

CODE OF ETHICS

Wake Way Behaviors in Action



Code of Ethics – WakeWay Behaviors in Action



WakeMed Health & Hospitals exists to improve the health and well-being of our community. Our success as an organization is built upon a foundation of dedicated and compassionate employees who put our patients and families first in all we do.

We are fortunate to have a culture at WakeMed – the Wake Way – that is unique and has set us apart from other organizations for over 55 years. The Wake Way includes four key behaviors – **respect for people, communication, teamwork and commitment & accountability** – that enable the WakeMed family to pursue our aspirational goals, one of which is ensuring the highest ethics and standards of integrity and corporate conduct.

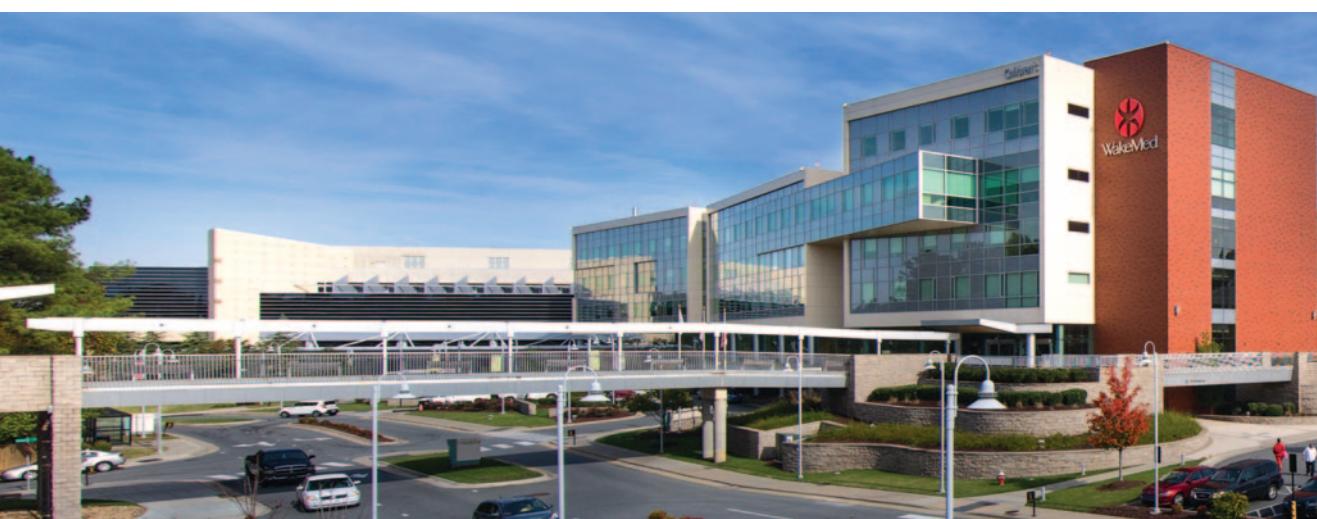
This Code of Ethics builds on the Wake Way behaviors, providing an overview of the policies, laws, regulations and expectations that employees, medical staff members, volunteers and others associated with WakeMed should uphold. The Code of Ethics is not intended to cover all situations that you may encounter, but offers guidelines to help you make the right decision when faced with difficult choices so you can help safeguard WakeMed's tradition of strong moral, ethical and legal standards.

Our success depends on the sound judgement and personal integrity of every member of the WakeMed family. By following the Code of Ethics, you can support our efforts to achieve our mission, vision and values. Please join me in fulfilling our commitment to protecting and strengthening WakeMed's reputation for integrity and keeping our promises to each other and the patients we serve.

If at any time you have a concern, question or need clarification about anything outlined in this document, please contact a member of the Corporate Integrity & Compliance department.

Donald Gintzig
President & CEO

David Nussman
*Interim Vice President, Chief
Compliance & Privacy Officer*





Learn more about the Wake Way behaviors and the role they play in our success.



Creating an Ethical Culture

In health care, we have an obligation to our patients, our community and each other to act with integrity and put our values into action. That's why having the highest ethics and standards in all we do is one of WakeMed's 10 Aspirational Goals and an expectation of all WakeMed employees.

Being ethical isn't difficult – it just means doing the right thing, for the right reasons, every time.

