

STEWARD HEALTH
CARE SYSTEM

Code of Conduct

You can make a difference.



Steward

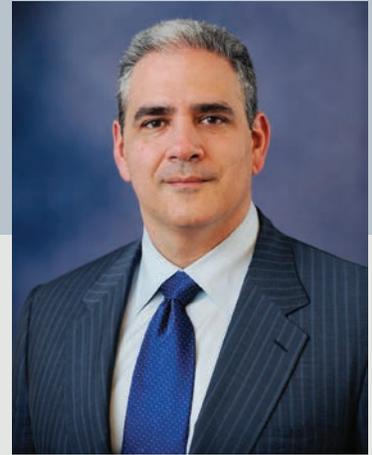
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Steward reserves the right, in its sole discretion, to modify any aspect of its Compliance Program, including, without limitation, this Code and Steward policies, at any time, for any reason, and with or without notice. If there is a conflict between this Code and a specific policy, the specific policy currently in effect will govern. The intranet version will contain any changes made after the date of the printed publication and will be the most current version of the Code of Conduct. This Code is available on the intranet website on the Compliance home page.

A Message from our CEO



Dear Colleagues,

The mission of Steward Health Care System LLC (Steward) is to serve the needs of our communities by delivering the highest quality care with compassion and respect. We accomplish this mission in an environment governed by complex local, state and federal rules and regulations, by which we must abide.

Steward is committed to behaving and doing business honestly, responsibly and in accordance with laws and regulations.

Because compliance may not always be an intuitive process, this Code helps you understand how to fulfill that commitment with the integrity and professionalism that embodies world-class health care.

Compliance is in your every day choices. Regardless of rank or status, it is the responsibility of every board member, officer, employee, physician, volunteer, vendor and agent (“Steward workforce members”) to understand and act according to the standards set forth herein. Please read it carefully.

Consider your actions in light of these standards and speak up if you are unsure or concerned that something doesn’t seem right. You are personally responsible for doing so. You can contact your manager or a member of the Office of Corporate Compliance and Privacy (OCCP) at 617-419-4732 or by sending an e-mail to compliance@steward.org. You may also report concerns anonymously in good faith and without fear of retaliation by calling the Compliance Support Line at 1-800-699-1202.

Steward communities place enormous trust in us. There are simple things you can do to ensure that, as an organization, we maintain and build upon that trust. Learn the concepts of this Code of Conduct, ask questions when in doubt, and report concerns. We have a zero tolerance policy for violations of these standards or related policies and procedures.

Our mission, reputation and future success hinges on the excellent care we deliver and the integrity with which we deliver it. Thank you for your dedication and diligence.

A handwritten signature in black ink that reads "Ralph de la Torre". The signature is written in a cursive, flowing style.

Ralph de la Torre, MD
Chairman and Chief Executive Officer



Section I: Understanding Our Code of Conduct

Introduction

All of us want to be proud of the work we do at Steward and know that we have done our part to serve the needs of our communities by delivering the highest quality care with compassion and respect. We also want to maintain our reputation for high ethical standards. But in today's complex world, no organization can assume that the right course of action is always clear. Even organizations with great reputations must invest in protecting that reputation. To help us all fulfill our obligations to our patients, our communities and each other, we have designed this Code of Conduct.

Please read this Code of Conduct and keep it handy for your reference. You will be asked to acknowledge your commitment to adhering to these standards.

Scope

Every person conducting business for Steward must follow this Code of Conduct, together with all applicable laws and Steward policies. This includes every board member, officer, employee, physician, volunteer, vendor and agent ("Steward workforce members"). This Code of Conduct also applies to all of Steward's locations, affiliates and subsidiaries.

Your Responsibilities

One of your responsibilities is to follow the laws and Steward policies as you conduct business on behalf of Steward. While this Code of Conduct has been written to familiarize you with many of the policies that apply to Steward, it does not supersede them or act as a substitute for reading each policy that applies to your specific job or service responsibilities.

Note: For purposes of this document, the term "laws" also refers to regulations. The term "Steward policies" includes all policies, standards, procedures and other governance documents.

Remember, no written policy or code on its own can guarantee compliance with the law or ethical decision-making. Everyone must do their part. Here are some key things to keep in mind:

- Act with honesty and integrity
- Follow the law and Steward policies
- Participate in required compliance trainings
- Ask if you are unsure about what to do or have questions about this Code
- Report any known or suspected violations
- Cooperate with investigations of potential violations

Additional Responsibilities of Managers

If you are a manager at Steward, you have additional responsibilities. You must lead by example and take steps to promote compliance. You must also prevent and report potential violations.

Note: For purposes of this document the term “manager” includes supervisors, administrators, department heads, physician leaders or similar management positions at all levels.

Here are some of the ways managers can fulfill these responsibilities:

- Serve as a positive role model in fostering a culture of compliance and ethical behavior. Don't give others the impression that it is okay to ignore policies or skip steps. Don't create or tolerate an environment where workforce members feel pressured to bend the rules.
- Guide workforce members on completing all required training on time. Regularly review policies that apply to them and make sure they know how to act in a manner consistent with this Code and Steward policies.
- Prevent problems before they happen. Respond to workforce members who raise concerns in a way that makes them feel at ease and secure.
- Report potential violations responsibly and promptly. Report problems that you suspect or that others share with you.

