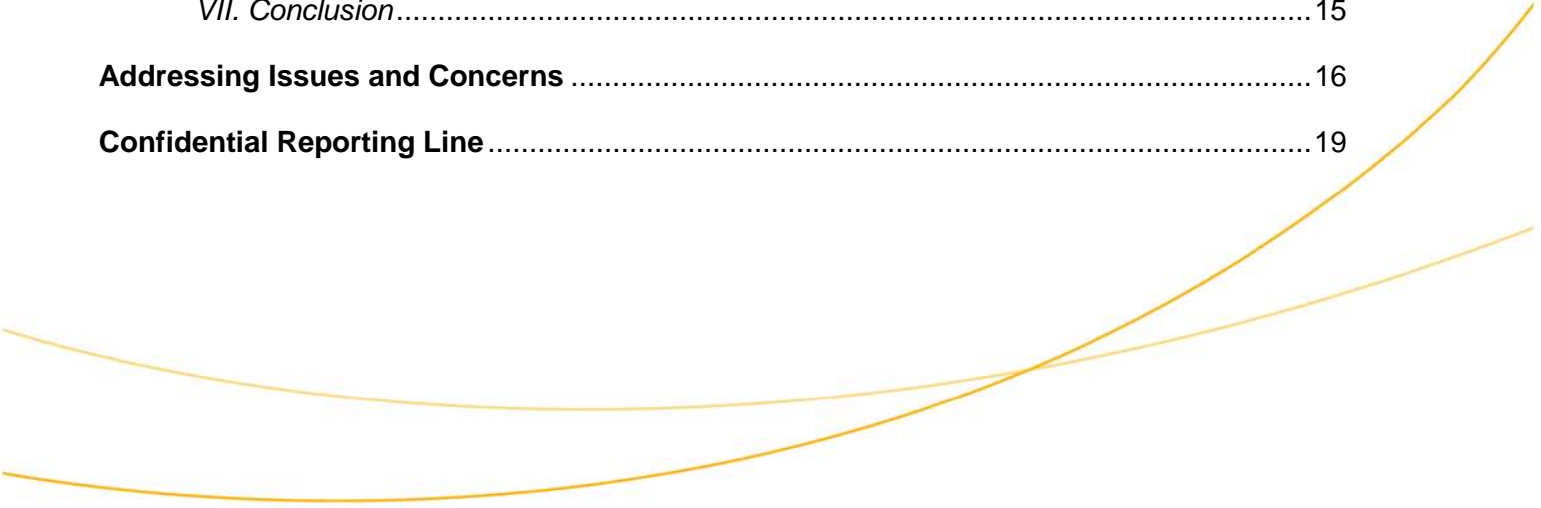




# Renown Health Code of Ethics

## Table of Contents

<b>Our Purpose Statement</b> .....	1
<b>Elements of Renown Health’s Corporate Compliance Plan</b> .....	2
<b>Code of Ethics – Guiding Principles</b>	
<i>I. Patient Rights</i> .....	6
<i>II. Compliance with Laws and Regulations</i> .....	7
<i>III. Confidentiality</i> .....	11
<i>IV. Conflicts of Interest</i> .....	12
<i>V. Business Ethics/Financial Accounting</i> .....	13
<i>VI. Community Relationships</i> .....	14
<i>VII. Conclusion</i> .....	15
<b>Addressing Issues and Concerns</b> .....	16
<b>Confidential Reporting Line</b> .....	19



## **A Vision of our Future**

As our region's premier health care organization, Renown Health will embody quality, service and caring. We will continue to meet the health care needs of the communities that we serve through coordination, collaboration and accountability. Our diverse range of integrated and cost-effective health care services will be recognized as a true and trusted community asset.

As the premier health care source for patients and their families, we will provide superior services and healing environments. Our focus will be the individual, empowered and encouraged to regain or retain good health.

As the premier physician resource, we will recognize and support the expertise of physicians by providing quality services and utilizing proven medical processes. We will partner with physicians to meet challenges and build solutions.