Leader Responsibility

WakeMed leaders are accountable for helping their team members understand the expectations outlined in the Code of Ethics and other applicable laws, regulations and policies. Supervisors, managers and directors must:

- Create an environment that supports the highest ethics and standards.
- Exemplify ethical behavior at all times and hold employees accountable for doing the same.
- Maintain an open-door policy where employees are encouraged to discuss the Code of Ethics and raise questions and concerns.
- Ensure we do not retaliate against persons who report a suspected law or policy violation in good faith.
- Take prompt, appropriate action when a potential law or policy violation arises.
- Consider commitment to the Code of Ethics and other policies when evaluating employees.
- Seek assistance from the chief compliance & privacy officer when addressing questions or concerns.

Employee Responsibility

Employees are responsible for maintaining the highest professional and ethical standards when conducting WakeMed business or medical activity. Employees must:

- Understand the Code of Ethics and how it applies to you.
- Refer to the Code and WakeMed policies to guide decision making.
- Ask questions and report concerns as soon as they arise.
- Complete annual training as assigned.





I

PUT PATIENTS FIRST



Patients and their families are the focus of all that we do. They are the reason we exist and the driving force behind our work. We treat patients and their family members with respect and dignity and provide care that is necessary and appropriate, regardless of their ability to pay.

Patient Safety

Patient safety is a shared responsibility that involves all members of the WakeMed team. As a WakeMed employee, you have a responsibility to report any observed or suspected incidents of non-compliance with federal or state laws and WakeMed policies.

Medical Research

We follow the highest professional standards for conducting research and will comply with all federal statutes and regulations. Research activities will be pursued with honesty and integrity, keeping the patient first with a goal of benefiting others. All research activities are monitored by WakeMed and all funds provided to support research activities are intended only for authentic purposes, separate from referrals. WakeMed provides oversight to protect the health and safety of the patients involved with research studies or activities.



LAWS YOU SHOULD KNOW

The **Health Insurance Portability and Accountability Act (HIPAA)** enables patients to have an accurate understanding of how they can protect their health information and governs how their providers will protect this information.

The **Emergency Medical Treatment and Active Labor Act (EMTALA)** is a federal law that requires emergency departments to ensure that all patients who come in are stabilized and treated, regardless of their ability to pay.



I

PROTECT INFORMATION



WakeMed is committed to protecting our patients' information by following HIPAA, state confidentiality laws and WakeMed privacy policies.

Patient information must be protected at all times and should not be shared with anyone who does not have a legitimate "need to know." This includes, but is not limited to, coworkers, family members and friends.

To protect our patients' personal health information, you have a responsibility to:

- Only access, use or disclose the minimum information necessary to provide treatment, conduct hospital operations or collect payment.
- Refrain from discussing confidential or business information in public places.
- Only disclose personal health information if you have express, written consent from the patient or appropriate written authority from a law enforcement agency (e.g., valid warrant, subpoena).
- Safely store or destroy personal information that is no longer needed in accordance with state, federal and organizational documentation and destruction policies.
- Uphold WakeMed's Confidentiality Agreement both during and after employment.



What is HIPAA and Data Privacy? *The Health Information Portability and Accountability Act (HIPAA) was designed to protect personal health information. Watch the video to learn more.*

Report any known or suspected HIPAA violations to the Privacy Department.

Protect Confidential Information

Confidential information includes – but is not limited to – patient information as well as proprietary information about WakeMed’s operations and strategies. Some examples of confidential information include:

- Patient lists or identifiable clinical information
- Social security numbers
- Passwords
- Cost data or financial information
- Contracts and supplier information

Confidential information should only be used when it is necessary to perform your job and must not be shared unless there is a legitimate need to know and the disclosure is not prohibited by law or regulation. We may require our business partners to protect confidential information through a written agreement, such as a business associate agreement or data use agreement.

Any WakeMed employee who knows or suspects that confidential information has been compromised must report the potential breach to WakeMed’s Privacy Department.

Accessing a patient’s chart without a medical or professional “need to know”, is a violation of HIPAA, state law and WakeMed policy. Doing so may result in disciplinary action up to and including suspension or discharge.

Privacy in the Digital Age

Because much of WakeMed’s clinical and business information is created and stored in electronic systems, WakeMed policy requires you to:

- Keep passwords confidential.
- Encrypt and secure mobile devices, laptops, flash drives, external hard drives and other electronic devices that contain confidential WakeMed information.
- Log off or lock computers when you are finished or walk away.
- Encrypt emails containing confidential information.
- Immediately report security issues, including lost or stolen devices.



