



Every Day, Every Decision

Ardent Health Services Code of Conduct



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ArdentSM
HEALTH SERVICES



A Message from David T. Vandewater

President and Chief Executive Officer, Ardent Health Services

Trust is at the very heart of who we are and what we do. Patients and their families trust us to provide expert care and treatment; physicians trust us to provide the tools and support they need to do their important work; and insurance and government payors trust us to provide accurate information.

Our success is determined by how we earn that trust every day and with every decision. That's why this Code of Conduct may be the most important piece of company communication you receive.

It's a guide to help all of us do our jobs in an ethical and honest manner, and it applies to everyone working on behalf of Ardent - employees, physicians and even contractors.

To our leadership... I insist you lead by example when it comes to ethics. Make sure the people you work with understand this Code and follow it.

To you, the employee... it's my expectation that you follow these guidelines - every day and in every decision you make. Ask questions about information you do not understand. Report inappropriate or unethical actions, and encourage your co-workers to do the same.

I assure you we will not tolerate any retaliation for reporting unethical behavior.

It's that important.

David Vanderwater
President & CEO



Our Mission

Ardent Health Services and its affiliates are premier providers of health care services, delivered with compassion for patients and their families, with respect for employees, physicians and other health professionals, with accountability for our fiscal and ethical performance and with responsibility to the communities we serve.

Our Vision

Ardent Health Services and its affiliates will be the health care providers of choice for our patients, employees, physicians and other health professionals by consistently performing at a superior level, while maintaining sound ethical standards and returning a fair value to our financial partners.

Our Values

- We are dedicated to meeting the health care needs of our patients.
- We treat patients, employees, physicians and others with respect and compassion.
- We partner with physicians to provide the best care possible for our patients.
- We work to foster a fulfilling and challenging workplace for all.
- We continuously seek ways to improve the quality of care delivered to our patients.
- We act with responsibility and accountability in the communities we serve.
- We expect 100 percent compliance with ethical and regulatory standards.
- We are dedicated to providing a fair return for our investors.

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I.O A Commitment to Our Code

As a premier health care provider, we are fully committed to setting and maintaining the highest standards of conduct.



I.I Making the Right Choices

Every day, you – and everyone else at Ardent – must decide to do the right thing. Our success depends on it. Government regulations and industry responsibilities demand it. Our patients deserve it. Our stakeholders expect it. And our employees – and our company – benefit from it because our Code:

- **Builds Trust** – Every day we ask people to trust us with their health and their lives, so all our actions must be beyond reproach. Even the appearance of an impropriety or hint of unethical behavior is problematic. The Code helps us take the high road in every decision we make.
- **Improves our Quality of Care** – The Code requires us to care for patients in a way that achieves the best health care outcome for them. It means using evidence-based best practices when appropriate, exceptional professionalism and customer service and to conduct every other aspect of our work with the same integrity and attention to detail.
- **Protects our Reputation** – Having strong standards helps us attract patients, physicians and top talent for every staff position. Being part of such a highly-respected organization enhances your reputation as well.

We live by the spirit as well as the letter of federal, state and local laws.



- **Increases Employee Loyalty** – When we work together to deliver superior value to our communities, we all share a sense of accomplishment. That, in turn, motivates us to perform at an even higher level.

Our Code lies at the core of how we operate. It outlines our standards and lays out the principles behind everything we do. Although it's not possible to cover every situation you might encounter, the ideals it establishes should guide you in every decision you make on the job. When in doubt, refer back to the Code and other policies and procedures that govern specific operations.

The Code Applies to Everyone Equally

We ask every employee of every facility to read, understand and follow our Code. That includes every employee at every classification – full time and part-time, exempt and non-exempt. It even applies to those who do business with us – to our vendors and third-party contractors and affiliated physicians when performing services at one of our facilities. You, along with everyone else associated with Ardent, BSA, Hillcrest and Lovelace, are responsible for knowing and following our Code and living up to its principles every day.

□□□ **Dilemma:**
I'm already an ethical person and I'm extremely busy. Do I really need to read the entire Code?

□□□ **Decision:**
Yes. It's important for you to understand all that's expected of you. Also, the Code will help you make decisions that fully comply with the law and promote our values. In fact, the Code is so important, we ask you to sign an acknowledgement that says, "Yes. I'll honor that commitment."

I.2 Our Ethics and Compliance Program

Ardent has developed a complete and comprehensive set of standards for our company. But they're just words on paper until you put them into action. Every time you make a decision, ask yourself:

- Does it comply with all laws and regulations?
 - Is it in the best interest of our patient?
 - Is it in the best interest of our company?
 - Do the facts support my decision?
 - Are you confident that you're doing the right thing?
- If you can answer "Yes" to all these questions, your decision is clear.
- If any of your answers are "No" or "Maybe," you need more information and additional advice. Talk to your supervisor or your local compliance officer. If you want to report a concern and remain anonymous, call the Ethics Line at (800) 633-2939.

- **Dilemma:**
I'm pretty sure I smelled alcohol on my co-worker's breath but I didn't see her drinking and I really don't want to get involved. Should I tell someone about it?
- **Decision:**
Yes. Not speaking up is not an option; it's your responsibility as an employee.

We All Share Responsibility

Obviously you're responsible for your own behavior. In addition, we have to hold each other accountable. If you see something inappropriate or unethical or you witness anything that goes against our mission and principles, there is no question. For the good of everyone involved and the long term health of our organization, you have a duty to report it.

If you know something is wrong and don't report it, you could be disciplined, too. Likewise, if you do anything to obstruct a report or hinder an investigation, you are violating our Code. We all have to work together to maintain our company's integrity.

- **Dilemma:**
My boss told me to award a contract to his sister-in-law, even though her company's prices were high. Should I just do as he asks?
- **Decision:**
No way. When someone does something obviously wrong, it hurts all of us. You have to report this - immediately!



I.3 Asking Questions, Raising Concerns

You can report a Code of Conduct violation or ask an ethical question of any manager including:

- Your direct supervisor
- Your department manager
- Your facility's compliance officer
- Your facility's CEO or CFO
- The chief compliance officer

If you see or suspect misconduct, share your concern with a manager or call the Ethics Line at (800) 633-2939.

If You Supervise Others ...

You have a responsibility for making sure that your staff and vendors understand and follow the Code. Take any report of misconduct seriously and share any and all information with your facility's compliance department.

Call the Ethics Line

To ensure fairness and confidentiality, we have engaged an outside firm to handle the reporting of ethical concerns:

- Call toll-free from anywhere: (800) 633-2939
- Totally confidential; you don't even have to give your name
- Staffed 24/7 by specialists who are NOT Ardent employees
- Your specialist will listen, ask questions and document your concerns
- You'll be given the confidential case number and a security code

Every report is sent to Ardent's chief compliance officer. Corporate then works with the compliance department at your local facility to investigate the report if it raises a compliance matter. Concerns raised about workplace conditions are referred to Human Resources for investigation and resolution.

Every report that raises compliance concerns is investigated. Facts will be reviewed. People will be interviewed. You have a duty to cooperate and tell the truth anytime you're asked to participate in an investigation.

