

Code of Conduct



A MESSAGE FROM OUR CHIEF EXECUTIVE OFFICER

Dear Fellow Premier Health Team Members:

Premier Health's core values are Respect, Integrity, Compassion, and Excellence. Every board member, employee, physician, affiliate and business partner of Premier Health plays an important part in this organization demonstrating those values. This Code of Conduct, also known as the Code, was designed to assist you by increasing your awareness of general compliance issues and business ethics as they apply to healthcare. At Premier, we expect Team Members to "do the right thing" with each and every task they perform.

If you have questions or concerns regarding the Code, then please feel free to contact our Corporate Compliance Division (937) 499-9793. Please know that we respect every Team Member's right to ask questions and report concerns without fear of retaliation. However, if you would like to remain anonymous, then please call the Corporate Compliance Hotline 1-888-271-2688.

Premier Health is committed to being an organization that encourages and supports open, honest communications and trust among each and every Team Member.

On behalf of Premier, I want to thank each of you for your commitment to demonstrate the values described in the Code...Premier Health's values!

Respectfully,

A handwritten signature in black ink that reads "Jim Pancoast". The signature is written in a cursive, flowing style.

Jim Pancoast
President and Chief Executive Officer
Premier Health

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CODE OF CONDUCT SUMMARY

Our Values in Action	We value respect, integrity, compassion, and excellence in the work place and putting these values into action depends on every member of our organization.
Obligations of Our Board Members	Premier Health Board members have fiduciary obligations to ensure that the mission of Premier is honored and that corporate resources are used wisely in support of that purpose. Board members are guardians of the trust, serving on behalf of the community, regardless of personal interests.
Compliance with Laws, Rules, Regulations and our own Policies	<p>We are committed to full compliance with all federal, state, and local laws and regulations. We will immediately and directly report any actual or perceived violation of this Code of Conduct in accordance with our reporting policy.</p> <p>We will also comply with our own policies, standards and procedures. This includes those that apply System-wide, those that are specific to an affiliate, and those that apply within a department.</p>
Relationships with Patients and Health Plan Members	<p>We are expected to know and understand the rights of the individuals we serve, and to provide care in a manner that recognizes and preserves the individual's right to treatment with dignity and respect.</p> <p>We will provide treatment to all individuals who have an emergency medical condition, and we will not delay emergency treatment in order to inquire about the individual's method of payment.</p> <p>Our patients will be informed of their right to make advance directives relating to healthcare and have them followed, within the limits of the law.</p>
Relationships with Customers, Suppliers and Third Party Payers	<p>We are committed to providing services that meet established quality standards and our contractual obligations.</p> <p>When we disclose information to the public it must be current, accurate and complete.</p> <p>We will refrain from engaging in illegal practices that might restrict competition, such as discussion of pricing with competitors.</p> <p>We will not offer or pay anything of value to induce someone to refer a patient or use Premier Health services.</p> <p>We are committed to ensuring that claims for reimbursement are accurate, that patients receive timely bills, and all questions regarding their bills are answered.</p> <p>When we submit time or expense reports or use time clocks, we do so in a complete, accurate and timely manner. We will not misrepresent time worked or the costs incurred by the enterprise.</p>

Using the
Organization's
Resources

We will not contribute or donate Premier Health funds, products, services, use of facilities or other resources to any political cause without prior approval.

Charitable contributions received from others must directly benefit Premier Health. We will not accept contributions in exchange for favorable treatment or a commitment to purchase supplies or services.

We will not seek to gain an improper business advantage by offering courtesies such as entertainment, meals, transportation or lodging to our business associates.

We will not solicit or accept education or research grants that create even the appearance of impropriety.

We will not use Premier Health resources for personal reasons.

Avoiding Abuses of
Trust

We will not accept cash or anything of substantial value from patients, patient family members or business associates of Premier Health.

We will avoid outside employment, financial interests, investments or other outside activities that impair our productivity or decision-making while at our Premier Health job.

We will not trade in the securities of any company on the basis of non-public information acquired through our relationship with Premier Health.

Safeguarding
Information

We will strictly safeguard all confidential information with which we are entrusted. We will not use, discuss or disclose such information except to serve our patients, carry out our job duties, or as required or allowed by law. This responsibility extends beyond the period of employment.

We will safeguard computer access codes from unauthorized use or disclosure. We will protect electronic information by using computers responsibly and in accordance with our appropriate use policies.

We will not use, copy or distribute copyrighted information and other intellectual property in violation of applicable laws or contractual obligations.

Workplace
Conduct and
Employment
Issues

We will report any incidences of bullying, discrimination, abuse or sexual harassment involving patients, visitors or Team Members.

We are committed to providing job opportunities to Team Members and applicants without discrimination.

We will comply with workplace safety regulations and standards and participate in safety education and training.

Team Members who are required to do so will maintain and hold their license or certification in a current and active status.

We will maintain a drug, tobacco and alcohol-free workplace, and strictly control the distribution and use of prescription drugs and controlled substances.

Program
Implementation

To oversee our Compliance Program, Premier Health has a Compliance Officer and a Compliance Committee. In addition, Premier Health affiliates have designated compliance personnel to assist with compliance oversight within their affiliate.

Every Team Member has a duty to report issues or concerns they believe may be a violation of this Code of Conduct, federal, state or local laws or internal policies and standards. No adverse action or retribution will be taken against a Team Member because he/she reports a concern or suspected violation in good faith. A report can be made to any member of the leadership team, the affiliate's compliance personnel, any member of the Compliance Committee, any member of the Compliance Division, the Compliance Officer, or anonymously using the Premier Health Compliance Hotline: 1-888-271-2688.

New Team Members will attend Compliance training as part of their orientation. Annually, Team Members will receive additional education on a variety of topics, including the Code of Conduct.

Team Members will sign or electronically submit a Statement of Understanding of the Code of Conduct upon initial employment and annually thereafter.

Internal audits and investigations relating to compliance will be conducted in many areas, including, but not limited to, computer usage, billing and financial reporting.

Strict adherence to the Code of Conduct is vital. Violations may result in corrective action ranging from a warning and reprimand, to discharge from employment.

