



WORKING WITH **INTEGRITY**

2019 Code of Business Conduct

Effective: May 21, 2019

- Allegheny Clinic
- Allegheny Clinic Medical Oncology
- Allegheny Health Network
- Allegheny Health Network Home Infusion, LLC
- Allegheny Health Network Surgery Center – Bethel Park, LLC
- Allegheny Singer Research Institute
- Alle-Kiski Medical Center
- Alle-Kiski Medical Center Trust
- Canonsburg General Hospital
- Canonsburg General Hospital Ambulance Service
- Forbes Health Foundation
- HMPG Pharmacy LLC
- HMPG Inc.
- Jefferson Hospital
- Jefferson Physician Practices
- Klingensmith, Inc.
- Lake Erie Medical Group
- McCandless Endoscopy Center
- Monroeville ASC LLC
- North Shore Endoscopy Center
- Palladium Risk Retention Group, Inc.
- PDL Distribution Services LLC
- Peters Township Surgery Center, LLC
- Physician Landing Zone
- Physician Partners of Western PA LLC
- Premier Medical Associates, PC
- Premier Women’s Health
- Provider PPI LLC
- Saint Vincent Affiliated Physicians
- Saint Vincent Consultants in Cardiovascular Diseases, LLC
- Saint Vincent Endoscopy Center, LLC
- Saint Vincent Foundation for Health and Human Services
- Saint Vincent Hospital
- Saint Vincent Health System
- Saint Vincent Medical Education & Research Institute, Inc. d/b/a Saint Vincent Medical Group
- Suburban Health Foundation
- West Penn Allegheny Health System, Inc.
- West Penn Hospital Foundation
- Westfield Memorial Hospital, Inc.
- West Penn Allegheny Health System, Inc. d/b/a Allegheny General Hospital
- West Penn Allegheny Health System, Inc. d/b/a Forbes Hospital
- West Penn Allegheny Health System, Inc. d/b/a West Penn Hospital

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Integrity is a firm adherence to a code or standard of values.

- Webster's Dictionary

MESSAGE

Allegheny Health Network's brand stands for trust and confidence. This trust is based on our persistent commitment to our vision to be the recognized leader in structuring, financing, and delivering high quality, affordable health care. Conducting ourselves with the highest level of integrity is paramount to achieving our shared vision. At Allegheny Health Network, we believe that we have many responsibilities, to our patients and customers, to those who use our services and to our business partners and to each other. We treat everyone with dignity and respect and we abide by the laws, rules, and regulations that govern our business.

The Allegheny Health Network Code of Business Conduct outlines our Principles of Integrity and provides an overview of legal requirements applicable to what we do. Allegheny Health Network employees also have responsibilities for being good corporate stewards to protect our good name and reputation. If you observe, learn of, or in good faith suspect an action or situation violates a law, regulation, Allegheny Health Network policy or any of its entities' policies or procedures, or breaches the standards of conduct defined in this Code, you must report it. Allegheny Health Network provides many resources to assist you. You may contact your manager, Human Resources, Integrity and Compliance Department, or the Helpline. All questions and concerns will be treated confidentially and will be promptly addressed.

The information contained in this Code is the framework for making business decisions that will ensure that we are fulfilling our responsibilities with integrity. Therefore, to encourage all employees to speak up when they have questions or concerns or experience wrong doing, Allegheny Health Network has a no retaliation or intimidation policy. This means retaliation or intimidation against those who, in good faith, report concerns or wrong doing to management, Integrity and Compliance Department, or to a government agency is prohibited.

We encourage you to read, become familiar with your responsibilities, and to practice the Integrity Process outlined in this Code. Allegheny Health Network leaders have the additional responsibility to make compliance with this Code a vital part of our business. Every member of Allegheny Health Network's Board of Directors and leadership team is fully committed to conducting company business according to the Code of Business Conduct and in setting the ethical tone of the company.

Thank you for supporting a corporate-wide culture of working with integrity.



Cynthia Hunderfean

President and Chief Executive Officer,
Allegheny Health Network



David A. Blandino, M.D.

Chairman of the Board,
Allegheny Health Network



Melissa M. Anderson

Executive Vice President, Chief Auditor
and Compliance Officer, Highmark Health

INTRODUCTION

Standards of Business Conduct

The Allegheny Health Network Code of Business Conduct (“the Code”) establishes the standards of business conduct expected of all of us and reflects our commitment to the highest standards of ethical business conduct. This Code provides the foundation for carrying out our daily activities within appropriate ethical and legal standards.

The Code applies to all members of the Board of Directors, officers, employees, non-employee medical staff, students, and volunteers of Allegheny Health Network herein referred to as “workforce members,” as well as contractors and vendors. These standards apply to all our relationships with our patients, customers, suppliers, and each other.

The Code provides a process for complying with our legal and ethical responsibilities and requirements, and to ensure that no one is forced to act in an unethical or illegal manner. In addition, the Code reinforces the principle that each and every one of us has a responsibility to help ensure that as a company, we operate legally and ethically in our business conduct.

Publication and Amendments

This Code will be maintained and posted on the Allegheny Health Network website at www.ahn.org. Because this Code is revised periodically, the most current version is always available on the website.

MISSION, VISION, VALUES



To create a remarkable health experience, freeing people to be their best.

MISSION



A world where everyone embraces health.

VISION



- People matter
- Stewardship
- Trust
- Integrity
- Customer-Focused Collaboration
- Courage
- Innovation
- Excellence

VALUES

WHAT WE VALUE



People Matter

Every person contributes to our success. We strive for an inclusive culture, regarding people as professionals, and respecting individual differences while focusing on the collective whole.

Stewardship

Working to improve the health of the communities we serve and wisely managing the assets which have been entrusted to our care.

Trust

Earning trust by delivering on our commitments and leading by example.

Integrity

Committing to the highest standards encompassing every aspect of our behavior including high moral character, respect, honesty, and personal responsibility.

Customer-Focused Collaboration

Because no one person has all the answers, we actively seek to collaborate with each other to achieve the right outcomes for our customers.

Courage

Empowering each other to act in a principled manner and to take appropriate risks to do what is right to fulfill our mission.

Innovation

Committing to continuous learning and exploring new, better, and creative ways to achieve our vision.

Excellence

Being accountable for consistently exceeding the expectations of those we serve.

CORE BEHAVIORS



Customer First

We place the customer at the center of everything we do!

- We put ourselves in the customers' shoes
- We anticipate our customers' needs
- We simplify the customer experience
- We deliver solutions that go a step beyond
- We appreciate our customers' loyalty to Highmark Health



Trust Working Together

We collaborate to achieve shared success!

- We involve the right partners at the right times
- We treat each other with honesty and respect
- We influence through relationship and not through position
- We trust one another to make the right decisions and do the right things
- We share risks and rewards



Transformational Leadership

We are driven to create the future of healthcare!

- We inspire through vision and action
- We are proactive in driving change
- We are authentic in who we are and what we do
- We embrace courageous conversations
- We challenge ourselves to continuously improve



Purposeful Execution

We value outcomes, not activity!

- We set clear priorities and expectations
- We take ownership of our commitments
- We take calculated risks
- We are relentless in our pursuit of excellence
- We recognize and celebrate results

Our Code of Business Conduct

While the Mission, Vision, Values and Principles of Integrity serve as a “general road map” for each of us, our Code provides more details that clarify what is required in a variety of work situations. To make the Code more practical, we have organized it into six Guideposts.

1. **Committing to Integrity and Compliance**
2. **Seeking Advice and Reporting Concerns without Fear of Reprisal**
3. **Complying with Legal and Regulatory Requirements**
4. **Conducting Business in the Best Interest of Allegheny Health Network, our Patients, and Customers**
5. **Maintaining a Safe, Respectful, and Dignified Working Environment**

The Code is a tool which helps you decide the right thing to do in each situation. In the final analysis, honesty should always be your guide. A well-founded reputation for honest, scrupulous dealing is itself a priceless personal and company asset.



Allegheny Health Network will achieve its mission and goals if each of us guards its reputation. Use the Code always to do the right thing and to avoid even the appearance of impropriety.



GUIDEPOST
ONE

Committing to
Integrity and Compliance

The Allegheny Health Network Integrity and Compliance Program

To be effective, Allegheny Health Network's Integrity and Compliance Program requires everyone's personal commitment. The Program is guided by our core Values and Principles of Integrity and is designed to promote a culture that encourages ethical behavior and a commitment to comply with applicable federal and state laws, regulations, and guidance.

Ethical Leadership and Accountability

Leaders at all levels have the responsibility to set the example by always being role models of appropriate behavior. Ethical leadership at Allegheny Health Network begins with the Board of Directors and senior leaders setting the ethical direction. By incorporating "integrity" as one of Allegheny Health Network's corporate values, our leaders aspire to maintain a corporate culture that not only embraces the principle of doing the right things, but also doing things the right way.