The person who files a report can follow the investigation. He or she is given the case number and a security code and, with that information, can call the Ethics Line and review general updates on the investigation. However, due to patient and employee privacy concerns, the report will be in summary form rather than detailed.

I.4 Our Policy Against Retaliation

Everyone who makes a good-faith report is protected to the extent possible. Any information you provide is treated confidentially, including your identity. Furthermore, we will not tolerate any actions meant to punish or retaliate against a fellow employee who reports a concern. If someone does discriminate against or ostracize a co-worker, he or she will be disciplined.

When you make a "good-faith report," it means that you honestly believe something is wrong.

□□□ Dilemma:

One of my co-workers called the Ethics Line to report a member of my team. Do I still have to work with him in the future?

□□□ Decision:

Absolutely. Excluding someone because he or she filed a report would be a form of retaliation which we do not tolerate. If you treat any co-worker unfairly, for whatever reason, you've violated our Code. Always act professionally and include appropriate personnel regardless of any personal feelings.

□□ **Dilemma:**

Does this mean someone who calls the Ethics Line can never be disciplined?

□□ **Decision:**

No, we do not tolerate retaliation for reporting a compliance concern, however, a caller could still be appropriately disciplined for unrelated, documented misconduct. The compliance department at your facility will investigate every report of retaliation to ensure any unrelated discipline is in fact not retaliatory.

1.5 Violations and Disciplinary Action

Disciplinary action is taken every time someone breaks the law, violates our Code or exhibits poor ethical judgment. The measures taken will vary with the severity of the offense and could include an oral warning, a written warning, a written reprimand, suspension or even termination.

An investigation or audit could determine that:

- No violation occurred. The Code was followed properly and the person involved was cleared.
- A violation was committed and appropriate disciplinary action was taken.
- The claim was unsubstantiated. The information given was incorrect or could not be verified, even though the person who filed the report acted in good faith.
- The person who filed the report knowingly gave false information in an attempt to damage another person's position or reputation. In this rare situation, the employee who made the malicious report will be disciplined.



2.0 A Commitment to Each Other

No other industry relies on teamwork as much as health care. We have to depend on our fellow employees, which means we have to trust and respect each other as well. We are committed to creating a work environment where teamwork thrives and every individual is appreciated and treated fairly.



2.1 Diversity and Equal Employment Opportunity

Equal Employment Opportunity is the law. At Ardent, BSA, Hillcrest and Lovelace, we not only follow the law, we welcome diversity. We believe employing people with different backgrounds and talents best serves our patients and our company. Therefore, we do not discriminate based on:

- Age
- Gender
- Race or color
- National or ethnic origin
- Religion
- Sexual orientation
- Disabilities

In fact, we will make reasonable accommodations for talented people with either physical or mental disabilities.

Our non-discrimination policy applies to every aspect of employment, including:

- Recruiting
- Hiring
- Compensation
- Performance evaluations
- Promotions
- Transfers
- Disciplinary action
- Terminations
- Staff reductions or layoffs

As an employee, you're judged by two things and two things only: Performance and ethics.

The One Exception

To maintain our facilities' integrity, we will not hire or contract with any vendor, company or individual who has committed an offense against Medicare, Medicaid, Tricare or other government reimbursement programs and appears on government exclusion lists.

- **Dilemma:**
Even though I have the best qualifications, I didn't get a recent promotion. I think it's because of my age. Should I say something?
- **Decision:**
Yes. All employment decisions should be based on performance. If you believe other factors influenced the decision, you have a right to discuss your concerns with no fear of retaliation.

2.2 Anti-Harassment

Harassment is a form of employment discrimination. It occurs when one person or a group of people creates a hostile, offensive or intimidating work environment through behavior, words or actions. Degrading remarks, physical threats, attempts at humiliation and inappropriate jokes do not belong in the workplace. They don't belong anywhere. We need your help in creating a safe, professional, dignified organization that works for all of us.

Sexual Harassment

We will not tolerate any form of sexual harassment in either same sex or opposite sex interactions. That includes sexual innuendo and unwelcome advances. Moreover, any request for sexual favors as a condition of employment or in exchange for a promotion or other special considerations will lead to disciplinary action. If you witness or experience any kind of harassment, tell a supervisor or call the Ethics Line immediately.

- **Dilemma:**
One of my co-workers frequently refers to women employees as “honey.” I’m sure he doesn’t mean any disrespect, but should someone say something to him?
- **Decision:**
Yes. Use of names like these are not appropriate in the workplace, regardless of whether or not he intends any disrespect.

2.3 Controlled and Abused Substances

Every day we administer thousands of doses of controlled substances. The way we handle and dispense these medications is subject to federal regulations. To ensure that we maintain the highest standards, we’ve also developed our own controlled substance policies and protocols.

If medications are part of your job, make sure you understand these policies and follow them completely every time you handle a controlled substance.

- **Dilemma:**
I think a bottle of a controlled medication is missing, but I didn’t see anyone take it. Do I still need to report it?
- **Decision:**
Yes. We need to be alerted to any potential problems right away. Your information will help us act quickly and could prove useful in an investigation.

Illegal Drugs and Alcohol

Use of illegal substances and alcohol poses a danger to the health of the user and to the well-being of our patients. These substances blur judgment and impair physical agility. In other words, we simply cannot trust anyone under the influence of alcohol or illegal drugs to deliver quality care.

Substance abuse includes:

- Consuming alcohol or using illegal drugs while at work
- Being under the influence of alcohol or illegal drugs you ingested before coming to work
- Having illegal drugs in your system
- Bringing alcohol or illegal drugs to work
- Buying illegal drugs on the premises
- Selling illegal drugs to others

Anyone who is suspected of drug abuse could be given a drug test; anyone who violates our substance abuse policy will be disciplined.



□□□ **Dilemma:**

It's my birthday! Since I don't work directly with patients, can't I have just one drink at lunch?

□□□ **Decision:**

No. Having any alcohol in your system while you're on duty is a bad decision and a Code violation.

Prescription Medications

Taking over-the-counter drugs or prescription medications is not considered substance abuse. You may carry these medicines with you and take them as prescribed during the course of your work day. However, be aware of all potential side effects, especially when you first start a new medicine or change the dosage. Many legal pharmaceuticals could also impair your judgment and negatively affect your work performance.

Don't hesitate to talk with your supervisor or Human Resources director if you have any concerns. If you believe someone else is abusing a substance, don't wait. Report it to your supervisor or the Ethics Line right away.

2.4 A Safe and Healthy Workplace

You are entitled, by law, to a safe and healthy workplace. All facilities follow company policies that meet or exceed OSHA and other government regulations.

As a health care provider, we also take special precautions with hazardous materials, infectious diseases and other biomedical concerns. For your sake and the well-being of our patients, always follow all policies regarding personal hygiene, sanitation, sterilization and disposal of materials.

If any situation appears dangerous to you, or if you know of anyone or any activity that violates our health and safety standards, speak to a supervisor immediately. The safety of everyone depends on your diligence.

No Tolerance for Violence

Violence is an extreme form of harassment, a threat to our safety and unacceptable:

- Never bring a weapon, firearm or explosive into a facility
- Never strike another person
- Never physically threaten another person
- Never stalk another person

□□□ **Dilemma:**

I accidentally overheard a conversation that sounded threatening. Isn't the decision to report it up to the person being threatened?