Disciplinary Action

Failure to comply with this Code, Steward policies or applicable law will subject workforce members to disciplinary action up to and including termination of employment, to the extent permitted by law. Disciplinary measures may also be taken when managers ignore misconduct, or fail to take action to correct it.





Section II: Resources for Getting Answers

Resources for Getting Answers

Part of adhering to this Code of Conduct is seeking help when you need it. If Steward policies do not provide enough direction, ask your manager for clarification. If you are uncertain about the ethics or legality of an issue, please keep asking questions and seek additional guidance before proceeding.

There are several resources available to assist you when you have a question or need advice about the topics discussed in this Code of Conduct or about compliance in general.

Resources include:

RESOURCE CONTACT INFORMATION

Your Manager	Refer to your department directory
Human Resources Support Center	1-800-579-1222
Office of General Counsel (OGC)	469-341-8800
Office of Corporate Compliance and Privacy (OCCP)	617-419-4732

Making the Right Decision

This Code of Conduct reflects our expectations for all Steward workforce members. The sections of the Code that follow contain compliance standards covering our responsibilities to our patients, the communities we serve and each other. In complying with these standards, you should ask yourself the following questions to aid in making the right decision about a possible course of action:

- Are my actions illegal or unethical?
- Could someone's life, health, safety, or reputation be endangered by my action?
- Am I being fair and honest?
- Would I be willing or embarrassed to tell my family, friends or coworkers?
- Would the reputation of Steward be harmed if the action were revealed in the newspaper?

Section III: Reporting Potential Violations

Reporting a Potential Violation

Each of us plays an important role in helping to meet our high standards for compliance with laws and Steward policies. *You can make a difference* by telling the appropriate person at Steward if you know of a problem or suspect something is wrong. At Steward, we value integrity, trust and respect. The earlier potential issues can be raised, the sooner they may be resolved.

Calling Steward's Compliance Support Line

You can contact Steward's Compliance Support Line at 1-800-699-1202 to make an anonymous report in good faith without fear of retaliation.

Steward takes all calls to the Compliance Support Line very seriously and handles calls on a case-by-case basis. Internal investigations are handled in a manner that is as confidential as possible. Steward will determine whether misconduct has occurred and will take actions as appropriate.

If you make a report, you can call the Compliance Support Line back at any time during the process to request follow-up information. Please be aware that we may be limited in the information that we can share with you.

Note that internal investigations may take some time. Don't assume nothing is happening just because it takes a while to close a matter.

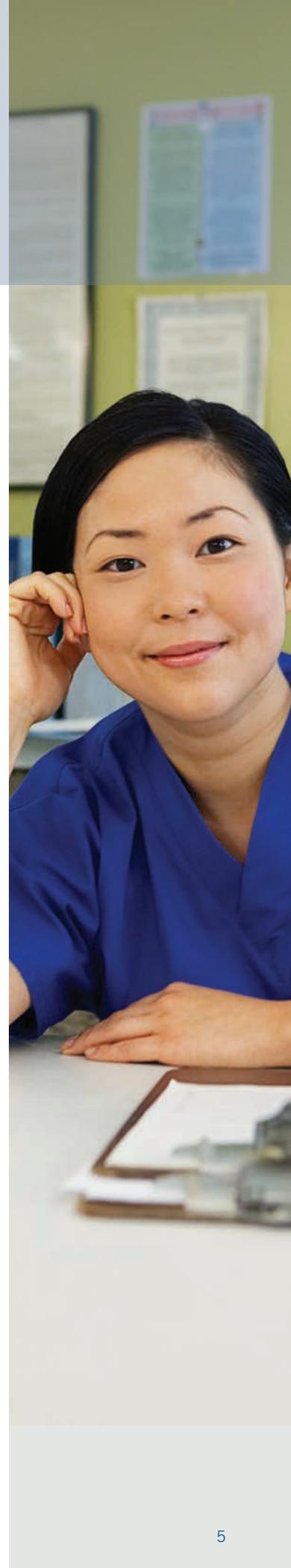
Anonymity and Confidentiality

When you call Steward's Compliance Support Line, you may do so anonymously – you do not have to give your name. You may request to remain anonymous; however, this can limit our ability to fully investigate the matter. Therefore, you will be encouraged to identify yourself whenever possible.

When you choose to provide your name, any issues you report will be treated as confidential to the extent possible. This means your name will be shared only with others on a need to know basis in order to answer your questions or to look into the matter reported. However, in some cases, Steward may be required by law to reveal your identity. Also, it may not always be possible to keep your identity confidential, for example, in situations where you are one of a small number of people who know certain facts or you work in a small department where it may be obvious from the details who originated the complaint.

Non-Retaliation

Steward policy prohibits intimidation or retaliation against workforce members and others who report a compliance concern in good faith and participate in good faith in an investigation or other proceeding related to such concern. This policy applies to reports made through Steward's Compliance Support Line, or those made through any of the resources identified in this booklet or in any other appropriate manner. Reprisals or retaliation against any person acting in good faith will not be tolerated.