Leaders must maintain a working environment that is free from harassment, sexual, and other; coercion of any kind, especially to perform illegal or unethical acts; and discrimination on the basis of gender, race, color, age, religion, creed, non-job-related disability, national origin, ancestry, veteran status, political affiliation, or any other status legally protected by federal, state, or local law. Our leaders must ensure that workforce members, vendors, and contractors have a platform to freely express ethical concerns and provide mechanisms for discussing and addressing such concerns. Leaders are also charged with ensuring that they have sufficient information and resources to maintain compliance with regulatory and the Code of Conduct standards.

Management Responsibilities

Management must encourage open communication about ethical and compliance issues that may arise. A vital component of this responsibility is to communicate regularly with each person on your team and to actively promote Allegheny Health Network values and ethical standards so that all of your workforce members, vendors, and contractors understand how the Code of Business Conduct and the Integrity and Compliance Program guide them in their decision making process.

Workforce Members Responsibilities

Allegheny Health Network maintains corporate policies in a variety of areas (e.g., Human Resources, Finance, Privacy and Security, and Information Technology) which provide detailed guidance on company expectations and requirements for behavior in the workplace and while conducting company business. These policies support and supplement this Code. Annually, specific workforce members, vendors, and contractors are required to attest that they understand and agree to abide by the Code and the policies within their respective company. Employee attendance and participation in compliance program activities, including fraud, waste, and abuse training, is a job performance expectation and a condition of continued employment. Additionally, all employees are expected to cooperate and assist in the resolution of identified compliance issues.

Failure to do so may result in disciplinary action up to and including termination of employment. Allegheny Health Network provides information and training to all employees so that they have an understanding of fraud, waste, and abuse laws including the False Claims Act, whistleblower protections, and the role employees play in the Company's compliance program. By committing to these responsibilities, we will continue to meet the expectations of conducting our business with integrity.

Vendors Responsibilities

Allegheny Health Network seeks to partner with those who share our values and ethical standards. Contractors, vendors and their employees, agents and subcontractors are expected to support the standards of conduct as described in this Code and to share and subscribe to Allegheny Health Network's commitment to ethical business practices.

Contractors and vendors working with or on behalf of Allegheny Health Network are obligated to conduct business activities and interactions ethically and in full compliance with applicable federal and state laws, regulations and contractual obligations; avoid actual or perceived conflicts of interest while doing business on behalf of Allegheny Health Network; protect, use and disclose Confidential Information only as permitted or required by law and their contract with Allegheny Health Network; and, report any questionable behavior, potential violations of this Code, or suspected fraud, waste and abuse to the Highmark Health Integrity and Compliance Department.

Integrity and Compliance Program Responsibility

The Compliance Officer, who is appointed by and has direct access to the Board of Directors of Highmark Health, has overall responsibility for the Highmark Health Integrity and Compliance Program. The Integrity and Compliance Departments within Highmark Health and its Companies and Diversified Businesses, collectively referred to as "Integrity and Compliance" are responsible for administering the Program under the direction of the Compliance Officer. The Compliance Officer, and Integrity and Compliance Department staff are available to offer guidance and support.

GUIDEPOST **TWO**

Seeking Advice and
Reporting Concerns
Without Fear of Reprisal

How Should I Seek Guidance or Report a Concern?

All Allegheny Health Network's workforce members, contractors and vendors are obligated to report any questionable behavior, potential violations of this Code, or suspected fraud, waste and abuse. If you are aware of or suspect unethical or illegal conduct, you have a duty to report the issue or seek guidance. You should speak with your manager, the Integrity and Compliance Department or your facility's Compliance Officer. You can also make the report anonymously through one of the following methods:



Call the Integrity Helpline (Available 24/7) at
1-877-867-7325 (1-877-TO-SPEAK)



Submit an online report (Available 24/7) at
<http://www.mycompliancereport.com>
(access code AHN)



E-Mail to: **compliance@ahn.org**

If you choose to make an anonymous report, you should provide enough information about the situation to allow us to properly investigate it. If you do not provide enough details, our ability to pursue the matter will be limited. All reports will be promptly investigated and when necessary, appropriate actions will be taken to reduce the potential for reoccurrence and to ensure ongoing compliance. Depending on the circumstances, corrective actions may include changes in business processes, coaching, disciplinary actions, and vendor contract termination. All matters will be handled with the appropriate level of confidentiality. However, if a matter necessitates the involvement of law enforcement or government agencies, information may be shared as required by law. In order to receive status updates on the matter or to provide additional information, you are encouraged to re-contact Integrity and Compliance Department, referencing the matter you have reported.

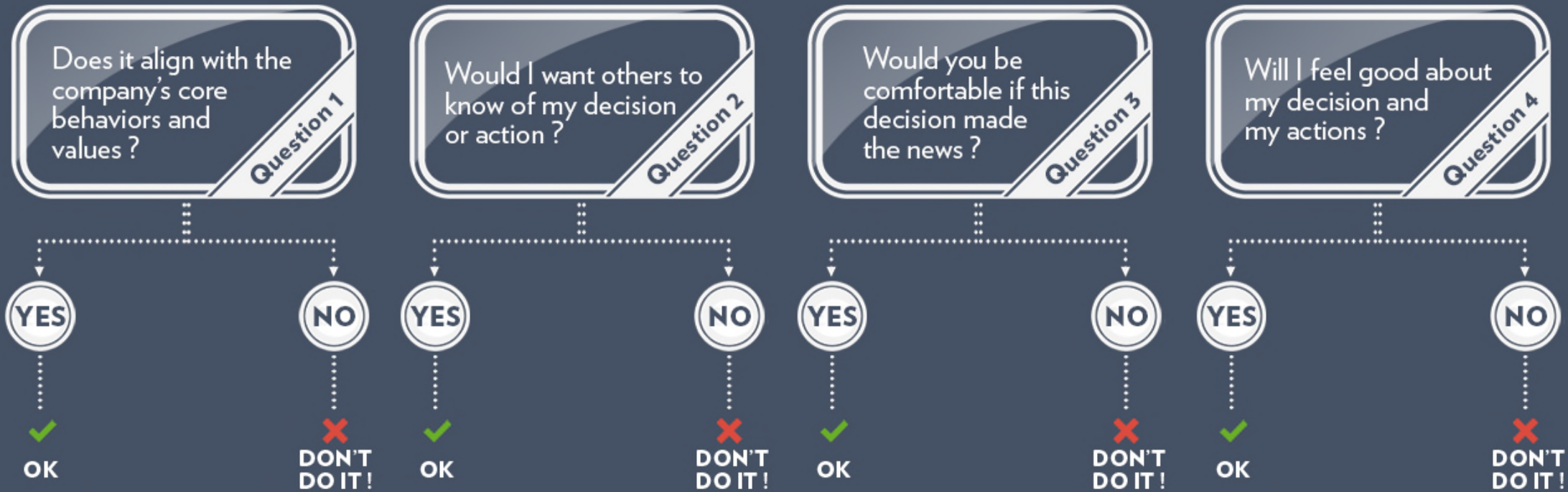
What Types of Suspected Misconduct Should be Reported to Management or the Integrity and Compliance Department?

Some examples are:

- submitting false timesheets or expense reports
- identifying an overpayment
- lying or not cooperating during an investigation
- an ethical dilemma or suspected violation of the code

ETHICAL DECISION - MAKING MODEL

When faced with a decision, ask yourself these questions:



If you answer “no” to any question, don’t do it. If you are unsure, seek the help of your management or Integrity and Compliance.

Personal Obligation to Report

It is important to remember that the designation of a Compliance Officer and the existence of an Integrity and Compliance Department in no way diminishes your individual responsibility to comply with laws and regulations, the Integrity Process, Code of Business Conduct, and related policies and procedures.

All reports of suspected violations, including all submissions to the Integrity Helpline, will be promptly reviewed by Integrity and Compliance. A thorough investigation will be conducted and an appropriate response will be implemented. In appropriate instances, Allegheny Health Network may report the matter to governmental agencies for further investigation.

All employees must report any evidence of a material violation of a law or regulation as well as breach of fiduciary duty or similar violation by Allegheny Health Network, its employees, subsidiaries, affiliates or agents to either the General Counsel or the Chief Executive Officer of Allegheny Health Network.

Disciplinary or corrective action in response to substantiated allegations is an integral part of the Allegheny Health Network Integrity Process. If you experience or are aware of any ethical or compliance concern, you have a personal obligation to report it. Knowledge of a possible violation of a law that is not reported may result in disciplinary action or termination of a contractor or vendor business relationship.

You are expected to fully cooperate with inquiries made by the Compliance Officer or Integrity and Compliance Department and respond completely and truthfully to any and all questions. You must refrain from discussing such inquiries with others to protect ourselves, the accused, and the integrity of the investigation.

