

MARSHALL Code of Conduct



Caring. Connecting. Elevating.

A Message

FROM SIRI NELSON,
Marshall's Chief Executive Officer



Dear Marshall Colleague:

Marshall's reputation for honesty, Integrity, and professionalism is directly impacted by how we conduct ourselves during our day-to-day responsibilities. I am proud to say that Marshall has a culture of maintaining the highest levels of ethical and professional standards. Our Code of Conduct is central to our Mission and Core Values and is an integral part of Marshall's Compliance Program. It guides our decisions and helps us consistently make the right choices in our daily work. It reaffirms the organization's commitment to maintaining its high standards and to an elevated experience for every person, every time. I encourage you to remember that this commitment applies not only to the patient or family member in front of you, but also to you and to the colleague standing beside you.

Together, we are the Marshall experience.

We are committed to providing deeply compassionate patient care of exceptional quality and value. We are equally committed to conducting our business activities in compliance with our policies and procedures, as well as all applicable laws and regulations. Compliance with Marshall's Code of Conduct is essential, and I ask each of you to make a personal commitment to read, understand, and follow the Code.

If you have any questions or concerns, I encourage you to speak up with courage and consult with our Compliance Officer. There is no retaliation for asking questions, raising concerns, or reporting possible improper conduct in good faith.

Purpose

Marshall's mission is to improve the health of our community and offer health care services of superior value and quality, centered on the goals and needs of our patients.

Marshall's Board of Directors adopted this Code of Conduct to provide standards by which employees, medical staff, volunteers, students, and contractors ("Workforce") must conduct themselves in order to protect and promote Marshall's integrity and to enhance its ability to achieve its primary mission.



Policy

1. Compliance with Laws

It is Marshall's policy that its workforce shall comply with all applicable laws. When the application of the law is uncertain, we will seek guidance from legal counsel.

2. Ethical Business Practices

As a recognized leader in the business community, we strive to set an example of conducting business with honesty, fairness, and integrity. Deceptive and/or fraudulent marketing and business practices are not tolerated. We make every effort to keep informed of and to comply with the laws and regulations applicable to our business. Individuals who have concerns regarding our compliance with any laws or regulations are encouraged to raise those concerns honestly and forthrightly. Retaliation against individuals who might express such concerns is strictly prohibited.

3. Treatment of Patients

Patients are cared for with dignity, respect, and compassion. Patients are admitted, discharged and transferred based on their medical conditions, regardless of ability to pay. Patients will continue to receive the required level of care even when conflicts arise over third-party reimbursement.

4. Treatment of Workforce

Workforce members are treated with fairness, dignity and respect. Harassment, discrimination, or abuse of any kind is strictly prohibited. Behaviors that are in conflict with this Code of Conduct shall be reported to a supervisor, Human Resources or Compliance.

5. Personal Conduct

Each individual is expected to exercise good judgment and act in accordance with this Code of Conduct and the law. Ethical behavior on the job comes down to honesty and fairness in dealing with each other, our patients, vendors, the government, and the public. Personal conduct extends to the responsible use of social media. Communication in social networks shall comply with all applicable laws, shall never compromise the privacy of our patients nor the confidentiality of their protected health information, and shall not defame Marshall in any way. When management determines that personal conduct adversely affects job performance or the legitimate interests of the organization, disciplinary action may be required.

6. Prohibition on Self-Referrals and Kickbacks

Caution must be exercised when engaging in transactions that involve referral sources. Referral sources include not only the medical practitioner who refers patients, but also his/her family members. Agreements involving compensation to or from a referral source shall be in writing and reviewed by our Compliance Department and/or legal counsel prior to its execution.

Employees in a position to influence selection, usage, and/or referral of vendors and business associates should be especially cautious of giving or receiving gifts, promotional items, and entertainment which may give the appearance of impropriety. Refer to the Gifts, Gratuities, Business Courtesies and Entertainment Policy.