Section IV: Our Patients and the Community



Patient Care

Steward is committed to delivering the highest quality care with compassion and respect.

As a Steward workforce member I will:

- Treat all patients with respect and dignity no matter their gender, race, color, national origin, ancestry, religion, disability (including history of disability and perceived disability), age, sexual orientation, genetic information, military status or any other characteristic protected by law;
- Respect our patients' spiritual and cultural values; and
- Not accept personal gifts from patients that might give the impression that our care may be influenced by gifts. Staff may accept homemade items with little or no marketable value, or perishable items which may be shared with other staff.

If I am a Steward physician or other patient care provider I will also:

- Provide only medically necessary goods and services, and
- Ensure that all goods and services that I provide meet professionally recognized standards for quality and safety.

Steward Catholic hospitals will:

- Comply with the Ethical & Religious Directives www.usccb.org.

Emergency Care

Steward will provide all individuals with emergency medical treatment regardless of citizenship, legal status or ability to pay in accordance with the Emergency Medical Treatment and Active Labor Act (EMTALA).

As a Steward workforce member I will:

- Immediately assist any individual who arrives on Steward property and is in need of emergency medical treatment.

If I am a Steward emergency care provider I will also:

- Screen all patients requesting treatment to determine if a medical emergency exists and provide treatment until the patient is stabilized.

Medical Records

Steward recognizes that medical records must be accurate and complete to ensure patient safety, quality of care and correct billing procedures.

As a Steward workforce member I will:

- Add information to medical records only as permitted by my job responsibilities;
- Ensure that all information that I add to a medical record is truthful and complete;
- Never change information in a medical record except through an approved amendment process;
- Never delete information in a medical record; and
- Ask my manager if I am unsure how to handle any situation involving medical records.



If I am a Steward physician or other patient care provider I will also:

- Document all care that I give to a patient accurately, clearly and completely within required time limits.

Confidentiality and Privacy

Steward is committed to protecting patients' confidentiality and privacy in accordance with applicable laws and Steward policies. Steward is also committed to informing patients about their rights with respect to their health information.

As a Steward workforce member I will:

- Respect and protect our patients' confidentiality and privacy;
- Guard against improper use and disclosure of patient information;
- Use and disclose only the minimum amount of patient information necessary to do my job;
- Never access, use, disclose, store or transmit patient health information except as permitted by Steward policy and the Steward Health Care Notice of Privacy Practices;
- Refer requests for patient health information to the appropriate responsible party in accordance with department procedure; and
- Report any known or suspected access, use, disclosure, storage or transmission of patient health information in violation of current Steward policy.

Information Security

Steward Health Care System values the confidentiality, security, and integrity of electronic information and provides tools to safeguard such information.

As a Steward workforce member I will:

- Read and comply with all Office of Information Security (OIS) policies and procedures;
- Recognize the classification of information I handle and safeguard that information according to OIS policies and procedures;
- Protect the confidentiality, security, and integrity of Steward electronic information;
- Review any periodic guidance from OIS for further information on safeguarding the network; and
- Complete any compulsory Information Security Training curriculum distributed by OIS.

Ownership and Privacy

Steward continually monitors its environment for security threats. Steward owns the rights to all electronic information and files in any information system directly accessing Steward's network, owned by Steward, or used for Steward business. Steward also reserves the right to monitor any use of Steward's network, Internet access via Steward's network, Steward-owned Information Systems, and non-Steward Information Systems while attached to Steward's network.



As a Steward workforce member I understand that whatever information I electronically handle via above methods will be subject to inspection, monitoring, evaluation, and usable by Steward at any time.

Email and Internet

Steward provides enterprise-class email for communicating Steward business.

As a Steward workforce member I will:

- Use my Steward assigned email account for all Steward business email communications and not use non-Steward issued email accounts for Steward business purposes;
- Secure any email messages that contain electronic confidential information and are destined for external or non-Steward recipients using encryption in accordance with the email encryption requirements defined in Steward policy.
 - Steward offers a mechanism to encrypt email in transit across the Internet when using Steward corporate email. To send email securely put the word “secure” in brackets anywhere in the subject line; i.e. – [secure]. Remember; never put confidential or internal information in the subject line of an email.
 - Messages sent from steward.org addresses to other steward.org addresses are considered secure.; and
- Appropriately secure any electronic confidential information using encryption when sending over the Internet or other unsecured public network.

Texting

Steward provides a secure texting solution for communicating Steward business via Short Message Service (SMS) or Multimedia Message Service (MMS).

As a Steward workforce member I may:

- NOT send text messages that contain electronic confidential information outside of the Steward provided solution;
- NOT send images via text that may contain electronic confidential information or that may result in an individual’s privacy being compromised; and
- As an alternative, send electronic confidential information and/or images via secure email, and follow up with a text message to the email recipient indicating an urgent message awaits them via email.

Information Storage

Steward provides secure repositories for the storage of electronic confidential information.