Personal Obligation to Report

Good Faith Reporting is:

- raising an issue or concern in a timely manner with no ulterior motive; or raising an issue or concern that could be a violation of the Code, law, regulation, or AHN's policy.

Good Faith Reporting is **not**:

- making frivolous reports to get someone in trouble
- reporting something only when you are facing disciplinary action



QUESTION

I saw my supervisor engaged in an activity that is against the principles of the Code. The matter does not concern me personally. What should I do?

ANSWER

Even though the matter does not concern you personally, you have an obligation to report any suspected violations to the next highest level of management and/or to Integrity and Compliance. You may use the anonymous Integrity Helpline or other confidential means to report this concern. Allegheny Health Network maintains a reprisal-free environment and has a policy of non-retaliation and non-intimidation to encourage employees to raise ethical or legal concerns in good faith.



QUESTION

Will I get in trouble for reporting a violation?

ANSWER

Allegheny Health Network has a non-retaliation non-intimidation policy to assure no one will be subject to any adverse action because they report in good faith.

To report an ethics or compliance concern, call 1-877-867-7325

Protection from Retaliation and Intimidation

Allegheny Health Network maintains a reprisal-free environment and has a policy of non-retaliation and non-intimidation to encourage workforce members, vendors, and contractors to raise ethical or legal concerns in good faith. Retaliation or intimidation against those who, in good faith, report wrongdoing to management, Integrity and Compliance Department, or a government agency is prohibited. Management must refrain from speculating or questioning individuals in an effort to determine who might have reported a possible violation or cooperated in an investigation. Such behavior can give the appearance of retaliation or can be perceived as intimidation by an individual who has reported or is thinking of reporting a matter to Integrity and Compliance Department.

The federal and state False Claims Acts also protect anyone who files a False Claims lawsuit from being fired, demoted, threatened, or harassed by their employer for filing the suit. Additional employee whistleblower protections were established under the National Defense Authorization Act for Fiscal Year 2013. Similar to the False Claims Act, we cannot discharge, demote, or otherwise discriminate against an employee as a reprisal for disclosing information (except for classified information) that the employee reasonably believes is evidence of any of the following: a gross mismanagement of a federal contract or grant; a gross waste of federal funds; an abuse of authority relating to a federal contract or grant; a substantial and specific danger to public health or safety; or a violation of law, rule, or regulation related to a federal contract (including competition for or negotiation of a contract) or grant. Employees who disclose these types of information to the following persons or entities are protected: a member of Congress or a representative of a committee of Congress; an Inspector General; the Government Accountability Office; a federal employee responsible for contract or grant oversight or management at the relevant federal agency; an authorized official of the Department of Justice or other law enforcement agency; a court or grand jury; or their management or the Integrity and Compliance Department, who has the responsibility to investigate, discover, or address misconduct.

Pursuant to the Defend Trade Secrets Act of 2016, an individual may not be held criminally or civilly liable under any federal or state trade secret law for the disclosure of a trade secret that: (a) is made in confidence to a federal, state, or local government official, either directly or indirectly, or to an attorney; and solely for the purpose of reporting or investigating a suspected violation of law; or (b) is made in a complaint or other document that is filed under seal in a lawsuit or other proceeding.

Further, an individual who files a lawsuit for retaliation by an employer for reporting a suspected violation of law may disclose the employer's trade secrets to the attorney and use the trade secret information in the court proceeding if the individual: (a) files any document containing the trade secret under seal; and (b) does not disclose the trade secret, except pursuant to court order.

Disciplinary Action

Failure to comply with the Code of Business Conduct and Allegheny Health Network's policies could result in disciplinary action, up to and including termination of employment. The severity of the discipline depends on the nature of the violation.

Workforce members, vendors, and contractors should also be aware that they have an obligation to report known or possible occurrences of wrongdoing and failure to do so could also result in disciplinary action or contract termination.



When contacting Integrity and Compliance

- You will be treated with dignity and respect
- You do not have to give your name
- No caller ID is used when calling the toll-free Integrity Helpline number
- All matters will be handled with the appropriate level of confidentiality
- Your questions or concerns will be promptly reviewed and addressed
- You will be protected from any form of retribution or intimidation.

To report an ethics or compliance concern, call 1-877-867-7325



QUESTION

What happens after I report an issue?

ANSWER

All reports will be promptly investigated and when necessary, appropriate actions will be taken to reduce the potential for reoccurrence and to ensure ongoing compliance.



GUIDEPOST
THREE

Complying with
Legal and Regulatory Requirements

Strict Compliance with All Applicable Laws, Contractual Obligations, and Regulations

The activities of Allegheny Health Network and each of its workforce members, vendors, and contractors are to be carried out in accordance with applicable laws, rules, regulations, and contractual obligations. We are required to obey all applicable laws, including United States laws that have application outside of the United States and foreign laws that have application within the United States. Those who violate laws, rules, or regulations may be personally subject to individual, civil, or criminal liability as well as to disciplinary action. Our actions may also expose Allegheny Health Network to civil or criminal liability or loss of business.

This Code provides general direction on a broad range of issues; however, it is not intended to address every law and regulation in existence or in the future that could impact our jobs or Allegheny Health Network.

Because of the wide range of health care services we provide, separate policies and procedures specific to Allegheny Health Network's operations of physician practices and hospital operations have been adopted. These policies and procedures are more specific and may be more stringent than the standards set forth in this Code.

Competition and Antitrust Laws

The United States antitrust laws are designed to create a level playing field in the marketplace and to promote fair competition. Federal and state antitrust laws are intended to encourage such competition by prohibiting agreements that restrain trade, such as agreements by competitors regarding the price they will charge for their products. Other practices limiting competition, such as agreeing on product characteristics, dividing up markets, "rigging" bids for contracts and agreeing to boycott competitors or suppliers, may also violate the antitrust laws.

Under antitrust laws, competitors may not make agreements on the prices they will charge for services, the territories in which each company provide services, patients to whom each company will offer its services, or certain types of services. For example, we typically cannot agree with another hospital to not provide certain health care services that they provide. In addition, competitors may not agree on the use or non-use of suppliers or on any contract terms and conditions except in the context of participating in a group purchasing organization that complies with all regulatory requirements.

Tying arrangements exist when one company conditions the sale of goods or services on the purchase of some other, unrelated good or service. In certain circumstances, antitrust laws prohibit these arrangements. Workforce members, vendors, and contractors should seek guidance from the Allegheny Health Network Law Department if they have any questions or concerns. Members of trade associations and other industry groups are, by their very nature, competitors. You must be particularly sensitive about trade association activities that might be construed as leading toward an agreement concerning prices or services and should contact the Allegheny Health Network Law Department for advice when you have questions or concerns.



QUESTION

What are examples of conduct that is considered unfair competition?

ANSWER

Unfair competition can include stealing or misusing a competitor's trade secrets; making false statements about competitors or their products or services; obstructing competitors' supply sources; and paying bribes to help increase company business or hurt a competitor.



QUESTION

When I attend trade shows and conferences, I usually have an opportunity to meet with representatives of competitors. Is it okay for me to talk to them?

ANSWER

Yes, but you must avoid conversations about inappropriate topics such as pricing, marketing plans, labor costs, and terms and conditions of sales to customers.

Detecting and Preventing Fraud, Waste and Abuse

Allegheny Health Network is committed to preventing, detecting, correcting, and reporting fraud, waste, and abuse. We value our reputation for integrity and require everyone to act in accordance with legal, ethical, and moral standards. Allegheny Health Network provides information and training to all workforce members, vendors, and contractors so that they have an understanding of fraud, waste, and abuse, federal and state laws pertaining to the False Claims Act, and whistleblower protection under such laws.

Definitions of fraud, waste, and abuse include the following:

- Fraud occurs when workforce members, vendors, and contractors intentionally deceive or misrepresent information that they know to be false or do not believe to be true. Example: a provider billing for services that were not rendered.
- Healthcare waste occurs when there is no intent to deceive for a monetary gain, but there is inappropriate utilization and/or inefficient use of resources. Example: A provider's belief that every patient should receive an x-ray every time they have an appointment.
- Abuse includes actions that may, directly or indirectly, result in unnecessary costs to the company. Abuse involves paying for items or services when there is no legal entitlement to that payment, and the provider has not knowingly or intentionally misrepresented facts to obtain payment.

Health care fraud is most prevalent in the following areas:

- Fraudulent charting, coding phantom complications and other misrepresentations of care provided, and falsifying certifications of medical necessity, plans of treatment and medical records to justify payment.
- Billing for services not rendered, which may include unbundling charges and up-coding.
- Waiving of patient deductibles and copayments when not based on patient financial need
- Soliciting, offering, accepting or receiving a kickback in order to obtain a referral, and /or diverting business from Allegheny Health Network to a private enterprise,

Federal False Claims Act

The Federal False Claims Act applies to the submission of claims by health care providers for payment by Medicare, Medicaid, and other federal and state health care programs. The False Claims Act is the federal government's primary civil remedy for improper or fraudulent claims. It applies to all federal programs, from military procurement contracts to welfare benefits to health care benefits.

