

The Westfield Memorial Hospital Code of Ethics

The Westfield Memorial Hospital Code of Ethics is a guiding set of principles for the operation of all Westfield Memorial Hospital entities. By its Code of Ethics, the hospital requires that all persons employed, representing, or doing business with Westfield Memorial Hospital, including members of the medical staff, allied health professionals, associates, leaders, board members, and all vendors exhibit the highest standards of clinical and business ethics and conduct all clinical and administrative operations in accordance with the mission of Westfield Memorial Hospital and in compliance with all regulatory requirements. In keeping with the Westfield Memorial Hospital mission, our fundamental objectives are to enhance the overall quality of life, dignity and well-being of every individual who needs health care services, and to create a more equitable, accessible, effective and efficient health care system.

We are a mission-driven workforce and we are obligated to act in ways that merit the trust, confidence and respect of our patients, the general public and our co-workers. Therefore, all persons who work for Westfield Memorial Hospital observe a Code of Ethics and are expected to adhere to the highest moral standards both on and off the job. Conduct that is illegal or not consistent with Westfield Memorial Hospital policy will result in disciplinary action, which may involve suspension or termination.

Under Corporate Compliance, observing our Code of Ethics is not only our responsibility; it is the law. Westfield Memorial Hospital is committed to complying with all federal, state and local laws and regulations. This Code of Ethics requires truthfulness, honesty and personal integrity. In general, the following apply to all Westfield Memorial Hospital associates and physicians or other persons affiliated with Westfield Memorial Hospital..

A. QUALITY PATIENT CARE

The highest priority for all associates - whether they work in clinical or non-clinical settings - is quality care for our patients and their family members. Physicians have the ultimate responsibility for decisions regarding patient diagnosis and treatment. Physicians, leaders and patient care associates are obligated to provide only appropriate and necessary care based on the patient's needs regardless of gender, race, color, age, religion, creed, non-job-related disability, national origin, ancestry, veteran status, political affiliation or any other status legally protected by federal, state or local law. Policies & procedures and information about the relationship between the use of care, treatment and services, and financial incentives as they relate to either referring to or using services are

available to all patients, staff, licensed practitioners and contracted providers when requested. Patient rights and responsibilities as well as spiritual, religious and cultural beliefs and practices of patients and their family members must be understood and considered with the utmost respect. Physicians are obligated to discharge patients whose conditions no longer require hospital services. To maintain the continuity of care, physicians and associates provide guidance and help to arrange alternative care delivery and/or specialized care not available at Westfield Memorial Hospital. Physicians and patient care associates are also required to provide patients with advance directives information and to support the patient's right to accept or refuse medical care. Adherence to our high quality patient care standards and the Westfield Memorial Hospital Code of Ethics directly affect patient outcomes and demonstrate our compassion for our patients and their family members.

B. CORPORATE COMPLIANCE

All persons working at a Westfield Memorial Hospital facility have the duty to understand and maintain a working knowledge of all laws, rules, regulations, and policies related to their responsibilities and areas. Our Corporate Compliance Program has been established to assist in the education of persons working at or with Westfield Memorial Hospital entities in these requirements. Suspected or actual non-compliance with regulatory requirements and laws must be reported. All leaders have the duty to ensure that this reporting can be made without fear of reprisal. The duty to report a non-compliance issue is so important that failure to report will result in disciplinary action. This report of a non-compliance issue should be made to either an immediate supervisor or to the Westfield Memorial Hospital Corporate Compliance Officer. If desired, the report can also be made anonymously via the Compliance Hotline, toll free at (877) 451-8070. Associates and physicians are expected to cooperate with all inquiries and investigations that relate to suspected violations of the Westfield Memorial Hospital Code of Ethics, customer/patient relations issues or any regulatory requirements affecting the operation of the hospital.

Fraud, Abuse and The False Claims Act

Our physicians and associates work hard to ensure that we create accurate and truthful patient bills and submit accurate claims for payment from any payer, including Medicare and Medicaid, commercial insurance, or our patients. It's the right thing to do, and federal and state laws require accuracy in health care billing.

