



Code of Conduct 2024

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Message from the Executive Officer

Dear Colleagues,

Sacred Circle Healthcare (SCHC) is dedicated to improving the health of those we serve with a commitment to excellence in all that we do. Together, we continue our journey to transform the health care experience by making Sacred Circle the best place to work and receive care. It is our promise and commitment to treat patients and their loved ones with dignity and respect, and ensure our partners trust us to conduct business in a lawful and ethical manner. SCHC's Code of Conduct sets forth standards and expectations by which we manage and execute our operations. All employees, managers, physicians, medical staff, affiliated providers, agents, contactors, vendors, and board of directors are expected to uphold SCHC's Code and values set forth within. All are expected to fulfill their responsibilities according to this Code, while complying with all applicable federal and state laws, rules, and regulations in addition to all SCHC's policies.

Our leadership team is committed to ensuring all SCHC colleagues and team members are comfortable asking questions and raising concerns. It is everyone's responsibility to safeguard the vision, values, resources, and reputation by reporting any improper, unlawful, or fraudulent activity.

Our compliance colleagues promise to act as partners and advisors in this venture. We welcome comments and concerns from all internal and external parties and SCHC provides a strict non-retaliation policy that applies to every reporting team member. If you have any questions, please contact the Compliance Officer or you may email at [Compliance Occurrence Reporting - Sacred Circle Healthcare](#) or utilize the Compliance Helpline at **877-594-2107**. This Code will be reviewed annually and as needed. On behalf of SCHC's Leadership Team, thank you for your dedication to SCHC and for helping us uphold and promote the principles set forth in this Code of Conduct.



Lorena Horse, Executive Officer of Sacred Circle Healthcare

Turning Values into Actions

Redefining Compassionate Healthcare

Our reputation as a leading healthcare organization depends on the actions of all colleagues and SCHC's efforts in conducting business with integrity, excellence, and accountability. This all serves to understand SCHC's mission, vision and values and ensures we embody this in all that we do. In this Code we will lay out the framework and standards of behavior that guide daily operations and provide content on helping prevent and detect criminal conduct, fraud, and abuse. This Code will also lay out requirements and standards held for all SCHC colleagues in their commitment to ethical standards set by SCHC.

There is no way one document can provide every action upon which staff should act in every situation; therefore, we provide multiple avenues for reporting and avenues to go to for questions and concerns within this document. We also offer additional guidance and have developed a comprehensive set of compliance policies and procedures which may be accessed online at <https://lms.medtrainer.com>. Those policies supplement many of the principles articulated in our Code of Conduct.

Who We Are

SCHC is proudly owned and operated by the Confederated Tribes of the Goshute Reservation (CTGR). CTGR is one of two federally recognized Goshute Tribes. SCHC preserves the Goshute heritage of protecting and caring for family and extends the tradition to all marginalized and underserved populations in our area. To those most in need, SCHC is a compassionate team of allies providing kindness, validation, and uncompromising care. We refuse to let access, ethnicity, or socioeconomic status restrict someone from receiving complete healthcare.

The Goshute ancestors were historically self-sufficient for generation upon generation. It is our responsibility to continue in this tradition by providing life and longevity to the individual and collective members of the Goshute Tribe. As a tribe-owned entity, maintaining our cultural foundation and contributing to the sustainability of our people is at the core of all we do. We are committed to fiscal responsibility and using profits to improve tribal members' access to premier healthcare solutions. Through improved health, community education, and employment opportunities, we enable Native Americans to better themselves while helping secure the tribe's future.

As our ancestors before us, we understand that every individual has a body and spirit that must be nurtured and cared for. Physical. Emotional. Intellectual. Spiritual. Each dimension of health and every component of the Medicine Wheel must be maintained and, if needed, mended to ensure continuation of life's cycles. As we remember our heritage of caring for ourselves, we will in turn be able to care for others.

SCHC's position of differentiation is our Circle of Care™. The Circle of Care philosophy stems from our devotion to patient relationships and the Goshute tradition of healing. Our ancestors understood that ceremony and communication are critical components to health and recovery. Historically, sitting

together, counseling together, and praying together ensured all parties moved forward with positivity and unity toward a common goal.