The False Claims Act provides for monetary penalties to be imposed upon a healthcare provider or individual person for knowingly and willfully making false statements or representations in connection with a filing of a claim seeking reimbursement. In the Act, the definition of "knowingly" includes actual knowledge, deliberate ignorance, and reckless disregard for the truth. The False Claims Act, state law, and organizational policies protect workforce members, vendors, and contractors who report concerns to the government related to the submission of false claims or who file a False Claims lawsuit from being fired, demoted, threatened, or harassed by their employer.

Kickbacks and Referrals

(1) The Anti-Kickback Statute makes it a crime for any person to knowingly and willfully offer or pay any remuneration, directly or indirectly, overtly or covertly, in cash or in kind, to induce a person to make referrals for services that may be covered by a federal health care program or to purchase, lease, order or arrange for or recommend purchasing, leasing, or ordering any services that may be covered by a federal health care program. The Anti-Kickback Statute also prohibits any person from soliciting or receiving any remuneration in return for making referrals for federal program-covered services or purchasing, leasing, ordering, or arranging for or recommending purchasing, leasing, or ordering any service covered by a federal health care program.

(2) The Stark Law prohibits a physician from making referrals to an entity for the furnishing of Designated Health Services (“DHS”) which include, but are not limited to, ancillary services, clinical laboratory services, outpatient prescription drug services, physical and occupational therapy, and imaging services, if the physician or an immediate family member has a financial relationship (ownership or compensation) with the entity unless an exception applies. Further, the entity may not submit a claim to or bill for DHS furnished pursuant to a prohibited referral, and no payment may be made under Medicare for DHS furnished pursuant to a prohibited referral.

Because these laws and the accompanying safe harbor provisions are complex, you should refer any questions or concerns regarding a specific transaction to the Allegheny Health Network Law Department.

Controlled Substances

Certain licensed practitioners employed by Allegheny Health Network are registered to purchase, acquire, and dispense narcotics and other controlled substances. Improper use of these substances is illegal and extremely dangerous. Allegheny Health Network complies with all federal and state laws regulating controlled substances.

Access to controlled substances is limited to persons who are properly licensed and who have express authority to handle them. No health care practitioner or researcher may dispense controlled substances except in conformity with state and federal laws and the terms of the practitioners’ license.

Unauthorized manufacture, distribution, use, or possession of controlled substances by Allegheny Health Network workforce members, vendors, and contractors is strictly prohibited. Any workforce member, vendor and contractor who know of any unauthorized handling of controlled substances should provide the information immediately to his or her supervisor or Integrity and Compliance Department.

Intellectual Property Laws

It is critical that we understand and comply with the laws governing the use of intellectual property, including those regarding copyrighted and trademarked materials. Intellectual property generally consists of documented knowledge or creative ideas that have a monetary value and are protected under copyright, patent, service mark, trademark, or trade secret laws.

A copyright is an intangible right of the creator of certain works such that he/she is the only individual allowed to copy the work, or a significant portion of it. In general, we may not copy or distribute, electronically or otherwise, any copyrighted materials unless prior written permission is obtained from the copyright owner.

A copyrighted work can usually be recognized by the symbol ©, date of publication and the name of the copyright owner displayed prominently on the work. All workforce members, vendors, and contractors are prohibited from copying, downloading, or reproducing software for personal use. In addition, Allegheny Health Network is prohibited from creating or loading any unauthorized copies of software programs.

Political Activities

As an exempt organization described in section 501(c)(3) of the Internal Revenue Code, Allegheny Health Network is prohibited from the following:

- Participating in or intervening in, including the publishing or distributing of statements in any political campaign on behalf of or in opposition to any candidate for public office.
- Using corporate funds in connection with federal elections.
- Using Allegheny Health Network corporate funds to directly or indirectly contribute to individual political campaigns or to political parties.
- The use of company resources, including workforce members', vendors', and contractors' time, or facilities to support or oppose any candidates for office. Examples of activities prohibited to be performed by employees running for elected office as a candidate or on behalf of a political candidate include, but are not limited to:
 - Use of Allegheny Health Network office supplies, facilities, or food services;
 - Purchases of prizes by Allegheny Health Network for use or consumption in a fundraiser;
 - Calling potential supporters or voters from Allegheny Health Network assets.

Allegheny Health Network will not:

- Reimburse workforce members, vendors, and contractors for any personal contributions and/or activities described above.
- Permit workforce members, vendors, and contractors to use their position to coerce another member of the workforce to work for a candidate or political organization, or to make personal contributions to a party or candidate.
- Allow political statements to be made on Allegheny Health Network letterhead or in any manner which leads the reader to believe that the statement is an official statement of Allegheny Health Network.

Allegheny Health Network recognizes everyone's freedom of choice regarding political matters. As individuals, employees may, of course, choose to participate in the political process on their own time and in the manner they choose. Employees who are personally involved in the political process must clearly identify that their actions are personal and not those of Allegheny Health Network or its family of companies. Employees must avoid conflicts of interest when serving in public office by excusing themselves from any political matters involving Allegheny Health Network and its affiliates.

Government Investigations and Interacting with Government Personnel

Appropriate handling of government investigations is very important, both for Allegheny Health Network and its workforce. Virtually all the laws regulating Allegheny Health Network's business including health care provider, antitrust, insurance, and government contracting laws contain criminal and civil penalties. Violation of these laws can result in criminal penalties not only for the company but also for individuals. It is Allegheny Health Network's policy to provide full cooperation with any government agency responsible for audits, investigations, or corrective actions.

If you are contacted by a government agency regarding an investigation related to Allegheny Health Network, you must immediately contact the Allegheny Health Network Law Department. Government officials rely upon the accuracy of oral and written statements made by Allegheny Health Network and its workforce members, vendors, and contractors. It is a violation of the law for any individual to knowingly make a false or misleading statement to a government official or representative, including auditors conducting audits on behalf of the government, in connection with a government program. In every instance, it is the obligation of Allegheny Health Network and its workforce members, vendors, and contractors to provide accurate and complete information to the government.



GUIDEPOST
FOUR

Conducting Business in the Best
Interest of **Allegheny Health Network,**
Our Patients, and Customers

Committed to Quality Patient Care

Our primary mission is to make high quality health care accessible, understandable, and affordable. We comply with the provisions of Emergency Medical Treatment and Labor Act (EMTALA), which means:

- We provide a medical screening examination and (if necessary) stabilizing treatment to all patients who come to the hospital for emergency treatment, regardless of their insurance or their ability to pay.
- In an emergency situation or if the patient is in labor, we do not delay medical screening and necessary stabilizing treatment to seek financial and demographic information.
- We do not admit or discharge patients with emergency medical conditions based simply on their ability (or inability) to pay or any other discriminatory reason.
- We only transfer patients with emergency medical conditions to another facility, in compliance with state and federal requirements, and EMTALA policies.

We treat all patients with respect and dignity and provide care that is both necessary and appropriate. We will respect and support each patient's right to competent, considerate, and courteous treatment or service within our capacity without discrimination as to gender, race, disability, age, religion, veteran status or military status, political affiliation, color, creed, national origin, ancestry, sexual orientation, or source of payment for care. While we strive to render care in an efficient manner, clinical care decisions are not based on patient financial means or business economics.

At Allegheny Health Network we provide a treatment environment where patients and their families understand their individual illnesses and make informed decisions concerning their medical care. Each patient or patient representative receives a clear explanation of care, including diagnosis, treatment plan, and an explanation of the risks and benefits associated with each available treatment option or with no treatment. We inform patients of their right to make advance directives regarding treatment decisions, financial considerations, and the designation of a surrogate decision maker for health care. Allegheny Health Network honors patient's advance directives or wishes regarding resuscitation within the limits of the law and the organization's capabilities.

Trained Professionals

We contract with and employ only healthcare professionals with proper credentials, experience, and training to meet our patients' needs. Only licensed, and where applicable, credentialed personnel will perform clinical assessments and procedures or will be supervised by those who are.

Each health care practitioner shall be duly licensed or certified and shall only provide health care services or items to patients within the scope of his/her license and/or credentials. All providers and healthcare professionals are expected to be current with their respective credentials by maintaining their licenses and through relevant educational training and teaching experiences.

Research Compliance

Research with research subjects have proven invaluable in advancing knowledge in the biomedical, behavioral, and social sciences. Such research is strictly regulated, with laws at the federal, state, and local levels. Further, professional societies have developed discipline-specific standards, policies, and guidelines to protect research subjects and to maintain the integrity of the research. Research must be conducted in strict conformity with the applicable policies, research procedures and approvals, and the requirements of all governmental and private research sponsors, as well as compliance with federal, state, and local laws.