As the premier employer, we will attract, value and retain the best employees. Our culture will foster teamwork and communication.


As the premier source for health education and promotion, we will provide resources to facilitate the health and well-being of the communities we serve.

The heart of our vision is superior people providing superior health care services.

This vision for tomorrow begins with our purpose today.

## **Our Purpose**


Make a genuine difference for the many lives we touch by  
optimizing our patients' healthcare experience



## **Elements of Renown Health's Corporate Compliance Plan**

- Written standards (including the Code of Ethics) and policies and procedures that promote Renown Health's commitment to compliance and that address specific areas of legal risk for Renown Health.
- A Compliance Officer who has a direct reporting relationship to the CEO and the Board of Directors.
- Compliance programs designed to enhance employee education and promote compliance in those areas that pose the greatest risks to Renown Health.
- A reporting system, through normal chain-of-command, the Compliance Officer and/or the Confidential Reporting Line, where employees can report known or suspected violations of the Code, without fear of retaliation.
- A system to monitor and audit legal compliance and violations of the Code, and to assist in the reduction of identified problem areas.
- Prompt correction of compliance problems within Renown Health.

The Renown Health Corporate Compliance Plan does not replace other policies, such as those governing employee grievance procedures, employee benefits, accounting or auditing. Rather, the Compliance Plan should be used along with these other policies.






## **Renown Health's Code of Ethics**

### **INTRODUCTION**

This Code of Ethics ("Code") applies to Renown Health and its affiliates and subsidiaries, members of the Boards of Directors, officers and leaders of Renown Health and its business units, employees, Medical Staff and allied health professionals of Renown Health, as applicable, and Renown Health agents and contractors, including independent contractors providing health care services. Each individual is responsible personally for his or her own conduct in complying with this Code. Any individual who fails to comply with the Renown Health Code of Ethics will be subject to progressive discipline under the appropriate policies.

This Code will be distributed and explained to board members, officers, leaders, employees, Medical Staff and allied health professionals, and Renown Health agents and contractors. In addition, supplemental materials dealing with specific subjects, such as compliance with the fraud and abuse laws and billing for services rendered to Medicare beneficiaries, will be distributed to those individuals with responsibilities in those areas.

This Code is not intended to create a contract between Renown Health and any person or to give any person any rights against Renown Health. This Code may be modified at any time at the discretion of Renown Health. In the event of any conflict between this Code and any specific Renown Health policy, the specific policy shall take precedence.



## **I. PATIENT RIGHTS**

**Patients must receive quality care delivered in a considerate, respectful and cost-effective manner. Patients have the right to make their own health care decisions after disclosure of relevant information.**

1.1 Courtesy and Respect for Patients. Employees must treat patients with care, concern and respect at all times. Patients are entitled to prompt and courteous responses to their requests and to their needs for treatment or service, consistent with Renown Health's capacity, its purpose statement, and applicable laws.

1.2 Economical Care. Care should be provided as economically as is practicable, consistent with maintaining quality. Patients are entitled to complete disclosure of all Renown Health charges and fees.

1.3 Patient Self-Determination. Patients must be informed of their right of self-determination. This right refers to the ability of competent adults to participate in and make their own health care decisions after receiving from their physicians complete disclosure of their diagnosis, prognosis and treatment alternatives. Patients have the right to accept medical care or to refuse treatment to the extent permitted by law, and to be informed of the medical consequences of such refusal.

1.4 Patient Competence. If a patient has been declared incompetent by a court, is found by his or her physician to be medically incapable of understanding proposed treatment, is unable to communicate his or her views regarding treatment, or is a minor, then it is the right of the patient's guardian, next of kin or other legally authorized responsible person to exercise, to the extent permitted by law, the patient's rights on his or her behalf. Questions concerning a patient's competence or the right of another person to act on a patient's behalf should be referred to the employee's Supervisor or to the Compliance Officer.

1.5 Honoring Patient Health Care Decisions. Employees must honor a patient's instructions regarding his or her health care decisions and must not discriminate against patients

based on whether they exercise their right to self-determination or on the substance of their specific health care decisions.

