

Code of **Conduct**

OUR MISSION

Improve the health and well-being
of each person we serve.

OUR VISION

Demonstrate the highest-quality, best-value
health care for all we serve.

OUR VALUES

- Patient-centered
- Respect, caring and compassion
 - Teamwork and partnership
- Continuous learning and improvement
 - Leadership



To the Swedish Family

Nothing is more essential to an organization like ours than having a health-care team that truly believes in the importance of ethics and integrity.

Thanks to you, Swedish has earned a reputation for quality health care and service. That reputation was built on the personal integrity of everyone at Swedish — our employees, physicians, administrators, volunteers, auxiliary members and board members.



At the same time, we operate in a business world that is becoming increasingly complex. We all face ethical issues every day, and the right path may not always seem clear. If you are ever concerned about what is ethical and what is not, or what is the right thing to do either for yourself or for another person, refer to this handbook for guidance or talk to your supervisor or another Swedish manager.

At Swedish, honesty and integrity are inherent in our culture. These qualities are essential to our mission of improving the health and well-being of each person we serve.

A handwritten signature in black ink, appearing to read 'Kevin Brown'. The signature is stylized with a long horizontal line extending to the right.

Kevin Brown
Chief Executive

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Introduction

Swedish has a long tradition of striving to improve the health and well-being of each person we serve. To complement that excellence in patient care, we continually stress business ethics and integrity in all of our dealings with patients, physicians, payers, vendors and others.

The Swedish Code of Conduct was prepared to give employees a clear understanding of what is expected of them in the work environment. It is intended to supplement Swedish standards manuals and provide general guidelines on conduct. Additional clarification may be found in Swedish policy manuals, which are located in departments and on Swedish On-line (the Swedish Intranet). The code applies to all Swedish employees, as well as to members of the medical staff, agents, consultants, contractors, representatives and vendors acting on behalf of Swedish.

Do What's Right

In the course of doing your job, you may encounter a variety of ethical and/or legal issues. Many of these issues will be covered in this Code of Conduct. Some won't be included because no code can cover all circumstances or anticipate every situation.

Situations not covered here should be decided in a way that is consistent with Swedish's values and principles. It's therefore important that state and federal laws must always be obeyed, regardless of whether they are mentioned in this code.

All employees are responsible for their own behavior. If you find yourself in a situation not addressed by this code, or by administrative, clinical or departmental standards, ask for clarification.

Ethical behavior by all employees, at all times, is necessary to preserve the Swedish reputation for integrity and lawful conduct – an asset that is vital to our continued success.

Note: No supervisor, clinician, officer or director at Swedish has the authority to require or approve any action by any employee that would violate the law or the standards published in this Code of Conduct.

Asking Questions and Reporting Concerns

If you have a question or concern about a violation or a suspected violation of the Code of Conduct, there are resources available to address your concern. The reporting process includes the following steps:

1. Talk to your supervisor. If you aren't comfortable talking to your supervisor, then ...
2. Talk to a higher-level manager. If you aren't comfortable talking to a higher-level manager, then ...
3. Talk to someone in Human Resources, Corporate Compliance or Risk Management. You can also ...
4. Call the Confidential Swedish Hot Line at **206-386-2880**, complete a Code of Conduct reporting form, write a memo to the Corporate Compliance Department, or e-mail **compliance@swedish.org**. Messages will be handled during usual daytime business hours by staff under the direction of the Corporate Compliance officer.

Swedish encourages employees with a question or a concern about a potential violation (their own or someone else's) to contact the Corporate Compliance Department for clarification. The department maintains an open-door policy and is committed to offering prompt guidance. Reports to the Corporate Compliance Department are not intended to replace the established chain of command, but provide an additional method for asking questions or reporting suspected violations when an individual is uncomfortable with usual communication channels.

Every employee is required to report any known or suspected violation of the Code of Conduct or related policies. The Corporate Compliance Department will initiate investigations of every appropriate report of a code violation that cannot otherwise be solved.

