

MaineGeneral Health Code of Ethical Conduct



Chuck Hays
CEO, MaineGeneral Health
President and CEO
MaineGeneral Medical Center

Dear Colleagues,

This Code of Ethical Conduct applies to everyone who is a member of the MaineGeneral Health family, including members of the Board of Directors, employees, consultants, clinical staff, residents, students and volunteers.

Just as we take pride in our reputation as an organization of outstanding and compassionate health care providers, we are equally proud of our commitment to legal and ethical conduct.

Please review the Code carefully and become familiar with its content. Each of us is responsible for upholding these principles, without exception. If you have any questions about the Code, you should contact your supervisor or the Corporate Ethics and Compliance Officer.

Core Compliance Principles

- Honest and ethical conduct
- Compassionate caregiving
- Dedication to professional excellence
- Teamwork
- Adherence to laws, regulations and policies
- Respectful environment
- Zero tolerance for criminal or inappropriate conduct
- Effective communication

Our Code

This Code of Ethical Conduct has been created for the benefit of the entire MaineGeneral Health family. It exists in addition to the requirement that we follow the laws, policies, procedures, bylaws and rules that guide our work.

If it concerns you, it concerns us.

**MaineGeneral Health
Compliance Helpline**

621-9350

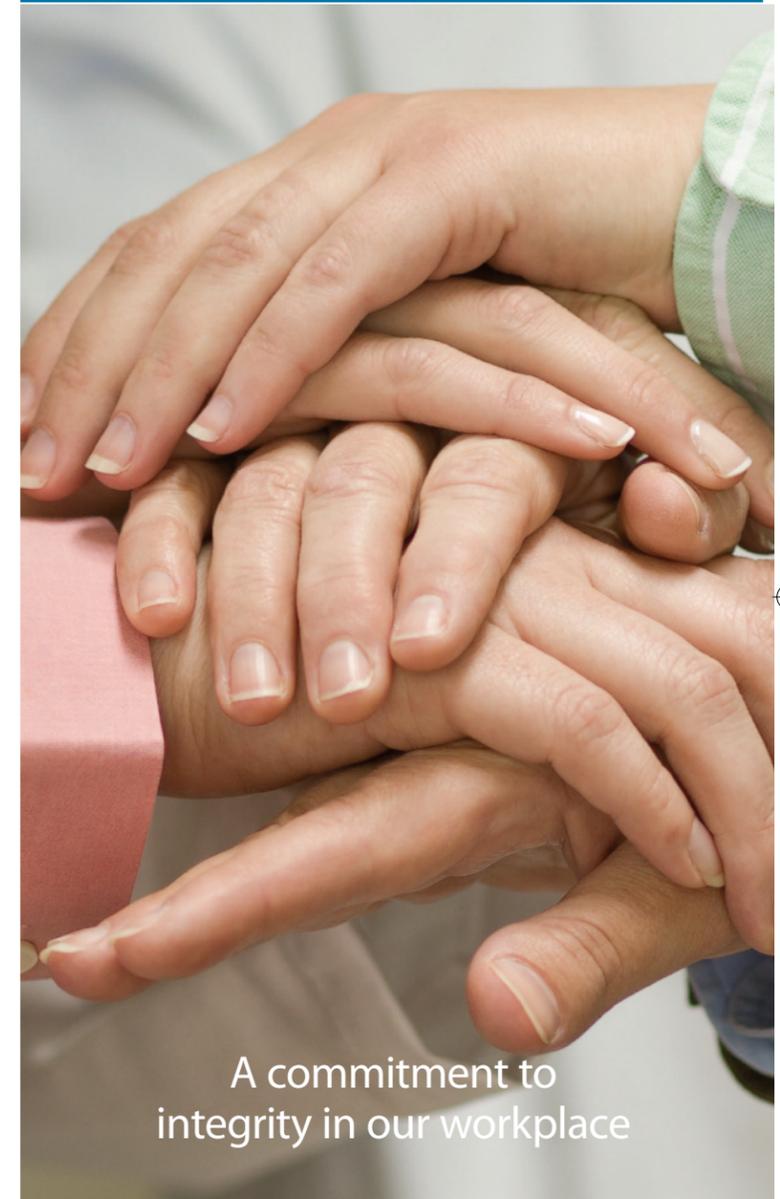
You may report anonymously

Compliance is everyone's responsibility.



MaineGeneral Health
MaineGeneral Medical Center
MaineGeneral Rehabilitation & Long Term Care
MaineGeneral Retirement Community
MaineGeneral Community Care

MaineGeneral Health Code of Ethical Conduct



A commitment to
integrity in our workplace



Core Compliance Principles

Honest and ethical conduct

Compliance with highest ethical standards.

We are committed to maintaining the highest ethical and professional standards and to acting with integrity in all of our activities. We pledge to treat our patients, visitors and fellow workforce members with courtesy, dignity, honesty and respect.

Avoid conflicts of interest.