1.6 Confidentiality. Employees must protect a patient's personal privacy and preserve the confidentiality of a patient's medical treatment program, including the patient's medical records. Employees must observe the highest standards of ethical and legal conduct with respect to such information.

## **II. COMPLIANCE WITH LAWS AND REGULATIONS**

**Renown Health will strive to ensure all activity by or on behalf of the organization is in compliance with applicable laws and regulations.**

2.1 General. Employees must comply with both the spirit and the letter of all laws that apply to Renown Health's operations, business and dealings. If an employee questions the existence of, interpretation or application of any law, the employee should direct the question to his or her supervisor.

2.2 Interaction with Government. Employees must cooperate with the government officials who are responsible for administering and enforcing those laws and for monitoring and regulating Renown Health's activities. If an employee is contacted by a representative of any government agency, the employee must consult with his or her supervisor for guidance.

2.3 Fraud and Abuse. Renown Health expects its employees to refrain from conduct that may violate the fraud and abuse laws. These laws prohibit (1) direct, indirect or disguised payments in exchange for patient referrals; (2) the submission of false, fraudulent or misleading claims to any government entity or third-party payor, including claims for services not rendered, claims that characterize the service differently than the service actually rendered, or claims that do not otherwise comply with applicable program (such as Medicare or Medicaid) or contractual requirements; and (3) making false representations to any person or entity in order to gain or retain participation in a program or to obtain payment for any service.

2.3.1 A difficult area in which to recognize violations of the fraud and abuse laws is the prohibition against offering, paying, soliciting or receiving any money, gifts or services in return for the

referral of patients or to induce the purchase of items or services. Situations that may arise include requests from physicians and other providers for special treatment or payments in return for referring patients or other business to Renown Health. Such requests might seek, for example, payment of an incentive each time a patient is referred, provision of free or significantly discounted billing, nursing or other staff services, or payment for services in excess of their fair market value.

2.3.2 An employee faced with a situation that appears to be questionable under the fraud and abuse laws should consult with his or her supervisor for guidance. Any questions about interpretations of the fraud or abuse laws should be discussed with the Compliance Officer. An employee who suspects that a violation of the fraud and abuse laws has occurred should disclose that situation to the Compliance Officer.

2.3.3 All financial arrangements with any actual or potential referral sources must be approved by Renown Health's Board of Directors. All such arrangements, including, without limitation, contracts for personal services, leases, recruitment arrangements and loans, shall be subject to review by the Compliance Officer.

2.3.4 Employees shall not enter into financial relationships with physicians that could put Renown Health in a position of possibly violating the prohibitions of Stark II or any state physician self-referral prohibition. If an employee has a question regarding whether a particular arrangement or situation raises questions under the prohibitions of Stark II or any state physician self-referral prohibition, the employee should consult his or her supervisor or the Compliance Officer for guidance, who may seek advice from legal counsel.

2.4 Coding and Billing for Services. Renown Health has implemented policies, procedures and systems to facilitate accurate billing to government payers, commercial insurance payers and patients. These policies, procedures and systems conform to applicable federal and state laws and regulations. Renown Health prohibits any colleague or agent of Renown Health from knowingly presenting or causing to be presented claims for payment or approval that are false, fictitious or fraudulent.

2.4.1 In support of accurate billing, medical records must provide reliable documentation of the services Renown Health renders. It is important that all individuals who



contribute to medical records provide accurate information and do not destroy any information considered part of the official medical record.

2.4.2 Accurate and timely billing also depends on the diligence and attention of physicians who treat patients in Renown Health facilities. Renown Health expects those physicians to provide Renown Health with complete and accurate information in a timely manner.

