

Code of Conduct



Beaumont

A message from the CEO

Beaumont Health is committed to excellence and quality when caring for our patients, families and each other. We do this by adhering to the principles of integrity and ethical behavior as stated in the Code of Conduct, thus ensuring our success and maintaining our reputation for providing quality care to our patients as well as a workplace of choice for all our employees and physicians. Every day, we make choices as to how to behave and conduct our business and each of us is accountable for the decisions we make.

Beaumont's Code of Conduct provides you with the guidelines on how to ensure we can all meet our commitment to ethical and compliant conduct. You are a critical part of the Beaumont team. We are counting on you to be actively engaged in and promote compliance every day.

While the Beaumont Code of Conduct cannot address every situation that we may face, each of us must exercise good judgment and be committed to upholding Beaumont's Mission, Vision and Values. Should you have questions or believe a problem exists, talk to your supervisor or contact the Compliance, Audit, Accreditation and Risk department or Human Resources.

Thank you for taking an active role in making honesty, transparency and ethical behavior a part of our culture.



John Fox

A stylized, handwritten signature in black ink that reads "John Fox". The signature is fluid and cursive, with the first letters of the first and last names being significantly larger and more prominent.

*President & Chief Executive Officer
Beaumont Health*

Mission, Vision and Values

Beaumont Mission

Compassionate, extraordinary care every day.

This is our core purpose. It is the framework by which we serve patients and families, make decisions, and conduct business as Beaumont.

Beaumont Vision

To be the leading high-value health care network focused on extraordinary outcomes through education, innovation and compassion.

Our vision sets our Beaumont goals. It defines our core ideals and give us direction and inspiration to achieve those goals.

Our Values

COMPASSION

RESPECT

INTEGRITY

TEAMWORK

EXCELLENCE



Our Values are the intrinsic behaviors we believe in and support. These Values foster and enable the practice of patient and family-centered care.

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Our Code of Conduct

Beaumont is committed to serving patients and families and conducting our business honestly and fairly. Each of us contributes to delivering on our mission, and we must always uphold and demonstrate the Beaumont Values.

What is the Code of Conduct?

In general, a Code of Conduct provides guidance on behavior expectations. By following the Code of Conduct, everyone can contribute toward the success of an organization. The Beaumont Code of Conduct sets out commitments for how each of us should act so we make decisions consistent with Beaumont's Values and culture.

Our Code describes the behavior that is required of employees, physicians, volunteers and all who do business with or on behalf of Beaumont. It provides information you need to know to comply with relevant laws. By applying our Code of Conduct commitments, we create an ethical environment for all aspects of our work.

At Beaumont, our Code also supports a Just Culture helping us create and sustain a culture of safety.

Beaumont supports an open, fair and Just Culture by:

- proactively managing risks and behavioral choices;
- designing safe systems;
- responding in a fair and consistent manner to adverse events;
- learning through transparent dialogue about risks and safety expectations.

What is compliance?

Compliance simply means acting in accordance with all relevant laws, rules, regulations, and standards applicable to Beaumont. It also includes following all Beaumont policies and procedures.

Consequences of non-compliance

Our Mission and Values are extremely important to our organization. Following the commitments in this Code of Conduct supports us in making good decisions every day.

It is essential that all workforce members, including employees, physicians, volunteers, vendors and others comply with the Code of Conduct. Non-compliance with the commitments in this Code or other Beaumont policies and procedures will be investigated. Workforce members may be subject to disciplinary measures for violations, including possible termination of employment, hospital privileges, and business relationships.

Each of us must ensure that we:

- Behave in an ethical manner.
- Understand and comply with this Code of Conduct.
- Raise any concerns regarding potential violations.

Nothing in this Code of Conduct or the policies that support the Code is intended to prevent any of us from engaging in or declining to engage in lawful conduct protected by the National Labor Relations Board.

Beaumont's commitment to patients, families and communities

No matter what our role is or where we work within Beaumont, all of us serve our patients and families. It's our common purpose, inspired by our Mission to provide compassionate, extraordinary care every day.

We are committed to keeping patients and families at the center of all we do. We use our resources to benefit our patients and provide medically necessary care at the highest levels of quality, safety and service. We also support the health and wellness of our communities through education, outreach and programs.

We ensure that individuals are not excluded from participating in, denied the benefits of, or subjected to discrimination under any health program or activity that is provided through Beaumont, based upon race, color, national origin, age, disability, sex, sexual orientation, gender identity, or religion.

