

Freeman Health System Code of Conduct and Ethics

Policy Number: 247483

I. PURPOSE

This Code of Conduct and Ethics (the "Code of Conduct") has been adopted by Freeman Health System ("Freeman") to provide standards by which Freeman employees, officers, directors, medical staff and agents will conduct themselves to protect and promote organization-wide integrity and to enhance Freeman's ability to achieve its organizational mission. The Code of Conduct is intended to serve as a guide to assist Freeman's employees, officers, directors, medical staff and agents to make sound decisions in carrying out their day to day responsibilities.

II. MISSION

The Mission of Freeman Health System is to improve the health of the communities we serve through contemporary, innovative, quality healthcare solutions. To accomplish this mission, Freeman Health System recognizes that it has the responsibility to behave ethically to its customers, patients, community, employees and physicians. In all of its endeavors, Freeman will strive to comply with the Code of Conduct and applicable laws and regulations.

III. WHAT IS THE FREEMAN COMPLIANCE PROGRAM?

The Compliance program is a formal established program that supports Freeman's commitment to following policies and standards of conduct to ensure that Freeman is in compliance with applicable federal, state, and local laws and regulations. The Compliance Department:

1. Identifies federal, state and local requirements that affect Freeman
2. Develops policies and standards of conduct
3. Establishes procedures to prevent, detect and correct non-compliance
4. Serves as a resource to receive compliance concerns and to resolve compliance issues

Why is compliance important to me? Compliance affects everyone and is every Freeman employee's responsibility. As a Freeman employee, you are expected to:

1. Carry out your job duties with integrity and honesty;
2. Learn and understand what laws and regulations apply to your position and to comply with those requirements;
3. Exercise good judgment and do the right thing when performing your job duties; and
4. Report suspected compliance concerns to the Compliance Department or your supervisor.

IV. RESPONSIBILITIES UNDER THE CODE OF CONDUCT

Who must comply with Freeman's Code of Conduct?

This Code of Conduct applies to all employees, officers, directors, medical staff and agents affiliated with Freeman throughout Freeman's diverse operations, including the following locations: Freeman East, Freeman West and Freeman Neosho and any other facilities, locations or services which shall become a part of Freeman (the "Affiliates"). Freeman recognizes the different missions and services that each Affiliate provides and that the Code of Conduct is designed to allow flexibility for each Affiliate in developing policies and procedures to achieve the standards and goals set forth in the Code of Conduct while maintaining each Affiliate's unique mission and services.

What are the responsibilities of each employee with regard to the Code of Conduct?

- Read the standards of conduct and think about their application to your work. You should have a basic understanding of issues covered by each standard and the supplemental compliance policies that apply to your job function.
- Seek assistance from your supervisor, the Vice President of Compliance or other Freeman resources when you have questions about the application of the standards and other Freeman policies to your work.
- Understand the numerous options that Freeman makes available to you for raising conduct or ethical concerns and promptly raise such concerns. You should raise such concerns with your immediate supervisor or Freeman's Vice President of Compliance. If you prefer to raise your concerns anonymously, the Freeman Compliance Hotline (417-347-4424 or 417-206-3286) and the compliance drop boxes at Freeman facilities are other resources upon which you can rely.
- Adhere to the laws, regulations that impact Freeman operations and Freeman policies. The failure to do so may expose Freeman and its Affiliates to civil or criminal liability, or exclusion from participation in federal health care programs. The failure of an employee to report a known violation will result in corrective action up to and including termination.
- Cooperate in investigations concerning potential violations of law, the Code of Conduct, the Compliance Program and Freeman policies and procedures.

What are the responsibilities of officers, managers and other supervisors?

All officers, managers and other supervisors are responsible to:

- a. Build and maintain a culture of compliance by:
 - Personally leading compliance efforts through frequent meetings that require compliance reports and regular monitoring of compliance matters and programs.
 - Encouraging employees to raise conduct and ethical questions and concerns and assuring employees that they will be protected from retribution or retaliation for reporting compliance concerns.

