

A photograph of a young man with dark hair and a warm smile, wearing light blue medical scrubs. He has his arms crossed and is standing in a bright hospital hallway with doors and framed artwork on the walls.

# Code of Ethics

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HealthCare  
Partners Nevada<sup>®</sup>  
an Intermountain Healthcare company

Dear Caregiver,

As a caregiver, you are part of an exemplary and ethical organization. Patient trust is fundamental to our mission of helping people live the healthiest lives possible. Caregiver trust serves as the foundation for a healthy workplace and our ability to fulfill our mission.

Our values as an organization demand personal responsibility from each of us to fully understand and follow the rules and requirements that apply to our work. This Code of Ethics booklet details our high standards and provides a reference to guide you in your responsibilities.

As caregivers in our ethical organization, we give up the right to stay silent about any questionable activity. Leadership will support you when you speak up immediately through the channels outlined within this Code of Ethics.

Thank you for doing your part to deliver extraordinary care to our patients and members and for sustaining a culture of integrity.



Sincerely,

A handwritten signature in black ink, appearing to read "Marc Harrison".

Marc Harrison, MD  
*President and CEO*  
*Intermountain Healthcare*

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## Code of Ethics Overview

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This Code of Ethics booklet provides guidelines and expectations about HealthCare Partners Nevada's standards. Specific subjects are highlighted to illustrate what to watch for and to provide guidance on how to handle these and other similar situations.

Caregivers (which include employees and providers), suppliers, contractors and other business partners of HealthCare Partners Nevada must accept personal responsibility to act with the utmost integrity in all business activities and adhere to the policies, regulations, and laws that govern their work.

Violations of our Code of Ethics — or the underlying laws, regulations, and policies — may result in corrective action up to and including termination of employment, suspension of privileges, termination of business relationships, civil or criminal liability, and/or financial penalties.



## Ethics Standards

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- We model HealthCare Partners Nevada's values of accountability, integrity, continuous improvement, teams, service excellence and fun.
- We treat each other, our patients and members, business partners, suppliers, and competitors fairly.
- We endeavor to know, abide by, and understand the

specific laws, policies, and procedures that apply to our jobs, roles, assignments, and us as individuals.

- We are empowered and responsible to speak up with concerns about compliance and ethical issues.
- We ask for help when we have questions or concerns about a situation.
- We report observed and suspected violations of laws or policies to:
  - our supervisor, manager, or director
  - our Compliance Team
  - People Services
  - the Corporate Compliance Officer, or
  - the 24-hour Compliance Hotline at 1.833.442.8263 or [HCPNV.Compliance@imail.org](mailto:HCPNV.Compliance@imail.org)
- We coordinate investigations of potential violations through appropriate channels.
- We notify the Compliance Department immediately if we are sanctioned or excluded by the government from participation in any government-funded program.

## Protecting Privacy and Confidentiality

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### WE PROTECT PRIVACY AND CONFIDENTIALITY.

While working or providing a service for HealthCare Partners Nevada, we are committed to safeguarding the privacy of patient information. This obligation applies even after we are no longer employed by or associated with HealthCare Partners Nevada.

We routinely collect personal information about our patients in order to provide care. We understand how sensitive this information is and maintain its confidentiality accordingly. Consistent with privacy laws, we access, use and disclose patient-identifiable information only to care for or serve the patient, obtain payment for his or her care, or as allowed by law.

In certain situations, HealthCare Partners Nevada may use health information for other limited purposes, such as for research or analysis. When this is the case, we will only do so as the law or the patient permits.

Suppliers who process confidential information on behalf of HealthCare Partners Nevada are required to comply with our privacy and security policies and all applicable laws and regulations. Suppliers are authorized to access, use and disclose only the minimum necessary protected health information (PHI) needed to provide their contracted services.