INTRODUCTION

It is the policy of Premier Health that all Team Members will comply with federal, state and local laws and regulations, and will conduct themselves in accordance with the highest ethical standards. To help achieve that end, we, at Premier have created a Code of Conduct that describes our policies concerning certain laws that affect many of our business operations.

The Code will be updated periodically to ensure that the organization is educating its Team Members about changes in specific laws and regulations, and that Premier is implementing and enforcing those changes. Some of the principles listed on the following pages are general statements to which a previously adopted Premier, hospital or affiliate policy applies. The more detailed policy will provide necessary guidance. If you have questions regarding the Code of Conduct, discuss them with your supervisor or call the Corporate Compliance Division or the Corporate Compliance Hotline discussed later in this book. The Code is intended as a guide for each Team Member's conduct, so that Premier and its affiliated entities may fulfill their obligations to comply with the laws and public policies that continually affect their business.

However, no set of standards or written rules can substitute for the personal integrity, good judgment and the common sense required to meet the challenges of the health care profession. Enclosed is your personal copy of the Premier Health Code of Conduct.

Our Mission

We will BUILD HEALTHIER COMMUNITIES with others who share our commitment to provide high-quality, cost-competitive health care services.

Our Values

We RESPECT each person's dignity, act with INTEGRITY to do the right thing in all aspects of our responsibilities, serve with COMPASSION that embraces each individual's concerns and hopes, and commit to EXCELLENCE as measured to the highest level of performance.

Compliance with Laws and Regulations

We are committed to compliance with all federal, state and local laws and regulations.

Fiduciary Obligations of Our Board

Board members have fiduciary obligations to ensure that the mission of Premier is honored and that corporate resources are used wisely in support of that purpose. Board members are guardians of the trust, serving on behalf of the community, regardless of personal interests.

Duty of Care

Board members have a responsibility to be active in Premier's affairs. Board members who know the facts, analyze the probable results of their actions, exercise sound judgment, and keep reasonable records fulfill their duty of care.

Duty of Loyalty

The duty of loyalty requires that the interests of Premier and its objectives take precedence over Board members' personal or business interests or those of their family and friends. Board members must always act fairly and in the best interest of Premier without concern for their own interests. Board members have an obligation to disclose conflicts of interest.

Duty of Compliance

Board members have a duty to be faithful to Premier's purpose and mission. Board members must also adhere to Premier's governing documents and to laws and regulations that relate to Premier and its operations.

Duty to Manage Accounts

Board members are responsible for Premier's financial stability and accountability.

Compliance with Our Own Policies and Standards

We are committed to full compliance with our own policies, standards and procedures. This includes those that apply System-wide, those that are specific to an affiliate, and those that apply within a department. Team Members will be made aware of these policies and procedures during general orientation, and, if applicable, orientation within the department where they work.

Relationships with Patients and Health Plan Members

Emergency Care

Our hospital affiliates will comply with the Emergency Medical Treatment and Active Labor Act (EMTALA), and all affiliates will comply with applicable state laws relating to the provision of emergency care. We will provide treatment to all individuals who have an emergency medical condition, and we will not delay treatment or an appropriate medical screening in order to inquire about the individual's method of payment or insurance coverage. We will not transfer or discharge patients based on their ability to pay. Individuals may only be transferred to another facility in limited circumstances after the individual has been stabilized. Refer to our policies on emergency care for more information.

Advance Directives

Our patients will be informed of their right to make Advance Directives and have them followed within the limits of the law. We shall comply with all policies and procedures, and federal and state laws and regulations governing Advance Directives.

Patients' and Members' Rights

All Team Members are expected to know and understand the rights of the individuals we serve. It is our policy to provide care in a manner that recognizes and preserves the individual's right to impartial treatment with respect and dignity. Health care services will be based on identified healthcare needs, and access to care is provided without regard to race, creed, sex, national origin, source of payment, age, disability, or whether advance directives have been specified. Rights of patients also include, but are not limited to:

- The right to receive a written copy of their rights
- The right to personal and informational privacy
- Freedom from abuse, harassment and unreasonable restraint
- The right to know the identity and professional status of individuals providing services
- When in a Premier Health facility, the right to know what support services are available and the right to access those services
- The right to consult with a specialist at his/her own expense
- The right to be informed of any research or experimentation affecting treatment, and the right to refuse to participate in such activities
- The right to receive complete and accurate information concerning his or her diagnosis and treatment
- The right to participate in ethical issues that arise out of his or her care
- When in a Premier Health facility, the right to communicate with people outside the facility within reasonable limits

- The right to informed participation in health care decisions, including plans of care and explanations of medically significant risks and probable duration of incapacitation
- The right to refuse treatment to the extent permitted by law
- When services are billable to a patient, member or third party, the right to request and receive an itemized bill and explanation of the bill regardless of the source of payment
- The right to a prompt and reasonable response to a question or request
- The right to express a grievance and receive a response

Relationships with Customers, Suppliers and Third Party Payers

Quality of Service

We are committed to providing services that meet all of our contractual obligations and established standards for quality. These include those established by our own policies and, where applicable, those of certain accrediting organizations such as the Joint Commission. Team Members who have a safety or quality concern should report the concern to the quality improvement or risk management official at their affiliate or complete an incident report. They may also report concerns to the appropriate accrediting agency. No disciplinary action will be taken against any Team Member for reporting a quality or safety concern.

Marketing and Advertising Activities

In all marketing and advertising activities, we will offer only factual information or documented evidence to the general public. We will not distort the truth, make false claims, engage in unfair comparative advertising, nor will we unduly attack or disparage another healthcare provider. In addition, all direct-to-consumer marketing activities require Compliance review in advance if they involve giving anything of value to a patient, health plan member or potential source of referrals.

Anti-Competitive Practices

Antitrust laws are designed to ensure competition and to preserve the free enterprise system. Activities that may implicate antitrust laws include agreements or understandings among competitors to:

- Fix Prices
- Divide Markets- allocating customers, services, or territories
- Collectively Refuse to Deal (Group Boycott)

Antitrust laws may also be implicated by any communications with competitors, whether orally or in writing, that relate to competitively sensitive matters, or even inappropriate trade association activities.

This is a highly complex area, and this document cannot cover all situations in which antitrust laws may apply. Team Members should take special care in this area, and promptly refer any questions to the General Counsel. For further information concerning these laws, see Appendix C.

