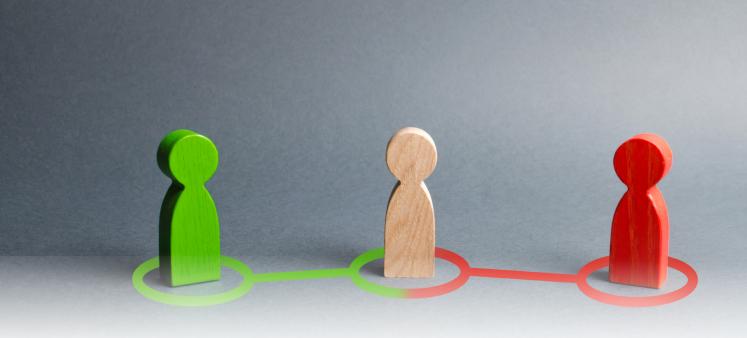
Equal Employment Opportunity

Professional Conduct and Prevention of Workplace
Harassment

Drug and Alcohol Use

Performace Accountability and Commitment





CONFLICTS of Interest

A conflict of interest occurs when a relationship, influence or activity impairs, or even gives the appearance of impairing, one's ability to make objective and fair decisions in the performance of his/her job. In other words, you should not place yourself in any situation that might force you to put your personal or financial interests ahead of the interests of Cone Health. In certain instances, conflicts of interest may arise despite your best efforts to avoid them. If such a situation arises, you should promptly and fully disclose it to your leader or Cone Health Audit and Compliance Services.

The following are examples in which a conflict of interest may exist:

- Employment by a competitor or potential competitor while employed by Cone Health
- Direct or indirect ownership of, or substantial interest in, a company that is a competitor or a supplier of goods and services to Cone Health (See Business Courtesies, Gifts and Supplier Relations)

- Acceptance of gifts, payments or services from those doing business or seeking to do business with Cone Health
- Serving as a director, officer, consultant or other key role with a company doing (or seeking to do) business with or competing with Cone Health
- Hiring or contracting with a family member or a friend to provide goods and/or services to Cone Health
- Any business or financial interest, or relationship you or a member of your family have that might appear to influence your ability to meet your obligations to Cone Health

For more information, refer to the following policies:

Conflict of Interest

Business Courtesies, Gifts, and Vendor Relations

Cone Health Medical Group (CHMG) Code of

Professional Conduct

IRB Guideline: Conflicts of Interest in Research

Business COURTESIES, GIFTS and Vendor RELATIONS

Cone Health deals with many vendors. It is our policy to select vendors on the basis of objective factors such as price, quality, performance, customer service assistance and reputation.

Cone Health does not conduct business through the improper use of business courtesies, gifts or relationships. It is against the law and Cone Health policy to give or receive any remuneration either in return for or to induce: (a) a patient referral or (b) the purchase or lease of a service or item. Remuneration is defined as anything of economic value, including kickbacks, bribes and rebates (whether in cash or in-kind). For example, acceptance of cash or a cashequivalent gift (such as a coupon or gift card) is not allowed. Also, the opportunity to earn money may be considered remuneration.

You should not accept or solicit any benefit from an existing or potential vendor that might compromise or appear to compromise your objective assessment of the vendorr's products or services.

You should refrain from requiring a supplier to give up

trade with our competitors or to purchase our products or services in order to obtain or retain their supply agreement with us. You must also respect and protect any confidential or proprietary information shared with you by a vendor.

Finally, you may not solicit or use your position with Cone Health to obtain a special discount or other favorable treatment (e.g., free gift) for yourself or others not extended by the vendor to all Cone Health team members.

Team members must disclose offers of gifts or gratuities to their leaders or Audit and Compliance Services. Because every business situation is unique, offers of gifts or gratuities may require review by Audit and Compliance Services to determine if acceptance of the gift or gratuity is appropriate.

For more information, refer to the following policies:

Business Courtesies, Gifts, and Vendor Relations
Cone Health Medical Group (CHMG) Code of
Professional Conduct

COMPETITION and **ANTITRUST**

Cone Health competes in an ethical and legitimate manner. It avoids all actions that are anti-competitive or otherwise conflict with laws that govern competitive practices in the marketplace. Unlawful practices include:

- Agreements with a competitor(s) to divide territories or customer lists.
- Any other arrangement with a competitor(s) that artificially raises the price of services or improperly reduces competition.

Never discuss or disclose price or market information with/to someone from another company unless you first consult with Cone Health's legal counsel.

