MERCY
CODE OF CONDUCT

As the Sisters of Mercy before us, we bring to life the healing ministry of Jesus through our compassionate care and exceptional service.
To Board Members, Medical Staff, Co-workers and others engaged in Mercy’s Health Care Ministry:

Consistent with Mercy’s mission and values, we’re committed to providing quality health care to the communities we serve. Part of that service is lawful and ethical conduct at each Mercy facility and clinic. Mercy’s Compliance Program is designed to promote these standards in a moral manner consistent with the heritage, values and teachings of the Sisters of Mercy.

As the foundation of our Compliance Program, our Code of Conduct expresses a commitment to conduct our business with integrity in accordance with all applicable federal, state and local laws and regulations.

Our Compliance Program provides the educational resources and tools you need to fulfill your role in the Program and adhere to the principles and standards in the Code of Conduct. Please review the attached information carefully. You are the essential ingredient in the Compliance Program, and your participation and ideas strengthen our ministry. We have a simple reporting process to encourage you to bring forward any issues or concerns you may have regarding ethical and lawful conduct in Mercy.

Thank you for your contributions and commitment to our health care mission.

Very truly yours,

[Signature]

Lynn Britton
President and Chief Executive Officer
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Letter from Lynn Britton, President/Chief Executive Officer

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Follow the Faith-Based Directives
Perform all duties on behalf of Mercy in conformance with the Ethical and Religious Directives for Catholic Health Care Facilities.

Comply with Laws, Regulations and Policies
Observe all laws, regulations and policies that govern Mercy’s activities.

Act in Good Faith and Honesty in Business Transactions
Represent Mercy honestly and in good faith in all business transactions. Conduct business transactions with vendors, contractors and other third parties in a manner that is free from offers or solicitation or gifts or favors or other improper inducements.

Maintain Confidentiality
Maintain the confidentiality of patient information and other proprietary confidential information in accordance with applicable legal and ethical standards.

Avoid Conflicts of Interest
Observe a duty of undivided and unqualified loyalty to Mercy.

Be a Good Steward of Mercy Assets
Make prudent and effective use of Mercy’s resources and properly and accurately report its financial condition.

Engage in Education and Professional Development
Educate yourself on Mercy’s compliance policies and pursue professional growth and development

How Do I Ask a Question or Report a Concern?
Compliance Hot Line - Available 24/7
Call 1-877-4MERCY2 or 1-877-463-7292

Contact Information
VALUES

Dignity
We cherish each person as created in the image of God.

Justice
We pledge to be in right relationship with one another with particular concern for people who are economically poor.

Service
We seek out and put the needs of others first.

Excellence
We give only the best for those entrusted to our care.

Stewardship
We wisely use our talents and resources to strengthen Mercy as a ministry of the Church.

MERCY
CODE OF CONDUCT SUMMARY

Mercy’s Code of Conduct (“Code”) sets forth principles of ethical and moral conduct for all persons engaged in its health care ministry. Mercy’s ministry includes Mercy Health and each hospital, clinic, skilled nursing, rehabilitation, home health, hospice and other health care entity of which Mercy Health is the sole or controlling member. All board and committee members and Mercy co-workers, medical staff and others engaged in services of Mercy are expected to act in accordance with the following principles of conduct:

1) Follow the Faith-Based Directives
2) Comply with laws, regulations and policies
3) Act in good faith and honesty in business transactions
4) Maintain confidentiality
5) Avoid conflicts of interest
6) Be a good steward of Mercy assets
7) Engage in education and professional development

These core values provide focus, direction and accountability for making the right choices as we go about our daily service. The principles of conduct described in the following pages guide how we live out these values.
PRINCIPLE 1
Follow the Faith-Based Directives

As a Mercy community member, you are expected to comply with the *Ethical and Religious Directives for Catholic Health Care Services*. The Directives are moral guidelines which express the Church’s teaching on medical and moral matters.