□□□ **Decision:**

No. If you witness an altercation, it's your responsibility to report it. Tell a supervisor or call the Ethics Line.

Your Security Matters

Your safety is a top priority. Therefore, the only guns allowed at our facilities are those that law enforcement or authorized security officers carry. Immediately report any violence you see or suspect.

3.0 A Commitment to Patients

Every day, we care for people when they are the most vulnerable. Even if you don't interact with patients directly, what you do affects them.

It's an awesome responsibility and one we take seriously. As an organization, we are committed to providing health services that are evidence-based to every patient, with every procedure, in every decision, every day. We require every employee to make that commitment as well.



3.1 Quality Care

One of our values states, “We continuously seek ways to improve the quality of care delivered to our patients.” To achieve that, we go beyond what is legally required and embrace best practices with a comprehensive quality program that investigates, evaluates and incorporates recommendations from trusted government, academic and medical sources. Be mindful of quality and report quality concerns like you would any other compliance issue.

3.2 Compassionate Care

The way we deliver care is as important as the care we deliver. We always see our patients and their families as people first and treat everyone with respect and compassion.

3.3 Emergency Treatment

We comply with the Emergency Medical Treatment and Active Labor Act (EMTALA) in providing emergency medical treatment to all patients - including pregnant women and their unborn children - regardless of their ability to pay. Anyone who comes to one of our facilities with an emergency medical condition is given a medical screening examination and necessary stabilization given the capability and capacity of our facility. If medically necessary, emergency patients are admitted and treated or stabilized. We only transfer a patient if our facility does not have the capacity or capability of treating him or her, or if the patient or guardian requests the transfer. In these cases, the patient is transferred to an appropriate facility, after the facility receiving the patient provides formal acceptance. In medical emergencies, or if the patient is in labor, we do not delay the medical screening examination or necessary stabilizing treatment in order to collect financial and demographic information.

□□□ **Dilemma:**
My patient is a homeless veteran. Can I transfer him to the local VA hospital before we provide stabilizing care?

□□□ **Decision:**
No, not unless he asks for the transfer or requires a treatment we can't provide and the VA hospital accepts the transfer. In all cases, the patient must be medically stable for transfer.

3.4 Admissions and Treatment

It's your job - no matter what your position - to help create a safe and compassionate environment.

Admissions Guidelines

Our criterion for admission is pure and simple. Does this person need this level of care? Patients are admitted if - and only if - treatment is medically necessary and appropriate. We do not discriminate in any way based on a patient's age, gender, disability, race, religion, sexual orientation or national origin.

Treatment Guidelines

We are committed to creating a safe, compassionate treatment environment where patients and their families understand their individual condition or illness, as well as the recovery process. As soon as possible, we provide our patients or patients' representatives with information regarding the diagnosis and anticipated treatment plan. We provide a clear explanation of the right to refuse or accept care or to make advance directives and the risks and benefits associated with available treatment options, organ donation or procurement, as well as financial and insurance information. Discharge planning begins at the time of admission and continues

throughout the treatment process. We include the patient, the patient’s family or guardian and the clinical team in the discharge planning process.

Patients are only admitted for medically necessary reasons and discharged when continued treatment is no longer medically necessary. Our hospital management teams ensure that employees and medical staff members never feel pressured to admit or discharge patients on any basis other than medical requirements.

All our admission, treatment and discharge decisions are based ONLY on medical necessity.

Discharge Guidelines

Sending patients home as soon as they’re stable and informed is our ultimate goal. That’s why we begin discharge planning on the day of admission. Our clinical teams consult with our patients – along with any representatives they wish to include – to set expectations, plan the discharge and arrange any follow-up treatment or care. We want patients to go home equipped with the knowledge and the assistance they need to continue their recovery.

□□□ **Dilemma:**

I have a patient who wants to stay in the hospital another day even though she’s recovering quite well and the treating physician has ordered her discharge. Should I discharge her anyway?

□□□ **Decision:**

Yes. All admission and discharge decisions are based solely on medical need.

3.5 Patient Rights and Confidentiality

All patients have certain rights, some dictated by federal law, others by state law. We follow all laws and give every patient or designated representative a written statement of these [Patient Rights](#) and a notice of privacy practices as part of the admission process. You should also read these rights and understand how they apply to the work that you do.

If you are medical staff ... Never feel pressured to admit or discharge a patient based on anything other than medical requirements.

Privacy is Paramount

From admission through discharge, patients share a great deal of confidential medical data with us including family medical histories, personal medical histories, diagnoses, prognoses, test results and medications. A federal law called HIPAA (Health Insurance Portability and Accountability Act) regulates the access, use, disclosure and process of this health information. It is your responsibility to protect a patient’s privacy. You must never disclose patient information in violation of HIPAA and never access patient information unless it is necessary to perform your job.

HIPAA also requires that we use secure phone and computer networks in all our communication. If you work with patient records, only use approved systems for any transmission. Make sure you take every measure to guard your patients’ privacy every time you speak with them, whether in person or on the phone. Never post patient information on social media networks and websites, even if you think it doesn’t reveal a patient’s identity.

Privacy is a federally protected Patient Right.

Of course, financial and insurance information is also confidential. For more information, see the section entitled [A Commitment to Laws and Regulations](#).

4.0 A Commitment to Ethical Business Practices

We operate with integrity in all our business dealings. In fact, we should go above and beyond what the law requires to avoid even the appearance of unethical behavior. In that way we protect our relationships with the public, physicians, vendors and government agencies. At the same time, we also protect our company.



4.1 Marketing and Advertising

We work hard to help the public understand our commitment to communities, our partnerships with talented physicians and staff, our compassion for patients and the quality of our services. To protect and promote that image, all our marketing and advertising materials must:

- Support any claims of quality with facts
- State our services clearly so as to avoid confusion with competitor’s services
- Respect our competition and never degrade or disrespect other health care providers
- Accurately reflect the true charge for our services when using pricing statements
- Follow all state and federal advertising laws
- Be submitted to and approved by Marketing Communications

No advertising or promotional material – print or electronic – can use the Ardent logo and information without a review by Corporate Communications. No advertising or promotional material – print or electronic – can use any hospital, pharmacy, physician practice or clinic logo without a review by Marketing Communications.

We protect our name and our reputation.

4.2 Relationships with Vendors and Suppliers

Many factors affect our purchase decisions. We award vendor contracts based on business criteria such as quality, price, delivery, technical excellence, availability, service and maintenance and not on personal feelings.

If You Are a Vendor

We expect all vendors and suppliers to:

- Hold themselves to the highest ethical, legal and professional standards
- Make sure any subcontractors understand and comply with our policies and standards

Working together, we provide the best quality and value.

- Win business based on the ability to best meet our needs
- Ensure patient privacy is respected
- Ensure all employees are not on the government’s exclusion lists

If You Manage Vendors

If you do business on behalf of our organization, we expect you to:

- Operate in full compliance with all laws.
- Conduct business professionally, ethically and legally.
- Protect our reputation and quality of care.
- Make your vendors aware of our Code of Conduct and vendor policies.
- Ensure that our vendors live up to our standards and their commitments.
- Refuse and report any vendor offers of gifts or money in exchange for contracts or increased business.
- Avoid even the appearance of anything inappropriate.