- Billing for clinical research subjects shall conform to Allegheny Health Network Research Institute policy, regulations, and laws.
- Allegheny Health Network Research Institute policies provide local guidance for compliance with federal, state, and local laws and regulations, including protection of the rights and safety of research participants, possible conflicts of interest and/or commitment, regulatory non-compliance, and scientific misconduct.

Allegheny Health Network works to ensure that we have a safe and compliant environment for our conduct with research subjects. The program protects the rights and welfare of all those involved in the research.

Proper Use of Company Assets

By using Allegheny Health Network assets for business-related purposes only, we can deliver products and services more efficiently and cost effectively. Company assets include such things as equipment, inventory, corporate funds, and office supplies as well as intangible items such as concepts, business strategies and plans, customer information, financial data, intellectual property rights, and other business information. Workforce members, vendors, and contractors are prohibited from using company property, information, or positions for personal gain.

Communications delivered via corporate systems are not private and are, as such, subject to management review and can be subpoenaed to serve as evidence in a court of law.

Accurate and Timely Records and Financial Reporting

Our patients and customers depend on Allegheny Health Network to maintain and provide accurate information. Maintaining information and records accurately and completely is vital to the success of Allegheny Health Network's businesses. A record is defined as a book, document or any other data, regardless of the type or form. A record may be written or electronic including e-mails. Records may contain financial, medical, or operational data.

We are obligated to accurately and truthfully document our work and to not make false or misleading oral or written statements regarding such work. Allegheny Health Network workforce members, vendors, and contractors are prohibited from taking any action to manipulate, mislead, coerce, or inappropriately influence any independent auditor engaged in an audit of the financial statements of any Allegheny Health Network company.

When preparing source documents for financial transactions, it is important to provide accurate information so that costs can be allocated to the appropriate service. No payment may be approved or made with the intention or understanding that any part of the payment is to be used for a purpose other than company business. Failure to maintain accurate books and records may expose Allegheny Health Network to significant fines, as well as civil and criminal penalties.

Contracts and subcontracts on government projects often require Allegheny Health Network to submit various certifications. These contracts usually contain clauses wherein Allegheny Health Network is required to make affirmative representations about a variety of matters in addition to financial data, such as compliance with socioeconomic programs, contract specifications, environmental laws, and various procurement regulations. These certifications and representations are serious matters. Allegheny Health Network relies upon the truthfulness and accuracy of the information it receives from its workforce members, vendors, contractors, and covered personnel when it submits these certifications.

Our billing practices comply with all applicable federal and state payor requirements as well as all private payor contracts and agreements. We shall not submit claims that contain information known to be false or unsupported by the medical record. Billing staff shall not destroy any information that is considered part of the designated record other than in compliance with the record retention policy.

It is a criminal offense to destroy records that are subject to a subpoena or government investigation. Records must be maintained in accordance with departmental and corporate records' retention guidelines and must not be destroyed before the prescribed retention period has expired or until threatened or pending litigation or government investigations are concluded.

Public Representation of Allegheny Health Network

When communicating publicly, you must be cognizant of keeping your personal views separate from communications you make and actions you take on behalf of the company.

Communications with Government Officials

Employees who are part of personal membership groups (examples include, but are not limited to, local or state medical societies, specialty physician societies, pharmacist trade association, etc.) and are planning to participate in an advocacy action on behalf of that trade group must notify the Government Affairs Department. For example, an employee who is called to testify or write a letter in support or opposition of regulation is not permitted to represent the Company in any form unless expressly permitted by Government Affairs.

Additionally, any public communication on a public policy on behalf of the Company must be done under the direction of the Government Affairs Department. Employees are required to comply with Corporate Policy 22.02 – Communications with Government Officials as well as all applicable federal, state, local, and corporate codes of conduct and requirements when representing the Company before government bodies and officials.

Interacting with the Media

To ensure that the views of Allegheny Health Network are accurately depicted and appropriately and consistently represented in public, all news media communications must be coordinated through Corporate Communications and Public Relations. You should not be interfacing directly with the media on behalf of Allegheny Health Network.



QUESTION

I realized after the fact that I neglected to document something on a patient's medical record. Can I go back and add it?

ANSWER

Changes/additions can be made to the medical record only by using an addendum that is properly signed, dated, and timed.



PASS THE WORD

To allow others access to your work files while you are on vacation or away from work...

- Move the files to a secure shared drive within your department
- Consult with your management to determine other options or to assign a surrogate

You are responsible for systems accessed under your logon ID. Sharing your user credentials with anyone is prohibited.

Participating in Social Media

Participation in social media on behalf of Allegheny Health Network must be coordinated through Corporate Communications and Public Relations. When you speak, write, or participate in public forums or social media networks, do not associate Allegheny Health Network with your own personal opinion. Workforce members, vendors, and contractors participating in social networking on their own time must not publish content that is Allegheny Health Network's property and/or could damage Allegheny Health Network's business reputation or the business reputation of its patients, customers, and providers.

Endorsing Other Organizations or Products

As a general rule, Allegheny Health Network's workforce members, vendors, and contractors shall not provide testimonial statements that could be used as an advertisement for vendors or their products unless supported by Allegheny Health Network. If you receive a request for an endorsement of an external entity, you must consult with Integrity and Compliance before you respond to such request. For the purpose of this Code, an endorsement means any promotional message reflecting opinions or experiences of a third party's services or products that the third party could use for advertising purposes. References provided for vendors in the ordinary course of business are not considered endorsements.

Protecting Allegheny Health Network's Confidential Information

Allegheny Health Network has strict compliance requirements and expectations with respect to safeguarding and proper use of patient data. Patient data includes information about co-workers, friends, relatives, celebrities, or anyone else who receives care at Allegheny Health Network. All of us are expected to strictly comply with applicable laws and company policies regarding the privacy and security of data. We must safeguard all of the company's Confidential Information, including, but not limited to Protected Health Information (PHI), Personally Identifiable Information (PII), Proprietary/Trade Secret Information, and Competitively Sensitive Information (CSI). All of us must strive to prevent improper use or disclosure of, or access to, Confidential Information. Even after our employment ends, this obligation continues to remain in effect.

All information that is maintained by the company is classified into three major categories: Public Information, Government Information, and Confidential Information. The information within each category may be subject to specific access, use, and disclosure policies and approval processes.

Public Information

Public information represents all information created or received by the company that is generally found in the public domain and is not otherwise sensitive, confidential, classified, or secret. There are no special use or disclosure requirements regarding this information.

Government Information

Most of the information relating to government contracts is government property. Certain government contracts prohibit the use of government-owned information or data to further Allegheny Health Network's private business endeavors. Release of such data, even to our own subsidiaries, without the permission of the relevant government entity is not permitted.



QUESTION

I am working on a project that is due tomorrow. I need to access my large spreadsheet to complete my work from home later tonight. May I e-mail my spreadsheet to my personal Gmail account so I can finish my work at home tonight?

ANSWER

No. You are strictly prohibited from e-mailing any Allegheny Health Network Confidential Information, including protected health information, to a personal e-mail account (e.g., Gmail, Yahoo, Hotmail, etc.) If you wish to work remotely, you must request VPN capability to access your Allegheny Health Network desktop and system applications.

Confidential Information

Confidential Information includes all sensitive or classified information either generated by the company or made available to the company for purposes of conducting its business operations. Confidential Information is further subdivided into the following nine (9) categories: Financial Information, Human Resources Information, Group Customer Account Information, Proprietary Information, Provider Information, CSI, PHI, Personal Data and PII.

For additional information concerning appropriate use and disclosure of this data, refer to the “Highmark Health Preserving Trust through Privacy and Information Management and Procedures” handbook or to Policy 16.04, “Information Use, Management, and Disclosure” (PolicyStat ID 2710180). You may also contact the Data Ethics, Policy, and Privacy Department (AHNPrivacy@ahn.org) or your facility’s Privacy and Data Ethics Official for additional information.

Allegheny Health Network maintains data used in its business operations in strictest confidence, and according to established ethical standards and applicable federal and state laws and regulations.

Competitively Sensitive Information

Competitively Sensitive Information (CSI) is non-public information held by Allegheny Health Network which includes: past, present, and future reimbursement rates and rate schedules; contracts with providers; contracts with payers; any term or condition in a payer-provider agreement that could be used to gain an unfair commercial advantage over a competitor or supplier, including but not limited to discounts, reimbursement methodologies, and provisions relating to performance, pay for performance, pay for value, tiering of providers, cost data and methodologies including specific cost and member information and revenue, or discharge information specific to the payer or provider; contract negotiations or negotiating positions, including but not limited to offers, counteroffers, party positions, and thought processes; specific plans regarding future negotiations or dealings with payers or providers; and claims reimbursement data.