SHOW RESPECT FOR MY WORK ENVIRONMENT



The safety of our patients, visitors, families and employees is of the utmost importance. As a member of the WakeMed family, you should:

- Know the health and safety requirements and potential hazards associated with your job.
- Promote and protect individual health and safety at all times.
- Take precautions to avoid injury or harm to patients, coworkers and yourself.
- Use, store, transport and dispose of hazardous materials in compliance with federal and state laws.
- Report any unsafe conditions to your manager or the Environmental Health & Safety Department.

Support a Substance-Free Workplace

WakeMed prohibits the use, possession, distribution or sale of legal or illegal drugs or alcohol on its premises, in its vehicles or while you are conducting WakeMed business. Prescription medications may be used when medically necessary. If, as a WakeMed employee, you participate in an event where alcohol is available, you are responsible for using good judgment and acting in an appropriate manner at all times.

Ethical Hiring Practices

WakeMed's hiring, promotion and other employment decisions are made without regard to race, color, religion, gender, national origin, ancestry, citizenship, age, medical condition or disability, marital status, sexual orientation, veteran status or any other characteristic protected by law. To avoid potential conflicts of interest, WakeMed discourages hiring close relatives or those with whom an employee may be romantically involved into the same department.

WakeMed does not tolerate any form of harassment, including sexual harassment, against its employees or those with whom we do business.

Partner with Approved Vendors

All contracts and proposals should be submitted to the Legal Department before being signed. Agreements with vendors that require access to patient health information must have a Business Associate Agreement. WakeMed does not contract with individuals or companies convicted of any criminal offense related to health care or listed by a federal or state agency as excluded, disbarred or ineligible for participation in federally funded health care programs.



MEDIA, SOCIAL MEDIA AND POLITICAL ACTIVITIES

Media inquiries must be referred to WakeMed Marketing & Communications. WakeMed employees should not speak to the media on behalf of WakeMed unless authorized to do so by a member of Marketing & Communications.

WakeMed employees should not post opinions, pictures or views that involve WakeMed patients or confidential information on social media, blogs, personal websites or bulletin boards. Do not use your WakeMed title, address or email address to post or share complaints about personal or work-related matters or views and opinions that would damage the reputation of WakeMed's or affiliated health care providers.*

WakeMed employees are free to engage in political activity on their own time, but may not do so on WakeMed property or using WakeMed resources. Employees may not harass or attempt to influence coworkers regarding a particular political position or candidate.

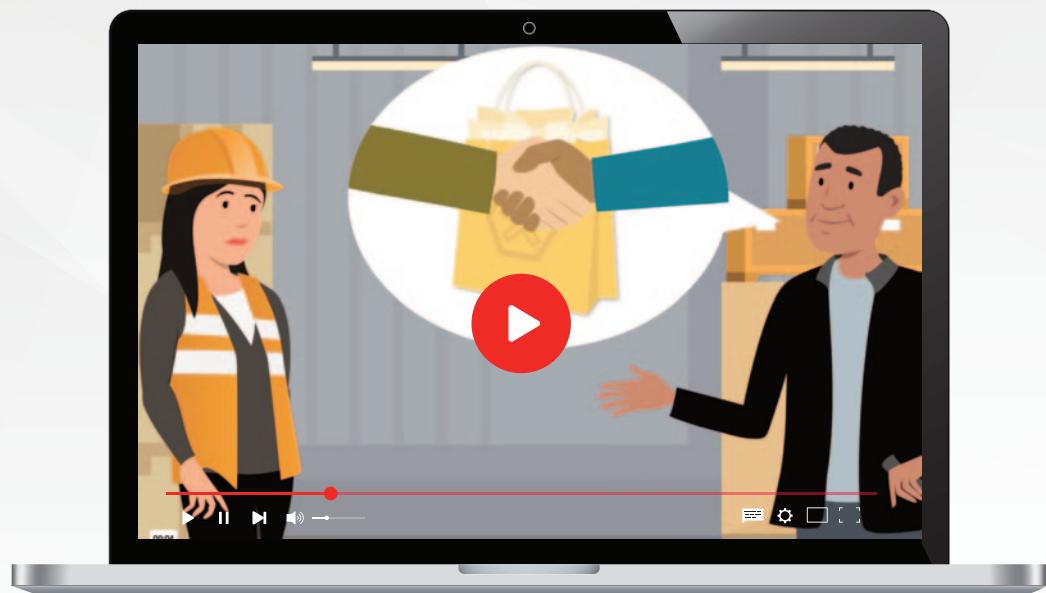
* These guidelines are not intended to infringe upon non-management employees' rights to engage in protected, concerted activity to discuss terms and conditions of employment under the National Labor Relations Act.