As a Steward workforce member I will NOT create or store electronic confidential information to/on any:

- Local device storage, including;
 - C:\drives on workstations (e.g., Desktop PCs, Laptop/Notebook PCs, etc.);
 - Portable electronic devices (e.g., PCs, laptops, smartphones, tablets, etc.); or

- Mobile media storage devices (thumb drives, DVDs, CDs, etc.); or on
- Unauthorized Internet accessible locations, including;
 - Drop boxes,
 - Google Docs,
 - File sharing services, etc.

Steward requires that all laptops used for Steward business must be encrypted.

In addition to the technical safeguards, workforce members who use a laptop, smartphone, or other portable electronic device for Steward business, are responsible for taking reasonable steps to protect the device from theft including securely storing and locking the device in the appropriate facility when not in use, including after normal department or area hours and securely storing and locking the device in the safest location available when travelling (hotel safe, car trunk, or similar area not visible to passerby).

Passwords

A password is a key aspect of information security—it is the front line of protection for access to Steward Information Resources. A poorly chosen or easily identified password may result in the unauthorized access, misuse, or theft of confidential or internal information, or in the compromise of Steward Information Systems.

As a Steward workforce member I will:

- Take appropriate steps to create strong passwords;
- Change my passwords regularly;

- Protect the confidentiality of my logon password by not sharing it with anyone; and
- Immediately create a new and significantly different password from previous iterations if I suspect that my password has been compromised.

Incident Response

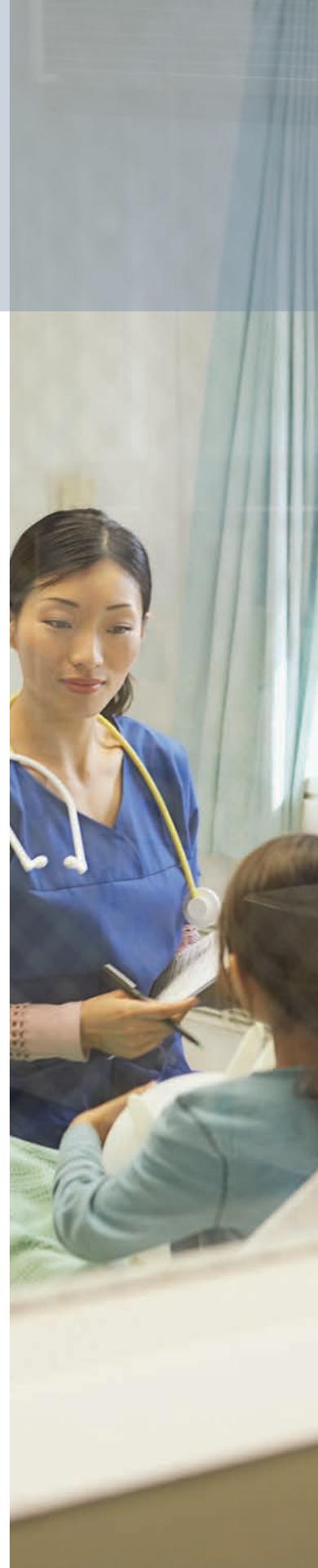
Steward takes the suspected loss, theft, compromise, negligent use, and unauthorized handling of devices and information very seriously. Steward's Office of Information Security may initiate Information Security investigations to address or prevent breaches of security. Steward is bound by certain timely reporting constraints.

As a Steward workforce member I will:

- Cooperate fully with, and make myself available to, Steward OIS personnel investigating a suspected or confirmed information security incident.

Policies

Information Security is extremely important to Steward and our patients. Workforce members have more responsibilities than what is outlined here. Remember to review all Office of Information and Security policies through your local policy library.





Proper Billing

Steward is committed to accurate reimbursement and billing practices. Steward devotes many resources to preventing and correcting billing errors to Medicare, Medicaid and other payors. The federal government and many states have enacted False Claims Act laws to pursue billing fraud, waste and abuse. Workforce members who suspect billing errors have an obligation to report these to their manager or the Office of Corporate Compliance and Privacy (OCCP) immediately.

As a Steward workforce member I understand that:

- Inappropriate submission of claims, such as intentionally submitting for payment services that are not covered or were not rendered, may be perceived as a false or fraudulent claim which can result in significant fines and/or penalties;
- Falsifying time sheets, work logs, or any other misrepresentation of effort that may in any way be used to construct a cost report on behalf of Steward or its workforce members may be considered a violation of the False Claims Act or fraud and abuse laws;
- Medical services provided to patients must be documented in a timely manner in the medical record to support the claims for services submitted; and
- I must inform my manager and/or the OCCP if I know or suspect intentional or unintentional submission of incorrect bills, or retention of overpayments received.

If I am a Steward workforce member involved in the billing process I will:

- Never bill for services that I know or suspect to be inappropriate or not rendered;
- Never put information on a claim only because it will increase the chances of it being paid;
- Never alter billing information unless in accordance with Steward policies and procedures;
- Report any known or suspected billing problems, including time sheets, to my manager and/or the OCCP; and
- Never take any retaliatory action against anyone because that person has reported a billing compliance concern.