SAFETY, HEALTH and ENVIRONMENTAL Matters

Cone Health seeks to provide a healthy and safe workplace for our team members. Supervisors are responsible for ensuring that all team members are properly trained in health and safety practices and precautions.

Our just culture at Cone Health recognizes there will be errors and encourages reporting that emphasizes learning and accountability over blame and punishment.

Cone Health is committed to complying with all local, state and federal regulations and laws in the safe handling and disposal of hazardous materials. These materials include regulated medical waste, radiological, chemical, laboratory and pharmaceutical waste; and other hazardous substances such as lead; lithium batteries, sharps and mercury lamps. Waste should be kept in designated containers. Radiological waste will be appropriately marked and stored in secure areas.

Cone Health has several ways that team members can get help with safety and quality concerns. Available methods for reporting include but are not limited to the following:

- a. Your Leader
- b. The Cone Health Safety Zone Portal on Cone Connects
- c. Environmental and Radiation Safety 2-HELP (1-336-832-4357)
- d. People and Culture Department
- e. Cone Health Chief Compliance and Privacy Officer
- f. Cone Health Audit and Compliance Services
- g. Compliance & Privacy Helpline (anonymous or direct) at 1-855-809-3042
- h. The Joint Commission or the North Carolina Division of Health Services Regulation. Information about calling The Joint Commission can be found on Cone Connects.

For more information, refer to the following policies:

Employee Safety

Environmental Safety Management Plan

ARMC Environmental Safety Management Plan

Hazardous Drug Handling

Hazardous Materials and Waste Management Plan
ARMC Hazardous Materials and Waste Management Plan



SAFEGUARDING Cone Health PROPERTY and TECHNOLOGY

Cone Health assets, which are assigned or made available to team members, may be used only for authorized business purposes. Any other use, such as for after-hours charitable work, must receive prior approval from your supervisor.

Those given custody of Cone Health equipment or other assets are expected to understand the proper use and maintenance. All Cone Health assets in the custody of a team member are to be returned in acceptable condition upon request or when the team member leaves Cone Health. Cone Health-issued equipment is intended for use only by Cone Health team members and must not be shared with family members or other individuals.

Team members use computer software programs only in accordance with the corresponding manufacturer's licensing provisions and restrictions. Doing otherwise could be a violation of federal copyright laws.

Applications to do your work are provided on Cone Health workstations and computers allowing you to collaborate securely from remote locations. Remote access is protected by your password and team members must never share passwords or access codes to preserve confidentiality.

You should not use free web-based tools for collecting and storing information related to your work as this can put Cone Health data at risk. If you or your team identify a need for new technology to do your work, please use the vendor risk management process to request the new technology and tools.

For more information, refer to the following policies:

Authorization and Usage of Cone Health Cell Phones and Other Electronic Devices

ITS Information Technology Acceptable Use Procedure

Proper ACCOUNTING and RECORDKEEPING

All Cone Health records are prepared accurately, reliably, honestly and in accordance with established finance and accounting procedures. A team member must not enter false or misleading information into Cone Health records and must report to management any transaction they feel is questionable.

Entries of cost, financial or similar business information shall be made only to the regularly maintained books and records of Cone Health. No "off the books" transactions will be tolerated.

Cone Health maintains a system of administrative and accounting controls to: (a) safeguard assets, (b) check the accuracy and reliability of accounting data, (c) promote operational efficiency, and (d) encourage compliance with laws and regulations.

All of us are responsible for proper accounting and adherence to control procedures so that errors or irregularities are avoided, or are identified and corrected in a timely manner.

All records should be stored in a safe and secure location for the period of time required by law or Cone Health policy, whichever is longer. Records should be organized in a manner that permits prompt retrieval. Old or unneeded records, either in electronic or paper form, should be properly disposed of or purged with the proper knowledge of management and in accordance with applicable document retention schedules. A team member should never destroy or alter any document in anticipation of or in response to a request for those documents by any government agency or court.

Refer to the **<u>Document Retention policy</u>** for more information.

Billing and Coding INTEGRITY

Cone Health bills only for care and services that are properly authorized and documented as medically necessary — nothing more and nothing less. Cone Health will not tolerate anyone misrepresenting the services, supplies and equipment furnished, or the extent of services, supplies and equipment rendered in order to circumvent coverage limitations or to increase payments from third parties. We will take every reasonable precaution to ensure that our billing and coding work is accurate, timely and in compliance with Cone Health policies, and with federal and state laws and regulations. Contacts made to obtain missing information must be properly and fully documented.