All Highmark Health Companies have adopted a policy for the protection of CSI. These policies prohibit the sharing of CSI publically and among certain corporate affiliates of Highmark Health. The improper sharing of CSI could result in the reduction of competition, competitive innovation, or pricing, as well as notice to the Pennsylvania Insurance Department (PID) and potential fines or penalties. Workforce members, vendors, and contractors should refer to Allegheny Health Network’s “Protecting Competitively Sensitive Information” policy on AHN.org to understand their obligations. Questions concerning specific uses of CSI should be submitted to Infomgmtdecisions@highmarkhealth.org.

Protected Health Information

Protected Health Information (PHI) is defined as any identifiable information that relates to the patient's past, present, or future physical or mental health condition, receipt of health care, or payment for their health care. Given the highly personal and sensitive nature of PHI, Allegheny Health Network expects the company's workforce to treat PHI with respect and in accordance with all applicable laws and corporate policies. We are committed to protecting the privacy and security of patient information. Safeguarding such information is every workforce members' responsibility, as well as the responsibility of vendors and contractors.

Workforce members, vendors, and contractors have access to information regarding patients' and their care (such as the patient's health condition, finances, or insurance information) as necessary to perform a legitimate job function. Workforce members, vendors, and contractors must comply with Allegheny Health Network's onboarding and annual privacy and security refresher trainings. Workforce members, vendors and contractors shall only use or disclose Confidential Information in compliance with Allegheny Health Network's information management policies and applicable laws. Federal and state laws impose a variety of obligations on Allegheny Health Network, its workforce and its vendors to protect the privacy of patient information. Accessing information about patients without a business need to know, or disclosing information about patients to anyone other than authorized recipients, can have serious consequences for workforce members, vendors, contractors, and Allegheny Health Network.

The patient is the owner of the health information contained in their medical record, and Allegheny Health Network is the keeper and custodian of that medical record. The medical record documents a patient's condition and the services received by the patient from practitioners in a medical facility. Medical records for Allegheny Health Network's facilities are maintained in accordance with applicable law and corporate policies and procedures. Medical records are strictly confidential, which means that they may not be accessed, used, or disclosed except with the consent of the patient or as prescribed by law. Medical records should not be physically removed from Allegheny Health Network facilities, altered, or destroyed except where permitted by applicable law or corporate policy. Workforce members, vendors, and contractors who have access to medical records must take great care to preserve their confidentiality and integrity and no workforce member, vendor, or contractor is permitted to access their own medical record, or the medical record of anyone else, without a legitimate business need to know. Any unauthorized release of or access to medical records must be reported to the Data Ethics, Policy, and Privacy Department or your facility's Privacy and Data Ethics Official.

The Health Insurance Portability and Accountability Act ("HIPAA"), the Health Information Technology for Economic and Clinical Health ("HITECH") Act, and the Omnibus Final Rule impose standards for privacy and security of patient information, including electronic information. As a covered entity, Allegheny Health Network is obligated to maintain the privacy, security, and integrity of patient information and to comply with all legal requirements regarding information use and disclosure.

Any use or disclosure of any patient information that is not in compliance with federal and state law or Allegheny Health Network policies is strictly forbidden. We strive to keep patient information secure and safe and share it with only those organizations or individuals authorized to receive it.

If you have any questions or believe that an unauthorized access, use or disclosure of any information has occurred, contact the Data Ethics, Policy, and Privacy Department or your facility's Privacy and Data Ethics Official.



Example

Tricia, a data analyst in the Allegheny Health Network provider financial operations area, sits in the cubicle next to her colleague, Glen. One afternoon Tricia overhears Glen talking on the phone to Helen who works as an analyst in Highmark Health Informatics. Glen thanks Helen for the report she generated and sent to him containing Highmark BCBS member-level data pertaining to specific cost and reimbursement rates for particular drugs and the associated prescribing provider information. Concerned that competitively sensitive information was compromised, Tricia contacts the Highmark Health Data Ethics, Policy, and Privacy Department.



QUESTION

What should I do if a co-worker is discussing patient information during lunch at the cafeteria?

ANSWER

Immediately ask the speaker to stop discussing the information while in a public place. Reinforce the patient's right to confidentiality.



QUESTION

I have access to Medical Record information as part of my job. May I look at my records, my relatives' records, or the records of my coworkers?

QUESTION

My neighbor keeps asking me if her friend is in our hospital. May I give her the information?

ANSWER

No. You are not permitted to access your records, your relatives' records, or the records of your co-workers without a legitimate business need to know. Protected health information may be released with a valid signed and dated Authorization for Release of Protected Health Information form.

ANSWER

No. You should tell your neighbor to call either the family of her friend or the hospital information desk.

Acceptable Use of Electronic Communication and Information

The company's information systems are the exclusive property of Allegheny Health Network and are to be used for business purposes only. This includes but is not limited to desktop computer equipment; hard drives; printers; handheld devices; software and operating systems; telephones; and network and/or Internet-related accounts providing electronic mail ("e-mail"), browsing, newsgroup access, social networking access, and/or file-transfer capabilities. Subject to certain restrictions and with limited exceptions, Allegheny Health Network provides to every employee, as required by the employee's individual job function, access to the company's internal network. All employees with such access are also provided with an Internet e-mail address. Other types of Internet access, such as browsing capabilities, are made available to Company employees with a demonstrated business need.

Personal Use

Authorized Users, defined as any person to whom Company has granted a unique user identification to gain access to the Company's systems, should only use Allegheny Health Network assets for business related purposes. Allegheny Health Network's information systems may never be used for personal gain or profit. The use of external personal e-mail accounts (e.g. Hotmail, AOL, Yahoo, Gmail) to conduct Company work or transmit Confidential Information is prohibited.

No Expectation of Privacy

Authorized Users have no legitimate expectation of privacy with regard to any communication that they create, receive, or store in Allegheny Health Network's assets and systems, including, but not limited to e-mails and photographs. Authorized Users should be aware that all information created or stored on the company's information systems is the property of Allegheny Health Network, and is subject to ongoing monitoring and auditing. The company cannot and does not guarantee the privacy or confidentiality of any personal (i.e., non-business-related) information stored on Allegheny Health Network's information systems. Personal (i.e., non-business-related) information that is intended to remain private and/or confidential should therefore not be created or stored in Allegheny Health Network's systems.

Monitoring

Activity conducted under the Authorized User's ID and password is monitored and audited at Allegheny Health Network's discretion. Allegheny Health Network maintains the absolute right to monitor all information system use by Authorized Users for any purpose, and particularly to ensure proper working order, to assure appropriate use, and to maintain the security and integrity of the company's information. Allegheny Health Network may retrieve the contents of any communication or file created or stored on the company's systems. Allegheny Health Network may access any Authorized User's files, including archived material of present and former Authorized Users, without the Authorized User's consent, for any purpose deemed appropriate by the company.

Use outside the United States

No company-issued devices are permitted to leave the United States unless prior approval is requested with business justification in writing to Information Security and Risk Management and approved by the Chief Information Security Officer (CISO) or delegate. If CISO approval is granted, business use may also require approval by the Chief Privacy Officer (CPO).

Social Networking

Social networking is the use of blogs, wikis, virtual worlds, Twitter, Facebook, and other emerging media. Generally, Allegheny Health Network does not permit Authorized Users to use its assets and systems for social networking. All Authorized User are personally responsible for the content they publish on social networking sites. Allegheny Health Network strictly prohibits the use of its assets and systems for social networking communications that could damage Allegheny Health Network's business reputation or the business reputation of its customers and partners. Publishing Confidential Information to social networking platforms is strictly prohibited.

Acceptable and Impermissible Content

Authorized Users must exercise good judgment and professionalism when creating, editing, publishing, storing, or transmitting content on Allegheny Health Network's systems. This applies to all systems and applications, including but not limited to e-mail, video, audio, images, or pictures. Among other things, Authorized Users may not use Allegheny Health Network's systems and assets to create or transmit any of the following content:

- Ethnic or racial slurs, personal insults, obscenity, profanity, slanderous and libelous statements, political attacks, or statements that would violate any corporate policy;
- Content that discriminates on the basis of an individual's protected status under the law;
- Content that is harassing, threatening, hateful, or demeaning;
- Content that is pornographic or sexually explicit;
- Content that promotes or that is designed to incite violence;
- Content that violates or that encourages anyone else to violate the law, including the sale or distribution of illegal substances or the unlawful sale or distribution of controlled substances;
- Content that infringes on any intellectual property rights including, but not limited to, copyrights, trademarks, and rights of publicity;
- Content that places a person in a false light or that portrays someone or someone's image inappropriately or distastefully;
- Protected Health Information and Personally Identifiable Information, beyond that which is authorized for business purposes and then only to the extent that is minimally necessary.