If I am a Steward physician or other patient care provider I will also:

- Understand the applicable coverage rules governing the services I render;
- Recognize that I am ultimately responsible for the accuracy of any claim which is submitted for a service I have rendered; and
- Contact appropriate billing personnel or the OCCP with any questions I have about the proper coding or billing of claims.

Patient Referrals

Steward obtains patient referrals through legitimate sources, including as a result of its excellent reputation. Steward does not offer or provide compensation in exchange for patient business.

As a Steward workforce member I will:

- Never offer or give anything of value to anyone, including patients, in an attempt to obtain patient business.

Section V: Our Relationship with the Government and Other Third Parties

Vendor Interactions

Steward makes purchasing and contracting decisions based on what is best for the organization, our communities and for our patients. Steward is committed to ensuring that all decisions regarding the selection of vendors are made fairly and in the best interest of the organization, free from personal bias or the appearance of personal bias.

As a Steward workforce member I will:

- Adhere to the Vendor Interactions Policy with respect to accepting any type of compensation, gift or gratuity from any business who seeks to do business with Steward.

Anti-Corruption

It is Steward's policy to comply with all anti-corruption laws that apply to Steward operations, including the Foreign Corrupt Practices Act (FCPA). Steward has a Government Relations & Political Activities Policy that sets forth expectations for our business dealings with Government officials, and prohibits Steward workforce members and those doing business with or on behalf of Steward from giving, offering or authorizing the provision of anything of value to, or for the benefit of, a Government official, in order to obtain or retain business, to secure any other business advantage, or to obtain beneficial governmental treatment, except as specifically permitted in the Policy. Before offering or giving anything of value to any individual who may be an official, employee or representative of a Government, or of a government owned or controlled entity, Steward workforce members and those doing business with or on behalf of Steward must comply with all Steward policies.

Interactions with Regulators, Inspectors and Accrediting Agencies

Steward policy is to be open and honest with government regulators (or investigators), inspectors and accrediting agencies, and we strive to satisfy their requirements by following the law and applicable standards. Government investigators have the right to contact you at home for work-related issues. The OGC and the OCCP should be contacted immediately about any government inquiry or investigation. In most situations, workforce members have the right to decide when and where the interview will be conducted. For more information about your rights regarding government investigators, please contact the OGC and/or the OCCP.

As a Steward workforce member I will:

- Be open and honest in all dealings with government regulators, inspectors and accrediting agencies;
- Never offer a gift, bribe or thing of value to any government regulator, inspector or accrediting agency; and
- Report to my manager any regulator's request for oral or written information, documentation, or access to data.





Financial and Political Interests

Steward does not allow its workforce members to use their positions to advance their own personal, financial or political interests or the interests of others.

As a Steward workforce member I will:

- Only use my position at Steward or Steward resources to financially benefit Steward or Steward entities;
- Never use Steward resources to advance my own interests;
- Truthfully disclose my or my immediate family member's financial interests in a company doing business with Steward in accordance with relevant Steward policies, including the Conflict of Interest Policy;
- Never make a donation on behalf of Steward or imply that a donation is made on behalf of Steward unless authorized as part of my job responsibilities; and
- Not use Steward resources for federal, state or local political interests beyond what is permitted by law and with appropriate advance authorization from Steward senior management.

As a Steward physician or other patient care provider I will:

- Never make a patient referral to any entity in which I have or my immediate family member has a financial interest unless such referrals are lawful and disclosed to Steward in advance through the OGC.

Conflict of Interest and Outside Activities

Steward workforce members must avoid situations in which their personal interests could conflict, or reasonably appear to conflict, with the interests of Steward.

For example, any opportunity for personal financial gain apart from a workforce member's normal compensation is a potential conflict of interest.

Steward workforce members should act with loyalty to Steward and refrain from engaging in outside activities that would interfere with their job responsibilities.

Workforce members should avoid outside employment or activities that could have a negative impact on their job performance, conflict with their obligation to Steward, or negatively impact Steward's reputation in the community. Steward workforce members who think they may have a conflict of interest due to investments or outside activities should disclose it to their manager or the OCCP.

As a Steward workforce member I will:

- Ensure that my outside activities do not interfere with my job responsibilities;
- Disclose to my manager or the OCCP if I have a second job with any vendor or contractor of Steward; and
- Comply with any further disclosure obligations I may have under my employment contract or applicable policy.

Section VI: Our People and Our Workplace



Protection of Steward Assets

Steward takes efforts to protect its assets against improper use so as to maximize its resources for patient care. Steward assets should be used for the benefit of Steward and may not be used by workforce members or others for personal gain.

Assets are more than equipment, inventory, funds and office supplies. Assets include medical records, concepts, financial data, intellectual property rights, research data, business strategies, plans about Steward's business activities and all Steward systems.

All Steward systems and the records and information stored on them are the property of Steward regardless of how you mark or label them. Generally you should not expect any confidentiality or privacy when using Steward systems. Steward may at its sole discretion inspect your files and messages or monitor your internet usage at any time without advance notice or consent. Use of a Steward system constitutes consent to inspection, monitoring and access by Steward, as permitted by law.