Patient and family-centered care is our approach to care delivery and is based on four core concepts: respect and dignity; information sharing; participation; and collaboration. It's how we work with patients and families as partners in care rather than doing to or for them. It's central to our strategy and puts our Mission, Vision and Values into action.

Each of us plays a vital role in providing our patients compassionate, extraordinary care every day. Living our Mission through our Values — Compassion, Respect, Integrity, Teamwork and Excellence—creates our Culture of Caring Partnerships that places patients and families in the center of everything we do.

Creating and supporting our Culture of Caring Partnerships and PFCC are the foundation for Beaumont's strategic programs and initiatives such as family presence, quality, workplace of choice and our service model.

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Beaumont's commitment to Workplace of Choice

At Beaumont, our employees are our core. We strive to find and motivate the very best team. We want to create an environment that inspires each of us to do our best every day, committing ourselves to the Beaumont Health Mission, Vision and Values.

We recognize that Beaumont employees are our most important asset and we ensure that we follow a fair and consistent recruitment process. We treat each other with dignity and respect. We do not engage in, or tolerate, violence or harassment.

Diversity and inclusion

Beaumont values and promotes diversity in every aspect of our business and at every level of our organization. Beaumont believes diversity is important to our organization, and our hiring practices support this. We aim to ensure there is equal opportunity for all, regardless of race, color, religion, gender, sexual orientation, disability or any other characteristics.

Collaboration and inclusiveness are central to how we work because the best solutions are often those that draw on our diverse ideas and perspectives. Beaumont leaders and employees help create an environment where all team members can contribute, develop and fully use their talents. We keep an open mind to new ideas and listen to different points of view.

We recognize and celebrate the importance of diversity in our workplace so we are as diverse as the patients and families we serve.

Non-discrimination

Beaumont does not condone discrimination based on race, color, national origin, age, disability, sex, sexual orientation, gender identity, religion or any other factor as governed by law. We act fairly when hiring any individual or contracting with suppliers.

Equal opportunities

We are committed to equal opportunities in employment. We all share responsibility for treating each other with mutual respect. We must ensure that these standards are maintained throughout Beaumont, by each of us all the time.

We want to ensure that every employee feels comfortable in the workplace and we must always show respect for each other. If an individual has any concerns in relation to the way they have been treated,

we encourage raising these concerns with their leader, contacting Human Resources, reaching out to the CAR team or reporting anonymously using our Trust Line at 800-805-2283.

Beaumont's commitment to integrity and individual accountability

Each of us at Beaumont must act with honesty, integrity and fairness in all dealings. We are accountable for our actions. As a Beaumont workforce member, you are responsible for reading and understanding this Code of Conduct. Each of us must demonstrate behavior consistent with Beaumont's commitments.

Accurate and honest business recordkeeping and management

Acting with integrity requires us to ensure that all our patient records, financial records, coding, billing, cost and financial reporting reflect the true nature of the services provided. We are responsible for ensuring that our books and records are full, fair, accurate, timely and understandable reflections of our operations and business activities.

We do not condone, under any circumstances, the creation of any patient or business records or documents that are false or inaccurate or which intend to mislead, misguide or conceal. If you have a concern about accurate record keeping, you can talk with your leader, the CAR team or call our Trust Line at 800-805-2283.

We must also ensure we follow our records management policies which establish uniform procedures for storing, retaining and destroying Beaumont records, in accordance with applicable federal, state and local laws. However, in the event of investigations of alleged wrongdoing or as required by court order, destruction of relevant corporate records under the policy shall be suspended as necessary and appropriate under the Office of the General Counsel's directive.

Use of Beaumont assets

Each of us has a responsibility to protect Beaumont assets. We must only use these assets for the benefit of our patients, our organization and the community. We must protect Beaumont's physical assets, name, image and reputation and ensure that assets are used only to further Beaumont's business purposes. Beaumont assets include our name, image, reputation, equipment, inventory, funds, office supplies, medical records, concepts, intellectual property, research data, strategic plans and other confidential and proprietary business

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information. Confidential/proprietary information must not be used by BH workforce, either during or after their employment or arrangement, for any non-BH purpose.

Respectful behavior

At Beaumont, we treat each other, patients and families, vendors and visitors to our sites with respect. As part of our commitment to having a respectful and inclusive workplace of choice, we do not allow harassment or bullying. We consider harassment to include language or conduct, which may be derogatory, intimidating or offensive to others.

