

## CODE OF CONDUCT

- Demonstrate Honesty, Integrity, and Professionalism at All Times
- Abide by the Code of Conduct and Applicable Laws, Regulations, Policies, and Procedures
- Honor Patients' Rights
- Provide Quality Care
- Provide Medically Necessary Care
- Preserve Confidentiality and Information Security
- Use Social Media and Technology Responsibly
- Support Diversity and Inclusion
- Work Safely
- Compete Fairly
- Record and Report Information Accurately
- Document, Code, Bill, and Collect Appropriately
- Do Not Do Business with Excluded Individuals or Entities
- Cooperate with Inquiries, Audits, and Investigations
- Use Resources Responsibly
- Conduct Political Activity and Fundraising Appropriately
- Disclose and Appropriately Manage Conflicts of Interest
- Prohibit Bribes, Kickbacks, or Payment for Referrals
- Prohibit Certain Inducements Affecting Patient Choice
- Report Compliance Concerns Without Fear of Retaliation

## QUESTIONS AND CONCERNS

Call 1-800-362-2921 to anonymously report a Code of Conduct concern.  
For additional compliance information and reporting options, please visit:

[http://intranet.unchealthcare.org/intranet/hospitaldepartments/  
auditcomplianceprivacy](http://intranet.unchealthcare.org/intranet/hospitaldepartments/auditcomplianceprivacy)

## UNC Health Care Code of Conduct

UNC Health Care has adopted the following twenty standards and explanations as its system-wide Code of Conduct:

### **1. Demonstrate Honesty, Integrity, and Professionalism at All Times**

We display and promote the highest standards of professional and ethical conduct. We act with the competence, skill, and integrity expected of our professions. We behave with dignity and courtesy toward our patients, clients, coworkers, learners, and others in business-related activities. We are honest, fair, reasonable, and objective in our professional relationships.

### **2. Abide by the Code of Conduct and Applicable Laws, Regulations, Policies, and Procedures**

Providing healthcare to a large community is an enormous responsibility. If each of us abides by this Code of Conduct and the laws, rules, regulations, policies, and procedures that apply to us, we will do our part to see that UNC Health Care operates with integrity. If you have questions about the legality or appropriateness of a situation, ask your supervisor or the Compliance Office for clarification.

### **3. Honor Patients' Rights**

As healthcare providers, we have an ethical responsibility to make our patients feel secure in our care and to treat patients respectfully and with dignity. In addition to an ethical responsibility, we have a legal responsibility to comply with all applicable laws and regulations related to patients' rights. We must also comply with UNC Health Care policies, including policies regarding informed consent, advance directives, discharge planning, and patient participation in the care plan.

### **4. Provide Quality Care**

As a healthcare provider, we dedicate ourselves to providing high quality care for our patients. Quality of care is a promise we deliver every day in every aspect of our work. We are committed to following all applicable policies, laws, and licensing / accreditation requirements relating to quality of care and patient safety. We uphold the professional standard of care, report patient safety concerns, and engage in quality improvement activities.

### **5. Provide Medically Necessary Care**

At UNC Health Care, we provide care that is medically necessary. Medical necessity requires us to be prudent in the utilization of our resources, being mindful not to overutilize or underutilize the services provided to our patients.

We follow the Emergency Medical Treatment and Active Labor Act (EMTALA) and similar regulations relating to the admission, transfer, and discharge of patients.

### **6. Preserve Confidentiality and Information Security**

Protecting confidential information is a UNC Health Care priority. Confidential information includes health information about our patients, information in employee records, and proprietary information about UNC Health Care business. We access confidential information and share it with others only when authorized to do so and for the purpose of doing our job. We follow applicable laws and policies when releasing confidential information and report concerns to appropriate parties. We investigate and report breaches of patient information and take steps to secure our systems from unauthorized access and comply with information security policies.

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### 7. Use Social Media and Technology Responsibly

UNC Health Care encourages an online and social media culture that complies with the law, internal policies, procedures, and ethical values. UNC Health Care employees may not disclose confidential or proprietary information about UNC Health Care, its patients, or its employees on social media (including, but not limited to, communications over the Internet, on personal websites or webpages, or in online communities). We do not take or transmit photographs or recordings of patients, visitors or staff in the workplace except as permitted by our policies. Any questions concerning the appropriate use of social media and technology should be directed, as applicable, to the Privacy Office or the Public Affairs and Marketing department.

### 8. Support Diversity and Inclusion

UNC Health Care supports a culture of diversity and inclusion. We treat everyone with respect. We do not tolerate illegal discrimination against anyone at UNC Health Care, including visitors, patients and fellow employees. We do not tolerate conduct that is disrespectful, hostile, intimidating, or harassing.

### 9. Work Safely

The health and safety of our patients and employees is a UNC Health Care priority. We comply with workplace health and safety laws and report safety concerns. We follow UNC Health Care policies for handling and disposing of hazardous materials and equipment. We only access, handle or prescribe controlled substances in accordance with UNC Health Care policy. We comply with fitness for duty policies. We maintain a work environment free from violence and disruptive behavior.

### 10. Compete Fairly

UNC Health Care is committed to antitrust compliance and fair competition. We do not make unlawful agreements with competitors about prices or charges, services that we provide, or who to buy from. We do not discuss related matters, such as pricing policies, purchasing practices, costs, salaries, marketing plans, or surveys with those outside of UNC Health Care. We comply with marketing policies and laws related to truth in advertising.