As a Steward workforce member I will:

- Be cost conscious;
- Guard against fraud, waste and abuse of Steward assets;
- Only use Steward assets, systems and records for conducting Steward business, except as otherwise permitted by Steward policy;
- Look for ways to improve efficiency; and
- Never borrow or remove Steward property without permission.

Protection of the Workplace and the Environment

Steward is committed to providing a safe workplace, using natural resources responsibly, minimizing waste, and developing innovative ways to protect the environment.

As a Steward workforce member I will:

- Strive to maintain a safe and healthy environment;
- Follow all rules for disposing of medical waste and dangerous or poisonous materials;
- Follow all rules regarding the storage of hazardous substances;
- Accurately and promptly file all required reports to state and federal environmental and workplace safety agencies, if required as part of my job responsibilities; and
- Report to my manager and/or facilities management if I learn of or suspect any dangerous or unsafe conditions in the work area or of any unsafe storage or disposal activities.



Workplace Civility

Steward recognizes that excellent care is best delivered in a work environment of respect and cooperation.

As a Steward workforce member I will:

- Treat all coworkers and individuals with respect, patience and courtesy;
- Refrain from conduct that would intimidate or threaten other individuals;
- Never engage in abusive or disruptive behavior;
- Not tolerate any threats of harm - either direct or indirect – or any conduct that harasses, disrupts or interferes with another workforce member’s work or performance or that creates a hostile work environment; and
- Never use alcohol or illegal drugs while working or while on any Steward premises. However, Steward workforce members may responsibly consume alcohol at events sponsored by Steward or attended in conjunction with their job duties on Steward property with the appropriate approvals.

Licensure and Professional Certifications

To deliver on our commitment to providing world class health care, many of our workforce members maintain professional licenses and certifications (e.g., MD, NP, PA, PharmD, RN, CPA, CISA, attorney-at-law, etc.). Anyone holding professional licenses and certifications has a personal responsibility to maintain such licenses and certification in good standing through timely renewals, and (where required) the attainment of the appropriate level of continuing education.

As a Steward workforce member with a professional license and/or certification I will:

- Maintain all pertinent licenses and certifications in good standing at all times, and
- Report to my manager and/or Human Resources any disciplinary action that is pending or taken against me by any licensing body in any jurisdiction.

Excluded Individuals and Entities

Steward takes precautions to ensure that individuals and entities that have been sanctioned from participating in government health programs do not work at or do business with Steward.

The federal government has the authority to exclude individuals and entities from federally-funded health care programs (Medicare, Medicaid, and other federally sponsored health care programs) pursuant to sections 1128 and 1156 of the Social Security Act.

Exclusions are imposed for a number of reasons including criminal convictions. For example, exclusions can result from actions including but not limited to: 1) misdemeanor convictions related to health care fraud other than Medicare or a State health program, fraud in a program (other than a health care program) funded by any Federal, State or local government agency; 2) misdemeanor convictions relating to the unlawful manufacture, distribution, prescription, or dispensing of controlled substances; 3) suspension, revocation, or surrender of a license to provide health care for reasons bearing on professional competence, professional performance, or financial integrity; 4) provision of unnecessary or substandard services; 5) submission of false or fraudulent claims to a Federal health care program; 6) engaging in unlawful kickback arrangements; 7) defaulting on health education loan or scholarship obligations; and 8) controlling a sanctioned entity as an owner, officer, or managing employee.

As a Steward workforce member I will:

- Report to my manager and/or the OCCP immediately if any issue or legal action is pending or taken against me that may result in my exclusion from participating in government health programs, and
- Report to my manager and/or the OCCP immediately if I ever learn or suspect that an individual or entity doing work for Steward has been sanctioned or disciplined, or is being investigated by any government health program.

Sanctioned Individuals and Entities

It is Steward's policy to comply with all applicable laws and regulations, including economic sanctions implemented by the Office of Foreign Assets Control (OFAC) of the U.S. Department of the Treasury. These economic sanctions prohibit U.S. persons from engaging in transactions with sanctioned individuals or entities, or with comprehensively sanctioned countries (e.g., Cuba).

As a Steward workforce member involved in the procurement of goods or services from outside vendors I will:

- Ensure that potential vendors are thoroughly vetted, including against government restricted party lists maintained by OFAC.
- Report to my manager and/or the OCCP immediately if I ever learn or suspect that an individual or entity doing work for Steward is sanctioned by OFAC.





Section VII: Our Business

Proprietary Information and Trade Secrets

Steward takes reasonable steps to protect its confidential information, its intellectual property, and all information related to its business.

Workforce members must safeguard Steward proprietary information and trade secrets. This includes information that is not generally disclosed to the public or information that is useful to Steward's competitors, such as:

- Patient information
- Financial data
- Planned new projects
- Information about areas where Steward intends to expand
- Workforce member information
- Capital investment plans
- Projected earnings
- Changes in management or policies
- Information about the physical security of our facilities or systems
- Unpublished research data

Workforce members are also expected to refuse unauthorized confidential information and trade secrets of any other company, including our competitors.