I SUPPORT ETHICAL BUSINESS PRACTICES



WakeMed complies with all federal and state health care fraud and abuse laws and regulations, including the Anti-Kickback Statute and the False Claims Act. This means that as an employee, you should never:

- Offer, make or authorize payments or gifts in order to obtain business or secure an improper advantage.
- Make agreements that limit patient choice or fix prices.
- Provide anything of value to anyone who is in a position to influence decision-making of any kind.



You have a responsibility to report any suspected incidents of fraud, waste and abuse. Watch this video to learn more about how to recognize and report fraud, waste and abuse.

WakeMed is committed to ensuring that patients are billed accurately for services that are actually rendered.



KEEP ACCURATE RECORDS

All of us share a responsibility for accurate record retention, which includes maintaining, storing and destroying paper and electronic data as required by law and WakeMed's policies. To comply with these laws, certain documents may need to be preserved as instructed by the Legal Department. When in doubt about whether documents, records or electronic data can be destroyed, ask your manager or the Compliance or Legal Departments.

I SUPPORT ETHICAL BUSINESS PRACTICES



Ensure Accurate Documentation, Billing and Coding

To maintain the highest ethics and standards related to accurate documentation, charges, billing and coding services, you have a responsibility to:

- Ensure all clinical documentation patient claims, invoices and requests for payment are accurate, filed on a timely basis, submitted for services actually rendered and follow relevant rules and guidelines.
- Accurately and completely record all services, code all bills, capture all charges, and prepare claims for payment that reflect services provided by WakeMed. Remember, we do not consider a service rendered until the appropriate documentation has been provided.
- Access medical documentation to ensure accuracy and compliance with regulations.
- Contact WakeMed's management team, or the Corporate Compliance or Legal Departments as soon as possible if you know or suspect that inaccurate or false claims are being submitted.



LAWS YOU SHOULD KNOW

The **False Claims Act** provides monetary penalties against anyone who submits a false claim for payment or approval to any government entity. It is a violation of the False Claims Act to knowingly submit, or cause another person to submit, false claims for payment from government funds.

Antitrust Laws are designed to protect the public by ensuring competitive forces drive patient care and prohibit price fixing or controls.

The **“Stark” Law** prohibits a physician from referring Medicare or Medicaid patients to a practice or hospital with which the physician or an immediate family member has a financial relationship.

Report any known or suspected violations of any of these regulations to the Compliance Department.

Avoid Conflicts of Interest

A conflict of interest is any situation that has the potential to cause a clash between our self-interest and what is best for WakeMed. A conflict or the appearance of a conflict can occur when you, a family member or close friend:

- Works for, owns or has a substantial interest in a company that WakeMed does or may do business with.
- Serves on a board of directors of such a company or organization.
- Works for or has a substantial financial interest in a WakeMed competitor or affiliated provider.
- Benefits personally from opportunities or resources that are available to you as a result of your relationship with WakeMed.

All questions about conflict of interest should be directed to the Compliance Department.



A potential conflict of interest exists any time an objective observer might wonder if your actions are motivated by personal gain. Watch this video to learn three simple steps to identify and resolve conflicts of interest.

Gifts and Donations

WakeMed employees may not ask for or accept gifts of cash or its equivalent from patients, family members, visitors or vendors. Non-monetary gifts of \$50 or less that are not perceived to improperly influence medical or business decisions are acceptable in some circumstances. Non-perishable items should be returned to the sender, if possible, along with a note explaining WakeMed's gift policy. For further clarification, contact the Compliance Department.

To avoid the appearance of a conflict of interest, all inquiries about donations should be directed to the WakeMed Foundation.