Anti-kickback Statutes

Federal and state laws prohibit offering anything of value to an entity or person to induce that person to purchase services from or refer a patient to Premier Health. The laws also prohibit anyone from accepting anything of value for such purpose. As this is a highly complex area, this document cannot list all situations in which the anti-kickback laws may apply. Therefore, we must take special care in this area, and promptly refer any questions to the Compliance Officer or the General Counsel.

Examples of the types of actions that could violate the federal Medicare/Medicaid anti-kickback statute and similar state laws include the following:

- Offering or paying anything of value to induce someone to refer a patient to Premier Health, including, but not limited to, the routine waiving of co-payments for Medicare/Medicaid beneficiaries
- Soliciting or receiving anything of value for the referral of Premier Health patients to others
- Giving or receiving free goods or discounts, except as permitted under applicable laws, regulations and Premier Health policies

Billing, Reimbursement and False Claims

We are committed to ensuring that our billing and reimbursement practices comply with all federal and state laws, regulations, guidelines and our own policies. Claims for reimbursement must be accurate and reflect current payment methodologies. We are committed to ensuring that patients and third parties receive timely bills and that all questions regarding their bills are answered promptly.

Premier Health has adopted various policies and procedures to ensure compliance with federal and state health benefit programs as well as rules relating to private insurance. These policies and procedures are necessary to avoid fines and other sanctions under state and federal False Claims Acts. For further information concerning these laws, see Appendix D, or contact the Corporate Compliance Division or the General Counsel.

Examples of the types of actions that could violate the federal and state false claims statutes include:

- Billing for services that were not rendered at all or were not rendered as described on the claim form
- Duplicate billing
- Failing to report overpayments or credit balances
- Filing a claim for services that were rendered, but the services did not meet coverage requirements
- Submitting a claim containing information known to be false such as incorrect diagnosis or procedure codes
- Billing incorrectly for services provided by interns, residents and fellows in a teaching program

- Falsifying treatment plans and medical records to maximize payments
- Failing to complete required medical documents when required by health program requirements
- Falsifying statements of medical necessity, or billing for services not medically necessary
- Submitting a false cost report or rate request
- Misusing Social Security or Medicare symbols, emblems or names in marketing

Using the Organization's Resources

Providing Business Courtesies to Customers or Sources of Customers

Our success in the marketplace results from providing quality services at competitive prices. We do not seek to gain an *improper advantage* by offering business courtesies such as entertainment, meals, transportation or lodging to customers, referral sources or purchasers of Premier Health services. We should never offer any type of business courtesy to a referral source or a purchaser for the purpose of obtaining favorable treatment or advantage.

Research Grants

We must ensure that any funds provided through healthcare research or consulting agreements are for bona fide purposes. Research grants must also be made in a manner that clearly separates payments from any referrals for healthcare services.

Healthcare services provided in connection with research may not be billable to government health benefit programs or other insurance. Team Members should feel free to contact the Compliance Division with questions.

Charitable Contributions

All charitable contributions received from vendors must directly benefit Premier Health. Under no circumstances may a check be made payable to an individual at Premier Health. We shall not accept any donations that are in conjunction with a marketing effort or sales promotion. Under no circumstances shall donations be accepted that require Premier Health to use the donation to purchase supplies from the vendor making the contribution.

Government Customers

Premier Health is a party to contracts with various governmental agencies. Examples include provider contracts wherein we provide services to or on behalf of the Medicare and Medicaid programs, either directly or as a subcontractor. It is essential that all Team Members are knowledgeable of, and comply with, all of the applicable laws, rules and regulations of governmental agencies with which we do business.

Accurate Books and Accounts

All of Premier Health's financial transactions must be properly authorized by management, and

accurately and completely recorded on Premier Health's books and records. Financial records and reports will be prepared and maintained in accordance with generally accepted accounting principles under an established system of internal controls. We will not make false, incomplete or unsupported corporate entries in our books. No undisclosed or unrecorded corporate funds will be established for any purpose, nor will Premier Health's funds be placed in any personal or non-corporate account. Finally, all corporate assets must be properly protected. Periodically, property records will be compared with the actual property, and action taken to reconcile any variances. We will not fraudulently influence, coerce, manipulate, or mislead any internal auditor or independent public or certified accountant engaged in the performance of an audit of the financial statements.

Personal Use of the Organization's Resources

It is everyone's responsibility to safeguard the organization's resources, including time, materials, equipment, and information. It is not permissible to use the organization's resources for personal reasons without authorization from a supervisor. Occasional use of some items like telephones, computers, and multifunctional devices is permissible. Likewise, your supervisor must approve any community or charitable use of the organization's resources in advance. Under no circumstances should non-business use of the organization's resources interfere with your job duties or the job duties of others.

Avoiding Abuses of Trust

Team Members must avoid any activity that might interfere or appear to interfere with decision-making in situations where the Team Member's personal interests conflict with Premier Health's interests or the interests of Premier Health's customers or suppliers.

Conflict of Interest

Premier recognizes that the potential for conflict of interest exists for Team Members at all levels within Premier, including board members, administration, medical staff and employees. It is the policy of Premier to request the disclosure of potential conflicts of interests on an annual basis so that appropriate action may be taken to ensure that said conflicts do not inappropriately influence important decisions. Such disclosure is required of board members, administration, medical staff personnel, Sourcing personnel, and authorized signers. The Premier Compliance Division coordinates the annual conflict of interest review.

Acceptance of Gifts, Gratuities and Other Business Courtesies

Premier provides guidance to all Team Members regarding offerings made by vendors and referral sources. Team Members may not accept meals or any other promotional items offered by vendors or referral sources, unless approved in accordance with policy. This policy ensures compliance with the federal anti-kickback statute. This policy also enables Premier to enter into both business and referral arrangements based on the quality of the services provided. This policy applies to potential vendors and referral sources, as well as those vendors and referral sources with whom Premier currently works.

Insider Trading

No Team Member may trade in the securities of any company, or buy or sell any property or assets, on the basis of non-public information acquired through employment in Premier Health, whether such information comes from Premier Health or from another company with which Premier Health has a confidential relationship.