Restrictions and Prohibitions on Use and Access

All information activity, including e-mail communications and Internet access, should be conducted in a responsible and professional manner reflecting the Company's commitment to honest, ethical, and non-discriminatory business practice. For more information, please review the corporate policy regarding Acceptable Use of electronic communication and information.

Gathering Information about Competitors

Obtaining public information about other organizations, including our competitors, through legal and ethical means such as public documents, public presentations, journal and magazine articles, and other published information is not unusual nor is it restricted. We are not permitted and should always avoid using improper means, such as misrepresentation, theft, bribery, or improper infiltration to gather competitive intelligence.

Marketing and Advertising

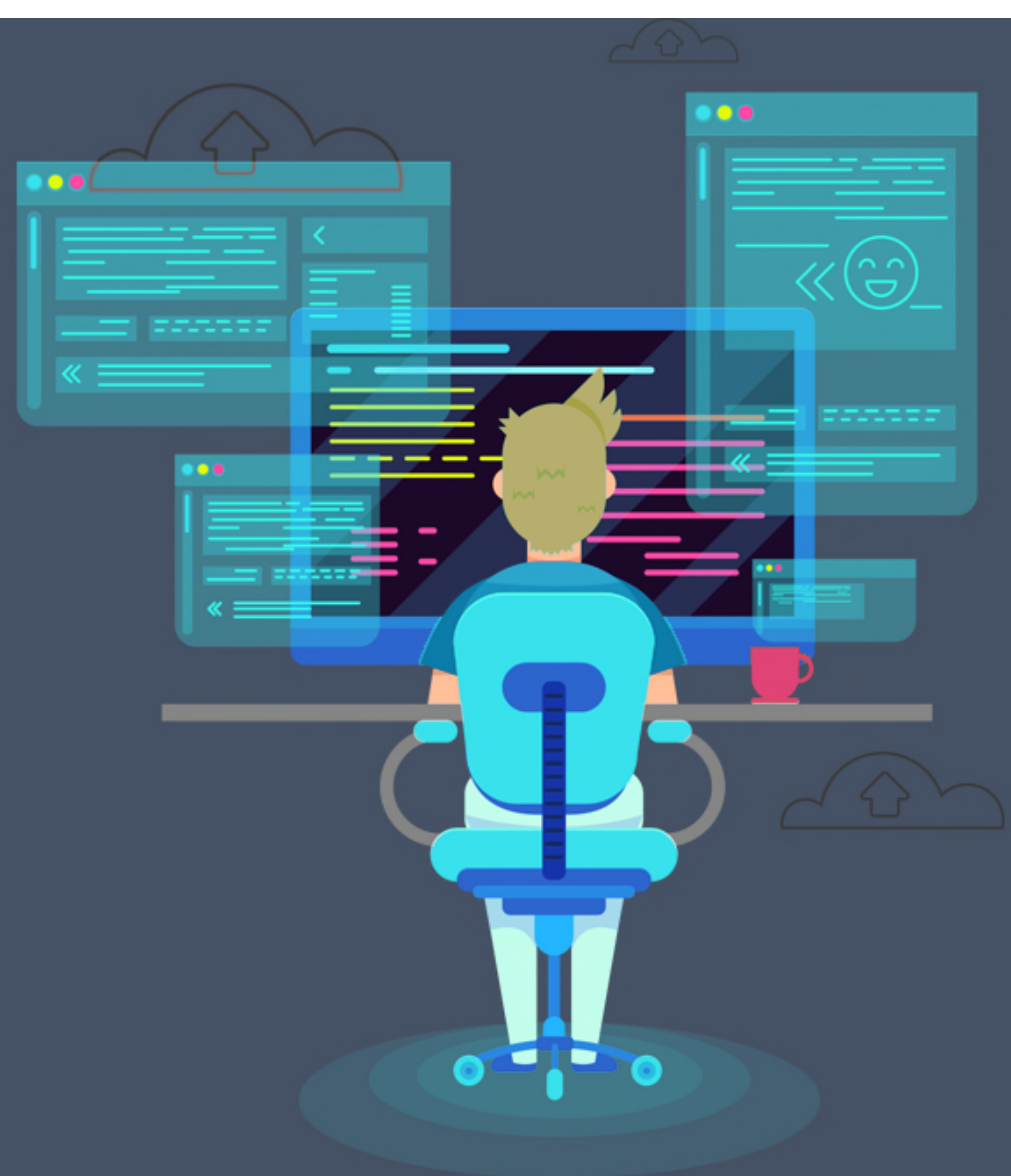
Allegheny Health Network engages in marketing and advertising activities to educate the public, provide information to the community, increase awareness of our services, and to recruit workforce members, vendors, and contractors. We present only truthful, informative, and non-deceptive information in these materials and announcements. We comply with applicable federal and state laws and, as relevant, professional ethical guidelines related to marketing, advertising, and communication activity. Third parties (e.g., vendors) may not use or associate Allegheny Health Network's name, symbols, logos, or trademarks in an advertisement, press release, or marketing material without the written prior consent of the Allegheny Health Network Law Department. Any media inquiries should be referred to Corporate Communication Department.

Example

Ted had a bad day at work and is upset with a project he has been working on for more than a year. When Ted gets home, he decides to vent on social media and posts obscene comments about the Allegheny Health Network Project Manager who has been overseeing Ted's project.

Ted arrives at work the next day and is immediately contacted by his manager. Ted's manager is aware of the post and the obscenities about the Allegheny Health Network Project Manager.

Even though Ted posted his comments on social media during off hours and from his personal equipment, Ted has violated the Code of Business Conduct by including the Project Manager who was from Allegheny Health Network. Ted is reported to Human Resources for appropriate disciplinary action, up to and including termination.



CONFLICT OF INTEREST

Conflicts of interest may arise when outside personal interests, employment, or affiliations influence or create the appearance of influencing business decisions. Business affiliations and financial interests by immediate family members or by persons with whom a workforce member, vendor, and contractor have a close personal relationship may also create a possible conflict of interest.

Workforce members, vendors, and contractors must avoid situations where personal interests appear to conflict or actually conflict or compete with the interests of Allegheny Health Network. For instance, it can be a conflict of interest to work simultaneously for Allegheny Health Network and a competitor. In addition, certain affiliations such as employment or serving as a board member with a vendor, provider, or customer may create a conflict of interest situation depending on the workforce members' as well as vendors' and contractors' position with Allegheny Health Network.

To further ensure independent decision making, Allegheny Health Network shall not directly or indirectly, including through any subsidiary, extend or maintain credit, arrange for the extension of credit, or renew an extension of credit in the form of a personal loan to or for any member of the Board of Directors.

Following are some basic details to remember about conflict of interest (COI) disclosures:

- Disclose all potential or actual conflicts when completing the COI disclosure statement.
- Keep your COI disclosure statement updated at all times by reporting new disclosures as they occur.
- If the potential conflict involves research activities, disclosure must occur prior to an application for funding.
- Vendors must not deal directly with any Allegheny Health employee who has a financial interest in the vendor, or whose spouse or immediate family member holds a financial interest in the vendor, in the course of negotiation or performance of its contract with Allegheny Health Network.
- Direct any questions regarding potential or actual conflicts of interest to your manager, facility's compliance officer or Integrity and Compliance. Integrity and Compliance can be reached anonymously via the Helpline 1-877-867-7325 or submit an online report at <http://www.mycompliancereport.com>.



...another job outside of the company that could influence your judgment or decisions you make in your Allegheny Health Network work?

...a financial interest or investment in a business outside of the company that may conflict with the interests of Allegheny Health Network?

...an offer of a gift or entertainment from someone who has a business relationship with Allegheny Health Network?

If you do, a potential conflict of interest exists. You should consult with the Integrity and Compliance Department.

See Allegheny Health Network's Conflict of Interest policy for more information.



QUESTION

My brother owns an office supply company and is seeking to become a supplier to the company. Does this create a conflict of interest?

ANSWER

If you are involved in the Supplier selection process or would be overseeing business transactions related to your brother's company if he becomes a supplier, a conflict of interest would exist. You should disclose the situation to your manager and remove yourself from the decision-making or oversight



Gifts, Gratuities, and Entertainment

Employees, officers, and members of the board of directors must remain free from influence created by unauthorized gifts or business entertainment. As a general rule, gifts and entertainment of a nominal nature may be an acceptable business practice as a means to build corporate goodwill. However, offering or accepting gifts or entertainment that are not incidental to a business relationship, or might be perceived to be primarily intended to gain favor or to compromise a business decision, must be avoided. Examples of inappropriate gifts and entertainment include:

- lavish dinners
- weekend trips
- cash or cash equivalents (such as gift cards or gift certificates, loans, stock, stock options), and honoraria for company related activities
- “Quid pro quo” (professional courtesy) offerings gifts that are given or taken in return for something else (such as offering gifts with the intent to influence patient referrals)
- gifts to Executive Branch officials, Congress and congressional staff members. State laws may also restrict making gifts or providing other things of value to certain public officials.
- offering money, gifts, services, entertainment, or anything of value, directly or indirectly, to any government official, vendors or contractors in connection with a government contract.