**We have a responsibility to not access or disclose information about our patients or members without proper authorization. This applies even after our employment or association with HealthCare Partners Nevada ends.**

**Clinicians should only access patient information where an established care provider relationship exists, a new patient relationship is developed, or a request for consultation or authorized quality review is made.**

## WE USE CARE WITH CONFIDENTIAL AND PROPRIETARY INFORMATION.

We protect confidential and proprietary information by:

- Following laws and policies related to protecting such information.
- Properly disposing of information which no longer needs to be maintained.
- Taking appropriate safeguards when transporting or transmitting information.
- Knowing and complying with agreements signed to protect the confidentiality of information – we are responsible for knowing what these agreements require and abiding by them.

### Secure Transportation of Information

- Whenever possible, convert paper documents into an encrypted electronic format with password protection for transport.
- Use encrypted mobile media such as a thumb drive. Send password or encryption keys separately from the media.
- Secure information and place it out of view (e.g., in a briefcase, backpack, or trunk of a car).



## ► WE USE CARE WITH PROTECTED HEALTH INFORMATION THAT IDENTIFIES PATIENTS.

Protected health information includes any information that could identify patients. This identifiable information is not only their name, medical record number, health plan number, or picture. For example, a date of treatment or zip code in combination with health-related information such as diagnosis or procedure would be protected health information.



If there is a privacy breach of patient information, regulations require that we notify the individual and the federal government. A breach may include inappropriate access to family members' or coworkers' records. It is possible that if you inappropriately access information, the individual may deduce from the notification that you are the person responsible for the breach.

**Do not discuss a patient's information with friends, family, or through social media. Discussing or describing patients or members through social media is against the law, and it destroys trust between patients and caregivers.**

The Privacy Office, Compliance Teams, People Services, and the Compliance Hotline can help address questions and concerns.

Accessing your own treatment information through your job-related system access when the information is not needed for your job responsibilities is a violation of policy.

Appropriate access to your own health information is made by following the cycle of care or requesting a copy of your records from the facility that provided the treatment.

## ► WE RESPECT THE PRIVACY OF CO-WORKERS WHO BECOME OUR PATIENTS.

When caregivers become our patients, they are entitled to the same privacy and other rights as any other patient. A patient's caregiver status should not impact their care or the confidentiality of their health information.

Accessing treatment information of a family member, coworker, or friend through your job-related system access, when the information is not needed for your job responsibilities, is a HIPAA violation.



## ► WE SUPPORT CAREGIVER PRIVACY.

Just as we are careful to ensure that our patients' information is not disclosed through photos and video recordings, we use the same care to protect our caregivers' privacy. We may be asked by patients and others to be included in their photos or videos. We understand that these images can be used at the sole discretion of the individual recording the image. Accepting the invitation to be a part of the image is at the caregiver's discretion. Caregivers may decline the invitation to be included in the image.

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## ► WE SAFEGUARD PERSONNEL INFORMATION.

We recognize that our personnel records contain sensitive information. HealthCare Partners Nevada will not disclose these records outside of the company, except upon an individual's own request, for a legitimate business reason, or as required by law.



 WE MAINTAIN COMPUTER AND NETWORK SECURITY AND PROTECT THE CONFIDENTIALITY OF INFORMATION CONTAINED ON OUR COMPUTER AND NETWORK SYSTEMS.

We only use and access HealthCare Partners Nevada's systems as necessary to perform our assigned functions. HealthCare Partners Nevada's computer systems are critical to help provide care to patients. To protect these systems, we comply with policies related to computer and network security. Passwords must be changed when requested. They must be kept confidential and not shared with anyone.

HealthCare Partners Nevada's property includes computers, the phone system, email, and Internet access. Our access to HealthCare Partners Nevada's information systems is a privilege and not a right of any caregiver.

Employees who witness or become aware of password sharing must report the activity to their manager or supervisor, People Services or to Corporate Compliance.

We are accountable for all activities that occur under our login including actions involving poor judgment or illegal activities.