- Using employee actions and judgments in promoting and complying with the Code of Conduct and compliance policies as considerations when evaluating and rewarding employees.
 - Equipping the Compliance Department with the resources it needs to be successful.
- b. Prevent compliance problems by:
- Identifying compliance risks and proposing appropriate policies and procedures to address such risks.
 - Identifying employees whose activities involve issues covered by Freeman policies.
 - Providing education and counseling to assist employees to understand the Code of Conduct, Freeman policies and applicable law.
- c. Detect compliance problems by:
- Implementing and maintaining appropriate controls to monitor compliance and mechanisms that foster the effective reporting of potential compliance issues.
 - Promoting an environment that permits employees to raise concerns without fear of retaliation.
 - Arranging periodic compliance reviews that are conducted with the assistance of the Vice President of Compliance to assess the effectiveness of Freeman's compliance measures and to identify methods of improving them.
- d. Respond to compliance problems by:
- Pursuing prompt corrective action to address weaknesses in compliance measures.
 - Applying appropriate disciplinary action when necessary.
 - Consulting with the Vice President of Compliance so that compliance issues are promptly and effectively addressed.

What are the responsibilities of members of the board of directors?

- Read the standards of conduct and think about their application to you.
- Make decisions that are in the best interest of Freeman and which are not affected by conflicts of interest.
- Exercise appropriate oversight over the Compliance Program.
- Receive and act upon appropriate reports from management and the Vice President of Compliance concerning the status of the Compliance Program, the resources required to maintain its vitality and Freeman's response to identified compliance deficiencies.
- Confirm that the Compliance Program is free from undue restraints and influences through direct reporting by the Vice President of Compliance to the Compensation and Compliance Committee of the Board of Directors of compliance matters that promote the integrity of the

Compliance Program and raising any concerns with the Vice President of Compliance or the Chief Executive Officer.

What are the responsibilities of medical staff?

- Read the standards of conduct and think about their application to you. You should have a basic understanding of issues covered by each standard and the supplemental compliance policies that apply to the services you furnish to Freeman and our patients.
- Actively participate in compliance activities as requested by administration.
- Assist in identifying possible compliance issues and in developing possible solutions to address those issues.
- Understand the various options that Freeman makes available for raising compliance or ethical concerns and promptly raise such concerns. You should raise such concerns with the Vice President of Compliance or the Chief Medical Officer. If you prefer to raise your concerns anonymously, the Freeman Compliance Hotline is another resource upon which you can rely.
- Adhere to the laws, regulations that impact Freeman operations and Freeman policies. The failure to do so may expose Freeman and its Affiliates to civil or criminal liability, or exclusion from participation in federal health care programs. The failure of an employee to report a known violation will result in corrective action up to and including termination.
- Cooperate in investigations concerning potential violations of law, the Code of Conduct, the Compliance Program and Freeman policies and procedures.

What are the responsibilities of agents?

- Read the standards of conduct and think about their application to the services you furnish to Freeman. You should have a basic understanding of issues covered by each standard and the supplemental compliance policies that apply to the services you furnish to Freeman.
- Participate in compliance activities, such as education and training, as requested.
- Understand the various options that Freeman makes available for raising conduct or ethical concerns and promptly raise such concerns. You should raise such concerns with the Vice President of Compliance. If you prefer to raise your concerns anonymously, the Freeman Compliance Hotline is another resource upon which you can rely.
- Adhere to the laws, regulations that impact Freeman operations and Freeman policies. The failure to do so may expose Freeman and its Affiliates to civil or criminal liability, or exclusion from participation in federal health care programs.
- Cooperate in investigations concerning potential violations of law, the Code of Conduct, the Compliance Program and Freeman policies and procedures.

How May the Code of Conduct Be Revised?

This Code of Conduct may be amended, modified or waived only with the approval of the Chief Executive Officer and the Board of Directors.

How Frequently will the Compliance Program Be Reviewed?

The Compliance Program (including the Code of Conduct) will be reviewed annually to foster its effectiveness and at such times when changes to it are necessitated by changes in applicable laws and regulations. Suggested changes to the Compliance Program will be presented to the Board of Directors for approval.