2.5 Tax. As a nonprofit, tax exempt entity, Renown Health has a legal and ethical obligation to act in compliance with applicable laws, to engage in activities in furtherance of its charitable purpose, and to ensure that its resources are used in a manner that furthers the public good, rather than the private or personal interests of any individual. Consequently, employees shall not engage in any activity that involves the use of Renown Health resources or property for any private use or private benefit. Transactions entered into must be in the best interest of Renown Health and negotiated at arm's-length for fair market value. An employee faced with a situation that appears questionable should consult with his or her supervisor for guidance. An employee who suspects a violation of tax-exemption requirements should disclose that situation to the Compliance Officer.

2.6 Antitrust. All employees must comply with applicable federal and state antitrust and similar laws that regulate competition. Examples of conduct prohibited by the laws include: (1) agreements to fix prices, bid-rigging, collusion (including price-sharing) with competitors; (2) boycotts, certain exclusive dealing and price discrimination agreements; and (3) unfair trade practices, including bribery, misappropriation of trade secrets, deception, intimidation and similar unfair practices. An employee faced with a situation that appears questionable should consult with his or her supervisor for guidance. An employee who suspects a violation of the antitrust laws should disclose that situation to the Compliance Officer.

2.7 Environmental. It is Renown Health's policy to manage and operate its business in the manner that respects the environment and conserves natural resources. Renown Health's employees will strive to utilize resources appropriately and efficiently, to dispose of all waste (including medical waste) in accordance with applicable laws and regulations, and to work cooperatively with the appropriate authorities to address any environmental contamination for which Renown Health may be responsible. An employee faced with a situation that appears questionable should consult with his or



her supervisor for guidance. An employee who suspects a violation of environmental laws should disclose that situation to the Compliance Officer.

**2.8 Discrimination.** Renown Health believes that the fair and equitable treatment of employees, patients and other persons is critical to fulfilling its purpose and goals. It is a policy of Renown Health to treat patients, without regard to the race, color, religion, sex, ethnic origin, age or disability of such person, or any other classification prohibited by law. It is a policy of Renown Health to recruit, hire, train, promote, assign, transfer, layoff, recall and terminate employees based on their own ability, achievement, experience and conduct, without regard to race, color, religion, sex, ethnic origin, age or disability, or any other classification prohibited by law. No form of harassment or discrimination on the basis of sex, race, color, disability, age, religion or ethnic origin or disability or any other classification prohibited by law will be permitted. Each allegation of harassment or discrimination will be promptly investigated in accordance with applicable Renown Health Human Resources policies. An employee faced with a situation that appears questionable should consult with his or her supervisor for guidance. An employee who suspects that he or she or a co-worker has been treated in a discriminatory manner should disclose that situation to the Compliance Officer.

**2.9 Controlled Substances.** Some Renown Health personnel routinely have access to prescription drugs, controlled substances and other medical supplies. Many of these substances are governed and monitored by specific regulatory organizations and must be administered by physician order only. Prescription and controlled medications and supplies must be handled properly and only by authorized individuals to minimize risks to Renown Health and to patients. An employee who becomes aware of inadequate security of drugs or controlled substances or the diversion of drugs from Renown Health must report the incident immediately.

**2.10 Substance Abuse and Mental Acuity.** To protect the interests of Renown Health employees and patients, Renown Health is committed to an alcohol and drug-free work environment. All employees must report for work free of the influence of alcohol and illegal drugs. It is also recognized that individuals may be taking prescription or over-the-counter drugs, which could impair judgment or other skills required in job performance. Employees with questions about the effect of such medication on their performance or who observe an individual who appears to be impaired in the performance of his or her job must immediately consult with their supervisor.

### **III. CONFIDENTIALITY**

**Hospital employees shall not disclose confidential patient or business information to unauthorized persons.**

3.1 Safeguard Confidential Information. Renown Health and its employees are in possession of, and have access to, a broad variety of confidential, sensitive and proprietary information, the inappropriate release of which could be injurious to individuals, Renown Health's business partners and Renown Health itself. Every Renown Health employee has an obligation to protect and safeguard confidential, sensitive and proprietary information in a manner designed to prevent the unauthorized disclosure of information.