#### Computer Access Security

- Never share your password.
- Use passwords, access codes, and screensavers.
- Close the browser when you are finished.
- When using a shared computer log in and out.
- Log off computers when you are finished or are away from the computer.
- Do not store passwords on white boards, sticky notes, notepads, under keyboards, or posted in or around workstations.

Accessing illegal, offensive, or violent content may result in the termination of access to HealthCare Partners Nevada's information systems resources and may also result in termination of employment and criminal liability.

## Providing a Healing Environment

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### ► WE PROVIDE A RESPECTFUL, CARING, AND HEALING ENVIRONMENT FOR PATIENTS AND FAMILIES.

We help patients understand and exercise their rights.

We keep patients - and, when permission is given, their families and others - informed of options in directing their care, treatment, and services.

We listen with sensitivity and consider the informed preferences of patients, including informed decisions to discontinue care, treatment, and services.

We offer clinical and ethical consultations to patients and families when needed during a patient's treatment.

We protect our patients' dignity; respect their cultural, psychological, and spiritual values; and safeguard their personal information.

We honor each patient's choice of providers for post-hospital services.



## WE ARE COMMITTED TO NON-DISCRIMINATION AND ACCESSIBILITY FOR OUR PATIENTS AND VISITORS.

We comply with applicable state and federal laws. We do not discriminate against any individual based on age, race, color, ethnicity or national origin, religion, creed, language, disability, socioeconomic status, sex, sexual orientation, gender identity or expression, or veteran status in providing care and services.

## WE ASSIST INDIVIDUALS SEEKING SERVICES WITH SPECIAL COMMUNICATION NEEDS.

We are committed to ensuring that all individuals, including those who have limited English proficiency, have meaningful access and equal opportunity to our services and programs.

We are committed to making reasonable accommodations to ensure effective communication with individuals with disabilities. This also includes an obligation to provide effective communication to a patient's companion who is an individual with a disability. Potential disabilities that

may require communication accommodations include, but are not limited to, impaired hearing, sight, and learning disabilities such as dyslexia.

If you believe discrimination has occurred to a patient or visitor, please make a report to Intermountain's Civil Rights/504 Coordinator, your Compliance Team, or the Compliance Hotline. Patients and other individuals may also report grievances to the Civil Rights/504 Coordinator.

We provide communication assistance aids and services in a timely manner and free of charge. Aids and services that may be provided include, but are not limited to, qualified sign language interpreters, written information in alternate formats, foreign language interpreters, and information translated into other languages.

When communication assistance is needed, we use a qualified interpreter. If a patient or family member insists on using someone other than a qualified interpreter (such as a family member or friend), a qualified interpreter should still be present to ensure that legal, consent, or other critical information is interpreted appropriately.

# Supporting a Positive Work Environment

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## ► WE ARE COMMITTED TO EQUAL OPPORTUNITY EMPLOYMENT AND NON-DISCRIMINATION.

We do not discriminate or make employment decisions based on a person's race, color, ethnicity, religion, gender, sexual orientation, gender identity, national origin, age, disability, protected military or veteran status, pregnancy, or genetic information.

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## ► WE MAINTAIN OUR REQUIRED LICENSES, PRIVILEGING, AND PROFESSIONAL CREDENTIALS TO PERFORM OUR JOBS.

We understand the scope of practice that our licensure or credentials permit us to perform and stay within those boundaries. When a job requires a license or specific credentials, we only allow individuals with current and valid licenses and credentials to perform those functions. We do not employ or contract with individuals who have been

excluded\* from participating in federally funded healthcare programs, nor are they permitted to practice or bill through Intermountain.

*\* Exclusion checks are run against State Medicaid databases, the Department of Health and Human Services Office of Inspector General's List of Excluded Individuals/Entities and the System for Award Management list maintained by the US General Services Administration.*

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## ► WE ARE COMMITTED TO FAIR PRACTICES AND EQUAL OPPORTUNITY EMPLOYMENT.

We are committed to recruiting the most qualified caregivers from a diverse pool of applicants. Talent and performance serve as the basis for advancement.