Responsible political activity

Beaumont is a nonprofit health system and is prohibited by federal law from directly or indirectly participating in any political campaign on behalf of or in opposition to any candidate for public office. Personal political activity is allowable but must not reference Beaumont. And, personal political activity must be conducted on our personal time and with our personal expense.

Fair and honest dealings

Beaumont conducts business ethically and compliantly. Our Business Ethics and Compliance Policy sets out key principles for how we will interact with industry, vendors and other third parties. Accepting gifts or entertainment from a business contact, such as a vendor, could cloud judgment when making decisions or give the impression that the vendor is buying favorable treatment.

As we are all aware, we operate in a highly regulated industry. We must never accept gifts or bribes and must not participate in, or facilitate corrupt activities of any kind. This prohibition extends to third parties acting on Beaumont's behalf.

Giving and receiving gifts, meals, entertainment and travel may create a real or perceived conflict of interest. In some cases, those expenses could also be viewed as a kickback in violation of the law. You must obtain any required approval before accepting gifts, meals, entertainment or travel from a vendor or industry stakeholder. Refer to the Beaumont Health Business Ethics and Compliance Policy for further guidance. If you are still unsure or have questions about what steps to take, you should speak with your leader, Human Resources or the CAR team.

Avoiding conflicts of interest

We encourage positive relationships with persons who

perform professional and business services for us that benefit our patients, families and communities. At all times, however, we must avoid situations in which our personal interests conflict, or appear to conflict, with the interests of Beaumont, our patients or our Mission. Employees are expected to use their judgment and always operate in the best interest of Beaumont.

Beaumont does not pay for or accept payment

for referrals. Such acts are illegal in health care. Personal gifts are not solicited by us and the receipt of gifts is subject to Beaumont policy. Services, supplies and equipment are acquired through objective evaluations and are consistent with good business practice and fair market determinations.

Conflicts of interest may arise. We seek to ensure that these conflicts do not have an impact on business decisions or operations. All of us conducting business on behalf of Beaumont are required to disclose to the CAR team any relationship we or our immediate family members have that may be perceived to conflict with the interests of Beaumont. Further guidance on this is provided in the Beaumont Health Business Ethics and Compliance Policy.

Reasonable gifts of gratitude received from patients that are consumable and of minimal value — e.g., flowers, cakes, candy, etc. — are acceptable. Under no circumstances may gifts of cash, including gift cards, be accepted.

If guidance is needed on what steps to take, speak with your leader, Human Resources or the CAR team.

Beaumont's commitment to compliance with the law

We ensure compliance with all applicable laws and regulations. Listed below are some of the key regulatory areas that impact our daily job responsibilities:

Examples of conflicts of interest may include: vendor and payor relationships, endorsements, business courtesies, business meals, entertainment, honoraria, advisory boards, consulting, royalties, stocks & bonds, real estate or other financial interests.

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Stark

The intent of the Stark law is to ensure medical decisions and actions are in the best interest of the patient. The Stark law policy goals are to prevent over-utilization and protect federal health care program funds.

Physicians cannot refer Medicare or Medicaid patients for specified designated health services to an entity with which the physician, or their immediate family member, has a financial relationship. For example, a physician cannot refer patients to a radiology center that the physician owns unless there is a Stark law exception that applies.

The Stark law contains approximately 35 exceptions. All the exceptions have detailed criteria and all the criteria must be met to satisfy the exception.

The Stark law is complex. It includes specific definitions for physicians, entities, immediate family members and designated health services. If you have a question about a situation that has possible Stark law implications, you should contact the Office of the General Counsel or CAR team.

Anti-kickback

The Federal Anti-Kickback statute prohibits anyone from purposefully offering, soliciting, or receiving anything of value to generate referrals for items or services payable by any federal health care program. The Anti-Kickback statute addresses exchanges of anything of value for referrals. The statute calls this "remuneration," and it includes exchange of cash, free goods or services, discounts, below market rent or other relief of financial obligations.

Although there may be legitimate reasons for the remuneration, if one purpose is to induce referrals, then the Anti-Kickback statute has been violated.

The Office of Inspector General has created over 20 safe harbor exceptions. Compliance with these safe harbors is voluntary, but you must meet all the conditions to qualify for safe harbor protections. Compliance with the Anti-Kickback statute can be complicated. Direct questions to the Office of the General Counsel or the CAR team.

Data privacy and security

As individuals and as a team, we are committed to treating people with dignity, honor and respect. This includes our pledge to protect our patients', employees', and other individuals' information.