Today, this philosophy drives our Circle of Care™ as diverse providers work in seamless coordination with each other, external experts, and patients. From primary care and pharmacy to mental health and dentistry, our 360° approach ensures we explore all options and viable solutions for our patients.

Our Mission

Our mission is to deliver quality healthcare with harmony, respect, and integrity; to provide a full “holistic” continuum of care, while promoting wellness education and increasing access to healthcare for American Indian/Alaskan Natives and our diverse patients, families, and communities.

Our Values

The concept of “good enough” does not exist at SCHC. Physicians. Facilities. Methodology. Technology. In all aspects of our approach to care, SCHC expectations are top shelf. Exceeding educational and service baselines, our practitioners are exemplary in their fields and choose SCHC because they choose to make the biggest difference. From the tribe to the doctors and administration, the SCHC employee sees the world in a different way.

The marginalized. The minorities. The uninsured. The refugees. To those who are routinely discriminated against and turned away, we open our doors and our hearts. In place of judgment, we offer compassion. Kindness over criticism. World-class care instead of substandard services. We give voice to populations who are routinely left out of their own healthcare decisions. Treating our patients like the Royalty they are is key to restoring the dignity so vital to the healing process.

Access to the best healthcare services should never be dictated by ethnicity or socioeconomic status. As taught in Goshute ceremonies and prayers, none in the human family are excluded and none are superior. We celebrate our similarity, equality, and diversity. By lifting restrictions on caring for Medicaid, Medicare, private insurance, and uninsured patients, SCHC provides accessible and individualized care to those who otherwise might not receive it. Everyone deserves the best care possible, and we open doors to ensure that happens.

Expectations. Standards. Lives. We’re changing them all. And don’t forget a broken system; we’re changing that, too. It’s an uphill battle but we are underdogs who carry a legacy of resiliency and adaptability. The current minimum acceptable care is, well, unacceptable so we’re leading the charge of change in the name of great healthcare for all. As advocates for our patients, we fight on their behalf like a family member would. We do the hard things, not because we seek the spotlight but because it’s exhilarating to help those who need it most.

And we’re just getting started. Healthcare shouldn’t be conditional.

How to Use this Code

Our Code of Conduct is used as an action plan and applies to all SCHC staff and their relationships with patients, affiliated physicians, third-party payers, subcontractors, independent contractors, vendors, consultants, and all staff members.

All staff members and associates are required to conform to high standards of ethical conduct. Staff are judged not only by official actions and conduct, but also by personal activities that are work-related. The Tribe relies on its staff members as representatives of the Tribe, to properly conduct tribal business, to protect Tribal interests, and to meet the high ethical standards of public service.

All staff members share the responsibility for ensuring that high standards of ethical conduct are maintained within SCHC. Staff members are required to become familiar with the Code of Conduct and to exercise proper judgment to avoid misconduct and conflict of interest situations. Supervisors and department heads must become familiar with the Code of Conduct and provide advice and guidance about the Code of Conduct for all departmental staff and other colleagues.

Staff who violate our code may be subject to disciplinary action, up to and including dismissal. Additionally, we can, and will, terminate a relationship with any third-party business partner if we have concerns about their ethical conduct.

Responsibilities

Compliance Responsibilities

Be Concise. The Compliance Department is responsible for creating concise guidelines to keep it clear and consistent while giving colleagues the tools for adhering to those guidelines.

Be Collaborative. The Compliance Department serves as both partner and advisor to all SCHC Departments and helps them establish solutions to compliance issues.

Be Proactive. The Compliance Department monitors risks and provides guidance on how to address concerns before they become an issue. We practice preventative, instead of reactive, measures.

Be Accessible. The Compliance Department is readily available to all individuals to ensure psychological safety and security when navigating ethical challenges, answering questions, or serving as a listening avenue. We can be reached at [Compliance Occurrence Reporting - Sacred Circle Healthcare](#) or utilize the Compliance Helpline at 877-594-2107. The Compliance Officer welcomes in-person reporting as well.

Employee/Contractor Responsibilities

Be Invested. Use this opportunity to strive in your contribution to our culture in a meaningful and impactful way. Be proactive about demonstrating our values through your work.

