



Code of Conduct

A Code of Business Ethics

summahealth.org



Dear Colleague:

The Summa Health Code of Conduct or Code of Business Ethics sets forth our governing principles. It takes all of us doing the right thing to ensure our services are effective, efficient, cost-conscious, and publicly recognized for their quality. This document clearly defines the expected standards of behavior and explains how to report possible violations of law, rules of regulations governing health care.

Understanding regulations governing federal and state healthcare programs, fraud and abuse matters, ethics, privacy and security requirements, billing and collection, and corporate governance is a responsibility of every party connected to Summa Health's services. Healthcare is a complex and ever-changing regulatory environment, and although we each have different roles and responsibilities, we all want to do the right thing. As an employee, Medical Staff member, Board member, contractor, or volunteer, you are accountable for understanding healthcare compliance basics, determining what you need to do to be compliant, and understanding the consequences to you and to Summa Health when you violate the laws.

My expectation is that everyone who is a part of our organization will understand and follow this Code of Conduct. Please read the material carefully, and ask questions about anything that is unclear to you.

On behalf of the Executive Leadership team, I want to thank you for doing your part to serve our patients with respect, integrity and compassion, and for your commitment to Summa Health.

Sincerely,

A handwritten signature in black ink that reads "T. Clifford Deveny". The signature is written in a cursive, professional style.

T. Clifford Deveny, M.D.
Interim President and Chief Executive Officer
Summa Health

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Our Commitments

The six commitments outlined below were developed by a diverse team of Summa Health employees as they sought to define the essence of who we are—not as individual employees or clinicians—but as one unified Summa Health.

They represent what we stand for, and what makes Summa Health the best place to work—and receive care—in our region.

For Summa Health to succeed, these commitments need to be more than just words on a page.

They need to be the embodiment of who we are. And they need to represent a promise we make to ourselves and this community: That things are different here at Summa Health, and that we're committed to you.



Serve with passion

- Appreciate the privilege we have every day to serve the people of our community at some of the most vulnerable times in their lives... when they are sick, injured, frightened and in pain. Be the calm in their storm.
- Look for the joy in our work, paying attention to the impact each of us can have on the lives of others.
- Serve with integrity by always following through on commitments, being honest and acting ethically.
- Create a welcoming environment by making eye contact and greeting others we pass in hallways and elevators.
- Recognize and celebrate what is right about Summa Health while always looking for opportunities to make the care we provide even better.
- Go above and beyond.



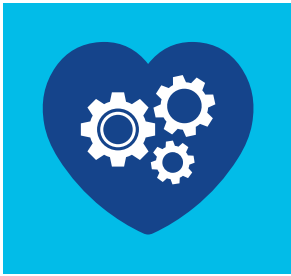
Personalize care

- Empower patients and family members to be involved in decisions related to their care.
- Communicate openly and effectively with patients and their family members, encouraging them to share their thoughts, concerns and questions.
 - Make eye contact.
 - Encourage patients and family members to share their questions and concerns by asking open-ended questions such as, "How can I help you most right now?"
 - Listen actively and ensure understanding by paraphrasing back what the patient has just told you.
- Always knock and ask patients if it is all right to enter their room.
- Call patients by their preferred name each time you enter their room.
- Introduce yourself by name and explain your role on the care team to patients and family members.
- Improve the continuity of care by always helping patients know and understand what comes next during their visit or stay.



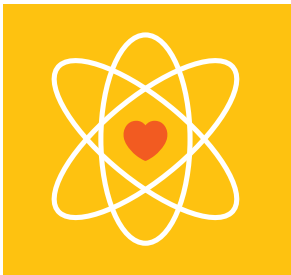
Value every person

- Look for the best in every individual we serve and in those we work with.
- Treat others without bias or judgment; we have not walked in their shoes.
- Respect and celebrate the diversity of the patients we serve and the talented colleagues we work with every day.
- Treat others with courtesy and respect, even when we may disagree with their ideas.
- Recognize the talents of others on our team, expressing thanks for their contributions.
- Offer a friendly ear to colleagues who may be struggling. Be willing to reach out to others when you need help or are having a bad day.



Take ownership

- Model the actions and qualities that you seek in others.
- Beyond just identifying the problem, be a part of the solution in any situation.
- Even when a solution seems like the right one, continue to evaluate it and make changes to improve the outcome.
- Be aware of your own emotions and the ways they may affect how others react to you.
- To ensure a safe environment for patients and colleagues, always follow "I'm 4 Safety" behaviors.
- Advocate for patients, ensuring they get what they need and have the best possible care experience.



Work collaboratively

- Encourage patients, family members and colleagues to speak up when they have a concern by proactively seeking their ideas and asking good questions.
- Seek the input and ideas of colleagues in decisions to find the best solution and to increase the chances for success.
- Be eager to learn, with an openness to new knowledge that will help the team provide consistently better care.
- Recognize the strength of our teaching programs in providing world-class care for patients today and preparing the next generation of tomorrow's professionals.
- Speak positively about colleagues and other departments, creating a higher degree of confidence and trust among patients and families.



Partner with the community

- Appreciate that as Summit County's largest employer, Summa Health plays an important role in keeping our community strong, healthy and successful.
- Look for opportunities to give back to our community through volunteerism, which contributes to the health and vitality of the greater Akron region.
- Recognize that we serve diverse communities through our clinics, special programs and partnerships with other community agencies.

Code of Conduct

A Code of Business Ethics

Summa Health is pleased to provide the Code of Conduct which describes the values and standards we live by. Summa Health has a tradition of ethical standards in the provision of health care services. The Code of Conduct supplements the mission, vision and values of Summa Health, and applies to all who are employed, are contracted with us or provide services in our system.

As Summa Health employees, officers, directors, and representatives it is essential that we commit to complying not only with the letter, but also the spirit of these standards. Although the Code of Conduct covers some examples of ethical and business issues and scenarios, a single document cannot provide all the answers. Additional guidance is provided in the form of policies and procedures, business practices and processes.

Please be aware that just as industry standards and legal and regulatory requirements evolve, Summa Health standards, policies and procedures are amended from time to time. For the most current information you should visit the Summa Health internal website, Summa@Work. The information you see posted is the most up to date and these posted policies are in effect.

Do the right thing

- Read this Code of Conduct
- If an issue seems unclear, you should seek help from your supervisor. If that does not clear up the matter, you should seek further assistance until the issue is clearly resolved, including calling the Compliance hotline.

Waivers of the Code

Any waiver of a provision contained in this document requires the written approval of the Compliance and/or Legal Department.

In addition any waiver requested for an executive, officer, or director requires the approval of the Summa Health Board Audit & Compliance Committee.

Act with Integrity and in compliance with the Law

Everyone associated with Summa Health works together, according to shared values and standards to do the right thing. Our reputation as a leading healthcare system depends on each of us making appropriate decisions every day.