The federal False Claims Act (31 USC 3729-33) makes it a crime for any person or organization to knowingly make a false record or file a false claim with the government for payment. "Knowing" can include deliberate or reckless ignorance of facts that make

the claim false. Penalties for violating the federal False Claims Act can be up to three times the value of the False Claim, plus from \$5,500 to \$11,000 in fines, per claim.

Examples of possible False Claims include someone knowingly billing Medicare for services that were not provided or were not ordered by a physician, services that are not medically necessary, accompanied by an illegal inducement or provided as the result of a prohibited referral ,or for services that were provided at sub-standard quality where the government would not pay.

Westfield Memorial Hospital is committed to complying with all federal, state and local laws and regulations. As such, any person associated with Westfield Memorial Hospital who suspects or knows a False Claim was filed for payment should notify the appropriate leader or the Corporate Compliance Officer so that the error can be corrected. He/she may also file a lawsuit in Federal Court on behalf of the government and, in some cases, receive a reward for bringing original information about a violation to the government's attention.

New York also has a False Claims Act as well as several other laws and regulations that allow a similar lawsuit in state court if a False Claim is filed with the state for payment, such as under Medicaid or Workers' Compensation. (see the WMH Corporate Compliance Communication/Reporting/Investigation policy for a more complete description of applicable regulations)

Westfield Memorial Hospital policy protects anyone who reports a suspected or actual violation from reprisal. The federal and state False Claims Acts as well as several other laws and regulations also protect anyone who files a False Claim lawsuit from being fired, demoted, threatened or harassed by their employer for filing the suit.

Our Corporate Compliance Program supports compliance with the False Claims Act by:

- Monitoring and auditing to prevent or detect errors in coding or billing.
- Educating our physicians and associates that they are responsible to report any concern about a possible False Claim.
- Investigating all reported concerns and correcting any billing errors discovered.
- Protecting our associates from adverse action when they do the right thing and report any genuine concern. Westfield Memorial Hospital will investigate any allegation of retaliation against an associate for speaking up.

A. BUSINESS PRACTICES

All information concerning Westfield Memorial Hospital business, associates and medical staff must be held in strict confidence. It must not be discussed with persons not needing to know such information and certainly never with people outside the hospital. As

responsible stewards of hospital resources, all Westfield Memorial Hospital associates, physicians and board members are expected to exercise good faith and honesty when conducting business on behalf of the hospital and to comply with all applicable bylaws, rules, regulations and policies.

Record Maintenance: All records, whether related to hospital business matters or patients, must be protected, maintained and retained in accordance with applicable laws and Westfield Memorial Hospital policy.

B. LEADERSHIP

Leaders are responsible for promoting the Westfield Memorial Hospital Code of Ethics and leading by example. They must exemplify Westfield Memorial Hospital's high ethical standards and practices and work to create a safe environment and culture that promotes high clinical and business standards. They must also maintain a working environment that is free from harassment, sexual and other; coercion of any kind, especially to perform illegal or unethical acts; and discrimination on the basis of gender, race, color, age, religion, creed, non-job-related disability, national origin, ancestry, veteran status, political affiliation or any other status legally protected by federal, state or local law. Our leaders must ensure that associates have a platform to freely express ethical concerns and provide mechanisms for discussing and addressing such concerns. Leaders are also charged with ensuring that their associates have sufficient information and resources to maintain compliance with regulatory and hospital standards.

C. COMMUNITY RELATIONS

Westfield Memorial Hospital's effectiveness in meeting the needs of patients depends to a large degree on the confidence patients have in the hospital. Patients and visitors may not understand the complexity of the care that is provided by Westfield Memorial Hospital, but they do understand the courtesy, concern, kindness, and compassion demonstrated by associates. It is also extremely important that all associates take an active interest in contributing to the best possible relationship between Westfield Memorial Hospital and the community by continuously working to improve the availability and provision for health promotion, education and patient care. Associates must also work closely with other community and regional health care organizations and professionals to share solutions for providing care to the residents of the areas we serve.