## ► WE KEEP OUR WORKPLACE SAFE.

We make sure HealthCare Partners Nevada's campuses are safe places for patients, visitors, and caregivers. We complete required safety training. If we see a hazardous condition, we respond appropriately.

We comply with all laws, regulations, and Occupational Safety and Health Administration standards. As required, we report certain injuries, inspections, illnesses, and motor vehicle accidents.



## ► WE DOCUMENT AND REPORT EVENTS SO THAT WE CAN IMPROVE OUR PROCESSES AND REDUCE THE RISK OF HARM.

When an unexpected event impacts, or may impact, the quality of patient care or the safety of our patients, visitors, or ourselves, we report these incidents through the appropriate channels.

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## ► WE ADDRESS INAPPROPRIATE AND DISRUPTIVE BEHAVIORS.

We treat each other with honesty and respect. We do not tolerate violence, threats of violence or any form of discrimination or harassment. We have policies in place to address inappropriate or disruptive behaviors and performance issues through our corrective action processes.

We are expected to act professionally and refrain from making comments, gestures, or acting in any manner that can be construed as harassing or disruptive. Retaliation against anyone reporting inappropriate behaviors in good faith is strictly prohibited.

#### ► WE OBSERVE AN ALCOHOL- AND DRUG-FREE WORKPLACE.

When we report to work, we do so fit for duty and free from the influence or impairment of alcohol and drugs.

#### ► WE DISPLAY APPROPRIATE IDENTIFICATION.

We wear a HealthCare Partners Nevada identification badge at all times while on duty. The badge being worn is applicable to our on-duty role. If we have a secondary role, we wear the applicable badge when performing that secondary role.

#### ► WE ENCOURAGE APPROPRIATE REPORTING RELATIONSHIPS.

We avoid working relationships where one family member reports directly to another family member (including one's spouse, parents, siblings, grandchildren, etc.). In addition, an employee who is involved in a romantic or intimate relationship with another employee may not supervise the employee with whom he or she is involved.

If any of these situations develop, we let management know so that the situation can be resolved. We also disclose to management any of these relationships we have with an Intermountain or HealthCare Partners Nevada supplier or business partner.



## WE REFRAIN FROM SOLICITING CAREGIVERS, PATIENTS, OR VISITORS FOR UNAUTHORIZED PRODUCTS OR SERVICES.

We do not solicit other caregivers, patients, or visitors for unauthorized products, memberships, or other causes during scheduled work time or in work areas. Work time includes both our working time and the time when others are working. Unauthorized promotional material may not be distributed in patient care areas at any time, for any purpose.

Prohibited solicitation and distribution activities include the following:

- Displaying items for sale in work areas or engaging in any other formal or informal sales activities related to a personal business.
- Placing decals on facility fixtures, ID badges, property and/or equipment.

Leaving unauthorized literature, sign-up sheets, order sheets, buttons, stickers, coupons, etc. in work areas is not distribution; it is considered littering and is prohibited.



## Safeguarding HealthCare Partners Nevada Interests

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### ► WE ARE HONEST WITH HEALTHCARE PARTNERS NEVADA FUNDS.

We are careful with company funds to make sure they are used effectively. We:

- Abide by company policies and procedures for the secure handling of HealthCare Partners Nevada funds.
- Accurately prepare financial records.
- Ensure that any funds we spend or approve reflect the appropriate use of company resources.



All caregivers, suppliers and contractors have a responsibility to immediately report any known or suspected irregularity. Irregularities include, but are not limited to:

- misrepresentation of payroll time and attendance
- inappropriate alteration of financial documents
- misappropriation of funds
- misuse of HealthCare Partners Nevada supplies, services, or other resources

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### ► WE PROTECT COMPANY ASSETS.

We respect and use HealthCare Partners Nevada's resources for legitimate business reasons and encourage others to do the same. Company resources include, but are not limited to, property, funds, information, records, intellectual property, clinical and business equipment, computer systems, telephones, and the company name.