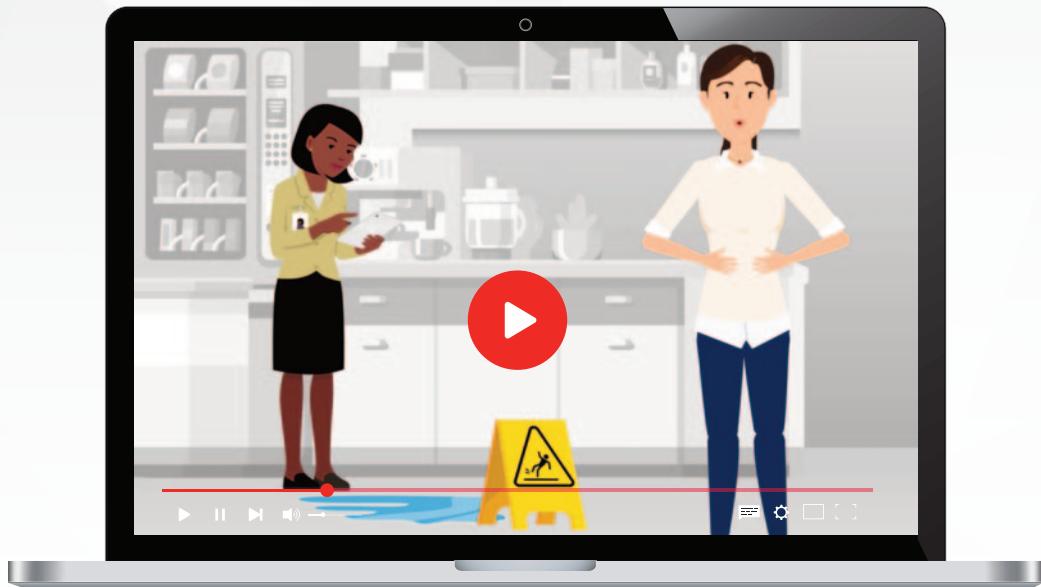
If you are in doubt about an issue or have a concern, ask: Is the action legal? Is it consistent with WakeMed policies and procedures? Is it within WakeMed values?

If the answer to any of these questions is 'no', you have a responsibility to share your concerns. Whenever possible, start with your supervisor or manager. You may also reach out to the Corporate Compliance Department or ask questions, raise concerns or report activities that may involve violations of the Code of Ethics or WakeMed policy, confidentially and anonymously, 24/7 by phone or online through Compliance Central:

- 833-740-5450
- compliancecentral.wakemed.com

Compliance Central is administered by an independent company specializing in confidential compliance inquiries.

WakeMed is committed to ensuring that all compliance concerns are reported and promptly investigated, and strictly prohibits retaliation against employees who report concerns in good faith. However, employees who use the Code for an improper purpose will be subject to disciplinary action, up to and including termination.



Watch this video to learn more about reporting concerns and suspected violations.

WakeMed will promptly investigate all reports of suspected Code violations and will treat them confidentially to the extent possible. All employees are expected to cooperate fully with any investigation of an alleged violation. WakeMed will report violations to government agencies in appropriate situations. If corrective action is required, WakeMed will take the appropriate steps to rectify the problem and prevent its recurrence.

Reporting issues “in good faith” means we are truly concerned that a person or situation may lead to a violation of the law or WakeMed’s Code of Ethics.

Cooperate with Inquiries & Investigations

WakeMed is committed to cooperating with all government agencies, including investigations and information requests, in a timely manner. We all share a responsibility to follow the instructions and guidance provided by government officials and must not obstruct the collection of data, records or information. Should you be contacted by a government agency or official in connection with an inquiry or investigation you should:

- Notify your manager, the Chief Compliance & Privacy Officer, Compliance Department, or the Legal Department.
- Not provide any information – verbal, written or electronic – to a government agency or official without prior approval from the Integrity & Compliance or Legal Departments.
- Provide complete and accurate information during any interviews you are asked to participate in.

Nothing in the Code of Ethics or WakeMed policies are intended to prohibit you from participating in, reporting or responding to an inquiry from a government authority about a suspected violation of state or federal law.

INTEGRITY & COMPLIANCE

The Compliance Department is available to provide assistance, support and guidance for all concerns or questions related to the Code of Ethics or other compliance issues.

- David Nussman, Interim Vice President, Chief Compliance & Privacy Officer: 919-350-8241
- Barbara Jones, Director, Compliance: 919-350-1081
- Dominic Messer, Director, Information Systems Security: 919-350-2204
- Frances Dragon, Manager, Privacy: 919-350-6235