What we expect from employees

As a Summa Health employee, you are expected to be honest, act ethically and demonstrate integrity in all situations. We trust you to do the right thing. The Code of Conduct provides general guidance but it is not all inclusive. This guidance is not a substitute for reading, understanding and following the health policies and procedures, business practices, processes and healthcare laws and regulations.

Most of the time, common sense and good judgment provide excellent guideposts. If an issue seems unclear, you should seek help from your supervisor. If that does not clear up the matter, you should seek further assistance until the issue is clearly resolved, including calling the Compliance Hotline.

Do the right thing

- Understand and comply with Summa Health commitment to integrity, expectations, standards, policies, business practices and processes, values, and any applicable laws and regulations as well as this Code of Conduct.
- You are responsible for developing skills to recognize and resolve work-related ethics and compliance concerns and demonstrating your commitment to maintaining ethics and compliance in your daily decision-making and conduct.
- Check the Summa@Work site for the most up to date policies and procedures.
- Participate in compliance, regulatory, or business ethics training opportunities.
- Ask the difficult questions and challenge each other in a professional and respectful manner to address the issues
- If an issue seems unclear, you should seek help from your supervisor. If that does not clear up the matter, you should seek further assistance until the issue is clearly resolved, including calling the Compliance Hotline.

What we expect from our leaders

As with all of the Summa Health employees, we expect our leaders to understand that business results, acting with integrity, and complying with healthcare regulations are all essential. To sustain a culture where trust and responsible business conduct is expected, our leaders must be a trusted resource for employees.

Leaders are expected to take ownership of compliance for the areas you are responsible for. Identify compliance risks and take prompt action to address them. Ensure your employees understand the laws and regulations with which they should be complying.

Do the right thing

- Lead by example; reinforce with employees that business results are not more important than acting with integrity.
- Make employees available for (and reinforce the importance of) attending compliance, regulatory, or business ethics training.
- Consider compliance efforts and results when evaluating and rewarding employees.
- Make sure employees understand their responsibilities and feel comfortable raising concerns without fear of retaliation.
- Deal immediately with business conduct issues and take appropriate action. Resources to assist you include the Human Resources, Legal, and Corporate Compliance departments.
- Share the Compliance publication Radar Screen with your employees.

What Summa Health expects from our business partners

We require our business partners (Board Members, Medical Staff members, Volunteers, Contracted Individuals and Groups, Vendors and Medical Students, etc.) interacting with any Summa Health entity to observe the same level of integrity, responsible business conduct and compliance with the law as Summa Health employees.

Employees should provide such third parties with the link to the Summa Health website where they can read the Summa Health Code of Conduct.

Questions and Answers

Q: I just read an article about some new regulations that will be effective in a few months. We will need to change some of our processes to comply with the new requirement. Our budget is already under pressure and the new requirements will add more time to our process, negatively affecting our productivity. What should I do?

A: Complying with our legal and ethical obligations is essential to maintaining our business. Sustainable long term performance requires that business results are achieved in a manner that complies with applicable laws, policies and procedures. Bring the matter to your supervisor's attention.

Q: What should I do if I think someone isn't complying with the Code of Conduct, a regulatory requirement, a law, or a policy or procedure?

A: Report your concern. As an employee, it's your responsibility to report any potential violation. You should speak to your supervisor or another member of management. The Compliance hotline is also available.



Ask Questions, Seek Guidance and Raise Concerns

When you do not know which decision is the best, or if you suspect someone else is not acting appropriately, the best thing you can do is to reach out and check with the resources available to you. It is better to ask the question than to regret the action.

Support to help you do the right thing

Help is readily available if you have questions, need information or assistance with any aspect of your role, or if you believe you should report a potential compliance issue. Summa Health has made available a variety of resources to assist you in what is expected in the workplace. This includes, but is not limited to, employee manuals, policies and procedures, and education courses.

If an issue seems unclear, your best resource to go to is your supervisor with your questions or concerns. If that does not clear up the matter, you should seek further assistance until the issue is clearly resolved, including calling the Compliance Hotline.

Do the right thing

- Don't assume the way things have always been is appropriate
- Ask questions, seek guidance, and raise concerns
- Use the resources available to you
- If you suspect or know that someone has violated the Code of Conduct, our policies, or any applicable laws or regulations, you must act and report the violation

Corporate Compliance Department

Compliance programs are about prevention, detection, collaboration and enforcement. To contact compliance:

Phone 330.996.0307
Email mitchelld@summahealth.org
Mail 525 E Market St
PO Box 2090
Akron, OH 44309-2090
Fax 330.996.0303

Compliance Hotline

We encourage calls to report suspected violations of the Summa Health Compliance Plan, the Code of Conduct, or of federal and state laws and regulations (e.g. improper coding or billing practices, etc). The Summa Health Compliance Plan, Code of Conduct, the Summa Health Medical Group Compliance Plan, and the NewHealth Collaborative Compliance Plan are not intended to handle human resources issues such as salaries and wages, benefits and personnel matters. For those issues, you should consult your employee handbook, the Human Resource Policies and/or your Human Resources representative.



- Compliance Hotline is available 24/7
- Callers have the option to remain anonymous
- All calls are treated confidentially
- All calls are taken seriously and investigated

Compliance Hotline:

Summa Health
800.421.0925

The Compliance Hotline is intended to supplement, not replace, other channels for communicating questions and concerns within the system. It should be used when other avenues of communication have been exhausted or you are uncomfortable with disclosing your identity when reporting a concern.

No retaliation

You can report a violation without worry. If you make a compliance report in good faith, you will not face retaliation. Summa Health's policy forbids supervisors and other employees from engaging in retaliatory acts against anyone who reports a violation or cooperates in an investigation of a potential violation or concern. If you believe you have been retaliated against for raising a concern, immediately contact your supervisor, the Compliance Officer, or the Compliance Hotline.

A word about inquiries and investigations

Summa Health handles inquiries and investigations confidentially. The substance of your inquiry and your identity (if you choose to provide your name) is disclosed on a strict need to know basis to the extent deemed necessary to conduct a proper investigation and to respond appropriately. When you ask a question, seek guidance, or raise a concern, you will receive a response if you have provided the means to do so. If a concern is substantiated, the situation will be resolved through appropriate corrective actions which may include among other things, clarification of a company policy, additional training, facility or process change and/or disciplinary action.

Do the right thing

- Cooperate during investigations and audits during your employment with Summa Health and after your employment ends
- Tell the truth
- Do not discuss an investigation or audit with other employees

Violations

Failure to adhere to Summa Health's Code of Conduct, policies and procedures, business practices, processes and applicable laws results from acting outside the scope of your employment or engagement with the health system. Employees may be subject to discipline, up to and including termination, while business partners may be subject to termination of relationships, breach of contract, or due process. Any person, group, or company may also face repayment or restitution, civil fines and criminal penalties.