As members of the MaineGeneral Health workforce, we agree to:

- (1) faithfully and honorably carry out our duties;
- (2) avoid conflicts between our personal interests and our official responsibilities;
- (3) refrain from utilizing any position within MaineGeneral Health for personal gain or benefit;
- (4) report, in good faith, actual or potential conflicts of interest;
- (5) avoid not only actual conflict but any appearance of a conflict of interest as well.

Compassionate caregiving

Dedication to professional excellence

Teamwork

Compliance with the highest standards of patient care.

As members of the MaineGeneral Health workforce, we are dedicated to providing the highest quality of care and service to our patients, their families and the communities we serve. All patients must be treated with compassion and concern, and all care must be reasonable, necessary and appropriate to the situation and only provided by duly qualified personnel. We agree to properly screen and treat emergency patients in accordance with EMTALA regulations.

Teamwork is one of the keys to providing excellent patient care, and is essential to maintaining an effective compliance program. We all must work together as a team to help MaineGeneral Health provide thorough, compassionate health care services in a lawful and ethical way.

Adherence to laws, regulations, policies

Compliance with legal requirements.

We must become familiar with, and abide by, the letter and the spirit of the laws and regulations that apply to our positions and duties at MaineGeneral Health. If we are concerned about a mistake or have a question about the appropriateness of an action or inaction, we should speak to a supervisor, administrator or the Corporate Ethics and Compliance Officer. When in doubt, ASK!

Fairness - Conducting business practices with honesty and integrity.

We are expected to conduct all business with patients, payers, grantors, vendors, competitors and the academic and research community with honesty and integrity. Among other requirements, we are expected to adhere to all laws that prevent bribes or kick-backs, wrongful referrals, price fixing and improper sharing of competitive or protected information. All purchases of supplies and services must come from qualified sources and may not personally benefit an employee. We agree not to view or share protected business information unless it is part of our work.

Creation, maintenance and preservation of accurate records.

We understand that our records, documents and claims must be accurate, complete and in compliance with institutional and governmental requirements. We bill only for services actually provided and medically necessary, which are supported by required documentation. All bills must conform to applicable legal and payer requirements.

Compliance with environmental and occupational safety regulations.

We comply with the health and safety laws, regulations, policies and procedures that govern and protect all persons who come in contact with MaineGeneral Health facilities or personnel. We comply with all environmental laws, regulations, licenses, permits, approvals, storage and disposal requirements for any toxic or biohazardous materials.

Respectful environment

Zero tolerance for criminal or inappropriate conduct

Respect for patient privacy.

Just as we respect the integrity of each patient we serve, we also respect the privacy of each patient's personal and healthcare information. We comply fully with state and federal confidentiality rules; we do not publicly discuss patient information that we learn from our work; we never view patient information, either on paper or by computer, unless it is actually necessary for accomplishing our job.

Respect for the rights and dignity of employees, patients and others.

MaineGeneral Health is committed to providing an environment that respects the dignity of all employees, providers, patients, residents, volunteers, visitors and others who come into contact with any of our facilities. We are expressly prohibited from discriminating, harassing or harming anyone based upon race, religion, gender, sexual orientation, marital or parental status, national origin, citizenship or military status, age or disability. As reinforced by our Values and Standards, we are committed to maintaining a safe, healthy, courteous and appropriate professional environment.

Maintenance of a drug, alcohol and smoke-free workplace.

The illegal use, sale, purchase, transfer, possession or presence in one's system of alcohol and/or illicit drugs, as well as the smoking of any substance on the campus of any MaineGeneral Health facility, is strictly prohibited.

Standards of Excellence

Effective communication

Honest, open conversations regarding crucial concerns.

Honest communication with colleagues and supervisors is critical to effective teamwork and to helping maintain MaineGeneral Health's excellent reputation in the community as an organization with integrity. To that end, members of the MaineGeneral Health family are encouraged to discuss concerns with colleagues, supervisors, administrators, and the Corporate Ethics and Compliance Officer.

Reporting violations of this Code; promise of no retaliation; enforcement.

Open communication applies to our compliance concerns as well as to our day-to-day work responsibilities. Each of us is expected to uphold this Code of Ethical Conduct and report any suspected violation to a supervisor, a Corporate Compliance Officer, the Human Resources Department, HIPAA Privacy Officer or the MaineGeneral Health Compliance Helpline at 621-9350.

It is a violation of this Code of Ethical Conduct and the Corporate Compliance Program to retaliate or take any adverse action against anyone making a good faith report of a concern or potential compliance violation, whether or not the report is proven after investigation.

A report may be made anonymously (by mail or the Helpline). MaineGeneral Health, if requested, will make every reasonable effort to keep confidential the identity of anyone reporting a suspected violation, to the extent permitted by law.

Reports of suspected violations will be investigated by authorized personnel. Each of us is expected to cooperate fully with any investigation undertaken. Violations of this Code of Ethical Conduct will not be tolerated and may lead to disciplinary action, up to and including termination.