All care and testing is appropriately documented and charged. We do not use HealthCare Partners Nevada's resources for free self-testing or treatment.

## WE ARE RESPONSIBLE WITH COMPANY TIME AND RESOURCES.

We use our time at HealthCare Partners Nevada to further the company's mission. We accurately report and record our time. Misuse of paid time or HealthCare Partners Nevada resources may be considered theft from HealthCare Partners Nevada.

When we clock in, we are at our work site and ready to begin work. We never clock in for someone else.

Accepting Terms and Conditions, including online click-through agreements, can be considered a contract between HealthCare Partners Nevada and another party. Care must be taken when accepting any obligation that could bind HealthCare Partners Nevada. If you have questions, consult with your supervisor.

We encourage caregivers and affiliated providers to create and develop new inventions, processes, and technologies. To protect our company's interests, caregivers and affiliated providers must not disclose Intermountain's or HealthCare Partners Nevada's proprietary materials or information unless authorized by the Intellectual Property Office.

We value innovation that leads to extraordinary healthcare. Guidelines are in place to appropriately reward innovators and developers.

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## WE REVIEW AND SIGN CONTRACTS BASED ON SIGNING AUTHORITY.

We sign or agree to contracts only if we are authorized to do so. Contracts obligating HealthCare Partners Nevada are required to receive a legal review, unless specifically exempted in the policy. This applies to all legally enforceable agreements that create an obligation for HealthCare Partners Nevada.

## WE PROTECT INTERMOUNTAIN'S AND HEALTHCARE PARTNERS NEVADA INTELLECTUAL PROPERTY.

## ► WE USE APPROPRIATE COMMUNICATION CHANNELS.

We work with our Marketing and Communications Department to ensure accuracy as we prepare public presentations or media interviews. We do not act as a spokesperson for HealthCare Partners Nevada without approval. We forward all media requests to Marketing and Communications.

Requests by external entities to record video on HealthCare Partners Nevada property are coordinated through Marketing and Communications.

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## ► WE PROTECT OUR BENEFITS.

We responsibly use company benefit plans for ourselves and other covered individuals and provide accurate information when doing so. We take steps to make sure that ineligible individuals are not covered under our plans.



## ► WE DISCLOSE POSSIBLE CONFLICTS OF INTEREST.

We identify situations where our personal interests may conflict with those of Intermountain or HealthCare Partners Nevada and disclose them.

A conflict of interest may arise if we have a personal or financial interest that could interfere or compete with the interests of Intermountain or HealthCare Partners Nevada, or if we are in a situation to use our position with the company for personal gain. A conflict may also arise if a family member or other close relation owns or works for a company that does business (or competes) with Intermountain or HealthCare Partners Nevada.

We disclose any circumstance that could be perceived as a conflict of interest, even if we do not think the situation would violate these guidelines.

### Potential conflicts of interest:

- Outside employment. Working in a job with assignments like those performed for HealthCare Partners Nevada, or that may conflict with HealthCare Partners Nevada jobs or assignments.
- Payment for participating in activities, speeches, or forums that are related to our jobs or assignments.
- Participating on a board of directors for a non-HealthCare Partners Nevada entity.



## Ensuring Fair and Ethical Business Practices

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### ► WE ARE RESPONSIBLE IN OUR LOBBYING EFFORTS.