Be Accountable. Understand and practice applying this Code and all policies, laws, rules or regulations to the risks that you encounter as a result of your job responsibilities.

Be Inquisitive. Be eager and passionate in your learning journey. If something feels questionable or you have questions or concerns, don't move forward. If you are confused or don't understand, ask questions.

Speak Up. Leaders do not and cannot know everything happening at SCHC. If you see a problem, speak up and follow up until the issue has been resolved. Report to direct supervisors, Divisional Officers, Executive Officer, Compliance Officer, through Teams or email. You may also use the intranet, [Compliance Occurrence Reporting - Sacred Circle Healthcare](#) or utilize the Compliance Helpline at 877-594-2107. The Compliance Officer welcomes in-person reporting as well.

Leadership Responsibilities

Be Knowledgeable. Be a resource for our teams; know and understand our values, code, and policies, and be able to communicate them to teams. Be willing to ask questions if there is something you don't understand.

Be Present. We serve as the voice of SCHC. We, as leaders, have a special responsibility to create a culture of integrity and openness where staff understand their responsibilities and feel comfortable coming to us. We set the example and always model SCHC values.

Be Approachable. We serve as a resource. Always keep our doors open so colleagues feel comfortable coming to us for support.

Be Consistent. As leaders, we do our part and help our teams do theirs. No objective is ever worth compromising our integrity and we hold people who report to us accountable for following our values.

We Make Good Decisions

We Pause

We don't act in urgency without thinking it through first. There is no way one document can address every situation you may encounter and all the reportable examples. If you are not sure or if it doesn't feel right, pause, and think before you act.

We Ask Questions

You should always ask yourself these questions when you're unsure:

- 1) Does this feel right?
- 2) Is this action or request legal, compliant, and consistent with SCHC's values, policies, and Code of Conduct?
- 3) In taking this action or submitting to this request would doing so be in the best interest of SCHC and all affiliated parties?
- 4) Would you be ok with this being on the front of a newspaper?
- 5) If it became known to the public or others, would you stand by your decision?

When to Proceed

If you answered no to any of the questions above, STOP. Do not proceed until you've received additional guidance from leadership, legal or the Compliance Department.

If you answered yes to all the above questions but are still unsure, seek further guidance.

We Speak Up

Use Your Voice

Here at SCHC if we see something questionable, we say something. Leadership works hard to stay informed and aware of all operations and activities within our healthcare facilities and related to our business relationships; however, they cannot be everywhere, and this is impossible without your help. In specific cases of suspected or actual fraud, waste and abuse, harassment, safety concerns, and more, you as the employee have the obligation to report. Reporting a potential issue not only allows SCHC the opportunity to correct and mitigate, but it may also provide protection in respect to SCHC's financial position, reputation, and employment security for all staff.

How to Ask Questions or Raise Concerns

Individuals should be as specific and detailed as possible when reporting issues or concerns. Include persons involved, what happened, when it happened, how and why it happened, if possible. Any of the following reporting avenues are available to you:

- Any manager or supervisor including department heads or direct supervisors.
- The Compliance Department at ext. 131, or 385-955-6540.
- Human Resources at ext. 177, HR@sacredcircle.com
- Compliance Helpline at 877-594-2107. You may also file a compliance report at: [Compliance Occurrence Reporting - Sacred Circle Healthcare](#)

Commitment to Non-Retaliation

Here at Sacred Circle Healthcare, we have a zero-tolerance policy against retaliation for reporting a potential problem or issue and we promise and ensure that we will do everything we can to protect all colleagues and outside parties from any retaliation or retribution for raising awareness of concerns or issues. We are committed to creating a culture where all individuals, including outside parties and partners are comfortable and feel empowered to speak up and not punished.

Response of Leaders

Leaders are Approachable. All employees and parties should feel comfortable voicing any questions or concerns. As leaders we have a responsibility to listen and act thoughtfully. We handle situations with candor and care and treat this as an essential part of resolving issues and building trust. Leaders will always:

Listen with Intent. All conversations regarding potential threats, issues or concerns will be done so with intent on the leader's behalf. We will not listen to respond; we will listen to understand. We appreciate those who come forward and for whom uphold SCHC's values. It is because of these actions that SCHC can thrive and become a better healthcare organization.