Learn more by reading these policies:

1. Reporting Actual or Potential Wrong Doing
 2. Non-Retaliation Non-Retribution
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Questions and Answers

Q: I've been thinking about calling the Compliance Hotline, but I'm not sure if I should. My supervisor told me to do something that I feel is dangerous and may violate a safety regulation. I think I should tell someone who can look into this, but I'm afraid that my supervisor will make my job difficult for me if I do. What should I do?

A: Even in great health systems, people sometimes do things they shouldn't. You have identified what you believe is a potentially serious matter. If something does not seem right, you should speak up. Your supervisor is often the best place to raise concerns, but because it is your supervisor's request that concerns you, you have other options including contacting the Human Resources Department, the Legal Department, the Corporate Compliance Department, or report your concern anonymously through the Compliance Hotline.

The right thing to do is to report your concern. When you do, the situation will be looked into. If you believe you have been retaliated against for raising a concern, you should immediately contact the Compliance Officer or the Compliance Hotline.

Q: If I call the Compliance Hotline to report a concern, will I find out the outcome of the investigation?

A: All calls to the Compliance Hotline are taken seriously and investigated. When you ask a question, seek guidance, or raise a concern, you will receive a response if you have provided the means to do so.

Comply with Laws and Regulations

Summa Health complies with the laws and regulations that govern our industry.

Healthcare is a highly regulated industry with numerous laws applying to the work that we do. You are responsible for knowing and complying with laws that relate to the performance of your job, whether or not they are specifically addressed in this Code of Conduct. Following are examples of laws or regulations that impact Summa Health.

Healthcare Fraud, Waste and Abuse

Fraud includes obtaining a benefit through intentional misrepresentation or concealment of material facts. Waste includes incurring unnecessary costs as a result of deficient management, practices, or controls. Abuse includes excessively or improperly using government resources.

Summa Health System and Summa Health Medical Group complies with all federal and state regulations to properly ensure the preparation and submission of accurate and complete claims. Summa Health System and Summa Health Medical Group does not submit false, fraudulent or misleading information to the government or any third party payer to obtain payment for a service.

Summa Health System and Summa Health Medical Group prohibits any employee, representative or subcontractor from knowingly presenting or causing to be presented claims for payment that are false, fictitious or fraudulent. All subcontractors that perform billing or coding services must have the appropriate skills, training, quality assurance processes, necessary procedures, and knowledge of federal and state regulations to ensure that all billings are correct. Summa Health System and Summa Health Medical Group is committed to maintaining current and accurate billing.

Do the right thing

- All billings to government and private payers must reflect truth and accuracy.
- All medical record documentation must be complete, accurate, and support the service being billed.
- Summa Health System and Summa Health Medical Group only bills for items or services that are actually rendered.
- Summa Health System and Summa Health Medical Group will bill for those services that are reasonable and

necessary for the diagnosis or treatment of the patient's illness or injury. The claim must be supported by the patient's documented medical condition.

- Summa Health System and Summa Health Medical Group will properly code its claims to actually reflect the service furnished to the patient consistent with the patient's diagnosis.
- Summa Health System and Summa Health Medical Group will avoid duplicate billing for the same services.

False Claims Act [31 U.S.C. § § 3729-3733] [18 U.S.C. § 287]

The False Claims act has both a civil and criminal aspect and protects the Government from being overcharged or sold inferior or nonexistent goods or services. It is illegal to submit claims for payment to government payors that you know or should know are false or fraudulent. The definition of 'knowing' includes not only actual knowledge but also instances in which the person acted in a way that was in ignorance or dismissal of the truth. No specific intent to defraud is required.

Do the right thing

- Submit bills for services, procedures, tests, supplies, or medications prescribed, accurately and only for services provided.
- Do not destroy electronic or hard copy records outside of the record retention policy.
- When making revisions to electronic or hard copy medical records, do so in compliance with the policy on addendums and late entries.
- Ensure all orders, tests, procedures, documentation, charges, coding, and cost report information submitted to the government or third party payer is completely accurate and not misleading.
- If you discover an error in a claim that has already been submitted contact your supervisor, the Compliance Department or the Compliance hotline.
- Direct other employees to record and report only information that is accurate, true and complete.

Anti-Kickback Statute [42 U.S.C. § 1320a-7b(b)] (AKS)

In some industries, it is acceptable to reward those who refer business to you. However, in the federal health care programs, paying for referrals is a crime. AKS prohibits asking for or receiving anything of value in exchange for referrals of federal health care program business. Healthcare anti-kickback laws provide important safeguards and it's our responsibility to understand and uphold these laws.

Do the right thing

- Summa Health shall not solicit, receive or offer to give anything of value to anyone in exchange for referral of patients.
- Contracts with referral sources shall conform to all applicable laws and shall be reviewed by the Legal Department prior to being entered into.

Physician Self-Referral Law [42 U.S.C. § 1395nn]

The Physician Self-Referral Law, commonly referred to as the Stark law, prohibits physicians from referring patients to receive “designated health services” payable by government payors 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.

“Designated health services” are:

- Clinical laboratory services;
- Physical therapy, occupational therapy, and outpatient speech-language pathology services;
- Radiology and certain other imaging services;
- Radiation therapy services and supplies;
- DME and supplies;
- Parenteral and enteral nutrients, equipment, and supplies;
- Prosthetics, orthotics, and prosthetic devices and supplies;
- Home health services;
- Outpatient prescription drugs; and
- Inpatient and outpatient hospital services.

Financial Arrangements with Physicians

All financial arrangements with physicians or other referral sources must be reviewed by the Legal Department prior to entering into such arrangements. All financial arrangements with physicians or other referral sources must be necessary for legitimate business purposes, set forth in writing at fair market value, and signed by all parties involved. Summa Health will not pay for referrals, nor will they accept payment for referrals made to other facilities. Summa Health will not consider the volume or value of referrals in establishing compensation under their agreement with a physician or other referral sources.

These arrangements may also be reviewed by other corporate officers and the Medical Executive Committee as appropriate, for compliance with applicable federal and state laws and regulations as well as Joint Commission standards.

Do the right thing

- Complete the annual Conflict of Interest questionnaire if it is assigned to you.
- Do not refer patients to a designated health service that you or an immediate family member has a financial relationship.
- If you have questions about laws related to your interactions with physicians, ask your supervisor, the Legal Department or Corporate Compliance who can provide you with answers or additional information.
- Be truthful and provide all information that may be construed as a conflict for yourself and family members.