Beaumont is required by state and federal law, and is

strongly committed, to safeguard the confidentiality of personal and protected health information. One way to honor our commitment is to treat the information our patients and others share with us with the utmost care. Only access information when our policy allows you to do so. Any breach of this obligation to maintain the confidentiality of protected health information will be viewed very seriously and will result in discipline, including possible termination of employment.

We prove to our patients and each other that we are worthy of trust when we protect their information. We also create an environment whereby our patients feel comfortable sharing the information we need to provide the best care available; and our team feels respected as well.

We should all take necessary actions to ensure that Beaumont data is protected at all times. This includes:

- locking computer screens
- clearing desks of paper with protected information
- Maintaining the security of our systems access credentials (*passwords, access cards and electronic tokens*)
- shredding and disposing of data appropriately when it is no longer needed
- avoiding leaving documents in the open

Fraud, waste and abuse prevention

Beaumont continually monitors and enhances its compliance and enterprise risk programs to ensure these programs have an appropriate focus on fraud, waste and abuse prevention and detection. Our anti-fraud, waste and abuse program encompasses multiple fraud risk management controls and necessary oversight across multiple internal departments. Beaumont requires workforce members, vendors and other stakeholders to refrain from conduct that may violate fraud and abuse laws, including but not limited to laws that prohibit:

- direct, indirect or disguised payments in exchange for the referral of patients;
- submission of false, fraudulent or misleading claims or bills, including claims for services not rendered or

claims that do not otherwise comply with applicable payer requirements;

- 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.

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The CAR team oversees Beaumont's Fraud, Waste and Abuse Prevention Program, including investigations and corrective action plans. Workforce members are encouraged to contact the Department or the Trust Line 800-805-2283 if they have concerns or to report fraud, waste and abuse.

Antitrust laws

Beaumont is committed to conducting business in a manner that helps maintain a free and competitive market. Activities that would restrain a competitive market, even artificially, are contrary to that philosophy and to federal and state antitrust laws. Of particular importance is the prohibition on agreements or joint conduct between competitors that harms competition. This includes a prohibition on collaborating with a competitor to decide what to charge for products or other services, or what to pay for services.

To avoid any implication of an antitrust violation, workforce members should never discuss sensitive business information with a competitor. Never exchange pricing information or communicate with a competitor about prices, or anything that may affect prices, or customers. Antitrust laws are complex. Direct any questions about permissible or impermissible conduct to the Office of the General Counsel.

Raising concerns

What should I do if I have a concern about the Code of Conduct?

We all have an obligation to uphold the Beaumont commitments. All of us are required to raise concerns, in particular when we feel that an action represents a violation of our Code.

There are several options for raising concerns.

- At Beaumont, we operate an open-door policy and any management leader can be approached with a concern.
- Concerns regarding our Code can be raised to the Human Resources team.
- Contact the CAR team directly through the Beaumont Health intranet.
- Concerns can also be reported directly to the Beaumont Chief Compliance Officer, Dawn Geisert, at 248.213.3304 or dawn.geisert@beaumont.org.
- Make a report by calling our Trust Line at 800-805-2283 at any time, day or night. We will respect

the confidentiality of individuals reporting anonymously at all times, so long as it is legally possible.

When reporting a concern, you can trust that it will be investigated without retaliation.

Beaumont prohibits retaliation against any individual making a complaint in good faith. No action will be taken against individuals who have a genuine concern, even if proven not to result in a compliance issue. However, any consciously false or misleading allegations may result in a breach of our Code of Conduct.

What if I am unsure about the activity?

If you are ever unsure about whether any action constitutes a violation of our Code, you should ask the following questions:

- Is it legal?
- Is it fair and honest?
- Is it unethical or improper?
- How would the actions look to others?
- Can I justify the decision?

Help from your leader or the CAR team is always available.

RESOURCES

Your manager is usually the best place to start getting answers to your questions and concerns.

You can find more information about the Compliance, Audit, Accreditation and Risk Department at:

<http://intranet.beaumonthealth.org/Departments-Services/CAR/>

- Trust Line – **800-805-2283**
- Conflict of Interest, physician compliance concerns – **248-551-1820**
- Revenue Cycle, 340b, and joint venture compliance concerns – **313-791-4762**
- Privacy, Post-Acute, and research compliance concerns – **877-471-2422**
- Human resources – **contact site specific HR department**
- Patient Safety and Quality – contact site specific administration office
- Patient Rights (Questions, Complaints, etc.) – **313-586-5847**
- Professional coding or billing questions – **248-551-5120**
- Environmental Safety – **248-551-8826**