V. STANDARDS OF CONDUCT AND ETHICS

1. Patient Relationships: *We are committed to providing a high quality of healthcare services to our patients, their families, visitors and the community. We treat all patients with respect and dignity and provide care that is necessary and appropriate. Freeman adheres to the following principals on this matter:*

- We will recognize the right of our patients to receive quality services provided by competent individuals in an efficient, cost effective and safe manner.
- We will continually monitor the clinical quality of the services we provide and will endeavor to improve the quality of the services provided.
- We will support every patient's right to be free from all types of abuse, and will not tolerate patient abuse in any form.
- We will apply our admission, treatment, transfer and discharge policies to all patients based upon identified patient needs and such policies will be consistent with all applicable legal requirements.
- We will listen to our patients, families and visitors to understand any concerns or complaints will involve patients in the decision-making process about their care and will inform patients of their rights to execute advance directives.
- We will provide treatment and medical services without discrimination based on race, color, national origin, sex (including sexual orientation and gender identity), age, or disability. 42 U.S.C. § 18116(a)
- We will not tolerate any form of disruptive behavior from employees, agents or medical staff, including verbal abuse, physical abuse or threatening behavior.
- We will implement policies and procedures to complete emergency assessments as required for all who request our emergency services, we will fairly evaluate requests to transfer patients to our care from our colleagues and providers in outlying areas, and will accept such transfers as clinically appropriate.
- We will maintain licensure and credentialing standards to further the provision of clinical services by properly trained and experienced practitioners.
- We will perform background checks of potential employees and contractors to verify credentials and to assess whether such individuals and entities have ever been excluded from participation in any of the federal health care programs, including the

Medicare and Medicaid programs, and we will not employ or contract with any excluded or sanctioned individuals.

- We will properly charge, code and bill for services in accordance with Federal and State health care programs and Freeman policies. Billings for services not documented or provided could be considered a false claim and could result in financial penalties.
- We will prohibit the offering or transferring of anything of value to a Medicare or Medicaid beneficiary that the offeror knows or should know is likely to influence the beneficiary to order or receive items or services from a healthcare provider. No employee, medical staff member, Board member, volunteer or vendor shall offer valuable items or services to Medicare or Medicaid beneficiaries to influence them in their choice of healthcare provider.
- We will respect the privacy of our patients, and we will treat all patient information with confidentiality, in accordance with all applicable laws, regulations and professional standards.

2. General Legal and Regulatory Compliance: *We will continuously and vigorously promote full compliance with applicable laws. Freeman adheres to the following principals on this matter:*

- We will continuously study our legal obligations and create policies and procedures that facilitate compliance by our employees, officers, directors, medical staff and agents with such legal obligations.
- We will engage in open and fair competition and marketing practices, based on the needs of our community and consistent with the furtherance of our mission, and in compliance with applicable antitrust and trade regulation requirements.
- We will recognize that our employees work in a variety of situations and with a variety of materials, some of which may pose a risk of injury. We are committed to providing a safe work environment, and will implement and monitor policies and procedures for workplace safety that are designed to comply with federal and state safety laws, regulations, and workplace safety directives.
- We will expect our employees, officers, directors, medical staff and agents to understand the basic legal obligations that pertain to their individual job functions or services they furnish to Freeman and our patients, and will require that they strive to make certain that their decisions and actions are conducted in conformity with such laws, regulations, policies and procedures.
- We will support educational and other training sessions to teach employees, officers, trustees, and as warranted medical staff and agents, about the impact of the law on their duties and to promote compliance with our collective legal obligations.
- We will support and maintain multiple resources for employees, officers, trustees, medical staff and agents to voice any questions about the proper interpretation or

application of a particular law, regulation, policy or procedure and protect from retaliation or retribution persons whose raise such concerns.

3. Avoidance of Conflicts of Interest: *Employees, Officers, Directors, Medical Staff and Agents owe a duty of loyalty to Freeman and, as a result, must avoid any activities which may involve (or may appear to involve) a conflict of interest or that may influence or appear to influence the employee, officer, director, medical staff member or agent's ability to render objective decisions in the course of his or her job responsibilities, or other services he or she furnishes.*