□□□ Dilemma:

One of our prospective vendors offered me a bottle of expensive wine. Do I have to report this?

□□□ Decision:

Yes. This could give the appearance of something improper. You need to discuss this with your supervisor or with your facility's compliance department.

4.3 Relationships with the Government

We partner with a wide range of government agencies – from local law enforcement and public health departments – to state and federal departments of health and human services. Governments not

Working together, we serve our communities.

only regulate our industry, they pay many of the bills. Other agencies oversee employment, facility safety, crime and more to ensure a safe and fair workplace.

It's our policy to cooperate with these agencies on any investigations, audits or lawful requests for information.

Government Requests for Information

Requests for information can come in the form of subpoenas, search warrants or interviews. We strive to respond in a timely, complete and accurate manner to all lawful requests.

If you receive a legal document that pertains to your facility's business, you must notify your supervisor, your facility's compliance officer, your facility CEO, the Legal Department or the chief compliance officer immediately.

□□□ **Dilemma:**

I was involved in an incident that could lead to a trial. Do I have to keep all of my emails on this topics?

□□□ **Decision:**

Yes. If you are aware of potential litigation, you should retain relevant emails. You should discuss this with the Legal Department which will issue an official legal-hold on all relevant documents.

Protecting Your Legal Rights

We encourage you to cooperate with governmental authorities conducting an investigation; no adverse action will be taken against you for any lawful cooperation.

You should be aware that the law guarantees each person the right to be represented by legal counsel during any investigation or inquiry by any governmental agency. Because of the extremely technical nature of these investigations, we believe that Ardent itself should be represented and that all of our employees should at least be made aware of the opportunity for such representation. However, you are not required to notify Ardent of your cooperation with governmental authorities in an investigation. Only the Ardent general counsel can consent on behalf of the company to the release of information or documents, and we expect you to respect that right.



4.4 Relationships with Physicians and Referral Sources

Working with highly-skilled, quality-minded physicians is critical to our success. Our facilities actively pursue relationships with independent health care organizations and physicians who may refer patients to us. In every case, our goal is consistent. As one of our values states: "We partner with physicians to provide the best care possible for our patients."

Rules of Engagement

We expect affiliated physicians to have the same high ethical standards and commitment to quality care that our company has. In return, affiliated physicians should expect

Working together, we always do what's best for the patient.

that we will have the same high ethical standards and commitment to quality care as they do.

Compensation Rules

Our compensation policies are transparent and fair.

We will:

- Pay contracting physicians in a timely and accurate manner
- Require submitted invoices to include the dates and descriptions of services provided, and in some cases, the amount of time spent performing each service
- Only pay fair market value for commercially reasonable services

We will NOT:

- Provide any kind of financial incentive to influence a physician's admission, referral or length-of-stay decisions
- Offer gifts, money, bonuses, or any other payment to any affiliated physician which does not meet a regulatory (Stark) exception
- Do anything that is ethically questionable

If you interact with physicians and make or receive any financial benefit, it is your duty to understand the regulatory requirements before making or receiving that financial benefit. Call your local compliance officer or Corporate Compliance if you have any questions.



- **Dilemma:**
There's one physician who orders an unusual number of tests for his Medicare patients. Is this any of my business?
- **Decision:**
Maybe. Treatment decisions are made by the physician. But if there's any chance of fraud, we need to know about it. It would be best to discuss this situation with your supervisor or your facility's compliance officer. Or you could call the Ethics Line.

4.5 Relationships with Researchers

We often participate in medical research and clinical trials. These research relationships are governed by [Institutional Review Board rules](#) as well as Ardent policies, both of which prohibit any tampering, misreporting or misconduct. We understand that our data could affect thousands of patients for years to come and therefore perform our responsibilities with extra care and diligence.

Researcher Rights

The professionals and organizations we work with have a right to expect:

- High quality information
- Complete confidentiality
- Professional conduct
- A collaborative environment

Research Participant Rights

Every patient who participates in a research project has the right to expect:

- A choice about whether or not to be involved
- A complete description of the purpose and potential benefits of the research

- An explanation of all the services and options available to them
- Full disclosure of any and all risks
- Regular updates about their condition

4.6 Relationships with Competitors

Ardent believes in fair competition. In every business relationship, our quality should speak for itself. We have no need to resort to unethical practices, and you should not:

- Hire a competitor's employee to gain proprietary knowledge
- Learn confidential trade secrets and information
- Obtain competitor strategies and plans

Of course we never reveal our own confidential information to competitors either. But we will gladly compete for business in the markets we serve based on the merits of our facilities, services and people.

**Respect unconditionally.
It's what everyone
deserves.**

□□□ Dilemma:

I work on a committee with one of our competitor's employees. One day she took me aside, told me I needed to keep a secret and bragged about the deal she gets from a mutual supplier. Can I use that information to demand an equally low price for Ardent?

□□□ Decision:

No. Even if a competitor makes a mistake and violates her company's Code, you're obliged to abide by our Code and maintain the highest standards of integrity in every circumstance.



5.0 A Commitment to Laws and Regulations

In every decision we make and everything we do, we always follow the law, and we expect all our partners to do the same. It's more than a legal matter. It's a matter of trust. This applies to health care laws and to other laws and regulations, such as business and financial reporting regulations.



5.1 Financial Integrity

Our patients, vendors, payors, shareholders and communities trust us with more than just providing quality health care. They also trust us with their wallets. Patients, governments and other third-party payors expect us to submit truthful and accurate information – and we do.

Never try to defeat or work around financial controls.

Like all U.S. companies, we are governed by accounting laws and rules. We have procedures and controls in place to ensure compliance with our legal obligations. These policies are built on certain basic principles:

- Follow every law, every time.
- Achieve 100 percent compliance with every government and payor regulation.
- Observe established and accepted general accounting principles.
- Properly record all assets and funds.
- Properly record and code all transactions.
- Assign accurate values to all costs.
- Enter complete information.
- Record all information in a timely manner.
- Cooperate with every investigation or audit.

Ultimately it's your responsibility to abide by these rules when you interact with information. You have to decide to uphold our standards and our reputation every day.

5.2 Billing and Coding

We are reimbursed for our services by a number of payors. Government, insurance companies and individuals all pay a portion of our revenues. It's our job to partner with payors – to fully comply with all regulations – and to accommodate requests whenever possible.

We owe all our stakeholders accurate, complete and timely billing information. We have several devices in place to certify the integrity of our billing processes and guard against any false, fictitious or fraudulent claims:

- **Employee Orientation and Training** – We continuously stress the importance of adhering to financial regulations. Ongoing training and evaluation ensures that we maintain our standards. These measures also consistently reinforce the high level of quality we expect in all financial matters.
- **Billing Controls** – We've built internal controls into our billing systems. If your job includes coding or billing activities, follow all applicable policies. We also have software systems that ensure complete input, provide detailed analyses and flag any anomalies.
- **Cost Reports** – These detailed analyses of charges by department are required in Medicare and Medicaid reimbursement. They often include statistical data on patient numbers and provider reports that give our company additional insight into the financial health of our facilities and services.
- **Audits** – We routinely conduct audits to spot-check our systems. Also government agencies and other payors can and do verify accounts with audits that may involve us. If you're ever asked to participate in an audit, cooperate fully.
- **Investigations** – When there is a report or suspicion of inappropriate activity, we proactively seek the truth. Outside government agencies and companies may also request our assistance with an investigation. As with audits, we will cooperate with any lawful request.