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

The government maintains a list of individuals/companies that have been determined to be excluded from the ability to participate in Federal Health Care programs. There are numerous reasons why individuals/companies are excluded; some examples are convictions of criminal offenses, patient abuse, fraud, and defaulting on school loans. No payment from any Federal Health Care Program will be made for items or services that are provided by excluded individuals/ companies. Summa Health cannot employ, contract with, or have any services provided by an excluded individual/company.

Do the right thing

- Notify Human Resources immediately if you are currently, or to the best of your knowledge, will be in the future, listed by the Federal Department of Health and Human Services Office of Inspector General, the General Services Administration, or in any of the 50 states as a person who is excluded from participation in Federal health care programs.

Medicare and Medicaid Program Requirements

Summa Health participates in the Medicare program and the Medicaid program. The rules and requirements of these programs are numerous and some aspects change frequently. You are responsible for knowing and complying with the program requirements applicable to your role.

Do the right thing

- Be engaged in your work process; keep up with the dissemination of information on regulatory changes for your area of responsibility.
- Implement any required changes to your work flow, processes, policies or procedures to comply with regulatory changes.
- If you have questions, ask your supervisor who can assist you.

Health Insurance Portability and Accountability Act (HIPAA)

HIPAA regulations, which protect the privacy and security of patient information applies to all of our interactions with patient information. Patients have the right to expect that their medical information will remain confidential. Under HIPAA regulations and health operating policies, if you have access to patient information, you need to be thoroughly familiar with HIPAA regulations and the health system policies and procedures. You must not reveal any personal or confidential patient information unless you have a legitimate business or patient care purpose.

Do the right thing

- Be knowledgeable of and comply with Summa Health HIPAA Privacy and Security policies and procedures.
- Never use or disclose confidential information in a manner that violates the privacy rights of our patients.
- Only access protected health information that is necessary to perform your job.
- Do not share or post computer passwords.
- Do not discuss protected health information in public areas such as the cafeteria, elevators, or outside of the workplace.
- Do not allow someone without a Summa badge to access protected health information.
- If you have HIPAA related questions, contact your supervisor, or the HIPAA Privacy & Security Officer.

HIPAA PRIVACY and SECURITY:

CONTACT INFORMATION

Privacy & Security Officer: 234.312.6243

HIPAA Helpline: 330.375.6665

Summa Health Compliance Hotline:
1.800.421.0925

Anti-Trust

Generally speaking, antitrust and competition laws constrain or prohibit discussions or agreements among competitors that restrain trade. This can include discussion about past, present or future prices, bids, terms or conditions of sale and territorial markets.

Summa Health employees and representatives are prohibited from engaging in the following:

- Agreements with competitors to fix prices, allocate markets, rig bids or engage in collusion (including price sharing).
- Boycotts or refusals to deal with suppliers or vendors, including certain exclusive dealing and price-discrimination agreements.
- Unfair trade practices, including bribery, misappropriation of trade secrets, deception, intimidation and similar unfair practices.

Do the right thing

- Exercise caution when talking with a competitor; be alert to improper discussion when attending industry meetings or functions.
- Question how any information about a competitor was obtained and whether the information is confidential.
- Do not acquire competitive intelligence through improper means.
- Seek guidance from the Legal Department whenever you have any questions or are unsure about a situation involving a competitor.

State Laws and Regulations

The State of Ohio has also adopted similar laws that apply to the provision of healthcare services provided at Summa Health. It is the responsibility of all employees to comply with applicable federal and state laws, regulations, and Summa Health policies and procedures that relate to your duties as an employee. If an issue seems unclear, you should seek help from your supervisor.

Do the right thing

- Be engaged in your work process; keep up with the dissemination of information on regulatory changes for your area of responsibility.
- Implement any required changes to your work flow, processes, policies or procedures to comply with regulatory changes.
- If you have questions, ask your supervisor who can assist you.

Licensure or Certifications Related to Your Job Responsibilities

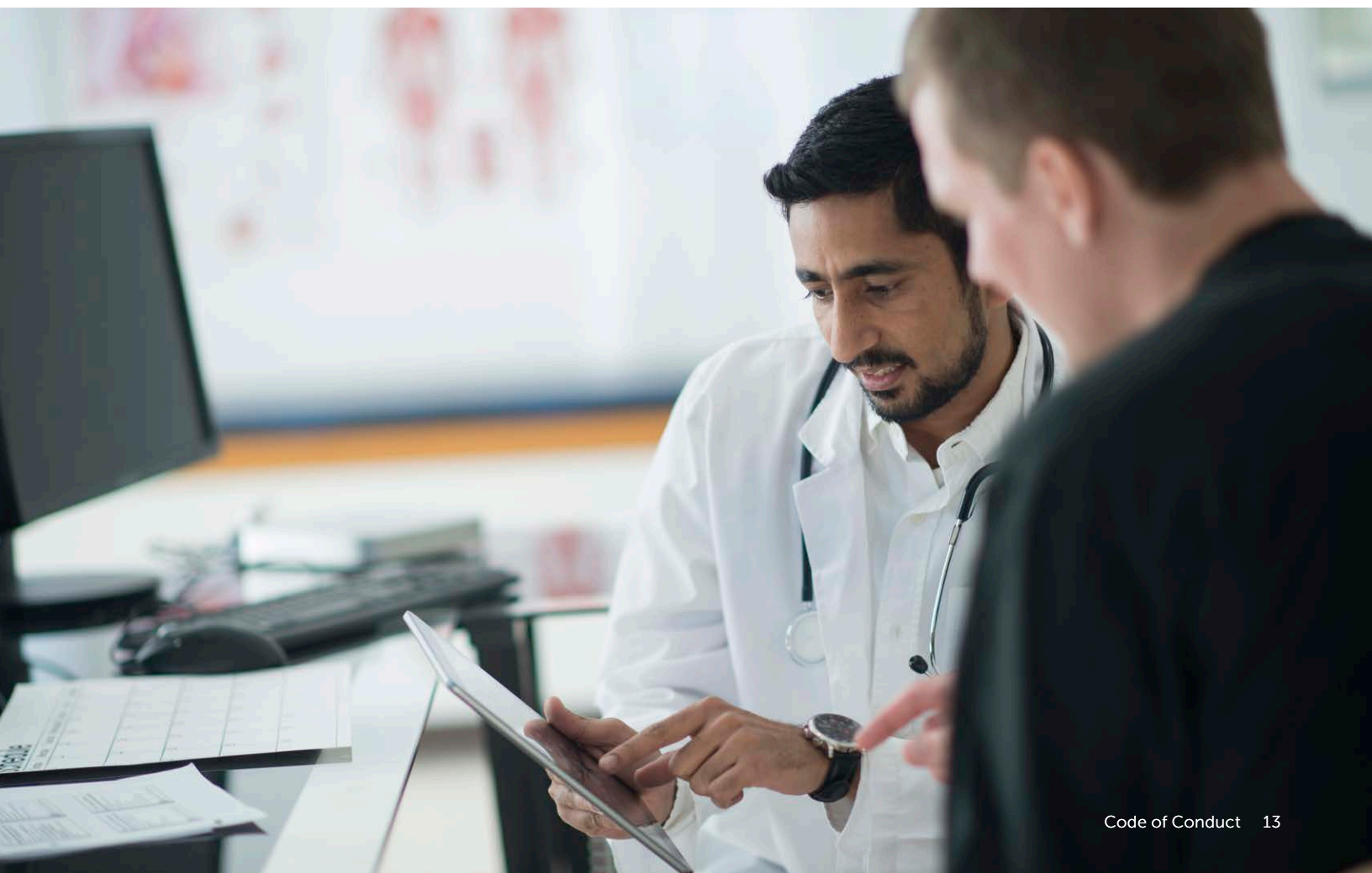
All employees who have made application for employment for a position requiring licensure, registration, or certification by the State of Ohio must possess a valid, current license, registration or certification. At the time of renewal of licensure, registration or certification, employees are required to provide verification to your supervisor. The application for licensure, registration or certification and renewal of licensure, registration, or certification is the employees responsibility.