Safeguarding Information

Confidential Information

Pursuant to the privacy laws, Team Members must strictly safeguard all confidential information with which they are entrusted. We may never discuss such information outside the normal and necessary course of Premier Health's business. In particular, all Team Members must protect the privacy of our patients and health plan members, and the confidentiality of all information related to their care, and any past, current or future medical condition. Personal information about patients, fellow Team Members, medical staff and others with whom we do business should not be discussed except with those with a genuine need to know. For more information about the privacy laws contact the Compliance Division.

Premier Health's Restricted Information

It is Premier Health's policy to control the dissemination of Premier Health's proprietary information. Except as specifically authorized by management pursuant to established procedures, do not disclose to any outside party any non-public business, financial, personnel, commercial or technological information, or plans or data acquired during employment at Premier Health. During the term of employment at Premier Health, a Team Member should disseminate this type of information only to individuals having a "need to know" and should protect the information from access by unauthorized personnel. Upon termination of employment, an individual may not copy, take or retain any documents containing Premier Health's restricted information. The prohibition against disclosing Premier Health's restricted information extends beyond the period of employment as long as the information is not in the public domain. An individual's agreement to continue to protect the confidentiality of such information after the term of employment ends is considered an important part of that person's obligations to Premier Health.

Use of Electronic Systems

Many Team Members will be provided with access to one or more of the organization's computer systems. Computer access codes are the equivalent of a signature. Identification codes and passwords provided to access computer systems must never be disclosed to another. Team Members must not attempt to learn another's access code, nor attempt to access a computer system with an access code other than their own. Compromised access codes must be reported to your supervisor immediately. Team Members must not use any computer outside the scope of their job responsibilities. For example, using the computer to browse patient records out of curiosity is strictly prohibited.

The Internet, electronic mail, voice mail and facsimile machines are also used throughout Premier Health. These electronic messaging systems are for business purposes only. Since complete privacy cannot be guaranteed when using an electronic messaging system, sensitive information must not be transmitted nor stored on these systems. Specific policies have been developed for the use of computers, the Internet and electronic messaging systems. Consult your affiliate's policies for more information on the use of these.

Workplace and Employment Issues

Harassment and Discrimination

Premier Health supports a work environment free of discriminatory practices or sexual harassment involving patients, visitors or co-workers. It is the policy of Premier Health that Team Members and their work environment shall be free from all forms of harassment. These behaviors include inappropriate jokes, slurs, and intimidation.

Sexual harassment in any form is not tolerated, including unwelcome sexual advances, request for sexual favors, and other verbal or physical conduct of a sexual nature. Any Team Member, who believes a Team Member, manager, supervisor or physician is subjecting him/her to sexual harassment, or their employment is being adversely affected by such conduct, should report such incidents to their supervisor, department manager, Human Resources or the Compliance Hotline. Team Members may contact the Human Resources department within their affiliate for specific reporting procedures.

Workplace Diversity and Equal Employment Opportunity

Premier Health is enriched by the diversity of people from all segments of our community. This diversity is reflected within the Premier Health workforce. Treating Team Members fairly with respect and dignity is woven into the Premier Health culture. All persons are entitled to equal employment opportunities, and Premier Health is committed to providing job opportunities to applicants and Team Members without regard to race, color, religion, sex, age, marital status, national origin, disability, or any other legally protected status. Our policy of nondiscrimination prevails throughout every aspect of the employment process, including recruitment, selection, placement, training, compensation, promotion, transfer, and termination.

Health and Safety

Premier Health will provide an environment that is safe for patients, visitors, Team Members, volunteers and medical staff. To meet this objective, all affiliates within Premier Health will comply with all governmental regulations and safety standards as prescribed by State and Federal regulatory agencies internal policies. Safety education and training is provided for all Team Members and is an ongoing process. The affiliate's safety official or safety committee will provide guidance on safety issues, as well as promotion of and administration of the safety policies to ensure a safe environment. Policies and procedures are in place to provide mechanisms for reporting incidents or addressing safety issues in a timely manner.

License and Certification Renewals

To maintain quality standards of care, and to comply with appropriate federal, state or local laws, Premier Health requires Team Members in certain categories to provide a current license or certification. Premier Health validates each license or certificate upon initial employment and on a periodic basis thereafter. Independent contractors and other businesses that are required to be licensed, certified, or hold certain other credentials are responsible for keeping such credentials current. Premier Health will not allow any Team Member, business or independent contractor to work in Premier Health without valid credentials as required by law, this includes providers that have been excluded or sanctioned from participating in government programs.

Controlled Substances

Licensed pharmacists and medical staff are the only individuals authorized to fill medication orders within Premier Health. Some Team Members have access to prescription drugs, controlled substances, and other medical supplies. Many of these substances are governed and monitored by specific regulatory agencies and they must be administered by physician order only. To minimize risks to patients, it is important that these items are handled properly and only by authorized individuals. If anyone is aware of a deviation from our controlled substance policies and procedures, it must be reported immediately to their supervisor, pharmacy management, or the affiliate's compliance personnel.

Refraining from Substance Abuse

It is the policy of Premier Health to provide Team Members and customers with a working environment that is free of the issues associated with the use and abuse of controlled substances, tobacco and alcohol. The consumption, possession, sale or purchase of alcohol on Premier Health property during business hours is prohibited with the exception of events in conference, meeting or recreational facilities and approved in advance by management. Premier Health also prohibits Team Members from arriving at work under the influence of alcohol or a controlled substance. If a Team Member is found to be in violation of this policy, management will determine the appropriate disciplinary action, which may include termination.

Program Implementation

Oversight

Reporting Issues and Concerns

Every Team Member has an affirmative duty to report issues or concerns they believe may be in violation of this Code of Conduct, federal, state or local laws, or internal policies and standards. Several channels are available for reporting issues or concerns. If the issue or concern cannot be addressed through the normal chain of command, then Team Members may contact the Corporate Compliance Division (937) 499-9793 or the Compliance Hotline 1-888-271-2688.

Training

Each new Team Member is required to attend Compliance training as part of their general orientation. Annually, Team Members are required to complete additional education on a variety of topics pertinent to their job, as well as general training on this Code of Conduct.