Note: Reports can be made anonymously. Managers who receive a report of a violation from an employee will, to the best of their ability, keep the identity of that employee confidential if the employee requests confidentiality. Swedish strictly prohibits retaliation against an employee who, in good faith, reports a violation or a suspected violation, or who cooperates with an investigation. Any employee who does retaliate is subject to disciplinary procedures, including termination of employment. Both Washington state and federal law also prohibit retaliation against employees for any good faith reporting of behavior or activity prohibited by the Code of Conduct or state and federal laws.

Confidential Hot Line: 206-386-2880

Obey the Law

Swedish complies with federal, state and local regulations.

Department leaders are responsible for assuring that their departments are in compliance with federal, state and local law, regulatory agencies and other accreditation agencies from which Swedish seeks endorsement and accreditation.

Obeying the law is the personal responsibility of every member of the Swedish team. While this applies to all laws, there are specific laws that our employees need to be aware of, including:

Fair Competition

Antitrust and similar laws regulate competition. Prohibited conduct includes:

- Agreements to fix prices, bid rigging and collusion (including price sharing) with competitors
- Boycotts, certain exclusive-dealing and price-discrimination agreements
- Unfair trade practices, such as bribery, stealing trade secrets, deception and intimidation

Tax

As a nonprofit organization, Swedish is obligated to pursue activities that promote its charitable purposes. All Swedish resources must be used for the public good, and not for the private or personal interests of any employee. Swedish employees will:

- Avoid compensation arrangements in excess of fair market value
- Accurately report payments to the appropriate taxing authorities
- File all tax and information returns required by law

Fraud and Abuse

Swedish expects its employees to refrain at all times from conduct that may violate federal and Washington state fraud and abuse laws. These laws prohibit:

- Direct, indirect or disguised payments in exchange for referring patients
- Submission of false, fraudulent or misleading claims to any payer
- Making false statements to gain or retain participation in a program or to get paid for a service

Violations of these laws can result in criminal and/or civil penalties (for example, penalties can be as much as three times the amount billed).

Additionally, federal law allows individuals to participate in federal false claims actions if the individual has personal and independent knowledge of the false claim, sometimes referred to as “whistle-blowing.” In some cases, a whistleblower may be allowed to share a percentage of recovery in a successful false claims action. Most false claims actions take many years to be processed through court systems.

Falling under the fraud and abuse laws are a number of other guidelines that cover:

- **Medical necessity.** This is a key consideration for clinicians as they decide which treatment and testing options their patients will require. An option must be “medically necessary” before a claim can be submitted to a federally funded health-care program.

- **Professional services.** These are to be billed in the name of a clinician who is (a) authorized to provide the service and (b) actually performed the service. The only exceptions are services billed in the name of a “clinical supervisor” as outlined in Medicare’s “Incident To” provisions or Physicians At Teaching Hospitals (PATH) regulations.
- **Documentation and coding.** All clinicians must maintain documentation and coding to support their services. Correct documentation includes using the right diagnosis codes, selecting procedure codes that accurately reflect the service provided and documenting that service in the patient’s medical record. Only specifically trained and supervised staff can enter charges for services. All other personnel, including billing staff, are prohibited from making modifications to billing or diagnostic codes.

Lobbying/Political Activity

Swedish expects each of its employees to refrain from engaging in activity that may jeopardize the tax-exempt status of the organization, including a variety of lobbying and political activities. For instance:

- Swedish is prohibited from using its resources to support or oppose any candidate for public office.
- No individual, acting on behalf of Swedish, will contribute any money, property or services of Swedish to any candidate, party, organization or committee to support or oppose any political candidate.
- Swedish may publicly offer recommendations on legislation or regulations, and may analyze and take public positions related to Swedish operations, when its experience may help clarify the issues involved.
- All Swedish contacts and dealings with government bodies and officials must be honest and ethical.

Note: Swedish employees may, of course, support candidates or campaigns as private individuals, using their own money and resources.