7. Conflicts of Interest

All workforce members and Marshall's governing board members are responsible to maintain objectivity and freedom from outside influence in the performance of their job or fiduciary responsibilities. Conflicts of interest, as well as the appearance of conflicts of interest, are to be avoided. Unavoidable conflicts or potential conflicts must be disclosed and resolved prior to taking a potentially improper action. Refer to the Conflicts of Interest and Recusal Policy.

8. Open Communication

Marshall encourages open lines of communication. If you are aware of an unlawful or unethical situation, there are several ways you can bring this to the attention of management. Your supervisor, director, or vice president is the best place to start, but you can also contact the Compliance Officer or call the anonymous Compliance Hotline at (530) 626-2800 to express your concerns. All reports will be investigated promptly.



9. Confidentiality of Information

Confidential information, such as Marshall's intellectual property, financial statements, patients' protected health information, and any information supplied by outside consultants for the organization's benefit is to be safeguarded and shall not be disclosed without proper authorization.

10. Information Security

Marshall policies require all employees to promptly report instances of non-compliance with Marshall's information security policies. Marshall employees are also expected to report observed non-compliant information security incidents. Employees are to report concerns to their supervisor first. If unavailable concerns can be reported to another member of the management team, the Information Technology Division or the Compliance & Privacy Officer.

11. Copyrights, Licenses, and Trademarks

Regulations governing copyrights, licenses, and trademarks shall be observed by taking reasonable steps to prevent copying or unauthorized use of such materials.

12. Use of Property

Marshall's equipment, systems, facilities, corporate charge cards, supplies, and other assets are to be used for business purposes only. Every workforce member is responsible to utilize all resources, including time, in a fiscally responsible manner. Personal items or information should not be kept in telephone/computer systems, offices, work spaces, etc. Workforce members should have no expectation of privacy with regard to items or information stored or maintained on Marshall equipment or premises.

13. Accuracy of Records and Reporting Information

All business, employee, and patient records must be accurate and honest. Records are to be maintained and retained as prescribed by regulatory agencies and Marshall policies. False, misleading, or dishonest reporting of information, whether internally or to outside organizations is prohibited.



14. Coding and Billing Integrity

Accurate, complete, and timely claims shall be submitted in accordance with federal and state laws and regulations, and billing/coverage criteria for each payer. Neither “over-coding” nor “under-coding” is tolerated. Claims must accurately reflect the services rendered and supplies provided. Documentation in the medical record must support medical necessity, diagnosis, condition, medical needs and anticipated results. No professional practitioner or Marshall employee shall intentionally submit incorrect, misleading, or fraudulent information to any payer or falsify, destroy or withhold records related to the billing and claims submission process.

15. The Work Environment

Marshall strives to provide a safe, healthy, and productive work environment free from discrimination and harassment, including sexual advances, comments and actions or any other conduct that creates an intimidating or otherwise offensive work environment. Workforce members are responsible to report violations to a supervisor, Human Resources or Compliance.

16. Research Misconduct

Any allegations of research misconduct such as fabrication, falsification, plagiarism or other practices that seriously deviate from those that are commonly accepted within the scientific community for proposing, conducting or reporting research will be thoroughly investigated by Marshall’s Bioethics/Institutional Review Committee and by the Compliance Officer. Allegations and the results of the investigation will be reported to the Office of Research Integrity at the U. S. Department of Health & Human Services.

17. Marketing and Promotions

As a provider of health care services, the marketing and promotional activities of the organization may be subject to anti-kickback and other laws that specifically apply to the health care industry. Marshall has adopted policies to specifically address the requirements of such laws. In general terms, workforce members are not allowed to solicit, offer or receive payments, compensation or benefit of any kind, regardless of the value, in exchange for referring, or recommending the referral of, patients or customers to any of our facilities.



MARSHALL

Compliance Hotline
530-626-2800