3.2 Privacy Laws and Regulations. All Renown Health employees have an obligation to conduct themselves in a manner that maintains the confidentiality of patient information in accordance with all applicable laws and regulations, including the Health Insurance Portability and Accountability Act of 1996 ("HIPAA"). Employees shall refrain from revealing any personal or confidential information concerning patients or members unless supported by legitimate business or patient care purposes. If questions arise regarding an obligation to maintain the confidentiality of information or the appropriateness of releasing information, the employee should seek guidance from his or her supervisor or the Compliance Officer.

3.3 Renown Health Intellectual Property. Information, ideas and intellectual property assets of Renown Health are important to organizational success. Information pertaining to Renown Health's competitive position or business strategies, payment and reimbursement information, and information relating to negotiations with employees or third parties should be protected and shared only with employees having a need to know such information in order to perform their job responsibilities. Employees should exercise care to ensure that intellectual property rights, including patents, trademarks, copyrights and software, are carefully maintained and managed to preserve and protect their value.

3.4 Salary, Benefits and Employee Information. Salary, benefit and other personal information relating to employees shall be treated as confidential. Personnel files, payroll information, disciplinary matters and similar information shall be maintained in a manner designed to ensure confidentiality in accordance with applicable laws. Employees should exercise due care to prevent the release or sharing of information beyond those persons who may need such information to fulfill their job function.

3.5 Electronic Media. All communications systems, including, but not limited to, electronic mail, Intranet, Internet access, telephones and voice mail, are the property of Renown Health and are to be used primarily for business purposes in accordance with Renown Health policies and standards. Limited reasonable personal use of Renown Health communications systems is permitted; however, users should assume these communications are not private. Users of computer and telephone systems should presume no expectation of privacy in anything they create, store, send or receive on the computer and telephone systems, and Renown Health reserves the right to monitor and/or access communications usage and content consistent with Renown Health policies and procedures.

#### **IV. CONFLICTS OF INTEREST**

**Employees (including officers and directors) owe a duty of undivided and unqualified loyalty to Renown Health. Such individuals may not use their positions to profit personally or to assist others in profiting in any way at the expense of Renown Health.**

4.1 Protecting the Interests of Renown Health. Employees must at all times seek to promote, enhance, and protect the interests of Renown Health, and avoid taking any action that may be adverse to those interests. A conflict of interest arises when an employee's outside activities influence the performance of that employee's responsibilities to Renown Health in a manner that is contrary to Renown Health's interests. Employees must be alert to any situation that may involve even the appearance of a conflict of interest and must disclose that situation promptly to their supervisors.

4.2 Gifts and Gratuities. Employees are prohibited from soliciting tips, personal gratuities or gifts from patients and from accepting monetary tips or gratuities. If a patient wishes to present a monetary gift, he or she should be referred to the appropriate Renown Health business office.

4.2.1 Employees shall not accept gifts, favors, services, entertainment or other things of value to the extent that decision-making or actions affecting Renown Health might be influenced. Similarly, offering or giving money, services or other things of value with the expectation of influencing the judgment or decision-making process of any purchaser, supplier, customer, government official or other person by Renown Health is absolutely prohibited. Any such conduct must be reported immediately either to the employee's supervisor or to Renown Health's Compliance Officer.

4.2.2 Employees may retain gifts from vendors that have a nominal value, defined as \$100 or less, as long as their decision-making or actions affecting Renown Health are not influenced, or do not appear to be influenced, by the gift. Renown Health expects its employees to exercise good judgment and discretion in accepting gifts. If an employee has any concern regarding whether a gift should be accepted, the employee should consult with his or her supervisor or HR Business Partner. To the extent possible, these gifts should be shared with the employee's co-workers. Employees shall not accept excessive gifts, meals, expensive entertainment or other offers of goods or services that have more than a nominal value, and may not solicit gifts from vendors, suppliers, contractors or other persons.

4.2.3 Any entertainment or gift involving physicians or other persons who are in a position to refer patients to Renown Health facilities must be undertaken in accordance with Renown Health policies, which have been developed consistent with federal laws, regulations, and rules regarding these practices. Renown Health employees must consult Renown Health policies prior to extending any business courtesy to a potential referral source.