Auditing and Monitoring

Premier Health is committed to monitoring its activities on a continual basis. The Compliance Division conducts audits and investigations in a variety of areas relating to regulatory compliance.

Findings may result in corrective action, disciplinary action or changes in our operations. In addition, performance improvement activities occur throughout Premier Health, and individual departments are required to monitor their performance.

Enforcement and Corrective Action

Strict adherence to this Code of Conduct is vital. Supervisors are responsible for ensuring that Team Members are aware of and adhere to the provisions of the Code of Conduct. Please consult your manager or the Compliance Division for clarification or guidance on any area covered in the Code of Conduct.

Upon receipt of credible reports of suspected violations or irregularities, a member of the Compliance Division will initiate an investigation and recommend corrective action where appropriate. Violations of the Code of Conduct may result in corrective action ranging from a warning and reprimand, to discharge, or where appropriate, disclosure to the appropriate government agency, retribution, or filing of a civil or criminal complaint. Disciplinary decisions will be made by operating management, according to our corrective action procedures. Team Leaders may also receive corrective action for failing to adequately instruct Team Members, or for failing to detect non-compliance with applicable policies and legal requirements, where reasonable care would have led to discovery of the problem and an opportunity to correct it.

Limitation on Effect of Code of Conduct

Nothing contained in this Code of Conduct is to be construed or interpreted to create a contract of employment, either express or implied, nor is anything contained in this Code of Conduct intended to alter a person's status of "employment-at-will" with respect to Premier Health.

Amendments to the Code of Conduct

From time to time, Premier Health may amend the Code of Conduct, in whole or in part. Changes will be communicated through management.

Appendix A- Questions and Answers

Questions & Answers

Q: What if I am confronted with a compliance problem and I don't know how to handle it?

A: Ask yourself the following questions:

- Does a specific act or policy appear to be in compliance with the relevant laws, regulations and the Premier integrity standards, policies and procedures?
- How would the issue appear to your family, friends and the general public?
- How would you feel explaining this matter to someone else to justify the action taken?
- Do you feel it would be advisable to seek further clarification from someone with expertise in the areas of compliance?

Q: Will my calls to the Premier Corporate Compliance hotline be recorded or traced?

A: No, after a call has been received, the call is transcribed and delivered to the Corporate Compliance office.

Q: Will I be informed of the results of the investigation that resulted from a hotline call?

A: Premier has an obligation to protect the rights of all employees. Therefore, actions taken by the Compliance department and management as a result of a call will generally not be publicized or disclosed. The department takes every call seriously, and assures employees that they will be acted upon appropriately.

Q: What should I do if my supervisor is telling me to do something that I think is unlawful, or against the Code of Conduct?

A: First, talk to your supervisor and make sure you both understand the situation. If that does not clear up the matter, seek further assistance at your work level. If all these avenues fail, you are encouraged to call the Corporate Compliance Hotline. Do not risk your job, your future and/ or the company's future by participating in something illegal or unethical.

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

A: Anything of value flowing to or from someone who refers or is in a position to influence referrals may constitute a kickback. This is a very sensitive area of the law and it includes excessive discounts, supplies and equipment, gifts, writing off accounts receivables, professional courtesies, and leases at less than fair market value, etc. If you have questions about this topic, speak to your supervisor, the General Counsel's Office or the Corporate Compliance Office.

Q: I have friends who work for competitors, so when we are socializing sometimes the topic of conversation does include work. Are there topics that could present problems?

A: The Premier Code of Conduct makes it clear that information derived as a result of Employment with Premier should be considered confidential. This is particularly the case when it comes to patient or proprietary information. You should consult your supervisor if you have any questions about this issue.

Q: I have seen occasions where physician orders have not been signed or have not existed to support a patient charge on a claim to be submitted for reimbursement. What should I do?

A: This may give rise to improper billing. You should raise this issue with your supervisor to be sure that Premier is not violating any laws or regulations.

Q: What is meant by sexual harassment?

A: Sexual harassment can be described as aggressive sexual behavior that has been demonstrated to a person who has not suggested or encouraged the behavior. It can be sexual jokes, advances, demands or suggestions. If you have been the subject of this type of behavior, please notify your supervisor, manager, human resources representative or call the Corporate Compliance Hotline. This behavior is not tolerated at Premier. Allegations will be investigated confidentially and offenders will be placed in the appropriate level of corrective action.

Q: A vendor has offered to pay my travel and lodging expenses to attend a training and educational seminar for their products(s) at their home office. Is this okay?

A: Employees should not accept a vendor's offer to pay for the seminar, as it is against Premier Policy. It could be construed as a gift or inducement. If your supervisor or manager feels that the seminar is worthwhile and affordable, the organization may pay for you to attend.

Appendix B - Statement of Understanding

1. I have read and understand the Code of Conduct and agree to abide by it to the best of my ability during my relationship with Premier Health.
2. I know that I have a duty to report any suspected violation of the Code of Conduct to management or a member of the Compliance Committee.
3. I have not been convicted of, or charged with, a criminal offense related to healthcare.
4. I understand that a violation of the Code of Conduct may be grounds for disciplinary action, up to and including discharge.
5. At this time, I am not aware of any possible violation of the Code of Conduct.

Confidential Information:

Team Members must safeguard all confidential information and may never discuss such information except to serve patients or conduct Premier Health business. In particular, Team Members must protect the privacy of our patients, and the confidentiality of all information related to their care or any past, current or future medical condition. Personal or proprietary information about patients, fellow Team Members, medical staff and others with whom we do business should not be used or disclosed except with the consent of the person or as allowed by law.

Use of Electronic Systems:

Team Members may be provided with access to the organization's computer systems. Computer access codes such as user IDs and passwords are like a signature. Access codes must never be disclosed to another. Team Members must not attempt to learn another's access code, nor attempt to access a computer system with an access code other than their own. Compromised access codes must be reported to a supervisor immediately. Team Members must not use any computer outside their job responsibilities. For example, using the computer to retrieve medical information for a personal reason is not permitted.

The Internet, electronic mail, voice mail and facsimile machines are used throughout Premier Health. These "electronic messaging" systems are for Premier Health business purposes only. Sensitive information must not be stored or transmitted on these systems, unless approved safeguards are in place. Consult your department's policies for more information on the use of computers, the Internet and electronic messaging systems.

