UCI HEALTH CODE OF CONDUCT

WHO WE ARE

Discover. Teach. Heal.

The mission statement centers us and serves as an ever-present reminder for all of us on why our institution exists. This statement represents our interwoven tripartite mission of excellence in patient care, research, and education. Our mission is fundamental to our overall plan because it serves as the guidepost by which strategic decisions will be made.

WHAT IS COMPLIANCE?

Compliance means maintaining and enhancing our quality of care and services through adherence to our standards. It means adhering to the laws and policies that apply to UCI Health, and doing the right thing. Asking questions, reporting concerns, and addressing issues are all critical to ensuring compliance.

WHO IS RESPONSIBLE FOR COMPLIANCE?

Everyone. This includes every employee, administrator, student, volunteer, physician, and those with whom we do business.

UCI Health wants everyone to display and promote the highest standards of professional and ethical conduct. We strive for all UCI Health workforce members to act with competence, skill, and integrity and behave with dignity and courtesy toward those around us.

WHAT DO I DO IF I THINK A LAW OR POLICY IS NOT BEING FOLLOWED?

All UCI Health employees are encouraged to report issues, concerns, or suspected violations if they believe that patient care is at risk, or ethical and business standards as set forth in this code have not been met. There are many reporting options:

- Speak with an immediate supervisor or manager
- Talk with higher level management
- Contact the UCI Health Compliance & Privacy Office at:
 - hacompliance@uci.edu
- Call the UCI Health Confidential Compliance Message Line: 1-888-456-7006

WHAT WILL HAPPEN IF I REPORT A COMPLIANCE CONCERN?

UCI Health supports open discussion of ethical and legal questions and concerns regarding compliance issues.

There will be no retaliation against UCI Health employees, who, in good faith, report suspected non-compliance or raise concerns about compliance issues. See the "Whistleblower Policy" available at policy.ucop.edu

UCI HEALTH GUIDING PRINCIPLES

QUALITY OF CARE

UCI Health provides healthcare to a large community, and it is our ethical duty to care for our patients in a respectful, responsible manner. Ensuring our patients' dignity, comfort, and security are our top priorities. Furthermore, our patients have legal rights, and it is our responsibility to ensure compliance with the applicable laws and regulations.

MEDICAL NECESSITY & PATIENT'S CHOICE

At UCI Health, we provide care that is medically necessary. This means ordering those services and items that are consistent with generally accepted medical standards for diagnosis or treatment of disease. This requires being mindful of the resources available and using them responsibly.

When referring patients to home health agencies, medical equipment suppliers, or long term care and rehabilitation providers, employees should respect the patient's right to choose their own providers.

SAFETY FIRST

UCI Health is committed to the health and safety of our patients and employees. A safe environment for employees ensures we can continue to provide the highest level of quality care to our patients. Following health and safety laws and reporting concerns is essential to this priority.

For assistance with a work environment safety concern, or information on the proper handling and disposal of hazardous materials, please email: UCIHealthsafety@hs.uci.edu.

ONLINE RESPONSIBILITY

UCI Health encourages those using online communication personally or professionally to do so responsibly. Compliance with laws, internal policies and procedures, and ethical values ensure there is no interruption to the UCI Health mission of discover, teach, and heal. Employees may not disclose confidential or proprietary information about UCI Health, patients, or other employees online.

Questions about appropriate use of online resources such as social media, blogs, or forums should be directed toward the Compliance Privacy Officer at: hacompliance@uci.edu.

FAIR TREATMENT OF EMPLOYEES

UCI Health supports a culture of diversity, inclusion, and respect. UCI Health prohibits discrimination in any work related decision on the basis of race, color, national origin, religion, sex, physical or mental disability, ancestry, marital status, age, sexual orientation, citizenship, or status as a covered veteran. The University is committed to providing equal employment opportunities.

PERSONAL AND CONFIDENTIAL INFORMATION

Crucial to all aspects of UCI Health's on-going success is the proper handling of confidential information. This can include a multitude of data types, including patient records, employee records, and internal or proprietary information about UCI Health. Employees should only access and/or share confidential information when authorized to do so.

UCI HEALTH GUIDING PRINCIPLES

PATIENT AND INSTITUTIONAL RECORDS

Accuracy is critical when it comes to records of any variety. UCI Health employees may be part of the creation or retention of records about patients, employees, physicians, clinical procedures, research, or financial transactions. Together, it is our responsibility to be accurate and honest when dealing with any type of record, and further to comply with all policies, procedures, and laws.

CODING, BILLING, AND PATIENT ACCOUNTING

UCI Health employees involved in the coding, billing, documentation, and accounting of patient care services for the purpose of billing governmental, private, or individual payers must comply with all applicable state and federal regulations and internal policies and procedures. Questions or concerns about possible inaccuracies should be directed toward hacompliance@uci.edu.

PREVENTING IMPROPER REFERRALS OR KICKBACKS

Employees must not accept or offer, for themselves or for UCI Health, anything of value in exchange for referrals of business or the referral of patients.

AVOIDING CONFLICTS OF INTEREST

UCI Health is committed to transparency of actual and potential conflicts of interest. These arise where there are personal considerations that may affect, or have the appearance of affecting, our ethical and legal commitments and ability to fulfill our responsibilities. All UCI

Health employees should disclose and appropriately manage conflicts of interest. Questions about actual or potential conflicts of interest should be directed toward hacompliance@uci.edu.

ADHERENCE TO ANTITRUST REGULATIONS

UCI Health is committed to adhering to all federal and state antitrust regulations. This means employees do not make unlawful agreements with competitors about prices or charges, services that we provide, or who to buy from. Discussion of these or other internal or proprietary information is prohibited. Everyone at UCI Health must comply with all marketing policies and legal regulations on truthful advertising.

EXTERNAL RELATIONS

UCI Health employees shall adhere to fair business practices and accurately and honestly represent themselves and our services and products.

GOVERNMENT INVESTIGATION POLICY

Employees at UCI Health should cooperate with appropriately authorized governmental investigations and audits.

CLINICAL RESEARCH

UCI Health ensures study participant's rights, well-being, and personal privacy are protected during clinical research by complying with all applicable federal, state, local government, and University regulations and non-federal sponsor requirements.

CODE OF CONDUCT NOTICE

The information in Code of Conduct is not a contract and is subject to change without notice by the appropriate authorities. It is understood that the explanations included cannot alter, modify, or otherwise change the controlling laws or regulations in any way, nor can any right accrue by reason of inclusion or omission of any statement in this Code of Conduct.