Business Ethics

To further Swedish's commitment to the highest standards of business ethics and integrity, employees will accurately and honestly represent Swedish and will not engage in any activity or scheme intended to defraud anyone of money, property or honest services.

A number of principles are in place to provide guidance and ensure that Swedish's business activities are always honest and above board. Conduct not specifically mentioned must still reflect ethics and integrity.

Honest Communication

Swedish requires candor and honesty from its employees in all business situations. No employee will make a false or misleading statement to or about:

- A Swedish attorney or auditor
- A patient, person or entity doing business with, or competing with, Swedish
- The products or services of Swedish or its competitors

Misuse of Information that Belongs to Others

Swedish employees will not misappropriate or dishonestly use information that is confidential or does not belong to them. This includes:

- Using any publication, document, computer program, information or product in violation of a third party's interest
- Improperly copying documents or computer programs in violation of copyright laws and licensing agreements
- Using confidential business information obtained from competitors — such as customer lists, price lists and contracts — to provide an unfair competitive advantage to Swedish

Confidentiality

Swedish employees will strive to maintain the confidentiality of patients and other confidential information in accordance with applicable legal and ethical standards.

Swedish and its employees have access to a wide variety of confidential, sensitive and/or privately owned information. All employees are obligated to protect this information and make sure that it is not released, disclosed or used to harm individuals, Swedish business partners or Swedish itself. This information includes:

Patient Information

Employees will not reveal any personal or confidential information about patients unless there is a legitimate business or patient-care reason, and all required authorizations to release information have been obtained. If in doubt, ask a supervisor, a manager, the Swedish privacy officer or the Swedish legal department.

Swedish Information

Information, ideas and intellectual-property assets of Swedish are important to our success. Information about business strategies, along with payment and reimbursement information, should be protected and shared only with employees who require that information as part of their jobs. The same applies to information related to negotiations with employees or other parties.

Note: Patents, trademarks, copyrights and software licenses should be carefully maintained and managed to protect and preserve their value.

Personnel Actions/Decisions

Salary, benefit and other personal information about employees is strictly confidential, including:

- Personnel files
- Payroll information
- Disciplinary and similar information

The above information can only be shared with employees who need it to do their jobs.

Conflicts of Interest

Directors, officers, committee members and key employees have a duty to act with undivided and unqualified loyalty to the organization. Persons holding such positions may not use their positions to profit personally or to assist others in profiting in any way at the expense of the organization.

Business Relationships

Business transactions with vendors, contractors, third-party payers and government entities will be made free from offers, solicitation of gifts and favors or other improper inducements in exchange for influence or assistance in a transaction.

This applies to all Swedish employees. The goal is to avoid even the appearance of improper activity, and nothing in this policy prohibits a business unit or a supervisor from establishing even stricter rules and regulations.

Gifts and Tips

It is the desire of Swedish to at all times preserve its integrity. To ensure that this objective is met:

- Employees are prohibited from soliciting or accepting tips, gratuities or personal gifts from patients and/or their families. Anyone who offers a gift of money or significant assets should be referred to the Swedish Foundation at 206-386-2738.
- Employees will not accept gifts, favors, services, entertainment or anything of value to influence a decision that affects Swedish. Similarly, to offer or give money or anything of value to influence any purchaser, supplier, customer, government official or other person by Swedish is absolutely prohibited. These types of conduct must be reported immediately to either the Corporate Compliance Department or a Swedish attorney.
- Employees may not accept gifts from suppliers, vendors, etc. The conflict of interest policy still applies to some employees. Employees may not solicit gifts from suppliers, vendors, etc. unless duly authorized by the Swedish Foundation.

Note: If you have any doubt as to whether specific conduct is acceptable, contact your supervisor or the Corporate Compliance Department.

Contracting

All business relations with contractors must be ethical and comply with all Swedish policies. Also:

- Employees must disclose any personal or business relationships with a contractor that may influence the employees' performance or duties.
- Employees must discuss any potential conflict-of-interest situation with management, to obtain clarification.