Do the right thing

- You are responsible for timely completing the requirements to maintain your licensure or certification.
- Provide verification of your license or certification renewal to your supervisor prior to license or certification expiration.
- If you or your company have had any action taken against your license, have been excluded from participation in a federal healthcare program, or have been found guilty, pled guilty, or no contest to a criminal violation you must notify your supervisor or Human Resources immediately.

Compliance with Tax Exempt Requirements

Summa Health has multiple charitable, tax-exempt entities. These organizations provide community benefits that include health care services, medical training, education, research and community outreach activities. Summa Health also provides significant free and discounted care to indigent patients and participates in federal and state medical assistance programs. Summa Health has a legal and ethical obligation to act in compliance with applicable laws, to engage in activities in furtherance of its charitable purpose and to ensure that its resources are used in a manner that furthers the public good, rather than the private or personal interest of any individual or entity. Summa Health and its employees will not enter into compensation arrangements in excess of fair market value, will accurately report required information to appropriate taxing authorities and will file all tax and information returns in a manner consistent with applicable laws. All pension and benefit plans must conform to the Internal Revenue Code, the Employee Retirement Income Security Act (ERISA), and other applicable laws.



Political Activity

Summa Health is not permitted to engage in excessive lobbying activities at the state or federal levels, nor may its assets be used to support or oppose political candidates. Violations of this policy may jeopardize the tax-exempt status of various Summa Health entities. While employees are encouraged to participate in federal, state, and local government they must be sure that their activities are not viewed as activities taken on behalf of Summa Health. Further, employees will not be reimbursed in any manner for their involvement in political activities.

Government Officials

Summa Health is committed to complying fully with the law and cooperates with any reasonable demand made by a government representative. If any employee receives an inquiry, subpoena or other legal document regarding Summa Health business, whether at home or in the workplace, from any governmental agency, the employee must notify his or her supervisor and a member of the Legal Department immediately.

During a government investigation, inquiry or inspection, you must never conceal, destroy, or alter any documents, lie, or make misleading statements to the government representative. You may not cause another employee to provide inaccurate information or obstruct, mislead or delay the communication of information or records relating to a possible violation of law.

Questions and Answers

Q: Whose responsibility is it to understand the laws and regulation in my work area?

A: It is the responsibility of all employees to comply with applicable laws, regulations, and Summa Health policies and procedures that relate to your duties as an employee. If an issue seems unclear, you should seek help from your supervisor.

Q: Where can I find Summa Health policies?

A: On Summa Health intranet, Summa@Work.

Q: What is meant by kickbacks or incentives for patient referrals?

A: Anything of value flowing to someone who refers or is in a position to influence referrals may constitute a kickback. Examples include excessive discounts, supplies and equipment, gifts, writing off accounts receivables, professional courtesies, leases at less than fair market value, etc. If there are any questions about this, you should speak with your supervisor, the Legal Department or the Compliance Department.

Q: What do I do if I'm at a meeting with competitors and an improper discussion about anti-competitive matters takes place in a group setting?

A: You must immediately object to the subject and end the discussion. This may require you to leave the room if the improper discussion continues after you object. Even after stating an objection, failure to withdraw from the group could be used to support an argument that an agreement existed if the improper discussion is continued. Any improper discussions should be promptly reported to the Compliance or Legal Departments regardless of the steps you took to object.

Q: I am active in political campaigns and have given donations in support of various candidates. Is this a conflict with my position at Summa Health?

A: As long as you are contributing your personal time and money to public campaigns, there is no problem with your position. The time you contribute must not be part of your normal business hours and in no way can it be inferred that Summa Health is contributing to the campaign. Any money that is contributed must be given by you personally and not reimbursed or paid directly by Summa Health funds.

Q: Recently, someone in my department made a mistake and sent a patient's information to the wrong person. Should I report this as a potential HIPAA violation?

A: Yes. Any potential HIPAA violation must be reported to protect the privacy of the patient's information. Summa Health is required to determine if any harm (financial or reputational) that may result from the mistake and protect the patient from the harm to the extent possible. Please notify the entity HIPAA Privacy and/or HIPAA Security Officer.

Avoid Conflicts of Interest

We make decisions based on sound business judgment and unclouded by any personal interest, relationship pressure or potential for personal gain.

Conflicts of Interest

A conflict of interest arises when outside personal, financial, political or social interests or activities have the potential of making it difficult to perform your work in the best interest of Summa Health. You must avoid situations

that conflict, or could have the appearance of conflicting, with the best interests of Summa Health. Conflicts of interest can occur in a variety of ways; however, the following situations can often produce conflicts of interest and should be carefully analyzed:

- Doing business with family or close friends
- Hiring consultants, agents and other third parties with whom you have a personal relationship
- Accepting entertainment or gifts from people or entities with which we do business

Annually, the Code of Conduct questionnaire is presented for completion to all Board Members, Directors, Officers, Management staff, Physicians in Leadership positions and to members of committees with purchasing decision-making roles. The questionnaire is a required element to continue your position as a leader or contractor with Summa Health. If a situation arises throughout the year that presents an actual or potential conflict, you are obligated to report it immediately.

If you do not receive the annual questionnaire but you have an actual or potential conflict of interest, you are obligated to report it immediately to your supervisor.

Do the right thing

- The best way to avoid a potential conflict of interest is to ask questions and address any situation that has the potential to be misinterpreted by others.
- If you're unsure about what poses a conflict of interest, talk with your supervisor or the Compliance Officer.
- Make decisions in the best interest of Summa Health.
- Resolve conflicts of interest in an open, transparent manner.
- Submit the annual conflict of Interest questionnaire timely and immediately report any situation that arises and presents an actual or potential conflict of interest.