- We will maintain policies and procedures that make clear scenarios in which an individual's private interests may inappropriately interfere with Freeman's interests and will provide support through which employees, officers, directors, medical staff and agents may pose questions about whether a particular outside activity or relationship could be construed as a conflict of interest.
- We will articulate expectations of the conduct that must be demonstrated by employees, officers, directors, medical staff and agents in the performance of services for Freeman, and will require that such individuals remain free of conflicts of interest in the performance of their responsibilities and services to Freeman.
- We will require employees, officers, trustees, medical staff and agents to inform Freeman of personal business ventures and other scenarios that could be perceived as conflicts of interest and will provide for policies and procedures for doing so.
- We will not permit employees, officers, directors, medical staff or agents to use any proprietary or non-public information acquired as a result of a relationship with Freeman for personal gain or for the benefit of another business opportunity.
- We will render decisions about the purchase of outside services and goods based on the supplier's ability to best satisfy Freeman's needs and not based on personal relationships.
- We will not solicit, take or offer any bribe, kickback, gratuity, gift or other payment made to influence a business decision. Doing so is improper and against the law and Freeman policy.

4. Relationship with Payers: *Freeman will consistently strive to satisfy the conditions of payment required by the payers with which Freeman transacts business.*

- We will promote compliance with laws governing the submission and review of bills for our services and will deal with billing inquiries in an honest and forthright manner.
- We will implement reasonable measures to prevent the submission or filing of inaccurate, false or fraudulent claim to payers.
- We will utilize systematic methods for analyzing the payments we receive and will reconcile inaccurate payments in a timely manner after discovery and review.

- When warranted, we will investigate inaccurate billings and payments to determine whether changes to current protocol or other remedial steps are necessary.
- We will not bill for instances of substandard care identified as “never events” in accordance with requirements of Federal health programs.
- We will implement documentation systems sufficient to create and maintain complete and accurate documentation of services provided.
- We will review cost reports to be filed with the Federal health care programs to determine whether such reports accurately and completely reflect the operations and services provided to beneficiaries and to confirm that such reports are completed in accordance with applicable federal and state regulations and Freeman policies and procedures.
- We will as necessary rely on internal and external sources to help improve our billing and coding protocol and to identify potential areas of non-compliance.
- We will compensate billing and coding staff and consultants for services rendered, and will not compensate such persons in any way related to collections or maximization of revenues in unlawful manners.

5. Relationship with Physicians and Other Providers: *Freeman will monitor its business dealings to structure relationships in ways that satisfy the needs of the community and fully comply with applicable legal requirements.*

- We will maintain relationships with physicians and other referral sources based only on the needs of our community and consistent with the furtherance of our mission.
- We will treat referral sources fairly and consistently, and will not provide remuneration that could be considered payment for referrals, including:
 - free or below-market rents;
 - administrative or staff services at no- or below-cost;
 - grants in excess of amounts for bona fide research or other services rendered;
 - interest-free loans; or
 - gifts, “perks” or other payments intended to induce referrals.
- We will implement policies, procedures and other protocols which require fair market value determinations for services rendered by referral sources and for services rendered by Freeman.
- We will implement procedures to require all agreements with physicians and other referral sources to be reduced to writing and reviewed and approved as appropriate under law and Freeman policy
- We will train the appropriate personnel on the primary laws and regulations governing the referral of patients and other legal restrictions on the manner in which Freeman

transacts business with physicians and other referral sources, including the penalties that may result for violations of such laws.

6. Respect for Our Culture: *We recognize that a diverse workforce enriches the life experience of all employees and our community, and will promote equal employment opportunity and a workplace free of unlawful discrimination and harassment.*

- We will provide equal employment opportunities to employees and applicants for employment without regard to race, color, national origin, religion, sex (including sexual orientation and gender identity), age, veteran status, or disability, in accordance with applicable law.
- We will implement policies and procedures that promote compliance with laws governing non-discrimination in personnel actions, including recruiting, hiring, evaluation, transfer, workforce reduction, termination, compensation, counseling, discipline, and promotion of employees.
- We will promote diversity with respect to individuals with disabilities, and will make reasonable accommodations to any individual as required by law.
- We will recognize the right of our employees to a workplace free of violence and harassment, and will not tolerate any form of harassment or violence toward our employees.
- We will implement policies and procedures that promote appropriate conduct in the workplace and prohibit unwanted or hostile interaction, including degrading or humiliating jokes, physical or verbal intimidation, slurs, or other harassing conduct.
- We will not tolerate any form of sexual harassment, either overt, such as request for sexual favors in return for promotions, or less obvious forms of harassment, such as sexual comments.
- We are charged with protecting and preserving Freeman assets by ensuring all employees follow procedures to prevent their loss, theft or unauthorized use. Using corporate assets for unlawful purposes or unauthorized personal benefit and failing to keep accurate and complete records of all assets, liabilities, revenues, expenses or financial transactions is prohibited.