5 Things we would NEVER do in an investigation or audit

- Circumvent
- Obstruct
- Delay
- Hinder
- Mislead



□□□ **Dilemma:**

Auditors are on site, and we are missing certain documents. I know we did the work. Is it okay to create the paperwork now?

□□□ **Decision:**

No. Do not create or modify documents or forms once an audit begins. Be transparent with auditors.

5.3 False Claims Act

We comply with all federal and state laws and regulations, including the False Claims Act (FCA) to ensure claims are properly prepared and submitted in an accurate and complete manner. We expect the contractors, subcontractors and vendors we work with to follow these standards as well.

The FCA is a law designed to fight fraud against the federal government. Anyone who knowingly submits or causes the submission of a false claim to the federal government (including claims submitted to Medicare) is liable for triple damages, plus civil penalties of \$5,500 to \$11,000 per false claim.

Under the FCA, a private individual – sometimes called a whistleblower – may file a case in federal court on behalf of the government and sue providers who violate the FCA.

In addition to the federal law, many states – including New Mexico, Oklahoma, Tennessee and Texas – have false claims laws. Some of these laws also permit private citizens to file suits against providers who violate state false claims laws on behalf of the state government. The prohibitions and penalties under these laws vary from state to state.

Ardent policies that address the False Claims Act in more detail may be found on the Ardent intranet site under Compliance Department/Compliance Policies or you may obtain a copy from your facility’s compliance office or Corporate Compliance.

We do not tolerate retaliation or harassment against any employee, contractor or vendor who reports an FCA concern. Federal and state false claims laws provide protection for whistleblowers who are discriminated against in the workplace as a result of their efforts to follow the False Claims Act or report a violation, including all relief necessary to make the employee whole.

5.4 Unacceptable and Illegal Activities

As this Code makes abundantly clear, following the law is more than mandatory. It’s the way we continuously earn our trust and represents the very foundation of our commitment to financial integrity.

Anti-Bribery; Pro-Ethics

A bribe is a payment or something else of value given in exchange for an unethical favor or a dishonest or illegal action. In our industry, a vendor, medical supplier, health care professional or group or even a patient might offer a bribe for your recommendation of a product or admitting privileges or better care. Conversely, an unethical person might solicit or ask for a bribe in return for awarding a grant or providing access to a product in limited supply or increasing the number of referrals. All of these actions are illegal and just plain wrong. Therefore, we reject and report any bribe attempts. Furthermore, we never let gifts influence our business decisions. We choose our business relationships based on one thing only: How well does this solution meet our company’s needs?

Anti-Fraud; Pro-Truth

Falsifying any financial or medical records is dangerous and unethical. Deliberately deceiving the company or a payor in order to benefit financially, knowingly misrepresenting facts and promising something with no intent to deliver all could

be fraud. So could ordering unnecessary tests and procedures for personal gain. All fraudulent activities are against the law and detrimental to our company. We run all our operations honesty and ethically.

Anti-Theft; Pro-Honesty

Stealing anything – from company supplies to patient belongings to confidential information – is illegal and unacceptable. Failing to record and bill tests, medications or procedures accurately is also a form of theft. We always respect property belonging to patients, partners, co-workers and the company.

Anti-Insider Trading; Pro-Confidentiality

In the course of doing business, you might be privy to financial information that’s not available to the public. If this information could impact a publically-traded company stock – and you use that information to buy or sell stock in that public company – that’s insider trading. Even if you don’t act yourself, if you tell others who then trade the stock, you can be as guilty of insider trading as the person who makes the trade.

If you’re in a position of trust, you have a duty to hold certain information confidential. Only disclose need-to-know information with authorized individuals who need the information to do their jobs. Ardent’s Legal Department can answer any questions and guide you in any decisions. Feel free to call the Legal Department or the Ethics Line for any advice you might need.

The Only Choice: Report it

Insider trading, theft, fraud and bribery are all illegal activities. Anyone who commits these acts could face severe legal consequences. Violators also face termination. That’s how serious we are about upholding the law. It’s the only way we can protect our relationships and the honest employees who work with integrity every day.

Doing the right thing is a decision you make every day.

If you ever receive an illegal offer or witness an illegal action, it’s not a hard decision. You have to report it. Immediately. It’s simply the right thing to do.

□□□ **Dilemma:**

Supplies keep disappearing from our storeroom. I think I know who’s doing it. Should I confront her?

□□□ **Decision:**

No. However, any suspicious activity should be reported and investigated properly. That way we protect any innocent parties, as well as the company.

5.5 Records Management

Everyone who handles a document has a responsibility to follow proper procedures as outlined in our comprehensive [Records Retention and Destruction Policy](#). Please review this policy carefully if records management is part of your job.

The term “document” refers to any financial or medical record, report, letter, memo, email, file, spreadsheet, presentation or other work product in either printed or electronic form. All documents must be:

- **Accurate** – In our industry, misinformation can have extremely serious consequences. Make every effort to input every detail correctly every time.
- **Timely** – All data should be entered into records as soon as possible. This is particularly important when multiple practitioners are providing care to a common patient. Timely financial entries also strengthen our cash flow and our payor relationships.
- **Complete** – All pertinent information should be included in entries and reports. The more complete the details, the fewer follow-up questions you have to answer and the more insight we can glean as a company.

- **Protected** – To guard the privacy of our patients and our company, be sure you understand the sections in this Code on [Protecting Information](#) and [Patient Rights and Confidentiality](#). Always keep confidential files closed when not in use. Refer to our comprehensive [Records Retention and Destruction Policy](#) to learn more about the proper storage and disposal of all documents.

- 5 things we should NEVER do to records**
- Falsify
 - Alter inappropriately
 - Prematurely destroy
 - Remove in order to conceal
 - Hide

When we take care with our records, we know we're complying with all laws and improving our company's long-term stability at the same time.

□□□ **Dilemma:**

It's been a crazy day! I'm supposed to enter medication errors into a quality database. It's late. Can I just do a best guess entry?

□□□ **Decision:**

No. Other health care practitioners need this data to provide the best possible care. Additionally, quality data can affect how payors reimburse the hospital.

5.6 Licenses and Certifications

To guard the public health, state and federal laws set standards for health care practitioners and issue licenses, certifications and accreditations that attest to skills. Many credentials have to be renewed periodically and may have continuing educational credit requirements.