Respond with Sincerity. Even in times of disagreement, leaders will approach all concerns and issues with objectivity. All who speak up will be treated with dignity and respect and will not have their motives questioned. Leaders are committed to ensuring that individuals are motivated to address any issues or concerns.

Safeguard Confidentiality. Leaders give full assurance and promise to avoid discussing any contents related to the report with others; and will not share any details except for on a need-to-know basis.

Escalate to Resolve the Issue. Leaders ensure that the issue or concern reported will be escalated to the appropriate department, without fear of conflicts of interest. For example, if a complaint is made about a leader, that leader will not receive the report and will remain separated from any decisions involving the outcome until a full investigation is complete.

Commitment to Investigate

All reports will be investigated no matter the content or level of risk. Individuals reporting are expected to cooperate with the investigators by providing information they know about the contents, acting with honesty and integrity, and respecting the confidentiality of anyone involved in the investigation. If it is concluded that any improper behavior or actions have taken place, SCHC officials will take the appropriate actions which may include the termination of employees or contractors who are engaged in the improper act or behavior.

We Respect Each Other

Why This Matters

We appreciate and encourage all unique thoughts, experiences, and backgrounds of our staff who help us to create, innovate, serve, and care for the health of our patients and the relationships that help foster this environment. For our organization to flourish we must create and maintain a safe and productive work environment for all. This means we all will and must respect our colleagues and appreciate any differences and unique characteristics and viewpoints they bring to the table.

We Value Diversity, Equity, and Inclusion

Turning Values into Action

- We stand against discrimination in all its forms, including racism, sexism, ageism, homophobia, and discrimination based on gender, religion, disability, ethnicity, or other protected characteristics or beliefs.

- We provide equal opportunities in all aspects of employment.
- We are building a diverse and inclusive workplace. We listen to and work with individuals of all backgrounds and ensure that our colleagues know they are valued and respected and that the contribution they make in all areas of our business is recognized.

How You Can Help

- All individuals must be given a fair and equitable chance by managers and leaders.
- We all must take a proactive stance against bias in our work environments and relationships by promoting a positive work environment where people feel like they are heard, welcomed, and valued.
- Provide us with feedback on SCHC 's stance and deficiencies in this area by reporting to your supervisor or emailing compliancereporting@sacredcircle.com or calling 385-955-6540.

We Safeguard Respect and Dignity

Turning our Values into Actions

- Everyone will and must be treated with respect and dignity and SCHC will not tolerate discrimination or harassment in the workplace.
- SCHC's goal is to create and maintain a physically and psychologically safe workplace free from threats, violence, bullying, sexual harassment, name-calling, negative stereotyping, unwelcome physical conduct, offensive gestures, or other abusive or intimidating behavior.
- We provide resources for anyone who experiences bullying or harassment and will investigate reports once received. We promise to protect anyone reporting from further discrimination or retaliation.

How You Can Help

- We will and must always treat others with respect and dignity.
- If you witness harassment or discrimination, speak up.
- If a colleague approaches you about bullying, discrimination, harassment, or other inappropriate behavior, take them seriously and encourage them to report the conduct. If they choose not to do so, we encourage you to report the conduct in a way that maintains their confidentiality.

We Keep Our Colleagues Safe

Our Values in Action

- We promise to never compromise safety to promote business objectives.

- We adhere to stringent health and safety standards and make every effort to maintain safe and healthy working conditions for all entering our facilities.
- We do not tolerate any verbal or physical conduct that is violent or may be misconstrued as violent.
- All facilities will be free from substance abuse or activities that could threaten the safety or effectiveness of SCHC operations, reputation and individual's health and safety.

How You Can Help

- Take reasonable care of your own safety at work and consider the safety of those around you.
- Follow all safety policies and protocols, including all traffic laws and regulations.
- Remember that even if you are not on SCHC property, our rules apply. Act appropriately whenever you are in a work-related setting including when visiting other businesses, during work functions, and on business trips.

Use Your Voice

It is particularly important to report safety concerns promptly. Additionally, if you are a manager, you must escalate all health and safety issues and ensure that appropriate corrective and preventative actions are taken.