4.3 Outside Activities. Employees must not engage in outside activities during working hours and must not use hospital equipment (including computers), supplies or information in connection with their outside activities unless they receive the approval of their supervisors. Self-employment or employment by others is permissible only if it does not adversely affect the employee's job performance for Renown Health or create a conflict of interest with Renown Health. An employee of Renown Health

must not become an officer or director of, or accept a position of responsibility with, any other company in competition with Renown Health without the approval of his or her supervisor.

4.4 Educational Programs. Employees are, with the permission of their supervisor, encouraged to participate as faculty and speakers at educational programs and functions. However, any honoraria in excess of Two Hundred Dollars (\$200) shall be turned over to Renown Health unless the employee used paid time off to attend the program or that portion of the program for which the honoraria is paid.

4.5 Family Members. Beginning with the adoption of this Code, no employee may be hired or promoted where the result will be that an employee will supervise a member of his or her own family or where two family members (*i.e.*, grandmother, grandfather, mother, father, sister, brother, aunt or uncle) will have the same supervisor.

## **V. BUSINESS ETHICS/FINANCIAL ACCOUNTING**

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

5.1 Candor and Honesty. Renown Health requires candor and honesty from employees in the performance of their responsibilities and in communications with Renown Health's attorneys and auditors. No employee shall make false or misleading statements to any patient, person or entity doing business with Renown Health.

5.2 Relationships With Vendors: "Insider" Information. An employee may not utilize "insider" information for any business activity conducted by or on behalf of Renown Health. All business relations with vendors or contractors must be conducted at arm's length both in fact and in appearance. Employees must disclose personal relationships and business activities with vendor and contractor personnel that may be construed by an impartial observer as influencing the employees' performance

or duties. Employees faced with situations that appear questionable should consult with their supervisors for guidance.

5.3 Personal Benefit From Renown Health Transactions. Employees who deal with contractors, suppliers and competitors must not take advantage of their position with Renown Health to obtain personal benefits. Employees must not take personal advantage of a business opportunity that may be or appears to be of interest to Renown Health without the approval of their supervisors. Employees must not conduct business on behalf of Renown Health with any company in which they have an interest without first disclosing that interest to their supervisors. Employees must not do business on behalf of Renown Health with any family member or relative without first disclosing that relationship to their supervisors.

5.4 Accurate Books and Records. Employees must record all entries in Renown Health's books and records accurately, honestly and fairly so that such entries reflect the true nature and purpose of the transactions that are being recorded. Books and records must not contain any false or misleading information.

5.5 Accurate Financial Reports. Renown Health financial reports must fairly and consistently reflect performance and accurately disclose the results of operations. They must also comply with Generally Accepted Accounting Principles, regulations of the Centers for Medicare and Medicaid Services, and other applicable rules. Employees must comply with all internal audit procedures of Renown Health. All transactions must be conducted as directed by management.

5.6 Adherence to Ethical Standards. All Renown Health employees should follow the ethical standards dictated by any professional organization of which they are a member.

## **VI. GUIDING PRINCIPLE FOR COMMUNITY RELATIONSHIPS**

Community relationships are valued, as exemplified through community involvement and feedback through various Renown Health Boards, the Renown Health Membership, and formal and informal research activities. Marketing practices and contract negotiations are accurate and reflective of the organization's vision and mission. It is Renown Health's vision that this organization be recognized as a true and trusted community asset.



## **VII. CONCLUSION**

This Code sets forth Renown Health's expectations about proper job-related conduct. However, this Code cannot anticipate every situation that an employee may face. An employee should consult his or her supervisor for guidance if this Code does not provide adequate direction or if the employee is being pressured to compromise his or her behavior, whether by another employee, a physician, a supplier, a competitor or a patient. If the employee is unable to resolve his or her concerns with his or her supervisor, the employee should contact the Compliance Officer. Any questions about interpretations of the law or the legality of a particular course of conduct should be discussed with the Compliance Officer, who may, in turn, consult legal counsel.