All Ardent affiliated health practitioners are required to have proper and current credentials. It's your responsibility to keep licenses and certifications up to date and,

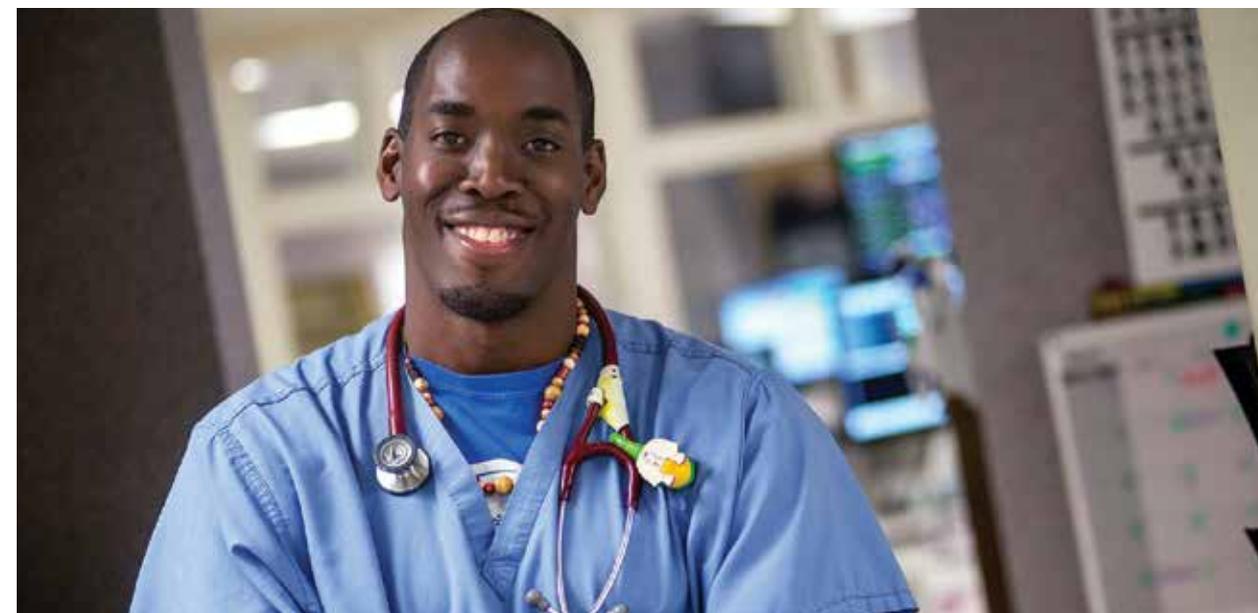
if you're a contractor, be prepared to show proof of your current status. Our patients and communities expect nothing less than the best qualified caregivers, and we take every measure to deliver that advantage to every patient, every day.

□□□ **Dilemma:**

My license is due to expire on January 1. With my packed schedule and the holidays coming, I'd like to wait till January to renew it. Is that ethical?

□□□ **Decision:**

No. You cannot work at an Ardent facility without current credentials.



6.0 A Commitment to Our Company

The long-term viability of our company is important to all of us who work here and to the people and communities we serve. Protecting it is a responsibility we all share and a commitment we all must make.



6.1 Protecting Company Resources

Company resources enable us to perform our services. Some of these resources are physically tangible assets such as:

- **Real estate** – the facilities we own like buildings, land, hospitals and pharmacies along with all their fixtures
- **Equipment** – the tools of our trade covering everything from computers and medical monitors to diagnostic machines and beds
- **Supplies** – the materials we use on a day-to-day basis like medications, bandages, paper and ink
- **People** – all our employees and affiliates and all the knowledge and skills they possess

Other assets are intangible:

- **Time** – As a 24/7 operation, every minute counts. How effectively we use time, and the productivity that results, has a big impact on our success.
- **Information** – In our business, we collect, store, manage and use tremendous amounts of data. The way we handle that data directly affects our ability to work productively and obtain positive outcomes.

Our most valuable asset = YOU (And the other 12,000 people who make our facilities work)

It's not enough to have these resources; we have to use them well.

Use Resources Responsibly

To be good stewards, we must leverage all our assets. To that end, we:

- Keep our equipment and buildings in good working order
- Never waste time or materials
- Guard our information
- Empower our people

Proper Use of Company Resources

Business resources are for business purposes only. You should never use company assets for your own personal gain.

Protecting our resources also protects our jobs.

However, some trivial personal use of certain resources is allowed. The cost of the use must be so small that it's negligible and has no impact on the cost of our operations.

EXAMPLE:

Probably okay – You make a copy of a couple of favorite recipes for your co-worker.

Not okay – You print out copies of your new cookbook for all 50 of your co-workers.

Personal Use of Information Systems

You can use company phone and computer systems for personal communications provided you don't:

- Overuse the system or abuse the privilege
- Waste company time
- Access, download or distribute anything illegal, threatening or obscene
- Send or solicit mass mailings, chain letters or spam
- Violate copyright or privacy laws

Be aware that both business and personal communications delivered through company systems could be monitored by the company, and nothing is private. Use these tools responsibly just as you do all other company resources.

EXAMPLE:

Probably okay – You call your mom from a company phone while you're on a break.

Not okay – You watch a movie while on duty.



Charitable Use of Company Assets

If you'd like to use company resources for a charitable effort, talk with your supervisor and get written approval first.

6.2 Protecting Information

Every day, we manage an enormous amount of medical, financial and corporate data. Much of it is highly confidential such as:

- Patient medical information
- Patient financial records
- Clinical information
- Research data
- Patient lists
- Employee personnel records
- Pricing and cost information
- Merger, acquisition, divestiture and other financial information
- Company strategies
- Company passwords

Never divulge this protected information or use it for your own benefit. Only discuss confidential information with appropriate personnel. Also make sure you use company systems that are HIPAA-approved for all your confidential communications.

When to Disclose

To keep the confidence of our patients, affiliates and communities, we must keep information confidential and guard it zealously. You can only disclose confidential information if:

- Your position with Ardent requires you to do so
- You are authorized to share with the person or organization requesting the information
- The person or organization requesting the information has a legitimate need to know
- The person or organization agrees to keep the information confidential

Confidentiality builds confidence.

□□□ Dilemma:

A referring physician would like some treatment details on patients he has admitted. Am I allowed to share this information with him?

□□□ Decision:

Yes. A physician has a legitimate need for information on his own patients. If he agrees to keep the information confidential, it's okay to share the data for treatment purposes.

Keep Our Confidences During and After Employment

Even if you leave your employment, you're responsible for keeping our confidences. It's both unethical and unlawful to disclose company and patient information.

Protect Yourself by Protecting Information

Sharing unauthorized information and using information in an improper way are both serious breaches of trust with serious consequences. It's illegal to disclose patient information. Disclosing company information for personal gain or for the benefit of another person or company is definitely a conflict of interest and likely against the law. If you violate these policies, you could be personally liable for damages and subject to discipline from the company. That's how important confidentiality is.

6.3 Conflicts of interest

A conflict of interest occurs when your personal interests or activities interfere with your responsibilities as an employee. It's an abuse of the trust placed in you and applies to any situation that appears to benefit you at the expense of the company.

Confidential information is protected by law.