As a Steward workforce member I will:

- Refuse to disclose Steward proprietary information and trade secrets outside of Steward or only in conjunction with the OGC, which can provide

appropriate disclosure agreements for trade secrets or confidential information;

- Discuss proprietary information with others internally only on a need to know basis;
- Be vigilant about inadvertently discussing confidential information or trade secrets in either social conversations or in routine business relations; and
- Never use the Steward name or logos, except as permitted by my job responsibilities.

Business Records

Steward is committed to maintaining high ethical standards of business conduct and to keeping accurate records of its business activities.

As a Steward workforce member I will:

- Ensure that all information that I enter into a business record is accurate and truthful to the best of my ability;
- Never omit relevant information from a business record; and
- Retain all information in accordance with internal record retention schedules or longer, if instructed by my manager or by the OGC.

Financial Integrity

Steward has a responsibility to provide full, fair, accurate, timely and understandable disclosure in reports and documents that are filed with governmental and regulatory agencies.

As a Steward workforce member I will:

- Keep Steward records accurate, true, and complete;
- Ensure that reports and documents that Steward submits to governmental and regulatory agencies are full, fair, accurate, timely, and understandable; and
- Cooperate fully with Steward's independent public accountants and never take any action to manipulate or mislead them.

Media Relations

We should always exercise care not to disclose confidential, proprietary information through public or casual discussions with the media (e.g., newspapers, magazines, trade publications, radio, television or other external sources seeking information about Steward or its patients). Requests for official comment on behalf of the organization should be referred to the Steward Director of Media Relations. While Steward's standard policy is to respond to external inquiries in an honest, candid and appropriate manner, responses may be limited by confidentiality requirements or other related concerns.

As a Steward workforce member I will:

- Refer any requests for official comment on behalf of the organization to the Steward Director of Media Relations.

Social Networking

We expect all who participate in social media (e.g., blogs, wikis, social networks, virtual worlds, or any other kind of social media) personally or on behalf of Steward to understand and follow Steward's guidelines. These guidelines will continually evolve as new technologies and social networking tools emerge—so be sure to routinely check Steward policies.

As a Steward workforce member I will:

- Not disclose proprietary information of Steward including business or financial information;
- Not represent that I am communicating the views of Steward, unless required by my job duties;
- Not use or disclose any subscriber or patient identifiable information of any kind; and
- Always adhere to Steward policies regarding harassment and professional conduct.



Section VIII: Additional Information about Our Office of Corporate Compliance and Privacy (OCCP)



The OCCP is responsible for implementing Steward's Compliance and Privacy Program which promotes the prevention, detection and resolution of conduct that does not conform to law and Steward compliance and privacy policies. The Chairman and CEO, and the Compliance Committee of the Board provide oversight of the OCCP and the Compliance and Privacy Program.

The OCCP is available to receive all reports of suspected violations of laws and Steward compliance and privacy policies. The OGC is also available to assist with questions about how to comply with the law. The OCCP conducts internal investigations into reported concerns about potential compliance violations and assists management with taking steps to prevent recurrence.

The OCCP Compliance and Privacy Officers and staff work with each Steward entity as a resource for questions and concerns about compliance and the current health care environment. They work with managers and appropriate committees at each entity to help ensure compliance with law and Steward compliance and privacy policies. The Compliance and Privacy Officers and the OCCP staff also provide education on compliance topics for all Steward workforce members, conduct compliance auditing and monitoring activities as well as other compliance and privacy program activities.

For more information about the OCCP or the Steward Compliance and Privacy Program call 617-419-4732 or e-mail compliance@steward.org.

Section IX: Frequently Asked Questions

Q: Does the U.S. or state government encourage compliance programs?

A: Yes. The government would like the health care industry to adopt a model of self-compliance to prevent fraud and abuse.

Q: As a workforce member, I receive my medical care here. Is my medical record kept confidential?

A: Yes. Steward policy requires all employees to respect the confidentiality of every patient and his or her information. Confidentiality standards are the same for ALL patients.

Q: Of course compliance with Steward policies is important, but can I skip a few steps in a procedure in order to meet our goals, especially when some of the requirements seem like administrative red tape?

A: No. Taking shortcuts is never acceptable. Procedures have been designed to help our organization meet specific goals and objectives. If you believe a requirement is unnecessary, discuss the issue with your manager.

Q: What should I do when I can't answer a question from a government official or other regulatory or accrediting body?

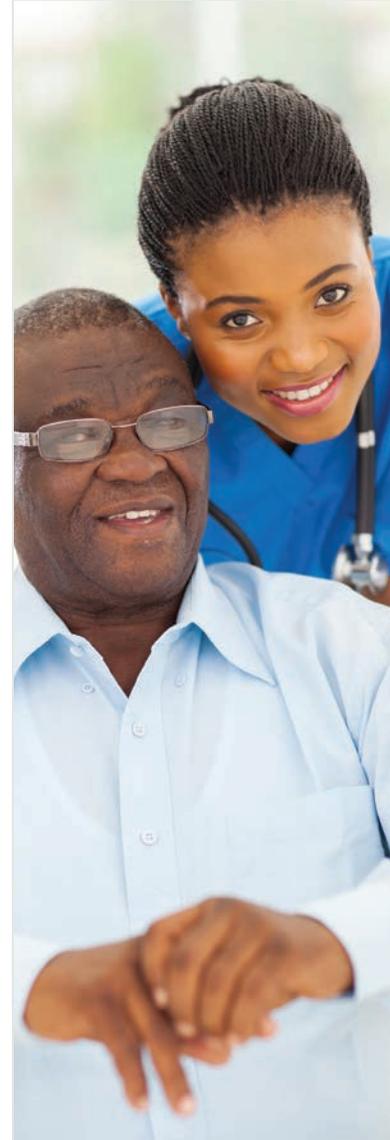
A: If you do not know the answer, say so and tell the inspector you will get the answer promptly. Do not guess or make up a response. Also, do not present information in a misleading way or omit critical information.