No employee's concern is too small or unimportant if he or she thinks it implicates policies concerning proper conduct. An employee will find that by seeking guidance, a resolution can be found that will both meet the employee's concerns and be consistent with this Code.



## **Addressing Issues and Concerns**

Maintaining ethical standards is a responsibility shared by all Renown Health employees. Given the complexity of our industry and the ever-changing regulations and rules that govern our services, it is not unusual for employees to encounter concerns or questions. Here are some tips and mechanisms to help employees find the resources they need.

**Understanding Renown Health Policies and Procedures:** Renown Health has developed policies & procedures that apply network-wide to all Renown Health entities and businesses. These policies may be found on the Renown Health intranet site, Inside Renown. Policy manuals are not published by Renown Health. Only those policies contained on Inside Renown are official Renown Health policies. Those policies govern our business operations, including the management of information resources, materials, community relations, finance administration, contracting, human resources, and corporate compliance.

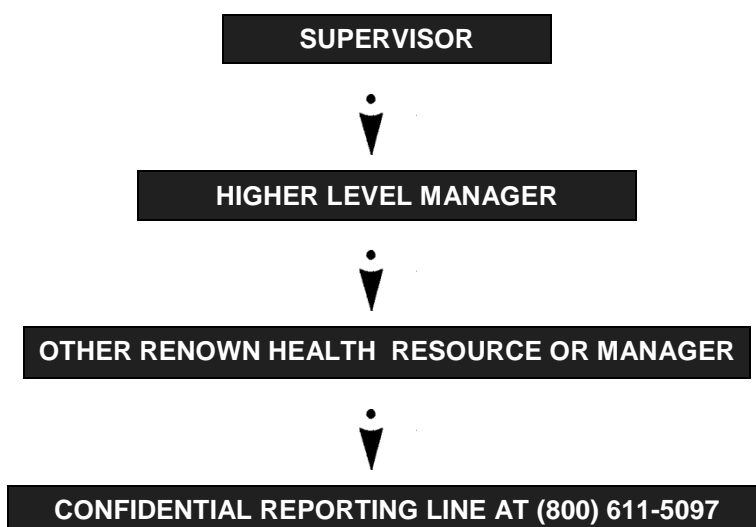
These policies are available for review by all employees. Copies may be accessed from a computer workstation within any Renown Health entity. If you need access to Inside Renown to review these policies, see your supervisor. In addition to these system-wide policies and procedures, most Renown Health businesses have processes and protocols that apply specifically to that business setting.

**When to address an issue or concern:** Quite simply, let your heart and your conscience be your guide. If you feel a sense of uneasiness about what you or another are doing, if you are worried about whether your actions will be discovered, or if you are rationalizing your activities on any basis (such as the belief that “everyone does it”), you probably should take steps to address the situation. Stop, step back, consider what you are doing, get advice, and redirect your actions to give yourself a sense of comfort that you are doing the right thing.

**Obligation to Report Violations; Non-retaliation policy:** An employee has an obligation to report suspected violations of the law and Renown Health policies & procedures if he or she reasonably believes that a violation may have occurred. If an employee reports a suspected violation in good faith, Renown Health cannot and will not retaliate against the employee.

**Reporting an issue or concern:** The Renown Health “Decision Tree” guides the process for reporting compliance issues and concerns.