7. Information and Information Systems. *We recognize that the provision of health care services generates business, financial, and patient-related information that requires special protection. We will establish systems that ensure such information is used appropriately and safeguarded zealously.*

- We are committed to the security and accuracy of documents and records in our possession, and will develop systems, policies and procedures sufficient to safeguard the integrity of our documents and records, including systems, policies and procedures to:
 - Establish retention periods and protocols for business, financial, and patient records.
 - Prevent the altering, removal, or destruction of records or documents except according to our records retention policy and applicable ethical and legal standards.
 - Promote the accurate, thorough, detailed, and complete documentation of all business, financial, and patient transactions.
 - Control and monitor access to Freeman communications systems, electronic mail, Internet access, and voicemail to ensure that such systems are accessed appropriately and used in accordance with Freeman’s policies and procedures.
 - Protect the privacy and security of patient medical, billing, and claims information by implementing sufficient physical, systemic, and administrative measures to prevent unauthorized access to or use of patient information, and to track disclosures of such information as required by law.
 - Prevent and detect identity theft through the identification of “red flags” to indicate potential identity theft.

VI. VIOLATIONS OF THE CODE OF CONDUCT

Violations of laws and regulations applicable to Freeman can result in serious sanctions, including fines and penalties and potential exclusion from participation in federal health programs. Freeman is committed to providing all employees, officers, directors, medical staff and agents with a means of raising questions and concerns, and reporting any conduct that the employee, officer, trustee, medical staff member or agent suspects is in violation of this Code of Conduct. Employees, officers, directors, medical staff and agents are expected and required to communicate any suspected violations of the Code of Conduct to, as applicable, a direct supervisor, the Vice President of Compliance or the General Counsel. If you prefer, you can anonymously call the Freeman Compliance Hotline which is available 24 hours a day, 7 days a week: 417-347-4424 or 417-206-3286. The Vice President of Compliance will maintain primary responsibility for investigating reports received on this hotline.

The following list, while not exhaustive, describes the type of concerns and questions that you should raise with your supervisor, the Compliance Officer or through the Freeman Compliance Hotline:

- i. The possible submission of false, inaccurate, or questionable claims to Medicare, Medicaid or any other payer;
- ii. The provision or acceptance of payments, discounts or gifts in exchange for referrals of patients or other business;
- iii. Allegations of discrimination;
- iv. Potential breaches of confidentiality or privacy; and
- v. Situations that could raise conflicts of interest concerns.

There may be times when you are unsure whether an activity or a situation is unethical or illegal. If you are not sure, pursue it until you are confident that it is either resolved, or that the right person in the organization knows the facts and has taken action. A delay on your part could be serious for you, for others, and for the organization.

There are words and phrases that raise "red flags" about potential problems, and should send a warning signal to you. *The following are examples of such words and phrases:*

- a. "Well, maybe just this once."
- b. "Everyone does it."
- c. "No one will ever know."
- d. "Shred that document -- no problem."
- e. "No one will get hurt."

If you hear comments like these or you begin to say things like this, then the following questions could be helpful as a guide for what needs to be done next:

- a. "Does this break a law, regulation, policy or Standard of Conduct?"
- b. "How will I feel about myself afterwards?"
- c. "What would my family, friends, our physicians or patients think?"
- d. "How would this look if it were in the newspaper tomorrow?"
- e. "Am I being fair and honest?"

If you are not comfortable with any of your answers to the above questions, or if you are still not sure whether an activity is wrong, contact your supervisor, department manager or the Vice President of Compliance.

Freeman maintains a strict non-retaliation and non-retribution policy. No action of retaliation or reprisal will be taken against anyone who makes a good faith report, complaint or inquiry to the Compliance Department, but contacts with the Compliance Department do not protect employees from appropriate corrective action regarding their own conduct or work performance. All allegations will be thoroughly investigated before action is taken.