Receiving and Offering Gifts and Gratuities

The rules for gifts and gratuities put precautions in place to prevent any impropriety or damage to Summa Health's reputation, which is central to preserving our integrity. The basic rule is simple: Never accept a gift, favor, service or entertainment, if your acceptance could be viewed as influencing a business decision or action.

Use good judgment about accepting gifts. Only gifts that are ordinary, customary expressions of social or business friendship or courtesy (meals, entertainment, golf, etc.) may be accepted. Avoid accepting anything with more than a small value (\$100 is the total amount allowed per calendar year). If possible, share any gifts with your co-workers. The following items shall never be accepted: Money and travel that is not business related. All site visits to be paid for by vendors are to be approved by the Administrative Director of Materials Management.

In addition, employees and directors of Summa Health may not attempt to influence the decisions of others by offering them money, services or other things of value.

Do the right thing

- What if you are not sure about accepting a gift? Ask your supervisor.
- Any gift, meals or entertainment accepted above the \$100 value per calendar year must be reported on your annual conflict of interest statement.

Questions and Answers

Q: I am a full time employee of Summa Health. I've been asked to consult with another healthcare company using the skills I use in my job with Summa Health. Is that a conflict of interest?

A: You can work a second job without a conflict of interest so long as the second job does not interfere with your responsibilities at Summa Health (e.g. you are able to continue to dedicate necessary time and attention to your Summa Health job, you are not competing with Summa Health, you do not use the assets or confidential information of Summa Health etc.) Since you are a full time employee and would be using the same skills you use in your job with Summa Health, there is a potential for a conflict of interest. The best way to avoid a conflict is to talk with your supervisor before accepting any outside employment or consulting arrangement.

Q: As a supervisor, I have been offered a computer and software free if I sign a contract with a certain vendor. I thought it would be a way to increase efficiency and get a good deal on the items that we need. Is this a problem?

A: This is not allowed by Summa Health. It could be seen as an inducement or gift.

Intellectual Property and Proprietary Information

Information and ideas of Summa Health are important to our success.

Information pertaining to our competitive position or business strategies, payment and reimbursement information, research and information relating to negotiations with our workforce or third parties should be protected and shared only with those that need to know such information in order to perform their job responsibilities. This type of information may only be disclosed to other parties internally or externally with the specific authorization of Summa Health management.

Information received in confidence is not to be used for personal gain.

Copyright Laws

Summa Health employees and representatives shall not reproduce any copyrighted materials without the express permission of the copyright holder. Copying copyrighted works, even for internal distribution, can lead to substantial organizational and personal liability for copyright infringement. Copyrighted works include, but are not limited to, printed articles from publications, magazines, books, television and radio programs, videotapes, musical performances, photographs, training materials, manuals, documentation, surveys, software programs and databases. In general, the laws that apply to printed materials are also applicable to all other media, including visual and electronic media such as diskettes, CD-ROM, DVD, and Internet pages.

Software Licensure

All software used in connection with Summa Health business must be properly licensed and used in accordance with that license.

Do the right thing

- Do not load personal computer software programs onto Summa Health owned computers.
- All software requests should go through the routine budgeting and Information Technology and processes.
- If you are unsure if material you would like to share is copyrighted, please ask your supervisor.
- Do not share Summa Health intellectual property or proprietary information without the approval of management.

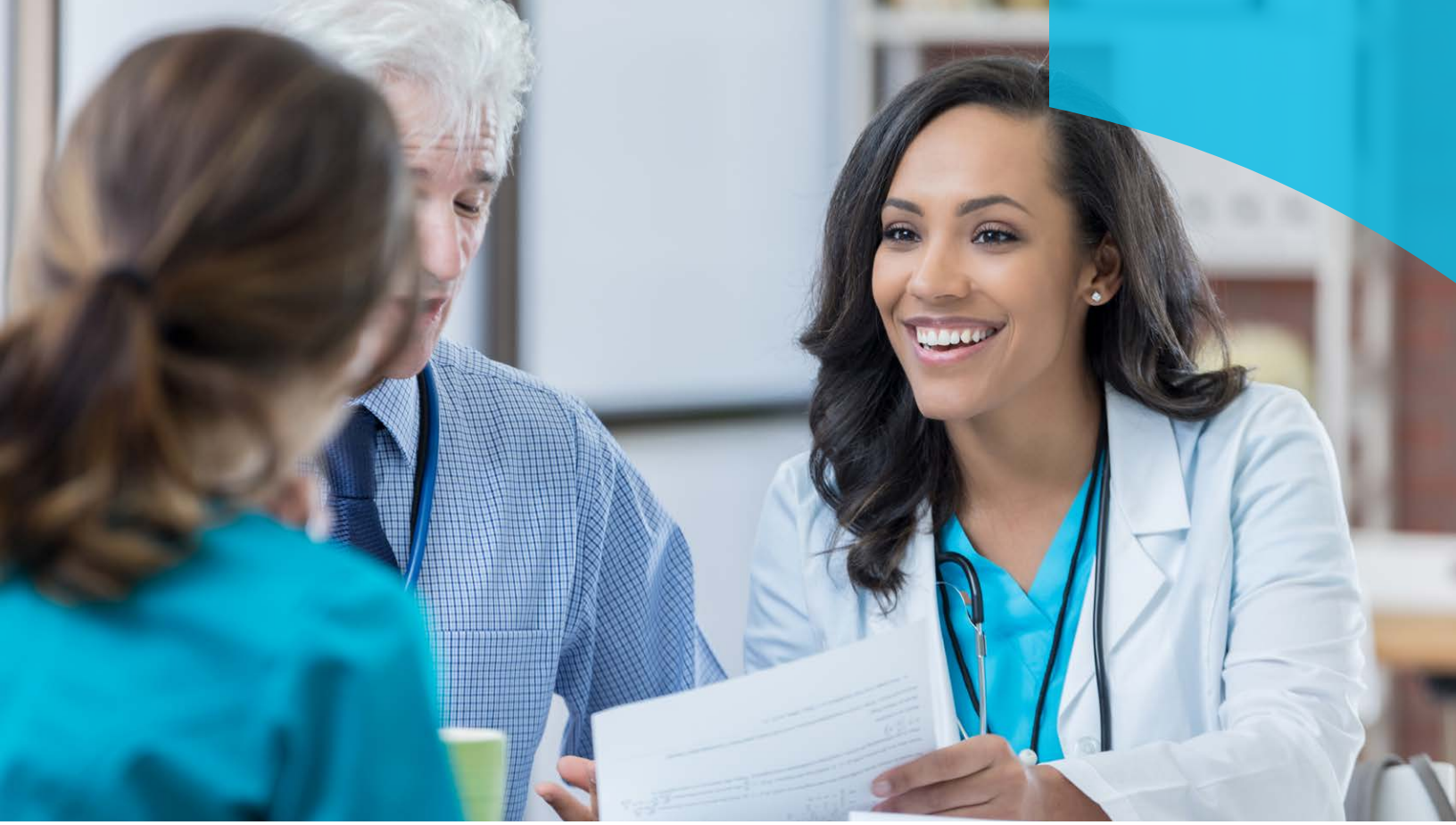
Personal Use of Organizational Resources

Summa Health assets are to be maintained and used for business related purposes. Unauthorized use, taking or borrowing of Summa Health equipment, supplies, materials or services is prohibited. Personal use of any Summa asset without prior supervisory approval is forbidden. Unauthorized removal of Summa Health property and unauthorized or inappropriate use of Summa Health supplies, equipment and/or services are offenses that may result in immediate termination. Community or charitable use of Summa Health resources (including employee time, information and telephone) must be approved in advance by a supervisor. Use of Summa Health assets for personal financial gain is not permitted.