If you work in a billing- or coding-related area, you are expected to understand and comply with all billing and coding policies and procedures

established by Cone Health and by third-party payers (including Medicare and Medicaid).

It is Cone Health's policy to refund any overpayments resulting from billing errors.

Certain government regulations and many insurance payer contracts require that patients pay coinsurance, copayments and deductibles. Because of this, the practice of routinely writing off coinsurance, copayments and deductibles violates legal and contractual obligations and is prohibited.

For more information, refer to the following policies:

Billing and Collections

Patient Bill Adjustment

Identifying and Reporting FALSE CLAIMS

It is against the law for a health care provider to submit fraudulent or false claims for payment to programs that are funded by federal or state governments, such as Medicare and Medicaid.

The Federal False Claims Act outlines penalties for individuals or entities who knowingly submit a false claim, or cause another individual or entity to submit a false claim for payment or approval by the U.S. government. North Carolina also has false claims laws.

Team members are required to report known or suspected false claims violations immediately. Team members can make reports to leaders, Cone Health

Audit and Compliance Services, or the Compliance & Privacy Helpline.

Team members who report suspected violations are protected by Cone Health policy from any type of retribution or retaliatory acts. Team members who choose to report a false claim to the federal or state government are entitled to whistleblower protections, including protection from retribution or retaliation from their employer.

Please refer to the Cone Health policy library for all Cone Health compliance policies and procedures to prevent and identify suspected false claims and other types of fraud, waste and abuse.

For more information, refer to the following policies:

False Claims Act and Reporting Fraud, Waste, and Abuse Concerns

Compliance and Integrity Program

ADMISSIONS, TREATMENTS and REFERRALS

Only those patients who need and will benefit from the services Cone Health provides will be admitted/ accepted for care and treatment. Standard clinical admission criteria that include medical necessity guidelines are used to determine whether or not an individual is admitted.

As a matter of policy, Cone Health does not waive insurance copayments or deductibles, or otherwise provide benefits to patients to obtain admissions. Under certain circumstances, Cone Health may provide appropriate financial accommodation (such as allowing monthly payments over time) to patients based on their financial need.

Each patient is treated as an individual. Medical professionals develop treatment plans to meet the specific clinical needs of every patient utilizing a multidisciplinary approach. Treatment is provided in the least restrictive environment that is appropriate to the individual patient's needs.

Discharge planning begins at the time of admission and continues throughout the treatment process. The patient, the patient's loved ones and the clinical team are all involved in the discharge planning process. Patients are discharged with an aftercare or follow-up plan including interface with community organizations and support groups whenever needed. In cases where care is needed in the home, Cone Health does not require patients to utilize Cone Health-owned or operated home health agencies in accordance with federal laws and regulations.

For more information, refer to the following policies:

Patient Admission
Utilization Management Plan
Utilization Review Process

Community **INVOLVEMENT**and Political **ACTIVITIES**

Cone Health strives to be a good corporate citizen within the communities it serves.

You are encouraged to participate as a private citizen in the political process and as an advocate for professional organizations, so long as your participation does not: (a) interfere with the satisfactory performance of your official duties, (b) bring discredit or embarrassment to Cone Health, (c) create a conflict of interest, or (d) imply that you are speaking on behalf of Cone Health unless so authorized. When participating, you should not wear your Cone Health badge or anything else with a

Cone Health logo or the name "Cone Health," which might imply that you are speaking for Cone Health.

No Cone Health funds, equipment, facilities or assets may be used to support any external organization without appropriate senior leadership approval.

Refer to the **Political Use of Health System Facilities** policy for more information.

Dealing with **GOVERNMENT OFFICIALS** and **REGULATORY AGENCIES**

Dealing with government officials is not the same as dealing with private parties. This is true whether the government is acting as a customer, payer, supplier or regulator. Always secure advice from the Office of General Counsel before entering into a contract with a government entity.

Do not give anything of value (such as a gift, award, food/drink, or entertainment) that is not allowed by the government's policy to a team member of a federal, state, or local agency. Direct questions about what is or is not allowed by a government's policy to Audit and Compliance Services.

Under the direction of the Office of the General Counsel, Cone Health will cooperate with requests for information from government auditors, investigators or other officials. Any written documents, such as search warrants or subpoenas, should be immediately brought to the attention of the Office of General Counsel before any response is made.