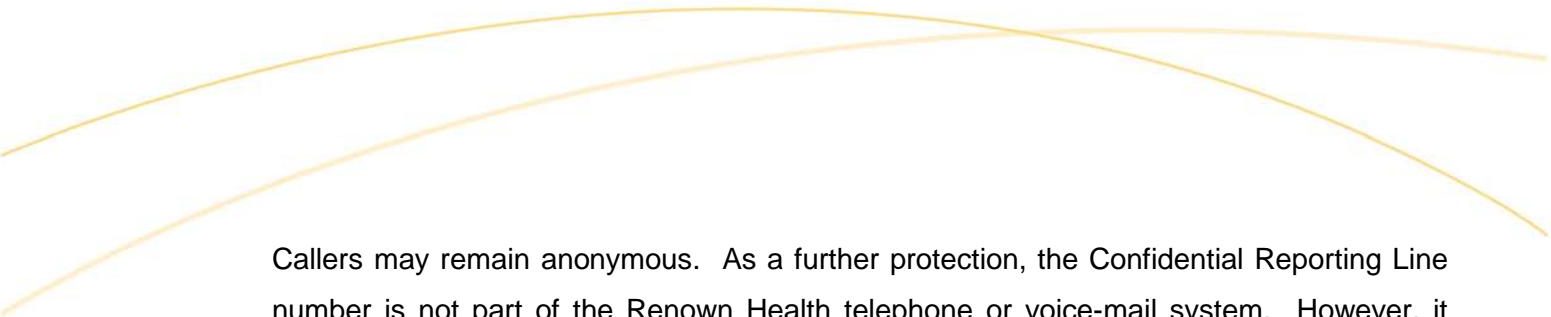
**Renown Health Decision Tree**



- First, discuss your issue or concern with your supervisor. If you are uncomfortable with this option, go to the next step.
- You may discuss the matter with a higher level manager. If you are uncomfortable with this option, go to the next step.

- A number of other Renown Health resources are available. Many issues may be appropriately discussed with a specific department. As an example, personnel or workplace conduct issues (such as harassment) should be discussed with a representative of the Human Resources Department. The Renown Health Privacy Officer, Information Resources Department or Medical Records personnel can help with questions or concerns about security and confidentiality of information.
- The Renown Health telephone directory can serve as a resource for other individuals or departments with whom you can discuss your situation. If you are uncomfortable with these alternatives, go to the next step.
- Individuals also can report concern using the confidential reporting form. This form can be found on the Corporate Compliance web page on Inside Renown, Renown Health's intranet. Completed forms may be submitted electronically or printed and mailed to the Corporate Compliance Officer.
- Renown Health also provides a Confidential Reporting Line. Callers may call the Confidential Reporting Line at **(800) 611-5097**. This telephone line, administered by the Corporate Compliance Officer, may be used by employees, patients, and others to report perceived violations of laws, policies or procedures.

The Corporate Compliance Officer or designee will assess all calls and determine if additional information is necessary to develop an investigative plan. All matters reported will be investigated promptly by persons having a sufficient level of expertise or knowledge of the issue reported.



Callers may remain anonymous. As a further protection, the Confidential Reporting Line number is not part of the Renown Health telephone or voice-mail system. However, it should be noted that callers who would like a response or are willing to provide additional information (if needed) must disclose their name. In these instances, every effort will be made to preserve the caller's confidentiality and privacy. Callers can report concerns without fear of retaliation.

**Confidential Reporting Line: (800) 611-5097**





## **QUESTIONS ABOUT ADDRESSING ISSUES AND CONCERNS**

**Q: If I report something suspicious, will I get in trouble if my suspicion turns out to be wrong?**

A: You have a responsibility to report suspected problems. Renown Health will not retaliate against anyone who reports a suspicion or violation in good faith. However, if an employee reports a concern in a manner intended to harm or retaliate against others, that conduct will be a violation of policy and will be subject to investigation and discipline. For further guidance, see the Confidential Reporting Line Policy on Inside Renown website.

**Q: What should I do if my supervisor asks me to do something that I think violates the Code of Conduct, company policy, or is illegal?**

A: First, seek clarification from your supervisor to avoid miscommunication. No matter who asks you to do something, if you know it is wrong, you must not do it.

If you suspect something is wrong or that you are being asked to behave inappropriately, and if communication with your supervisor fails to resolve the issue, you must exercise your best judgment about the situation and whether there is a risk to personal safety or quality of patient care. Regardless of your decision, you should report the incident to the level of management above your supervisor or to the Confidential Reporting Line.