Questions and Answers

Q: I am aware that some people in our department have copied software that they did not purchase onto their computer hard drives at work. Is there anything I should do if I am aware that this is happening?

A: Yes, you should remind the employee that copying someone else's licensed software without written permission is not legal and may result in financial penalties, in addition to disciplinary action by Summa Health. If the employee refuses to remove the software from the hard drive, you should report the matter to your supervisor. The supervisor should be made aware so that if something happens in the future, it is known about.



Record Accuracy

We maintain a high standard of accuracy and completeness in the documentation and reporting of all our financial records. These records serve as a basis for managing our business and are important in meeting our obligations to patients, employees, suppliers and others. These records are also necessary for compliance with tax and financial reporting requirements.

Accounting and Financial Responsibility

Summa Health is committed to the highest standards of business ethics and integrity, and to maintaining the integrity and accuracy of its books, records, and accounts. This requires every employee to record and report information accurately and honestly, including accurate reporting of time worked, business expenses incurred, revenues and costs, and other business-related activities.

Summa Health's records must accurately reflect the assets, liabilities, revenues and expenses of Summa Health. All company records are subject to audit, and financial records are to be maintained in accordance with generally accepted accounting principles, as well as with all applicable federal, state, and local laws.

As Summa Health receives reimbursement under government programs, it is required to submit reports to government agencies on the costs of our operations. Summa Health commits to complying with all Federal and State laws, regulations and policies defining

allowable costs and appropriate methodologies to claim reimbursement for services provided.

Do the right thing

- Record and report all information accurately and honestly
- All employees are to accurately report their time worked
- If you have any questions regarding generally accepted accounting principles, or the federal, state, and local laws regarding your job duties, ask your supervisor.

Questions and Answers

Q: How often do the hospitals have to submit cost reports to the government?

A: It is an annual requirement to submit a Medicare cost report and separately a Medicaid cost report.

Q: I have heard we have external auditors on site – are they investigating us for a problem?

A: Summa Health has a contract with an external auditing firm to complete routine audits of multiple aspects of our business to ensure our systems and processes are functioning as we intended. They validate our financial reporting to ensure its accuracy.

Relationships with Patients

Summa Health is committed to providing the highest quality of care and delivering services in an ethical, professional manner. We shall provide high quality care to all patients without regard to race, color, sex, creed, age, gender, religion, national origin, disability, sexual orientation, medical condition and ability to pay.

We shall treat all patients with dignity, respect, and compassion at all times. We will honor the patient's right to give informed consent. We understand that informed consent is a continuing process and not just a form.

We shall honor the right of patients, or their legal designees, to participate in decision making regarding their care, including refusing treatment to the extent permitted by law and being informed of the consequences of such action.

To avoid compromising the quality of care, clinical decisions including tests, treatments and other interventions are based on identified patient health care needs. The plan of care is developed by a team of healthcare professionals based on the acuity of the patient's condition.

EMTALA

Any patient who comes to one of our Emergency Departments requesting examination or treatment for an emergency medical condition is entitled to, and shall be provided with, an appropriate medical screening examination. This exam will be performed by a qualified medical practitioner regardless of the patient's ability to pay for the services. If it is determined that an emergency medical condition exists, the facility shall provide treatment to stabilize the emergency medical condition (within the capabilities of the facility), or provide an appropriate transfer to another medical facility in accordance with Emergency Department policies and procedures. Emergency medical treatment should not be delayed in order to inquire about the patient's method of payment, or to seek authorization from the patient's insurance carrier for screening or stabilization services.

Admission, Transfer, Discharge

Admissions, transfers and discharges are conducted in a medically appropriate and ethical manner, and in accordance with local, state, and federal laws and regulations. Summa Health does not base admission or transfer policies on patient or hospital economics.

Patient Freedom of Choice

Patients always have the freedom to choose their care provider. While we can and should properly promote Summa Health programs and services, we will never restrict in any way the patient's freedom to choose a home health agency, DME supplier, long term care facility, or any other provider to meet their medical needs.

Do the right thing

- Do: Treat patients who come to the emergency department requesting an exam regardless of their ability to pay. No employee or representative of Summa Health shall turn away a patient for lack of health insurance coverage or other inappropriate criteria.
- Do: Provide high quality care to all patients regardless of age, race, sex, national origin, disability, gender, ability to pay, sexual orientation, religion, creed, color, or medical condition.
- Do: Follow Summa Health policies and procedures related to admissions, transfers, discharge, and patient's freedom of choice.

Relations with Vendors and Subcontractors

Good relations with subcontractors and vendor representatives are important for being successful in the procurement of goods and services. Contacts with salespeople and subcontractors add to the basis upon which public opinion about Summa Health is formed. For these reasons, Summa Health employees should always treat subcontractors and salespeople with fairness and integrity. Summa Health purchasing and subcontracting decisions are based on objective criteria, not on personal relationships or friendships. Objective decision-making considers factors such as quality, design, price, consistent and timely delivery, adherence to schedules, service, and maintenance of adequate sources of supply.

The following values should always be observed in evaluating and awarding bids, in administering contracts, and in conducting subcontractor/vendor relations:

- Keep all competition open and fair.
- Be truthful in all verbal and written transactions.
- Respect the confidentiality regarding quotes and other information provided by vendors or subcontractors.

In turn, all salespeople must sign in through purchasing before meeting with hospital personnel. Subcontractors and vendors are expected to conduct themselves in accordance with the same values.

Do the right thing

- Treat Vendors and Subcontractors with fairness and integrity.
- Be truthful in all verbal and written transactions.
- Base purchasing and subcontracting decisions on objective criteria.

Questions and Answers

Q: A vendor keeps showing up unannounced in my department and they are not wearing the badge given to them in purchasing when they sign in properly. What can I do about it?