Q: Can I use my Steward computer for personal matters?

A: Generally, you may access e-mail and the internet using company systems for limited personal purposes under certain conditions. For example, your use should not violate the law or Steward policy or impact your job performance. Personal use must take place before or after work, or during breaks.

Q: I am moving to another department in Steward. Should I take all of my records with me?

A: Many of your electronic records will automatically transfer with you, such as e-mails and those stored in electronic folders. However, records that are part of your old department's business should stay with that department. Before you transfer, talk with your manager about the best way to ensure that the proper records (including electronic records) remain with your old department.





Q: I need to send confidential data to a vendor that is doing work for Steward. What should I do?

A: You should obtain approval from your manager and your manager needs to make sure that all appropriate protections are in place with any outside company, institution or individuals before any confidential information is revealed. If you have any question you may contact the OGC or the OCCP.

Q: During a neighborhood picnic, a reporter asked me what I thought about a political candidates' position on issues that face Steward. I wasn't sure what to say. How should I respond?

A: You should politely decline to respond. Your personal opinion might be misinterpreted as an official statement from Steward. Any public statement about Steward should be reserved for the Media Relations Department. The best thing to do is to say that you don't speak for Steward and refer the reporter to the Steward Director of Media Relations.

Q: When should I turn to the Steward Compliance Support Line?

A: You should call the Compliance Support Line if you suspect a violation of the Code of Conduct, a Steward policy or applicable law. If you have a general question about compliance or privacy, you may call the OCCP Main Line at 617-419-4732 or e-mail compliance@steward.org.

COMPLIANCE
IS **EVERYONE'S**
RESPONSIBILITY

INTERPRETER SERVICES AVAILABLE

Albanian - Shqip

Flisni shqip? Ne do t'ju sigurojm një përkthyes pa asnjë kosto personale për ju.

اللغة العربية - Arabic

هل تتحدث العربية؟ سوف نوفر لك مترجمًا فورًا بدون أي تكلفة عليك.

Brazil-Portuguese - Português

Você fala português? Nós lhe forneceremos um interprete, sem nenhum custo adicional.

Cambodian - ភាសាខ្មែរ

តើអ្នកនិយាយភាសាខ្មែរដែរទេ? យើងខ្ញុំនឹងផ្តល់ជូនអ្នកបកប្រែភាសាដោយឥតគិតថ្លៃផ្ទាល់ខ្លួនដល់អ្នក។

Cantonese - 粵語

您講粵語嗎？我們將免費為您提供翻譯。

Cap Verdean Creole - Kriolu di Kabuverdi

Bo ta papia Kriolu di Kabuverdi? No ta ranja-bu un tradutor di grasa.

German – Deutsch

Sprechen Sie Deutsch? Wir stellen Ihnen unentgeltlich einen Dolmetscher zur Verfügung.

Greek - Ελληνικά

Μιλάτε ελληνικά; Θα σας παρέχουμε ένα διερμηνέα χωρίς καμία οικονομική επιβάρυνση για εσάς.

Haitian Creole - Kreyòl Ayisyen

Èske ou pale Kreyòl Ayisyen? N ap ba ou yon entèprèt gratis.

Italian - Italiano

Parla italiano? Le forniremo gratuitamente un interprete.

Mandarin - 中文

您讲国语吗？我们将免费为您提供翻译。

Pennsylvania Dutch – Deitsch

Kannscht du Deitsch schwetze? Wann du duscht, kenne mer dich en Interpreter griege as dich nix koschte zellt.

Polish - Polski

Czy mówisz po polsku? Zapewnimy bezpłatną pomoc tłumacza.

Portuguese - Português

Fala Português? Vamos oferecer-lhe um intérprete gratuito.

Russian - Русский

Вы говорите по-русски? Мы абсолютно бесплатно предоставим вам переводчика.

Spanish - Español

¿Habla español? Le proporcionaremos un intérprete sin costo alguno para usted.

Vietnamese - Tiếng Việt

Quý vị nói được tiếng Việt không? Chúng tôi sẽ cung cấp một thông dịch viên miễn phí cho quý vị.



If you use a TTY, please dial 711 to reach your state's Telecommunications Relay Service system

Steward Health Care complies with applicable Federal and State civil rights laws and does not discriminate on the basis of race, color, national origin, gender, sexual orientation, religion, disability or age.



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Steward Health Care System LLP

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