We Comply with Laws and Regulations

Why This Matters

The health care industry is a highly regulated industry, and certain business practices that are permissible elsewhere may be illegal for SCHC health care providers. It is important for us to facilitate compliance with all applicable laws and regulations to protect the reputation, integrity, and the future financial health of SCHC which in turn affects how we're able to care for the well-being of our community, employees, and patients. We value our ability to comply; and to ensure this we have developed a comprehensive compliance program. We regularly provide training and education on this compliance program and the underlying regulatory provisions. Several federal and state laws are particularly applicable to health care providers; and we've highlighted a few in this section. This is not a comprehensive list and does not cover state-specific obligations. Other important fraud and abuse laws are covered in our compliance program policies including, but not limited to, The Exclusion Statute and The Civil Monetary Penalties Law.

Exclusion Statute [42 U.S.C. § 1320a-7]

The Office of Inspector General (OIG) is legally required to exclude from participation in all Federal health care programs individuals and entities convicted of the following types of criminal offenses:

1. Medicare or Medicaid fraud, or any other offenses related to the delivery of items or services under Medicare or Medicaid
2. Any patient abuse or neglect
3. Any felony convictions for other health-care-related fraud, theft, or other financial misconduct; and
4. Any felony convictions for unlawful manufacture, distribution, prescription, or dispensing of controlled substances.

The OIG has discretion to exclude individuals and entities for other things such as misdemeanor convictions related to health care fraud other than Medicare or Medicaid fraud or misdemeanor convictions in connection with the unlawful manufacture, distribution, prescription, or dispensing of controlled substances; suspension, revocation, or surrender of a license to provide health care for reasons bearing on professional competence, professional performance, or financial integrity; provision of unnecessary or substandard services; submission of false or fraudulent claims to a Federal health care program; engaging in unlawful kickback arrangements; and defaulting on health education loan or scholarship obligations.

If an individual or entity is excluded by OIG from participation in the Federal health care programs, then Medicare, Medicaid, and other Federal health care programs, such as TRICARE and the Veterans Health Administration, will not pay for items or services that are furnished, ordered, or prescribed. Excluded physicians may not bill directly for treating Medicare and Medicaid patients, neither may their services be billed indirectly through an employer or a group practice. In addition, if an individual or entity furnishes services to a patient on a private-pay basis, no order or prescription that is given to that patient will be reimbursable by any Federal health care program.

Antikickback Statute (AKS)

The AKS is a criminal law that prohibits the knowing and willful payment in return for inducing or rewarding patient referrals or the generation of business involving any item or service payable by the Federal health care programs (e.g., drugs, supplies, or health care services for Medicare or Medicaid patients).

The Government does not need to prove patient harm or financial loss to the programs to show that a physician violated the AKS. A physician can be guilty of violating the AKS even if the physician rendered the service and the service was medically necessary. Taking money or gifts from a drug or device company or a durable medical equipment (DME) supplier is not justified by the argument that you would have prescribed that drug or ordered that wheelchair even without a kickback.

Criminal penalties and administrative sanctions for violating the AKS include fines, jail terms, and exclusion from participation in the Federal health care programs. Under the Civil Monetary Penalties Law (CMPL), physicians who pay or accept kickbacks also face penalties of up to \$50,000 per kickback plus three times the amount of the remuneration.

The Federal False Claim Act (FCA)

The FCA can be applied where any person is found to have knowingly submitted, or caused to submit, false claims to the government. These individuals are liable for three times the government's

damages plus a penalty that is linked to inflation. Some examples of violations would be billing for services not rendered, knowingly submitting inaccurate claims for services, or taking or giving a kickback for a referral.

Filing false claims may result in fines of up to three times the program's loss plus \$11,000 per claim filed. Under the civil FCA, each instance of an item or a service billed to Medicare or Medicaid counts as a claim, so fines can add up quickly.

Physician Self-Referral or Stark Law

The Physician Self-Referral Law, commonly referred to as the Stark law, prohibits physicians from referring patients to receive "designated health services" payable by Medicare or Medicaid from entities with which the physician or an immediate family member has a financial relationship, unless an exception applies. Financial relationships include both ownership/investment interests and compensation arrangements. For example, if you invest in an imaging center, the Stark law requires the resulting financial relationship to fit within an exception or you may not refer patients to the facility and the entity may not bill for the referred imaging services.