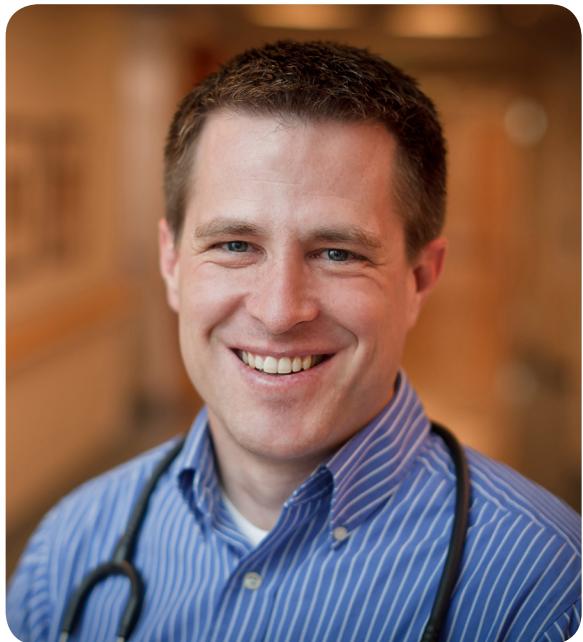
Lobbying government officials is a sensitive activity requiring strict controls. For this reason, Intermountain Government Relations directs any lobbying efforts. We do not provide, receive, or solicit gifts from government or legislative officials or lobbyists.

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### ► WE ENCOURAGE INDIVIDUALS TO TAKE AN ACTIVE INTEREST IN GOVERNMENT PROCESSES.

If we choose to participate in a political process outside of our job responsibilities, we will do so as individuals and not as representatives of HealthCare Partners Nevada. It is our responsibility to report any lobbying activity to the Government Relations Department for appropriate reporting.

If a caregiver is reimbursed for attending any event where a legislator is in attendance, the event needs to be reported to the Intermountain Government Relations Department.





► WE ACT AS A RESPONSIBLE  
COMMUNITY PARTNER.

Charitable contributions may be made to outside charities on behalf of HealthCare Partners Nevada, with proper approvals from the Marketing and Communications team.

We do not participate in charitable acitivites or make charitable contributions to improperly induce referrals, to illegally gain an unfair business advantage, or in violation of the law.

We are encouraged to volunteer for charitable activities. However, no person may pressure another to do so.

## ► WE MAINTAIN OUR COMMUNITY'S CONFIDENCE BY COMPETING FAIRLY IN THE MARKET.

We comply with antitrust laws. These laws are designed to promote fair competition. For example, we risk violating these laws by discussing certain aspects of HealthCare Partners Nevada's business with a competitor such as how we establish our prices, the terms of supplier relationships, or agreeing with a competitor to refuse to do business with a supplier. We seek the advice of Intermountain's Legal Department prior to discussing potentially sensitive topics with competitors or suppliers.



We are required to report all suspected violations through the proper internal channels for investigation. HealthCare Partners Nevada management will report violations of law to the appropriate authorities.

## ► WE FOLLOW ALL LAWS AND REGULATIONS.

We are committed to knowing, understanding, and abiding by all laws, regulations, and policies that apply to our jobs or assignments. We refrain from conduct that may violate any laws pertaining to fraud, waste, and abuse of government funds.

The Federal False Claims Act makes it illegal for any person or organization to knowingly make or file a false claim for payment from the federal government. Provisions allow an individual who knows that a false claim was submitted for payment to file a lawsuit in federal court on behalf of the government.

## WE ENSURE ACCURACY OF RECORDS AND REPORTING.

We ensure that our records are accurate and not misleading. HealthCare Partners Nevada's credibility is judged in many ways, including the accuracy and completeness of our records. These include business records such as financial transactions and reports, and personnel, insurance, and medical records. We depend on accurate and reliable information to make responsible business decisions.

We comply with local, state, and federal laws relating to the accuracy and completeness of all records. We retain our records according to legal requirements. We are honest, objective, and accurate in our recordkeeping. If we make mistakes, we will follow standard protocol to correct them and will not hide them. Altering documentation of any type to hide or mislead the users of the information is unacceptable. Coding and billing records are created based on accurate documentation that supports each claim.

We create, approve, and archive records to document our

work, including the services rendered to patients, and others; work performed by employees, contractors, and others; and purchases made from suppliers.

Several government agencies have implemented time-sensitive error reporting requirements. Our reporting obligations may begin the minute any HealthCare Partners Nevada caregiver knows of an error. Call the Compliance Hotline at 1.833.442.8263 as soon as a mistake in billing or breach of patient confidentiality is suspected.