### 11. Record and Report Information Accurately

We keep accurate records about our patients, our employees, our physicians, clinical procedures, research trials, and financial transactions. It is the responsibility of each of us, when engaged in recordkeeping on behalf of UNC Health Care (including employee time cards, medical records, and patient bills), to be accurate and honest. For example:

- We do not sign another person's name to documents or share each other's passwords.
- We amend the medical record only in accordance with UNC Health Care policy and applicable law.
- We do not fabricate, falsify or plagiarize when proposing, conducting or reporting research.
- Our financial records conform to applicable accounting principles.

We retain documents for the length of time described in our document retention policies.

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### **12. Document, Code, Bill, and Collect Appropriately**

We handle claims for payment of services with integrity to avoid fraud, waste and abuse in healthcare. All UNC Health Care personnel are expected to comply with federal healthcare program requirements, including, but not limited to, Medicare / Medicaid rules and federal and state False Claims Acts.

We bill only for medically necessary services rendered by eligible providers and properly documented and coded. We respond to patient and payer questions concerning charges in an accurate and timely manner. We correct any billing errors of which we have knowledge and refund payments received in error to third party payers and patients, with appropriate documentation.

If you become aware of inaccuracies, notify your supervisor so that the error can be corrected. If you see problems with claims that are not being corrected, contact the Compliance Office or Compliance Hotline.

### **13. Do Not Do Business with Excluded Individuals or Entities**

We expect all individuals and entities associated with UNC Health Care to be appropriately credentialed, licensed and otherwise qualified to perform their duties. UNC Health Care does not do business with, employ, or bill for services rendered by individuals or entities that are excluded or ineligible to participate in federal healthcare programs. UNC Health Care personnel and vendors have a responsibility to report to their supervisor, Human Resources, Credentialing, or Purchasing (as applicable) if they are excluded, debarred, or otherwise ineligible to participate in healthcare programs.

### **14. Cooperate with Inquiries, Audits, and Investigations**

We cooperate with government inquiries, as well as internal and external audits and investigations. When receiving non-routine requests, we consult with the Legal Department or Compliance Office to ensure that requests are handled properly. We do not alter or destroy records in violation of the law or UNC Health Care policy.

### **15. Use Resources Responsibly**

We use UNC Health Care resources responsibly for UNC Health Care business purposes, not for personal gain. We spend UNC Health Care funds wisely, eliminate waste, and control operational costs without compromising patient care. We use physical assets like computers, vehicles, machinery, and work space for UNC Health Care business, and we protect those assets from loss, damage, and theft. We don't waste supplies, equipment, space, or time. We protect intellectual property and respect patents, software licensing, copyright, and other IP agreements.

### **16. Conduct Political Activity and Fundraising Appropriately**

UNC Health Care respects employees' rights to participate in or refrain from political and fundraising activities on personal time. Employees must follow applicable policies relating to use of UNC Health Care resources for political activity, engagement in political activity while on work time, and similar issues. Employees may not inappropriately force, direct or encourage coworkers to support or contribute to a political cause, candidate, or party in violation of the law or applicable policies.

### **17. Disclose and Appropriately Manage Conflicts of Interest**

We disclose and appropriately manage conflicts of interest. Employees must report any actual or potential conflict of interest. Conflicts of interest are situations in which personal considerations

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may affect, or have the appearance of affecting, our loyalty and ability to fulfill our responsibilities to UNC Health Care. Depending on the circumstances, a “conflict of interest” might include: employment outside of UNC Health Care with a competitor or in violation of our policies, supervising a close relative, purchasing stocks based on confidential information, accepting gifts from a vendor, patient, or fellow provider, or causing UNC Health Care to contract with vendors with whom you have a personal or financial interest. If you have questions about what might be a conflict of interest, review UNC Health Care policies and speak with your supervisor or the Compliance Office.

### **18. Prohibit Bribes, Kickbacks, or Payment for Referrals**

We do not offer or accept bribes or kickbacks. Bribes and kickbacks are money, gifts, or special treatment given to someone in exchange for a favor. The favor may be many things, from a promise to make patient referrals to a promise to use a particular vendor’s product.

We also do not offer or accept “something of value” for patient referrals. “Something of value” includes money, services, gifts, entertainment, or anything else of value to the recipient.

As this is a highly complex area of the law, employees must take special care and promptly refer any questions to the Compliance Office or the Legal Department.

### **19. Prohibit Certain Inducements Affecting Patient Choice**

The law prohibits UNC Health Care and its employees from offering certain inducements that may affect a patient’s decision about where to seek care. For instance, it may be illegal to offer copayment waivers, free services, gifts, and other inducements to encourage patients to receive care at UNC Health Care. However, patient value initiatives associated with the UNC Health Alliance (our clinically integrated network) may not be precluded. As this is a highly complex area of the law, employees must take special care and promptly refer any questions to the Compliance Office.

### **20. Report Compliance Concerns Without Fear of Retaliation**

Employees are encouraged to contact the Compliance Office whenever they need clarification or direction regarding Compliance issues (including this Code of Conduct). Employees are required to report suspected violations of the Code of Conduct, policies, procedures, the law, and regulations to a supervisor, the Compliance Office, or the confidential Compliance Hotline. Retaliation is not permitted against anyone who seeks advice, raises a concern, or reports misconduct in good faith. Such retaliation should be reported immediately to the Compliance Office.