The Stark law is a strict liability statute, which means proof of specific intent to violate the law is not required. Stark law prohibits the submission, or causing the submission, of claims in violation of the law's restrictions on referrals. Penalties for physicians who violate the Stark law include fines as well as exclusion from participation in the Federal health care programs.

How You Can Help

Be present and observe activities and if you suspect any wrongdoing, report. The Compliance Helpline is available to all covered persons for advice and guidance on compliance-related matters. It is everyone's responsibility to perform their duties in compliance with applicable laws and regulations and with our policies and procedures, including those incorporated into the compliance program. Any actions that violate federal, state, or local laws and regulations are strictly forbidden and any taking of such actions or involvement will be subject to immediate disciplinary action if such misconduct occurs.

We Protect Privacy

Why This Matters

As a Healthcare organization we are an intimate part of the lives of thousands of patients and communities. We must always respect and guard their privacy. We are equally responsible for caring for the personal information of our colleagues and the confidential business information of SCHC. Protecting this information is the right thing to do and it is an obligation of every employee.

We Respect Privacy and Personal Information

Turning Values into Action

- We know and understand the rules and standards regarding the collection, use and maintenance of personal data and protected health information, including

the Health Insurance Portability Act of 1996 (HIPAA) and General Data Protection Regulation (GDPR).

- We exercise care when dealing with information that could be used to identify an individual, including: names, email addresses, addresses, social security numbers, drivers' license numbers, and personal health information (or other personal information).
- We are transparent about our privacy practices and how individuals can contact us with questions or concerns.

How You Can Help

- We must only collect personal information for legitimate business purposes and only retain it if it is needed.
- Only share personal information with those who have a legitimate need to know and whose access is appropriately authorized.
- Use additional care when dealing with any information relating to a patient's health or treatment.

Use Your Voice

Privacy breaches often occur because of human error – such as clicking on a “phishing” link in an email. Don't be afraid to speak up if you suspect that you may have been the victim of such a scam or if you otherwise suspect any unauthorized use or disclosure of SCHC information. The sooner you let us know about an issue, the sooner we can protect the information entrusted to us.

We Keep Confidential Information Confidential

Turning Values into Action

- As the trusted organization for our patients and other healthcare parties, we promise to remain vigilant about protecting confidential business, personal data, and personal health information.
- We protect the confidentiality of our partners' confidential business information and the personal health information of our patients as though it were our own.

Confidential Information Can Look Like

- Business plans
- Pricing
- Costs Customer lists, purchasing habits and preferences
- Personal data
- Research and development

Personal Information Can Look Like

- Name
- Phone number
- Email address
- Social media handle
- Birthdate
- Social Security number
- Drivers' License number

Protected Health Information Can Look Like

- Demographic information
- Medical histories
- Test and laboratory results
- Insurance information

Remember, these are only examples, not a conclusive list. Use caution with any information that could potentially fall into any of these categories.

How You Can Help

- Only use confidential information for valid business purposes.
- Be careful when discussing confidential information in public places where conversations may be overheard.
- Follow SCHC policies and protocols for protecting confidential, private, and personal health information.
- Protect devices and files containing confidential information when working off SCHC property.

We Do Business with Integrity

Why This Matters

Conducting business with integrity is a fundamental requirement for operating a successful company. We create and adhere to policies and procedures that ensure we act ethically, sustainably, and in compliance with all applicable laws and regulations. This is true even when doing the right thing might be more time consuming, expensive, or could cost us business.

We Take Accountability for Our Third Parties

Turning Values into Action

- Whenever we direct any third party to act on behalf of SCHC, we hold ourselves accountable for the actions of that third party.
- Our commitment to ethical conduct and responsible business practices extends to all third parties that act on our behalf or for the benefit of SCHC.
- We practice extensive due diligence to ensure that we are partnering with ethical and qualified business partners.