Bribes and Improper Payments

Swedish employees may never try to gain advantage through the improper use of payments, business courtesies or other incentives. Appropriate commissions, rebates, discounts and allowances are customary and acceptable as long as they are approved by Swedish management and aren't illegal or unethical payments.

Any such payments must be:

- Reasonable in value
- Competitively justified
- Properly documented

Also, payments must be made to the business to which the original agreement or invoice was issued. Payments should not be made to employees or agents of businesses.

Note: Offering, giving, soliciting or receiving any form of a bribe or other improper payment is always prohibited.

Protection of Swedish Property

All employees will strive to preserve and protect the assets of Swedish by making prudent and effective use of Swedish resources and properly and accurately reporting its financial condition.

To help ensure Swedish's financial health, the following principles should be used as guidelines:

Internal Control

Swedish has established standards and procedures to make sure that all assets are protected and properly used, and that all financial records are accurate and reliable. All employees should follow these standards and procedures.

Financial Reporting

Improper financial reporting violates Swedish policy and may violate state and/or federal laws. Among the documents that must always be true and accurate are:

- Financial reports
- Accounting records
- Research reports
- Expense accounts
- Time sheets

Keeping Records

Swedish has Paperwork Retention Standards — including rules to specify what must be saved and what can be destroyed — that all employees must follow. If Swedish is served with a subpoena, or there is reason to believe a subpoena may be served, all relevant documents must be saved. Also, if a violation of this code is reported or suspected, all documents related to that real or potential violation must be saved.

Travel and Entertainment

Travel and entertainment expenses should always be consistent with both the employee's job and the needs and resources of Swedish. Employees should not lose money — or make money — as a result of business travel and entertainment, and should always use good judgment and spend Swedish's assets as if they were spending their own.

Personal Use of Swedish Property

Corporate assets cannot be converted to personal use. All Swedish property and business will be used and conducted to promote the best interests of Swedish, rather than the personal interests of employees. All employees must receive advance approval before working at an outside activity on company time.

Note: Swedish equipment, supplies, materials and services may not be used for personal or non-work purposes without management permission.

Government Investigations

Government investigations are becoming more common in today's health-care environment and do not necessarily reflect any wrongdoing on the part of Swedish or any of our employees. In the event you are involved in an investigation, the particular circumstances might dictate how you should react. For instance:

Indirect Contact

If a federal, state or other regulatory agency investigator arrives at your Swedish facility, contact the senior administrator on-call and the Corporate Compliance Department. Only legal counsel or someone from Corporate Compliance is authorized to respond to investigators, so you should ask that the investigator(s) not proceed until one or more of these people are present.

Direct Contact

If a federal, state or other regulatory-agency investigator contacts you directly, either at work or at home, during normal business hours you should contact the Corporate Compliance Department and after hours you should contact the risk manager on-call. Although the decision on how you respond is your own, you do have the right not to respond and to first consult with an attorney. Neither of these actions implies that you aren't willing to cooperate fully.

Questions involving investigations, or your rights as an employee if you are involved in an investigation, can be answered by the Corporate Compliance Department.

Note: No Swedish employee should ever make false or misleading statements to any government investigator or try to persuade another employee to make statements that are anything but true.

Note: Please see *Keeping Records* section on page 10 for information on saving documents relevant to a government investigation.

Discipline for Code Violations

Swedish expects each employee to follow the rules and principles contained in this Code of Conduct. Failure to follow the code may lead to disciplinary action that may include:

- Verbal warning
- Written warning
- Suspension without pay
- Termination of employment

In the event that an employee is covered by the terms of a collective bargaining agreement, discipline will meet the terms contained in that agreement. Also, supervisors may be disciplined for failure to adequately instruct their staff, or for failing to notice violations of this code when reasonable diligence would have led to the discovery of violations and given Swedish the opportunity to correct them.

Note: Nothing in this Code of Conduct is meant to provide additional employment or contract rights to the employees or other persons. Swedish reserves the right to modify or alter this code without any advance notice.

Notes