D. MARKETING AND PUBLIC RELATIONS

Associates and leaders involved in marketing and public relations practices for Westfield Memorial Hospital promote hospital activities, health care services and job and educational opportunities to the residents of the communities we serve to enable them to make enlightened judgments and decisions regarding services. Marketing and

advertising materials and ads should reflect hospital services and levels of licensure and certification in a fully informative, non-deceptive manner.

E. CONFLICT OF INTEREST

Conflicting situations may arise where an associate is performing services outside of work. While associates have many competing demands for their time and energy, associates are always expected to give first priority to their employment relationship with Westfield Memorial Hospital. Outside working relationships must not conflict with the goals and objectives of Westfield Memorial Hospital. Associate activities, which might present conflicts with the goals or services of Westfield Memorial Hospital, must be reported to department management.

Leaders, Medical Staff and Board Members: It is the duty of all leaders, board members and medical staff members to act in the best interests of Westfield Memorial Hospital in all transactions related to their duties on behalf of the hospital. In the event any leader, board member or medical staff member has any direct or indirect interest in, or potential benefit from, any individual, corporation or organization that proposes to enter into any transaction with Westfield Memorial Hospital for the sale, purchase, lease or rental of property, products or equipment, or to render or employ services, personal or otherwise, the leader, board member or medical staff member must immediately notify the Westfield Memorial Hospital president and CEO of such interest or potential benefit and shall thereafter refrain from voting or otherwise attempting to exert either directly or indirectly any influence on the Westfield Memorial Hospital to affect its decision to participate or not participate in such transaction or services. Westfield Memorial Hospital leaders, medical staff members and board members must disclose outside employment activities that may conflict with the interests of the hospital. It is possible that such disclosure may result in request for resignation from the board of trustees, medical staff or leadership staff.

Tips and Gifts: It is rewarding to an associate when a patient or relative appreciates services, but associates are reminded that they cannot accept gifts of cash or cash equivalents from patients. Be polite yet firm in refusing the gift, and explain that, according to hospital policy, associates are not to accept these gifts. It is the policy of Westfield Memorial Hospital that associates, leaders, medical staff and board members, allied health professionals and vendors may not accept or extend a gift or business courtesy in order to influence purchasing decisions, patient care or referrals. However, gifts valued at \$100 or less that are given by any person or organization that has a business relationship with Westfield Memorial Hospital may be accepted by associates and medical staff members. Monetary gifts should be sent to the Westfield Memorial Hospital Foundation. Perishable or consumable gifts given by a patient, person or

organization that does business with Westfield Memorial Hospital are not subject to a specific dollar amount.

H. CONFLICT OF CONSCIENCE

Westfield Memorial Hospital recognizes patient care responsibilities may, at times, create a conflict with associates' religious, ethical and/or cultural beliefs ("conscience conflicts"). To provide associates with a mechanism for resolving such conflicts, the hospital has established a procedure for requesting exclusion from an aspect of patient care based upon these beliefs. The paramount consideration when evaluating any requests is the impact on patient care.

I. PRIVACY AND SECURITY OF INFORMATION

Westfield Memorial Hospital has a legal and ethical responsibility to safeguard the privacy of all patients and associates and to protect the confidentiality of their health information. It is the policy of Westfield Memorial Hospital to hold all associates, physicians and business partners to the levels of accountability outlined in applicable state and federal laws when in contact with confidential materials. Such information can be in the form of the written or spoken word and viewed in either hard copy or electronic form. Associates, physicians and business partners have a duty to keep information private and secure at all times while conducting treatment, processing claims and maintaining hospital operations. Access to information systems is only granted after the associate has demonstrated a need for access, and the associate has signed a confidentiality agreement to use the information and/or system to conduct hospital business. Breach of confidentiality and misuse of any information system are considered serious violations of policy and are dealt with according to hospital corrective action and applicable federal laws.