How You Can Help

- Do not ask a third party to do anything on behalf of SCHC that would be prohibited if we did it directly.
- Use caution when entering into any relationship or agreement with a third party and avoid forming relationships with third parties that you know or suspect are involved with any unethical or illegal business practices.

Preventing Bribery and Corruption

Turning Values into Action

- We do not give, offer, or accept bribes in any form – that includes giving or receiving any payments, services, gifts, entertainment, or favors to obtain an improper business advantage.
- We do not allow any third parties to engage in corrupt behavior on our behalf.
- We maintain accurate books and records.

How You Can Help

- Understand that a bribe can be anything of value, not just cash.
- Do not offer or give money or anything else of value to someone in exchange for securing a business advantage for SCHC.
- Never do anything through a third party that you are not authorized to do yourself.

Handling Business Courtesies Appropriately

Turning Values into Action

- Although exchanging gifts and hospitality may be appropriate in some professional situations, we take care to ensure that these business courtesies do not create a conflict of interest or otherwise violate the law or our Code of Conduct.

- We do not offer or accept business courtesies where doing so could even appear to influence a business decision or where it could compromise or be reasonably seen to compromise the receiver's judgment, integrity, or impartiality.
- We only offer or accept business courtesies that are appropriate, proportionate, traceable, and transparent.

When in doubt about any situation or relationship please do not hesitate, REPORT.

We Hold Ourselves and Others Accountable

Why This Matters

Our position as a successful and meaningful healthcare organization is dependent on the trust of our colleagues, patients, visitors, and the public. We are aware and transparent in our actions and operation to protect, serve and partner.

We Provide Safe, High Quality Health Care and Service

Turning Values into Action

- Our work impacts patients' lives and health. Accordingly, we provide our colleagues with the tools and services needed to perform and provide a high standard of quality patient care.
- We seek to comply with all applicable Federal, State, and local laws and implement procedures to ensure safety and quality for our patients.

How You Can Help

- Always follow policies and procedures relating to safety and quality control.
- Make sure all products, processes, and care satisfy the relevant quality and safety standards.
- Implement and follow our procedures for notifying appropriate personnel when quality or safety standards are not met.

Speak Up

Never turn a blind eye if you are worried about patient care or safety. Tell your supervisor immediately if you are concerned that a patient, colleague, or other party might not be safe.

We Avoid Conflicts of Interest

Turning Values into Action

- We protect our reputation as a trusted business partner and avoid conflicts of interest. We disclose any situations that could create even the appearance of a conflict.
- We help our colleagues to avoid situations where their personal interests might not align with what is best for SCHC, creating a conflict of interest.
- We prevent conflicts where possible and address them promptly if they arise.

How You Can Help

- Use caution when your personal interests or relationships, including business activities and familial obligations, might put you in a position where your personal wants and needs could influence or appear to influence your business decisions or actions.
- Disclose any potential or actual conflict of interest to your supervisor and Compliance Officer.
- Avoid using SCHC confidential business information for your own personal gain.
- Use caution when investing in, or otherwise doing business with, any company that has a potential or actual business relationship with SCHC.

We Protect SCHC Property

Our Values in Action

- We use company resources wisely, carefully, and only for SCHC business.
- We value our intellectual property and will vigorously defend our intellectual property rights.
- We always respect the intellectual property rights of others.

How You Can Help

- Only use SCHC equipment, facilities, and resources to do work for SCHC and do not remove equipment from our facilities without permission.
- Work to prevent the loss, misuse, or theft of SCHC property.

We Maintain Strong Internal Controls

Turning Values into Action

- We are honest and accurate when recording and reporting financial and business information.

- We maintain accurate books and records and do not omit or misrepresent facts and figures.
- We are committed to providing full, fair, accurate, timely, and understandable disclosures of financial information.

How You Can Help

Make sure any books or records you are responsible for are accurate, sufficiently detailed, and up to date so they give an accurate picture of our business. This responsibility is shared by all of us, not just our published accounts and never knowingly misrepresent facts about Sacred Circle Healthcare.

Acknowledgement

I agree to comply with the standards referenced in the Code of Conduct and all related policies and procedures. I acknowledge that the Code of Conduct is a statement of principles for individual and business conduct and does not constitute an employment contract.

Employee Printed Name

Employee Signature

Date