As an employee, you've made a commitment to look out for the company's best interests. Anything that could compromise your objectivity – or even look like it does – is a problem. Here are some examples:

- **Loans to employees and families** – Lending money to employees is against company policy. At the executive level, such loans are restricted by federal law.
- **Business relationships with family members** – Do not do business directly with family members or companies owned by family members without authorization from senior management. Purchasing decisions should be made by someone who is not related or influenced by your relationship.
- **Employer/employee relationships** – If you hire, supervise or evaluate others, you may refer family members or close personal friends to other hiring managers or HR but you cannot directly supervise them.
- **Outside employment** – Depending on your duties, working for a firm that does business with Ardent could constitute a conflict. Talk to your supervisor and get his or her approval before you accept any additional employment in the health care field.
- **Outside activities** – Don't take for yourself any opportunities that belong to the company or that you discover through working at the company. Avoid any activity that consumes so much of your time and energy that it diminishes your ability to perform your duties.
- **Investments** – Having a personal stake in one of the competitors is a clear conflict. Therefore, no Ardent employee can own more than one percent of such a company. Any exception requires the written consent of your facility CEO or Corporate.
- **Affiliations with other health care organizations** – If you or a family member has ownership in or serves on the board of a health care organization involved with Ardent, it could be a conflict to directly participate in any purchase or sales decisions.

Doing the right thing is always the best thing.

If there's any potential of a conflict of interest you are required to submit a [Compliance Form](#). If you have any questions about whether a conflict exists, discuss the matter with your supervisor or the chief compliance officer or contact the Ethics Line.

We have to earn the trust we're given every day.

□□□ **Dilemma:**

My brother is a great nurse with great credentials. Since I already work here, would we still consider hiring him?

□□□ **Decision:**

Yes. We're always interested in meeting highly qualified practitioners. Of course, you could not make the hiring decision nor could he report to you, but he may qualify for a position under a neutral manager.



□□□ **Dilemma:**

I work part-time and need to get a second job. Since I have a license, can I apply to another hospital?

□□□ **Decision:**

Maybe. Working for one of our competitors is a potential conflict of interest, but could be approved. Talk with your supervisor first.

6.4 Accepting and Receiving Gifts

Gifts can affect -- or give the appearance of affecting -- your objectivity as an employee, and, as a general rule, we discourage them. However, we recognize that gifts are a common business practice and can be acceptable under certain circumstances.

By definition, a gift is an expression of appreciation with no strings attached. If it comes with a request for a favor like a contract or a referral or a good recommendation, it is no longer a gift. It's a bribe. We only give and accept true gifts with no strings attached. We also follow appropriate gift guidelines that make sure our actions always appear above-board and honorable.

All gifts MUST be:

- Appropriate as a normal business courtesy
- A reasonable amount

Gifts MUST NOT be:

- Solicited
- Lavish
- Exchanged for any favor
- Given as a reward for business
- Cash or cash equivalents, except for gift cards given at appropriate events (such as a holiday or birthday) and valued at \$50 or less

A gift to a member of your family is the same as a gift to you.

If the gift is an event such as a meal or a ticket:

- Business should be discussed during the event or a business relationship furthered
- The giver should be in attendance

The best gift is compassionate care. Feel free to give it to everyone.

Gifts to and from Patients

Despite the bond that can develop with patients, we generally discourage any exchange of gifts. If you give something to one patient, other patients may think you're showing favoritism. If you

accept a gift from a patient, it could look as though you provided extra care to that patient in return for a "tip."

If you receive an unsolicited gift from a patient, given in gratitude, you may accept it only if the value is small (generally, less than \$10) or homemade or perishable, for example, flowers or cookies. Gifts to patients are only appropriate if they are small in value (again, generally, less than \$10) and consistent with the patient's clinical care, for example, a warm pair of socks.

Gifts to Groups of Patients

Gift guidelines allow occasional patient celebrations such as a holiday party as long as these events are inclusive and fair for all patients on the floor. Again, we'd never want it to appear as though we're playing favorites.

Gifts to and from Employees, Health Care Practitioners and Referral Sources

It's important that we avoid any actions that could be misinterpreted or misconstrued. Check the chart below for guidance on gift-giving.

Gifts Given to:	Must:
Employees	Be reported in accordance with federal and state tax laws.
Employed Health Care Practitioners	Meet the requirements of our practitioner relationship policies
Potential Referral Sources or their Family Members	Not to be given unless they meet specific company policies . Check first with the Ardent Legal Department or the Corporate Compliance Office.
Government Employees	Not to be given unless pre-approved in writing by Ardent's General Counsel.

Gifts from Health Care Practitioners

We would never want to give the impression that a practitioner has special access to our facilities or preferential treatment because he or she gave us a gift so, as a rule, they are prohibited. There are some exceptions. For more information, please review our [Practitioner Relationships Policy](#) and consult with Legal or the Corporate Compliance Office before accepting any gift.

Gifts from Vendors

In the course of doing business, it's common to be invited to lunch or some other event. You can accept reasonable and normal gifts of this type. However, that gift cannot in any way inappropriately influence your business decisions. You may also give small tokens to a vendor in appreciation of extraordinary performance.

Gifts under \$100 in value per person or multiple gifts from a single source valued at \$300 or less per year are considered reasonable. If you accept a gift such as a meal or ticket to an event, the person offering the gift should be present and business matters discussed or the business relationship furthered. Any gift valued at more than \$100 or multiple gifts valued at \$300 per year must be approved by your facility CEO or, in the case of corporate employees, the employee's immediate supervisor and a supervisor at the vice president level or above on the [Ardent gift form](#).

Gifts from Pharmaceutical Companies and Medical Device Manufacturers

Medical suppliers are important partners in our health care services. Many of these companies also offer educational and research opportunities which could benefit you personally as well as our company.

We expect these vendors to follow the principles spelled out in [The Pharmaceutical Research and Manufacturers Code on Interactions with Health Care Professionals](#) or the [Advanced Medical Technology Association Code of Ethics](#). Check this document before you accept any offer and consult with the Corporate Compliance office. As always, it's important that these opportunities do not result in special access or extra information for the company extending the gift.

Executive Level Gifts

Additional rules apply to those in senior management positions:

- If you're a corporate Vice President – Any gift more than \$100 or multiple gifts valued at \$300 per year must have the approval of a Senior VP
- If you're a Senior Vice President – Any gift more than \$100 or multiple gifts valued at \$300 per year, you give or receive must be approved by Ardent's CEO.
- If you're a CEO – All gifts must be approved by the Regional CEO or Ardent's CEO.

A [Report of an Offer of Something of Value form](#) which details the approvals received has to be filed for any and all executive gifts. In addition, any gifts over \$1,000 must be approved by Ardent's CEO and reported to the chief compliance officer.

Recognition Efforts

Gift policies don't apply to our facility's recognition programs for employees. Awards for work performance or volunteer activities are a show of appreciation and an important part of our culture. Recognition gifts to physicians are subject to policies and you must consult with Legal or the Corporate Compliance office before offering a recognition gift to a physician.

- **Dilemma:**
Our department head wants to take a staff physician to lunch and pick up the tab. What should I do?
- **Decision:**
This is probably okay, but any financial benefits paid to physicians are strictly regulated and must be tracked. Report this to your local compliance office so it can be tracked.