**TEAM MEMBERS WILL ACKNOWLEDGE THEIR
UNDERSTANDING VIA HEALTHSTREAM**

Appendix C –

Antitrust Compliance

The antitrust laws are intended to ensure competition and preserve the free enterprise system. This is a highly complex area, and this document cannot cover all situations where the antitrust laws might apply. For example, antitrust issues might arise in the context of communications with competitors; customer or supplier relations; mergers or joint ventures; or trade association activities. Team Members should take special care in this area, and promptly refer any questions or concerns directly to General Counsel.

Key Antitrust Violations

In general, the antitrust laws prohibit collusive or exclusionary practices that suppress competition. Such practices include, but are not limited to, any anti-competitive agreement or understanding among or between competitors, such as (a) fixing prices or price-related terms; (b) allocating customers, services, or territories; or (c) refusing to deal with a supplier or customer except on collectively determined terms. Each of these unlawful practices is explained in more detail below:

Price Fixing

Price fixing covers any agreement or understanding involving two or more competing entities that directly or indirectly influences the price of the products or services they sell or buy. Such an agreement may be illegal regardless of whether the parties have arrived at a specific price. In addition to agreements to establish specific prices, the following types of agreements among competitors may also constitute unlawful price fixing:

- Agreements to use a common formula or method of calculation to determine prices
- Agreements to use a common asking price or starting figure in negotiations with customers, even though downward revisions are likely to take place
- Agreements to use a common strategy in price negotiations with managed care plans or other payers
- Bid rigging, which may take the form of agreements to rotate contracts among potential bidders or to submit “complimentary” (sham) bids
- Agreements to establish uniform or similar discounts or to eliminate or reduce such discounts
- Agreements to establish uniform credit terms or to eliminate or limit such terms
- Agreements on either the timing or the announcement, whether written or oral, of price changes
- Agreements among purchasers to limit prices at which they will buy supplies or services.

Price fixing is per se illegal, meaning that the agreement itself violates the antitrust laws regardless of its business purpose, whether there are any pro-competitive effects, or whether any injury to competition has, in fact, occurred.

Market Divisions - Allocating Customers, Services or Territories

Any agreement between competitors to allocate customers or potential customers is illegal per se. Such an agreement may involve an allocation by territory, by specific customer or customer classification, or by service rendered. Market divisions, like price-fixing, are among the most serious of antitrust violations. In a recent case, for example, a state attorney general obtained an injunction to block an arrangement between two competing hospitals to allocate clinical services between them. The court held that the allocation scheme was per se illegal under the antitrust laws. In a subsequent settlement of that litigation, the hospitals agreed to pay for the Attorney General's litigation expenses, which exceeded \$500,000.

Concerted Refusals to Deal (Group Boycotts)

Any arrangement by which two or more competing providers, including hospitals, refuse or threaten to refuse to do business with specific payers or kinds of payers is deemed to be a group boycott and normally constitutes an antitrust violation. A variation on this theme is an agreement between two or more providers not to contract with a payer except on their collectively determined terms, that is, unless the payer agrees to pay higher fees to the providers or agrees to discontinue contracting with other providers. Both HMOs and governmental payers (e.g., Medicaid) have been the targets of actual or threatened group boycotts by providers. In such circumstances, federal and state antitrust agencies have often reacted by initiating civil or criminal antitrust lawsuits against the providers. Private payers that are targets of group boycotts may also assert antitrust claims, and are entitled to a broad range of civil remedies, including the issuance of injunctions and the recovery of treble damages, attorneys' fees and costs.

Prohibited Communications

With the limited exception noted in the section below on joint ventures and other legitimate business collaborations, Premier Health Team Members should not engage in any communications, whether orally or in writing, with any competitor that relates to a competitively sensitive matter, including but not limited to any discussion or communication of, or any exchange of information on:

- Current or future prices for healthcare services
- Discounts, discount levels, rebates, or other price-related terms to be offered to customers or suppliers
- Managed care pricing or contracting strategies
- Marketing or promotional initiatives
- Strategic business plans concerning the development, expansion, contraction, or reconfiguration of any facilities, clinical programs, or services
- Employee compensation and benefits

Unsolicited Communications from Competitors

If a Premier Health Team Member receives any nonpublic information from a competitor about its business intentions, strategies, or practices, the Team Member should notify the General Counsel immediately. The Team Member should have no further written or oral communication with the competitor other than to advise them that the matter has been referred to the General Counsel for appropriate review in accordance with Premier Health's Code of Conduct.

If General Counsel, or an attorney designated by the General Counsel, thereafter determines that the communication was problematic, he or she will take appropriate action, including but not limited to providing written notice to the competitor of the impropriety of such communication and disavowing any interest on the part of Premier Health in engaging in any further communications of that nature. The General Counsel will maintain a log identifying the source and specific nature of the non-public information received, the circumstances of its communication, and the action taken by the General Counsel.

Joint Ventures and Other Legitimate Business Collaborations

From time to time, Premier Health may need to disclose - orally or in writing - nonpublic, competitively sensitive or proprietary information in order to explore the formation or evaluate the performance of a legitimate joint venture or business collaboration between Premier Health and one or more co-venturers. A joint venture or collaboration is "legitimate" in an antitrust sense if it involves a significant degree of clinical, financial, or operational integration among or between the co-venturers, and has the purpose and effect of providing services more efficiently, improving quality of care, or offering a product or service that otherwise would not be available. In such case, the antitrust aspects are evaluated under a "rule of reason" (rather than determined to be a per se violation) and judged on whether the pro-competitive effects outweigh any anti-competitive effects.

Premier Health may lawfully disclose pricing or other competitively sensitive information to a responsible independent non-party if and when such disclosure is reasonably necessary to further the legitimate objectives of the joint venture or collaboration. Premier Health will disclose such information only after a Confidentiality Agreement has been executed by the co-venturers. Under the terms of that Agreement, when any pricing, financial or other nonpublic, competitively sensitive information is involved, it will be submitted to an independent third party (usually a business consultant, accountant or attorney), solely for the purpose of evaluating the feasibility of a prospective joint venture or collaboration or the performance of an existing joint venture or collaboration. The independent third party will further agree not to share Premier Health's submission with any of its actual or prospective co-venturer(s), and vice versa. Upon completion of its business review, the independent third party will destroy all competitively sensitive information or return it to its original source.