We do not alter documentation to hide errors or mislead the users of the information.

All medical procedures and tests must be entered into the medical record including date and time, and if required, authenticated by the author/owner.

## WE COOPERATE WITH AND DOCUMENT GOVERNMENT INQUIRIES AND INVESTIGATIONS.

HealthCare Partners Nevada is regulated by state and federal agencies. From time to time, we may encounter officials responsible for regulating various aspects of healthcare or other business practices.

If we receive a request for information from a government investigative agency, external surveyor, or enforcement agency, either on-site or through correspondence, we take the following steps:

- Notify our manager and/or leadership.
- Call the Compliance Hotline at 1.833.442.8263, the Legal Department at 1.801.442.3430, or our Compliance Team.
- Carefully preserve documents related to a known or possible government investigation.

Caregivers must never:

- Conceal, alter, or destroy any relevant documents.

- Cause another caregiver to provide inaccurate information.
  - Obstruct, mislead, or delay the communication of information or records relating to a possible violation of law.
- .....

## WE SUPPORT INTERNAL AND EXTERNAL AUDITS.

Audits are routinely performed to assess areas for compliance. These audits are performed by internal and external auditors with experience in the area under review. When asked, we participate fully in these audits. If corrective action is needed, a written plan is developed and implemented to ensure compliance.

## ► WE INTERACT WITH SUPPLIERS HONESTLY.

We value our suppliers, as they play a role in the success of HealthCare Partners Nevada. Suppliers include anyone providing products or services to HealthCare Partners Nevada, including patient service and product providers, physician or clinician service and product providers, and technical, maintenance, inspection, delivery, and construction personnel.

Our selection of suppliers is based on their ability to meet our business needs, rather than on personal relationships and friendships, or on any inducements or personal offers.

We interact with our suppliers with honesty and integrity, which means we do not take kickbacks or bribes from them, nor do we offer such inducements to them. When working with suppliers, we do so free from conflicts of interest and are compliant with applicable laws and fair business practices.

Gifts of any kind from suppliers are discouraged and not solicited.

Don't request additional items or services from suppliers over and above their contracted service. For example, don't ask for items such as pens, pencils, notepads, gift certificates, supplies, meals, etc.

Accepting or seeking anything of significant value from contractors or service providers should be reported (see Reporting Concerns or Misconduct in this Code of Ethics).



→ WE EXERCISE GOOD JUDGMENT AND DISCRETION WHEN ACCEPTING GIFTS FROM PATIENTS.

We treat all of our patients with equal care and concern without the need for extra expressions of gratitude or rewards.

In the event a patient or member gives an employee a non-perishable gift, the employee should seek guidance from their leader, and as needed, consult with Compliance and People Services. The final decision on acceptance of the gift will be made in alignment with our Code of Ethics.



 WE CAREFULLY REVIEW FINANCIAL RELATIONSHIPS WITH PHYSICIANS AND OTHER HEALTHCARE PRACTITIONERS FOR COMPLIANCE WITH THE ANTI-KICKBACK AND STARK LAWS.

Laws and regulations put strict requirements on financial relationships between Intermountain Healthcare, HealthCare Partners Nevada, and physicians. All financial agreements with physicians must be carefully reviewed and also approved by the appropriate committee. There is risk whenever we give something of value (money, services, gifts, trinkets, etc.) to physicians, other providers, and the general public. Before we give anything away for free, or at a discount, we review the situation with our supervisor and Compliance.

We do not accept payments for referrals or authorizations to accept patients. We are not permitted to directly or indirectly solicit or receive anything of value in exchange for referring our patients to a provider.

We do not pay for referrals. We accept patient referrals and authorizations from other providers based on the patients' medical needs and our ability to render the needed services.



