



CODE OF CONDUCT & BUSINESS ETHICS

A Message from the Board of Directors and CEO

Western Connecticut Health Network's (WCHN) success and reputation depend upon the integrity of its employees. WCHN has maintained a reputation for lawful and ethical behavior, a reputation to which you and your colleagues both past and present, have contributed since our beginning. Our reputation for high standards of business conduct and integrity is one of our greatest assets, as it enables us to continue to provide compassionate, cost-effective care to those in need.

As part of WCHN's commitment to integrity, we have periodically adopted policies and procedures to protect against unlawful activity. Among these are the provisions of WCHN's ethical framework, code of business ethics and corporate compliance policy that specifically address areas that may be susceptible to unlawful behavior within the context of our business. Integrity, in the broadest sense, must govern our actions in all of our relationships, not just with patients, but with physicians, visitors, vendors and each other. We ask you to continue to adhere to the guiding principles set forth in the applicable policies and procedures of WCHN and dedicate yourself to:

- Obeying the applicable laws and regulations governing our health network.
- Being honest, fair and trustworthy in all of your activities and relationships.
- Avoiding all conflicts of interest between work and personal affairs.
- Fostering an atmosphere in which equal opportunity extends to every member of our diverse community.
- Striving to create a safe workplace and to protect the environment.
- Fostering leadership at all levels, so as to sustain a culture where ethical conduct is recognized, exemplified and valued by all employees and by others doing business with WCHN.
- Establishing accountability for compliance at all times.

If you have questions or concerns about what is appropriate conduct for you or your colleagues, or the organization itself, please promptly contact your supervisor or WCHN's Chief Audit, Compliance & Privacy Officer at extension 7110. Concern about appropriate conduct will be promptly addressed with professionalism, care and respect.

WCHN does not condone questionable or criminal conduct by employees or others. Our reputation can be severely damaged, and our mission jeopardized, if even one employee violates the law. Failure to report observed or known instances of wrongful activity or criminal conduct may be grounds for sanctions, ranging from reprimand to termination. WCHN expects all employees, agents and vendors to conform to the highest ethical standards and to avoid even the appearance of wrongful conduct.

We are privileged to work for WCHN. We must, everyday and in every way, preserve and strengthen our commitment to total, unyielding excellence and integrity.

John M. Murphy, M.D., President & CEO
Western Connecticut Health Network

ETHICAL STANDARDS

Western Connecticut Health Network expects all employees to conduct themselves in accordance with all legal requirements and institutional policies that apply to their positions. The Ethical Standards outlined below must be adhered to by all staff.

Compliance with legal requirements:

We must abide by the letter, as well as the spirit, of all applicable laws and regulations.

Adherence to ethical standards:

We must adhere to the highest ethical standards of conduct in all activities.

Respect for patients:

All patients are entitled to equal access to care and to be treated with respect and dignity. We must respect the privacy of patients and fully comply with confidentiality obligations.

Respect for fellow employees:

All employees are entitled to be treated fairly and respectfully. Discrimination based on race, color, religion, national origin, age, gender, marital or military status, disability or sexual orientation is strictly prohibited, as is sexual harassment.

Maintenance of accurate records and documents:

All Western Connecticut Health Network records, documents, and reports must be accurate, complete and in compliance with internal as well as governmental requirements. All bills for patient care services must be based on the services actually provided and supported by the required documentation.

Avoidance of conflict of interest:

We must avoid conduct which has even the appearance of conflict between our personal interests and those of Western Connecticut Health Network, and comply fully with the Policy on Conflicts of Interest.

Adherence to proper business practices:

We must conduct our business activities on the basis of fair competitive practices. All purchases of services and supplies must be from qualified and reliable sources and be based upon objective factors.

Compliance with environmental laws:

We must comply fully with all environmental laws and regulations - All hazardous materials and infectious wastes must be stored, handled and disposed of in full compliance with all laws, regulations and policies.

Protection of occupational safety:

To ensure a safe work environment, we must abide by all laws and regulations regarding occupational safety.

Maintenance of a drug and alcohol free workplace:

The use, sale, purchase, transfer, possession or presence in one's system of illegal drugs is strictly prohibited. Similarly, the use, sale, purchase, transfer, possession or presence in one's system of alcoholic beverages while on duty is prohibited.

Reporting concerns:

Employees are encouraged to come forward with any concerns or information regarding an actual or possible violation of this code or Western Connecticut Health Network's policy and cooperate fully in the investigation of any alleged violation. Reports may be made either in person, by telephone or in writing to any of the following:

- Your Supervisor
- Human Resources
- Compliance Office
- Confidential Compliance & Privacy HotLine 844-650-1212

All reports will be maintained in confidence to the extent which is practical and will be thoroughly investigated and a resolution determined. Any employee reporting a concern in good faith will not be subjected to retaliation in any way.

Discipline of violations:

Western Connecticut Health Network will take disciplinary action, including dismissal when appropriate, against any employee who violates any legal requirements or institutional policies, including anyone who fails to report violations or retaliates against any individual for reporting in good faith a possible violation.

Questions regarding the Code:

This code is designed to remind you of the general legal requirements and institutional policies that you must adhere to as an employee of Western Connecticut Health Network. It is not a substitute for existing and future policies of the Health System.

If you have any questions regarding the Code, you may direct them to your supervisor or the Compliance Office at 203-739-7036.