\$300	Maximum total of gifts you can receive in a year. Any gifts exceeding that amount must be approved by BOTH your supervisor and your facility's CEO
\$100	Maximum amount of a gift you can accept. If any single gift has a face value more than \$100, it has to be approved by BOTH your supervisor and your facility's CEO
\$ 50	A reasonable and acceptable amount of a gift card you can receive for a holiday or birthday
\$ 10	The maximum value of any gift you give to or receive from a patient
\$0	Generally speaking, no gifts to or from government representatives or referral sources are appropriate

Whatever your position with the company:

- Always protect confidential information.
- Only speak on Ardent's or your health system's behalf if you are authorized to do so.
- Refer any inquiries from the press to someone authorized to speak.
- Get contact information for anyone who requests information or an interview and pass it along to Marketing Communications.
- Notify Marketing Communications before accepting any speaking engagements or publishing any papers.
- Get the necessary permission to use any photos, charts, graphics, music or other elements protected by privacy laws and copyrights.
- Only communicate information you know to be accurate.
- Demonstrate integrity in all your communications.
- Always portray Ardent, your health system and yourself in a positive light.

You are the face of Ardent.

□□□ **Dilemma:**

One of my vendors serves on a charity board. She offered me two \$100 tickets to the annual gala. I know it's rather extravagant, but I really want to go. Can I?

□□□ **Decision:**

Maybe. You would have to get approval from your supervisor and your facility's CEO. Remember, the vendor should attend the event with you.

□□□ **Dilemma:**

I want to start a blog that talks about medical conditions. A lot of what I know, I've learned from working at my health system. Is that considered a violation?

□□□ **Decision:**

No, but you need to be careful. You should not identify yourself as speaking for Ardent or your health system in your posts, misrepresent yourself, share confidential information or act unethically. Never post any patient information.

6.5 Speaking on Behalf of Our Company

There are many ways you could be asked to speak for the organization. A news reporter or private company could request an interview. An association or conference could invite you to make a presentation or publish a paper. Someone at a social event could ask your opinion of your hospital, clinic or pharmacy or one of our services.

6.6 Social Media

Social media has many advantages. It helps individuals stay in closer contact with friends and families. It gives our facilities and brands a highly interactive communication venue, and it improves our ability to educate and connect with our

communities. However, there are also risks involved. Every communication from every employee either adds to or detracts from our reputation. Messages are instantaneous and sometimes posted without serious consideration of the contents.

It's important that all social media posts are as thoughtfully prepared and thoroughly vetted as our other communications. You should apply all the rules for public speaking explained above. In addition, there are several things you should avoid:

- Never speak on behalf of Ardent or your health system unless you are authorized to do so.
- Never misrepresent yourself, exaggerate your expertise or brag about your skills or authority.
- Never post photos of patients or any information about patients, even if you don't use a patient's name. Any information posted about a patient may be a HIPAA violation.
- Never make disparaging remarks about a patient or statements about the hospital or a fellow employee which you know to be false.
- Never make statements that are obscene; they constitute unlawful harassment, create a hostile work environment and contain discriminatory language on the basis of race, sex, disability, religion or other status protected by law or which would constitute a threat of violence.



□□□ **Dilemma:**

I want to update my professional profile on business sites like LinkedIn. Can I mention Ardent and my health system and outline my responsibilities without violating the Code?

□□□ **Decision:**

Yes, with a couple of conditions. You can't reveal any confidential information or misrepresent yourself, your authority or your position.

While it's not possible to define all social media practices that are acceptable or unacceptable, you should remember that whenever using social media tools you should conduct yourself in a way that's consistent with the principles outlined in our Code and the specific employment policies that apply to you. If you use social media for good and take care to avoid any missteps, you'll protect your own reputation as well as the company's.

□□□ **Dilemma:**

I saw a negative post about my hospital online. Can I add a comment to correct them and defend us?

□□□ **Decision:**

No, not unless you're authorized to speak on behalf of your hospital. But please, do report the post to Marketing Communications.

7.0 A Commitment to Our Communities

We demonstrate our commitment to communities every day. As one of our values states, “We act with responsibility and accountability in the communities we serve.” Everything from our admission process to our public policy efforts are designed to serve the communities we call home.



7.1 Charity and Community Efforts

By the nature of the work we do, our facilities are fully integrated members of our communities. We accept this responsibility and are committed to giving back as well. Nearly all of our community participation takes place at the local level.

Many facilities benefit from robust volunteer programs with dedicated people who donate their time and optimize our patient care. Likewise, many employees contribute countless hours of service to the organizations of their choice. We honor and appreciate these efforts and consider all our community interactions an important part of the services we provide. However, charitable contributions with company assets or while on company time must be approved by your organization's CEO.

Volunteers make every system better.

□□□ Dilemma:

I know this great charity that could really use some office supplies. In the spirit of community service, can I give them some of ours?

□□□ Decision:

No. Talk with your CEO about other charitable opportunities, such as sponsoring a fundraising event.

- Raise money for a political candidate, cause, committee or party on company time or property
- Make any statement or contribute any funds or resources on behalf of Ardent or any of our facilities
- Seek reimbursement from Ardent for contributions you made
- Violate any law regarding political contributions
- Provide false information, mislead or otherwise obstruct any government campaign finance investigation

The Company's Role

As a company, we exercise our political voice through the AHS Medical Holdings LLC Good Government Fund. This separate entity is a Political Action Committee that focuses on policy issues that impact health care and our hospitals, clinics (PAC) and physicians. The Good Government Fund abides by all federal and state regulations concerning PACs.

□□□ Dilemma:

I'm very excited about a candidate who is running for state office and want to contribute to his campaign. Can I hand out his yard signs to my co-workers who want them?

□□□ Decision:

No, not on company property. If co-workers ask for signs, please arrange to meet them at another location and outside of work.

7.2 Political Participation

Both corporations and individuals have a right and responsibility to participate in the political process. However, political views can be highly personal and sometimes controversial. Out of respect for your fellow workers and patients, keep these personal opinions out of the workplace. It's a violation of our Code to:

- Promote a political candidate, cause, committee or party on company time or property

7.3 Protecting the Environment

Ardent facilities have relatively large physical footprints and resource needs but we take numerous actions to minimize our environmental impact. Here's how you can help:

- **Recycle** - The recycling of materials like paper, plastic and aluminum has become common in the workplace. Before you throw anything away, ask yourself if this could be recycled.
- **Reduce** - Stay aware of all the natural resources we use on a day-to-day basis. Conserve water, electricity and supplies whenever you can do so without diminishing the quality of the care we provide.
- **Rethink** - Look for environmentally-friendly purchase options that also minimize costs.
- **Report** - If you spot any environmental concern, report it to your supervisor or Facilities Management.

Medical Hazardous Waste

Environmental Protection Agencies on both a national and state level regulate the transportation, management, storage and disposal of hazardous biomedical waste. We adhere to all regulations regarding the treatment and disposal of solid waste, as well as blood, body fluids, tissues, organs and microbiological and pathological waste. If your position puts you in contact with any of these materials, learn and apply all the proper handling techniques.

**If you manage vendors ...
Make sure all suppliers
comply with the law and
our policies.**