## WE RESPECT THE PROPRIETARY INFORMATION OF OTHERS.

Just as we protect our own confidential information, we respect the proprietary and confidential information of others. This includes written materials, software, music, and other intellectual property.

Any software used at HealthCare Partners Nevada must be licensed, approved and used as outlined in the software owner's license agreements.

Obtain copyright permission from the copyright holder prior to use. Permission is required for all nongovernmental or nonpublic domain materials, including print, audio, and video.

## WE ENSURE THE CONFIDENTIALITY OF MATERIAL NONPUBLIC INFORMATION.

We will not communicate material nonpublic information, either directly or indirectly, to anyone, including family, friends, or acquaintances.

### Material Nonpublic Information:

- Information is material if a reasonable investor would consider it important in deciding whether to buy, sell, or hold a security. Any information that is likely to affect the price of a company's securities is material, and any information that would motivate you or others to trade in a security is material.
- Information is nonpublic if it is not generally known by the public. Accordingly, if an individual becomes aware of information that is not widely available to the investing public, such information is nonpublic.



► WE FOLLOW ENVIRONMENTAL REGULATIONS.

We abide by all laws, regulations, and company policies relating to the protection of the environment. We strive to manage and operate our business in a manner that respects our environment, conserves natural resources, and complies with environmental laws and regulations. We are committed to the following best practices:

- Utilize resources appropriately and efficiently.
- Recycle where possible and dispose of all waste in accordance with applicable laws and regulations.
- Work cooperatively with the appropriate authorities to remedy any environmental contamination for which HealthCare Partners Nevada may be responsible.

## Reporting Concerns or Misconduct

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### ► WE REPORT SUSPICIOUS ACTIVITY, CONCERNs OF MISCONDUCT, AND DISRUPTIVE BEHAVIORs.

Each of us is responsible to report concerns and suspected misconduct that could violate HealthCare Partners Nevada's Code of Ethics, state or federal laws, or Intermountain policy.

Any individual who reports a legitimate concern in good faith will be protected from retaliation or intimidation. We take concerns seriously and appreciate individuals who report concerns or misconduct.

Report concerns to:

- Your supervisor, manager, or director
- Your Compliance Team
- People Services
- Intermountain's Legal Department 1.801.442.3430

- The Corporate Compliance Officer
- Submit concerns through the Compliance Hotline mailbox ([HCPNV.Compliance@imail.org](mailto:HCPNV.Compliance@imail.org))
- Call the Compliance Hotline at 1.833.442.8263
  - The Hotline is staffed by a team of Compliance professionals and is available 24 hours a day, 7 days a week
  - We honor the reporter's request for anonymity
  - Interpretation services are available
- Call the vendor-staffed Hotline at 1.844.442.5844
  - Calls made to this number can also be anonymous

Information on reporting to other agencies is included in the *Compliance Violation Reporting Policy*.

## ► THE KEY IS TO SPEAK UP.

We recognize that our daily work gives us each the opportunity to see problems before they become apparent to others or to management. Anyone who reports legitimate concerns will be protected from retaliation.

We pay attention to activity occurring in our work areas that may be a risk or harm to patients, employees, other personnel, or data.

Suspicious activities and threatening behaviors need to be reported through local leadership, and when needed escalated to law enforcement (call 911). Reportable activities and behaviors include:

- Individuals in work areas without identification badges
- Individuals requesting patient information without proper authorization
- Unattended personal belongings, boxes or bags
- Verbal threats of harm to self or others
- Any activity that might be a crime on the premises
- Acts of physical violence such as assault

Caregivers should contact local law enforcement when there is an imminent threat to the safety of others including:

- Bomb threat
- Terroristic threat
- Active shooter
- Use of weapons
- Any other credible threat of violence





# HealthCare Partners Nevada<sup>®</sup>

an Intermountain Healthcare company

**36 SOUTH STATE STREET 23RD FLOOR  
SALT LAKE CITY, UTAH 84111  
1.833.442.8263**

*HCPNV.Compliance@mail.org*

MARCH 2020