A: Ask the vendor if they are aware of Summa Health process to register with the Purchasing Department prior to calling on departments. Send the vendor to the Purchasing Department.

Marketing Practices

Marketing practices are conducted with truth, fairness and responsibility to patients, the community and the public at large. All information issued (including information on Summa Health's website) will be accurate at the time of publication and will not be presented in an intentionally misleading manner. Summa Health will not purposely misrepresent its services, supply needs, or any other aspect of its business.

Summa Health may engage in marketing and advertising activities to educate the public by providing information

to the community, increase awareness of our services and recruit employees. We will present only truthful, informative and non-deceptive information in these materials, our website and/or other electronic publications and announcements. We will comply with applicable federal and state laws and, as relevant, professional ethical guidelines related to marketing, advertising and communication activity. You may not consent to allowing a third party (i.e. vendor) to use or associate Summa Health name, symbols, logos or trademarks in an advertisement, press release, marketing material or website without the prior consent of the marketing and corporate communications department. Advertising relating to clinical trials will be conducted consistent with regulatory requirement and in compliance with Summa Health and IRB policies.

Do the right thing

- Information represented in Summa Health marketing and communications material will be truthful and informative.
- Follow Summa Health's brand standards for creating and using materials.

Questions and Answers

Q: I would like to market an existing service. Who should I call?

A: Contact the Marketing and Corporate Communications team.



Research

Summa Health is committed to responsible conduct of research and investing in educational programs that prepare researchers, staff, and students. Research undertaken by our physicians and professional staff is conducted within legal and ethical standards. We are committed to research integrity in disseminating appropriate, valid scientific results in accordance with applicable regulations and guidelines.

All human subject research proposals must be approved by the Institution Review Board (IRB) that has oversight responsibility for the research project. Any employee or physician engaging in human subject research must do so in conjunction with IRB approval and consistent with Summa policies and procedures governing human subject research.

Research misconduct is not tolerated. Researchers who falsify or change results, copy results from other studies without performing or citing the applicable research, fail to identify and deal appropriately with conflict of interest, fail to strictly follow study protocol, fail to actively protect the rights of research subjects, or who proceed without IRB approval will be appropriately investigated and sanctioned as necessary.

Physicians participating in research activities involving human subjects are expected to fully inform patients of their rights and responsibilities related to participating in the research or clinical trial. All personnel applying for or performing research of any type are responsible for maintaining the highest ethical standards in any written or oral communications regarding their research projects as well as following appropriate research regulations and guidelines. As in all record keeping, our policy is to submit only true, accurate and complete costs related to research grants.

Medical Education

Students, residents, fellowships:

We will conduct our training programs, including residency and fellowship programs, in accordance with applicable requirements for supervision, billing and evaluation of trainees. The attending physician or supervisor has both an ethical and legal responsibility for the overall care of the individual patient and for the supervision of the trainees involved in patient care and clinical research activities. The supervisory staff, including attending physicians, must ensure that the level of responsibility given to a trainee is appropriate

based on each trainees skills and ability, and that the documentation of such supervision is consistent with all applicable requirements.

Do the right thing

- Obtain approval from the Institutional Review Board for all human subject research projects prior to initiating them.
- Conduct all research with integrity and in accordance with government regulations, IRB approval, study protocols and institutional policies.
- If you participate in research, have knowledge of the Summa Health research policies and procedures and participate in research education.

Questions and Answers

Q: I have been asked to assist with a research study but I am not familiar with the study protocol and research policies and procedures. Who should I contact?

A: research@summahealth.org

Safety and Environmental Preservation

The Environment, Medical Waste and Hazardous Materials

Summa Health is committed to protecting the environment. Although Summa Health business may affect its surroundings in many ways, Summa Health's primary environmental impact lies in the management of medical waste and other hazardous materials and, to a lesser degree, in air emissions from pollutant sources and waste water discharges. Every Summa Health employee is responsible to safeguard patients, fellow employees, the community and the general environment from harm. Summa Health complies with all applicable occupational health (OSHA), environmental and waste management (EPA) laws and regulations, and cooperates with local, state and federal agencies in their inspection and enforcement activities.

Safety

High-quality health care can only be provided to Summa Health patients, staff and visitors in an environment free from identifiable hazards. Each Summa Health employee is required to observe completely all relevant laws and regulations, as well as the Environment of Care standards set by The Joint Commission. Requests from regulatory agencies shall be referred to the Safety Officer.

Do the right thing

- Everyone within Summa Health has an obligation to maintain a safe working environment not only for themselves and their co-workers, but also for anyone entering Summa Health property.
- Know where personal protective equipment and other equipment is located and how to properly use it.
- Employees are expected to know and to use specific safety policies, procedures and resources related to their individual jobs.
- All Summa Health employees should immediately report to their supervisor any injury to an employee or any injury or unusual occurrence to patients or others.
- No one may use tobacco products in any Summa Health building or outside any building entrance.

Questions and Answers

Q: I believe the supervisor could be violating environmental laws and not following our policies and procedures. How should I report my concerns if I have addressed it with my supervisor already?

A: If you believe in "good faith" your supervisor is not in compliance with environmental laws, report it up the chain of command, to the Director of Environmental Services, or by calling the Compliance Hotline.

Harassment

All Summa Health employees, patients, and representatives have the right to an environment that is free of violence and harassment. Degrading or humiliating jokes, slurs, intimidation, or other harassing conduct is not acceptable.

We will not tolerate a hostile work environment under any circumstances regardless of whether the behavior takes place before, during, or after normal working hours; inside or outside of the workplace.

All forms of sexual harassment or inappropriate behavior are prohibited. Sexual harassment includes but is not limited to unwelcome sexual advances, requests for sexual favors in conjunction with employment decisions, or verbal or physical conduct of a sexual nature, or offensive remarks about a persons gender.

An employee having knowledge of any alleged harassment is responsible for reporting it to the supervisor and/or the Human Resource Department or the Compliance Hotline immediately. Such reports will be held in confidence and the employee will be protected from harassment or retaliation for reporting this misconduct. Summa Health will investigate all claims of harassment and take immediate and appropriate remedial action.

Do the right thing

- Do not participate in degrading jokes, harassing or intimidating behaviors
- If you are the victim of harassment, report it immediately to one of the following individuals: the supervisor of the harasser, the department Director, the Vice President of Human Resources, or the Compliance Hotline.

Questions and Answers

Q: What is meant by sexual harassment?

A: Sexual harassment can be described as aggressive sexual behavior that has been demonstrated to a person who has not suggested or encouraged the behavior. It can be sexual jokes, advances, demands or suggestions. If you have been the subject of or subjected to this type of behavior, please notify your supervisor, Human Resources, or the Compliance Hotline. This behavior is not tolerated at Summa Health. Allegations will be investigated confidentially and offenders will be appropriately disciplined.

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