In some instances, in order to facilitate decision-making, it may become reasonably necessary and appropriate for the independent third party to share certain non-public information received from one of the co-venturers with the other(s). Accordingly, the Confidentiality Agreement will include the following additional safeguards: All nonpublic written or oral information that is exchanged

between Premier Health and a prospective co-venturer(s) will be held in strict confidence and will not be disclosed to any other third party without the written consent of the organization that is the source of such information;

- When possible, the information will be disclosed in an aggregated manner, to reduce the antitrust sensitivity
- Any nonpublic written or oral information received by Premier Health from a co-venturer(s) will be shared within the Premier Health organization on a “need-to-know” basis, and vice versa
- If discussions about a possible collaboration are terminated by the parties, any nonpublic documents that may be exchanged between Premier Health and a prospective co-venturer(s) will be promptly returned to the original source of such documents with all copies destroyed.

Any meetings between Premier Health and one or more competitors to explore the feasibility or performance of a legitimate joint venture or collaboration shall be attended by the General Counsel or an attorney designated by the General Counsel. The subject matter of such meetings shall be strictly limited to those issues necessary to evaluate the viability, or the actual or potential benefits, of a joint venture or collaboration. To that end, a formal agenda for the meeting should be prepared, subject to the review and approval of the General Counsel or an attorney designated by the General Counsel, prior to the meeting itself.

Market Surveys

Premier Health Team Members should not seek to obtain confidential cost, pricing or other competitively sensitive information directly from competitors in order to conduct a market survey or analysis. Such information about competitors shall be obtained only through or from publicly available sources. Questions relating to the appropriate methods of or appropriate sources for obtaining information about competitors shall be directed to General Counsel.

Inappropriate Trade Association Activities

Trade associations present opportunities for competitors to come together and pursue many legitimate and worthwhile goals. Premier Health recognizes, however, that trade association activities can also give rise to the risk of anticompetitive collusion if nonpublic, competitively sensitive information is shared among or between competitors who are participating in such activities. Accordingly, any Premier Health Team Member attending a trade association meeting, conference or show should follow the guidelines below at all times:

- At a trade association meeting, do not discuss with or give your competitors any information concerning prices, salaries or benefits, territories, capacity, trade secrets, sales, bidding or contracting strategies, costs, customers, business plans or other marketing practices. If the association intends to conduct a survey of its member-hospitals’ prices, costs, salaries or business practices, the Team Member should confer with the General Counsel before providing any information to the association pursuant to such a survey.

- Be cautious if you attend any informal or ad hoc sessions or meet or speak with competitors before, during or after the official trade association meeting. Such informal gatherings are of concern because, at a minimum, they create the appearance of impropriety and, at worst discussions may slip into competitively sensitive areas that are properly off-limits during the official meeting or at any other time.
- Do not participate in, or acquiesce to, any solicitation to engage in a “boycott” or to take other collective action against a private or governmental payer, hospital, or other provider. Trade associations are not labor unions; unlike labor unions, trade associations cannot lawfully bargain or refuse to deal with payers on behalf of their members.
- Be wary of any meetings that are not open to all members of the association. If you find yourself in this type of meeting, leave immediately and contact Premier Health’s General Counsel as soon as possible.
- If there is any reason to believe the trade association is engaging in questionable or illegal behavior, the Team Member should object and make sure that his/her objection is duly recorded and leave the meeting. Next, the Team Member should promptly contact the General Counsel and notify him/her of any concerns and, if the General Counsel so advises, the Team Member should resign from the association.
- If, in the course of a trade association meeting, a Team Member is asked by an official or member of the trade association to engage in any conduct that is questionable from an antitrust standpoint, he/she should consult with the General Counsel before agreeing to engage in any such conduct.
- Team Members have a personal responsibility to understand and adhere to these guidelines. Each Team Member attending a trade association meeting must review these guidelines prior to attending any trade association meetings and should direct any questions about these guidelines to the General Counsel.

Sanctions for Non-Compliance

It is the responsibility of each Team Member to ensure that all of the activities of Premier Health are conducted in compliance with the antitrust laws. Whenever a Team Member becomes aware of potentially anticompetitive conduct, he or she should promptly contact General Counsel so that timely advice may be provided and effective action may be taken to ensure compliance with the antitrust laws. Any Team Member who engages in conduct that violates the antitrust laws, or who knowingly fails to report such conduct in which another Team Member has been or is engaged, will be subject to corrective action, including but not limited to the possibility of suspension or termination of employment.

Appendix D - Federal and State False Claims Laws

Introduction

False claims statutes protect government funded programs from abusive or fraudulent practices by the beneficiaries of such programs. The primary government health benefit programs with which Premier Health does business are Medicare, Medicaid and TRICARE.

Medicare was established in 1965 by Title XVIII of the Social Security Act. It is a federally funded health insurance program for citizens age 65 and older and persons with a long term disability or end-stage renal disease. Medicare consists of four parts. Part A provides coverage for care provided in institutional settings, such as inpatient hospitals and skilled nursing facilities. Part B covers items and services provided by outpatient hospital departments, physicians, certain non-physician practitioners, ambulance companies, laboratories and durable medical equipment suppliers. Part C was established in 1997 as “Medicare Choice” to provide services through health maintenance organizations and preferred provider organizations. In addition to the services covered under Parts A and B, Part C can include wellness and preventative health programs. Part D became effective January 1, 2006 and provides coverage for prescription drugs through private Prescription Drug Plans.

Medicaid was established in 1965 to provide healthcare coverage and services for low income and financially needy people. Medicaid is administered by the states, and is funded by both state and federal governments.

TRICARE is the name of the U.S. Department of Defense’s managed healthcare program for active duty military, active duty service families, retirees and their families, and other beneficiaries.

The laws and regulations governing these programs are complex. Nevertheless, Premier Health has an obligation to submit claims to these programs that are accurate, complete and in compliance with the applicable regulations and program instructions. Failure to do so can result in heavy fines and costly corrective action.