A team member who is contacted by a government agent in connection with an investigation or request for documents should immediately:

- 1. Ask to see the government agent's credentials.
- 2. Write down the agent's name and the name of the agency.
- 3. Notify the supervisor who will then contact the Administrator on Call and the Office of the General Counsel.
- Request a copy if the agent has a legal document (search warrant or subpoena) presented by the agent.
- 5. Maintain a written inventory of any document or other items taken by the agent.

Never do the following:

- Destroy or alter any record requested by a government agency or court
- Provide misleading or untruthful information to a government agent or persuade anyone else to do so

MARKETING and MEDIA Activities

All Cone Health advertising and publicity must be truthful and not misleading. Any claims about services must be clearly supported by evidence to substantiate the claims made. All price advertising must accurately reflect the true charges for services.

Cone Health does not use advertisements or marketing programs that may cause confusion between our services and those of our competitors. False or misleading representations should not be made.

Because of the nature of our industry, we frequently receive requests from the media for information such as patient conditions or interviews with staff members, visitors or patients. All media requests should be handled in accordance with Cone Health's policy for media inquiries. We recognize that the unapproved release of sensitive information could have a negative effect on the customers we serve, as well as Cone Health's reputation and interests.

Refer to the <u>Media Relations</u> policy for more information.

How to **GET HELP**

Cone Health needs your help in order to follow the principles described in this booklet.

We are responsible, as an organization and as individuals, for acting in an ethical and legal manner. If you are involved in a situation that is not covered in the Cone Health Code of Conduct and you need additional guidance or direction, you should seek the advice of your leader or consult the various policies and procedures of Cone Health. If you are unable to seek or are uncomfortable when seeking guidance from these sources, you should ask for assistance from Cone Health People and Culture, the Office of the General Counsel or Audit and Compliance Services.

Because ethical behavior and compliance with laws and regulations are important, Cone Health has also established a Compliance & Privacy Helpline. The Compliance & Privacy Helpline is available to any team member who has a question or concern about a compliance, legal or ethical matter. Also, the Helpline is available to team members who observe violations of the Code of Conduct described in this booklet or other violations of laws and regulations. Cone Health wants to make it clear that you can raise these concerns without any fear that you will be disciplined or terminated for doing the right thing. We only ask that you tell the truth as you understand it.

If you contact the Helpline, you may ask your questions or report suspected unethical or illegal acts without giving your name should you wish to remain anonymous.

The Helpline is run by an independent contractor and is available to all team members, seven days a week, 24 hours a day. The toll-free number is 1-855-809-3042 or you may choose to complete a web report at www.conehealth.ethicspoint.com. Helpline calls are forwarded to Audit and Compliance Services within 24 hours. Emergencies are forwarded immediately. Cone Health will investigate and respond to all Helpline inquiries. You will be able to follow up on the status of your inquiry, if you wish. Again, no retaliation will be tolerated against any team member who reports information to the Helpline in good faith.

It is important to remember that the Helpline is not intended to replace current Cone Health procedures and processes for communicating information and resolving operational conflicts or problems. For example, you should continue to use Cone Health's policies and procedures for resolving issues such as team member grievances and risk management concerns.

COMPLIANCE Education and Training

Cone Health provides training to all team members and other appropriate parties regarding the Code of Conduct and the Compliance & Privacy Helpline. In addition, many team members will receive specialized training on subjects such as billing, coding, safety and environmental issues, and employment regulations that relate specifically to their jobs. Cone Health conducts ongoing audits to measure the effectiveness of the Compliance and Integrity Program, and compliance education and training.

The Compliance and Integrity Program and related training initiatives are effective only if each team member participates. Managers are responsible for making sure their team members complete the annual continuing education module on the Compliance and Integrity Program, attend any additional compliance training as needed and actively participate in any audits for which their assistance is requested.

Refer to the **Team Member Education policy** for more information.

REPORTING Process

How to Use the Cone Health Reporting Process

If you would like to report a potential compliance issue, talk with your leader.

If the issue concerns your leader, or if you are uncomfortable discussing it with your leader, talk with your higher level leader.

If you are still uncomfortable discussing it, contact:

For Human Resource Issues:

Cone Health People + Culture's People Solutions Center 336-832-8100 or email peoplesolutionscenter@conehealth.com Click here to reach the People Solutions Center portal

For Compliance and Privacy Issues:

The Compliance & Privacy Helpline 1-855-809-3042 or www.conehealth.ethicspoint.com

For Patient Safety and Quality Matters:

The Safety Zone Portal



1200 North Elm Street

conehealth.com