Vendor Gifting

Allegheny Health Network manages our consulting, subcontractor supplier, and vendor relationships in a fair and reasonable manner, free from conflict of interest and consistent with applicable laws and good business practices. Allegheny Health Network selects consultants, subcontractors, suppliers, and vendors on the basis of objective criteria, such as quality, technical excellence, price, delivery, adherence to schedules, service, and maintenance of adequate sources of supply. We make purchasing decisions on the basis of the vendor's ability to meet our needs and not on personal relationships. Strict adherence to entity specific policies that govern vendor relationships is required. Furthermore, a gift may never be accepted if it is offered by Industry as defined in the AHN Gifts and Entertainment Policy during a time where the individual or vendor providing the gift is seeking to do business with Allegheny Health Network, involved in a bid for work, Request for Proposal, or in negotiations with Allegheny Health Network, or near the time of a contract award by Allegheny Health Network.

Food and meals may only be accepted from a vendor if the food or meal is provided in connection with an accredited educational event. Meals or entertainment intended to serve all or part of a department, whether on or off-site, with no associated business purposes shall never be accepted. If a vendor offers to sponsor training or educational events, which may or may not include payment for travel, express approval must be granted by management and the Integrity and Compliance Department. In addition, several conditions must be met. See Allegheny Health Network's Gifts and Entertainment Policy for more information.

Patient Gifting

Allegheny Health Network requires that workforce members, vendors, and contractors may not offer any gifts to patients unless such gift is of nominal value or unless express approval from Legal and Integrity and Compliance Department is granted. Cash and cash-equivalents are never to be offered or accepted. In order to prevent an actual or perceived conflict of interest when offering or accepting gifts from patients, strict adherence to policies and procedures that govern activities related to gifts, gratuities, and items of value is required.



Gifts/Grants from Pharmaceutical or Device Manufacturing Companies

We will avoid arrangements with pharmaceutical or device manufacturing companies that would give the perception that any of our workforce members have a relationship with these companies that would influence clinical decision making, including prescribing patterns or the use of products. To that end, gifts from pharmaceutical manufacturers and biotechnology, medical device and hospital equipment supply industry entities and their representatives are prohibited.

As it pertains to grant funding, the OIG has specifically cautioned against programs under which drug and device manufacturers offer grants to physicians or other practitioners for studies of prescription products when the studies are of questionable scientific value and require little or no scientific pursuit. Allegheny Health Network workforce members should understand that payments may generally be considered improper if the payment is made to persons in a position to generate business for the donor company, related to the volume of business generated or exceeds the fair market value of any legitimate service provided to the donor company, or is unrelated to any service at all other than the referral of patients. To prevent a real or perceived conflict of interest, a pharmaceutical or device manufacturer contemplating making a grant or donation to Allegheny Health Network should be referred to the Development Office or the Integrity and Compliance Department.

In addition to the standards outlined above, Allegheny Health Network maintains policies and procedures that provide specific guidance around the offering and acceptance of gifts, gratuities and items of value. Strict adherence to this Code as well as the Gifts and Entertainment Policy is required; Integrity and Compliance is available to assist workforce members, vendors, and contractors with any questions or concerns.



Ask yourself:

- Would accepting or giving the gift or entertainment appear unethical to others at Allegheny Health Network, my peers, or the general public?
- Will my giving or accepting this gift influence what the company pays or is paid for its products, services, etc.?
- Should I give or accept this gift merely because “it always has been done this way”?
- Is this gift being offered or given because my position enables me to influence an Allegheny Health Network decision in favor of the customer or supplier?
- Have I made a decision to purchase goods or services that will provide personal gain to me?
- Is a vendor bringing me food unrelated to a CME event?
- Does the gift or item of value comply with the company’s Gift and Entertainment Policy?

If you answered “yes” to any one of these questions, then declining the gift may be the appropriate action. Because each offering is different, your decisions should be evaluated on a case-by-case basis. See Allegheny Health Network’s Gifts and Entertainment Policy for additional detail on what is considered appropriate.

To report an ethics or compliance concern, call 1-877-867-7325



GUIDEPOST
FIVE

Maintaining a **Safe, Respectful, and Dignified Working Environment**

One of the guiding principles of our company is to provide equal employment to qualified individuals regardless of their race, age, sex, religion, national origin, ancestry, creed, sexual orientation, mental or physical disability, veteran status, political affiliation, or any other status or condition protected by law. Differences in backgrounds that each individual brings to Allegheny Health Network are to be respected, as it is those differences that bring value and diversity to the company. We are expected to treat all people we encounter with professional respect and courtesy, regardless of their position, age, race, sex, disability, or other differences and we should expect the same level of respect in return whether they are our co-workers, customers, or suppliers.

Diversity and Inclusion

Allegheny Health Network is committed to diversity and the creation of an inclusive work environment where everyone is valued for both their similarities and their differences. Allegheny Health Network respects the unique attributes and diverse thinking of each workforce member, vendors, and contractors and recognizes and embraces the many diverse perspectives and life experiences that each individual brings to the workplace. A diverse and inclusive workforce ensures Allegheny Health Network's capacity to serve all communities and to reach new and emerging markets.

Equal Employment Opportunity

Current and prospective workforce members, vendors, and contractors can be assured that our work environment promotes fairness and equal opportunity in the employment process. Equal opportunity is provided in all aspects of the employment relationship, including recruitment, hiring, work assignment, promotion, transfer, termination of employment, wage and salary administration, and selection for training.

Workforce Members/Applicants with Disabilities

Our company provides a work environment that helps prevent discrimination against qualified individuals with disabilities with respect to any offer, condition, or privilege of employment. Applicants and workforce members, vendors, and contractors are assured that all information regarding a disability will be kept confidential.

Harassment-Free Work Environment

All Allegheny Health Network workforce members, vendors, contractors, and visitors must be treated with professional respect and courtesy. Harassment, which may be of a sexual, physical, written, or verbal nature, will not be tolerated from workforce members, vendors, contractors, patients, customers, outside business invitees, or visitors.

Dealing with Excluded or Ineligible Persons

Under certain contracts with the federal and state governments, Allegheny Health Network is prohibited by law or contractual provision from contracting or doing business with any person or entity that is currently debarred, suspended, excluded, proposed for debarment, or declared ineligible to perform work under any government contract or subcontract. Allegheny Health Network will not knowingly employ any individual or contract with any entity or individual who has been convicted of a criminal offense involving government business, is listed by a federal or state agency as suspended, debarred, excluded, proposed for debarment, or suspension, or is otherwise excluded from federal or state program participation, for the purpose of fulfilling its obligations under certain contracts with the federal and state governments.

SAFETY



Safe and Healthy Environment

We have the right to a safe and healthy work environment, free of illegal drugs, alcohol, and workplace violence. Allegheny Health Network will not tolerate actions or threats by anyone who disrupts business activities or places our patients, customers, workforce members' vendors, contractors, suppliers, or visitors at risk of harm. Possession of weapons, firearms, firearm ammunition, firearm replica, or firearm components on owned or leased company property, regardless of whether the workforce member, vendors, and contractors possesses a license to carry a concealed weapon, is prohibited (unless required by their position as an Allegheny Health Network Police Officer). If you have a concern for your own or someone else's safety, please contact the Security Department. Workplace safety also extends to our physical work environment. It is, therefore, important that you identify and promptly report any condition that could create a physical hazard in your area to the Security Department.

Sustainability

Our commitment to a healthy environment extends beyond the walls of our buildings. At Allegheny Health Network, we know that creating a healthy environment helps to create healthier people. We are committed to being responsible corporate citizens by being active in the communities where we do business. We strive to make our communities stronger and healthier places to live through workforce members, vendors and contractor's volunteerism, corporate philanthropy, and eco-friendly business practices to protect the environment.



QUESTION

A physician with whom I usually enjoy working with has a habit of yelling and using profanity when he gets busy. What should I do?

ANSWER

The Allegheny Health Network Code of Business Conduct specifically prohibits use of profanity or similarly offensive language.

Notify your supervisor or manager, Human Resources, Corporate Security, or Integrity and Compliance



What is Expected of You?

This Code is intended to provide guidance on how you can support Allegheny Health Network's commitment to integrity and a strong business culture. You play a vital role in Allegheny Health Network's success, regardless of your job responsibilities or position within the Company. If you detect a problem or suspect someone is acting inappropriately, help us maintain our values and culture by reporting it immediately.

Amending the Code

Allegheny Health Network reserves the right to modify the Code at any time when determined necessary. The most current version of the Code of Business Conduct is always available on Allegheny Health Network's website.

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