Federal False Claims Act

The federal False Claims Act makes a person liable for fines ranging from \$5,500 to \$11,000 for knowingly presenting a false or fraudulent claim to a federal government agency or program.

In addition, a guilty party may be required to pay three times the amount of damages to the government. A court may assess a lower penalty if the violator promptly discloses the violation and cooperates with the government.

For purposes of the False Claim Act, “claim” includes any request or demand, whether under a contract or otherwise, for money or property which is made to a contractor, grantee, or other recipient if the United States Government provides any portion of the money or property which is requested or demanded, or if the Government will reimburse such contractor, grantee, or other recipient for any portion of the money or property which is requested or demanded. In healthcare,

claim includes any of the paper or electronic billing forms submitted to a government healthcare program.

“Knowingly” means that a person, with respect to information on the claim:

- Has actual knowledge of the information
- Acts in deliberate ignorance of the truth or falsity of the information
- Acts in reckless disregard of the truth or falsity of the information; no proof of specific intent to defraud is required

Actions that give rise to liability under the federal False Claims Act include:

- Knowingly presenting or causing to be presented, to an officer or employee of the United States Government or a member of the Armed Forces of the United States a false or fraudulent claim for payment or approval
- Knowingly making, using, or causing to be made or used, a false record or statement to get a false or fraudulent claim paid or approved by the Government
- Conspiring to defraud the Government by getting a false or fraudulent claim allowed or paid
- Having possession, custody, or control of property or money used, or to be used, by the Government and, intending to defraud the Government or willfully concealing the property, delivering, or causing to be delivered, less property than the amount for which the person receives a certificate or receipt
- Authorizing to make or deliver a document certifying receipt of property used, or to be used, by the Government and, intending to defraud the Government, making or delivering the receipt without completely knowing that the information on the receipt is true
- Knowingly buying, or receiving as a pledge of an obligation or debt, public property from an officer or employee of the Government, or a member of the Armed Forces, who lawfully may not sell or pledge the property
- Knowingly making, using, or causing to be made or used, a false record or statement to conceal, avoid, or decrease an obligation to pay or transmit money or property to the Government

The False Claims Act also provides protection from retaliatory acts committed by an employer against an employee for investigating or reporting violations. Remedies can include employment reinstatement, back pay and other compensation.

Ohio False Claims Laws

Ohio laws impose liability on providers or persons who commit fraud in the Ohio medical assistance program. Ohio's Medicaid fraud laws, specifically, O.R.C. §§ 2913.40, 2921.13, and 5164.35, prohibit providers from making false or misleading statements in order to receive payment for goods or services provided to Medicaid beneficiaries that is greater than the amount

of reimbursement to which they are entitled. These laws prohibit, among other things:

- Billing Ohio's Medicaid program for services or goods not provided
- Billing Ohio's Medicaid program for undocumented services
- Making inaccurate, false or improper entries in medical records, cost reports and any their records used to support reimbursement
- Billing Ohio's Medicaid program for medically unnecessary services
- Characterizing non-covered services or costs in a way that secures reimbursement from Ohio's Medicaid program
- Assigning an incorrect code to a service in order to obtain a higher reimbursement
- Failing to seek payment from beneficiaries who may have other primary payment sources
- Participating in kickbacks and rebates
- Altering, falsifying, destroying, or concealing medical records, income and expenditure reports or any other records that support Medicaid reimbursement

The Ohio laws, specifically O.R.C. § 2913.401, also prohibit any person from doing any of the following in an application for Medicaid benefits or in a document that requires a disclosure of assets for the purpose of determining eligibility to receive Medicaid benefits:

- Making or causing to be made a false or misleading statement
- Concealing an interest in property

Civil and Criminal Penalties for False Claims or Statements

A violation of these Ohio laws may result in penalties of \$5,000 to \$10,000 for each falsification, three times the amount unlawfully received plus interest, payment of the government's expenses to pursue reimbursement, and exclusion from the Medicaid program for up to five years. In addition, a person who violates these laws commits a crime punishable by imprisonment for up to five years and a fine not to exceed \$10,000.

Civil Lawsuits

Currently, unlike the Federal False Claims Act, Ohio law allows civil lawsuits to recover monetary damages to be filed only by the state government and not by private citizens or employees. There is no provision for a private citizen to share a percentage of any monetary recoveries.

No Retaliation

Like federal law and Premier Health policy, Ohio law prohibits employers from retaliating, discriminating or harassing employees because of their lawful participation in a false claims disclosure or their refusal to assist employers in violating laws such as the Ohio Medicaid fraud

laws. These laws also provide for certain monetary awards and equitable relief to the prevailing plaintiff including compensation for lost wages and reinstatement to a former position.

Ohio's whistleblower law, unlike other laws, requires an employee to notify his/her employer, both orally and in writing of any suspected illegal activity, policy or practice before disclosing it to the appropriate government agency. The purpose of this particular requirement is to give the employer a reasonable opportunity to correct the activity, policy or practice. If the employer does not make a good faith effort to correct the asserted violation within 24 hours of receiving notice, the employee may file a written report of the violation with the county prosecuting attorney, law enforcement, any governmental entity that has regulatory authority over the employer or the inspector general.

Any employee who engages in or condones any form of retaliation against another employee because that employee either (1) reported a potential violation of The Premier Health Code of Conduct or a government law or regulation, or (2) refused to violate The Premier Health Code of Conduct or a government law or regulation, will be subject to disciplinary action up to and including separation of employment.

Workplace Practices

Premier Health leaders recognize that it is not possible for Team Members to know every Medicare or Medicaid law and regulation that exists. However, Team Members should be aware of the rules that apply to their job responsibilities. Team Leaders are responsible for ensuring that their Team Members are appropriately informed about relevant regulatory requirements, and that they are adequately supervised.

This Code of Conduct was prepared for all Team Members. We hope you will find it helpful whether you are a newcomer or a Team Member of long duration. We have tried to make this booklet as complete as possible. However, because ethics and compliance policies require almost constant updating to meet the needs of a changing environment, the policies stated here may be revised, amended or deleted as necessary. Changes will be reflected in a subsequent printing or communicated through management.

Premier Health Compliance Hotline: 1-888-271-2688



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