The current edition of the Directives is divided into six parts. They are:

*The Social Responsibility of Catholic Health Care Services*: Catholic health care is a ministry of the Church which promotes the dignity of all, cares for persons who are poor, and contributes to the common good of the community and responsibly stewards its resources.

*The Pastoral and Spiritual Responsibility of Catholic Health Care*: A Catholic health care institution is a community of healing and compassion, embracing the physical, psychological, social and spiritual dimensions of the human person.

*The Professional/Patient Relationship*: Catholic health care nurtures a truly interpersonal professional/patient relationship that requires mutual respect, trust, honesty and appropriate confidentiality.

*Issues in Care for the Beginning of Life*: Catholic health care ministry is rooted in a commitment to respect the sacredness of every human life from the moment of conception to death.

*Issues in Care for the Dying*: A Catholic health care institution provides compassionate care and related relief of pain and suffering for the dying.

*Forming New Partnerships with Health Care Organizations and Providers*: Catholic health providers, when forming new partnerships with other health care organizations, should require systematic and objective moral analysis and respect Church teaching.

For more information regarding how the Directives apply to you and your position, please contact your supervisor or Mission leader. The Directives can be found on the website of the United States Conference of Catholic Bishops at:

PRINCIPLE 2
Comply with Laws, Regulations and Policies

You are responsible for performing Mercy activities in compliance with applicable laws, regulations and policies.

The following are examples of legal requirements that apply to Mercy. These examples do not cover every situation you may encounter. Please talk with your manager or local Compliance Officer if these examples are not clear to you or do not cover the question you have. (Contact information for your Compliance Officer is listed in Attachment I.)

ANTI-KICKBACK LAW: Kickbacks are gifts, entertainment, or anything else of value given to or from a person or company with an expectation or hope that it will result in referrals of patients or prescribing or ordering of items or services paid for by a government program.

The Anti-Kickback statute prohibits offering or receiving, directly or indirectly, remuneration (anything of value) to induce, or in exchange for, a referral of federal health care program business—patients, items, services.

You are responsible for recognizing gifts or other benefits that may violate the Anti-Kickback Law and may not offer or receive those items or services. (See also Gifts, Gratuities and Entertainment – pp 9-10.)

ANTITRUST LAWS: You must comply with applicable antitrust and similar laws that regulate competition. Examples of prohibited conduct include:

(1) agreements to fix prices (including price sharing) with competitors; (2) boycotts, participation in certain exclusive dealing and price discrimination agreements; and (3) unfair trade practices including bribery, stealing trade secrets, deception, intimidation and similar unfair practices.
PRINCIPLE 2 (cont’d)
Comply with Laws, Regulations and Policies

CODING AND BILLING RULES: Mercy is committed to submitting accurate, complete and timely claims for payment. Co-workers responsible for creating charges, including clinical, billing, coding, and medical records management personnel, must use due care that all claims are accurate and in compliance with applicable federal and state billing requirements. It’s your responsibility to immediately notify a supervisor or compliance officer of errors in coding or billing so these may be promptly corrected. Bills must be submitted only for services provided and appropriately documented. Inaccurate, false or fraudulent claims could subject Mercy to prosecution, refunds and/or penalties. Quality control processes and procedures are used to support accurate billing and to identify and address inappropriate claims.

DOCUMENTATION STANDARDS: Mercy is responsible for the accuracy of all patient, employment and business documents and records. Complete documentation helps us comply with regulatory and legal requirements and supports our business practices.

Corrections to documents and records must be made according to Mercy policies and applicable laws and regulations. Line through, initial and date incorrect entries. Do not use correction materials to remove an original entry in a legal document. Correcting documentation and errors in electronic records requires specific procedures to maintain the accuracy and integrity of those records. Contact your supervisor or clinical informatics department for assistance.

EMERGENCY MEDICAL TREATMENT AND ACTIVE LABOR ACT (EMTALA): We follow the federal Emergency Medical Treatment and Active Labor Act (EMTALA), sometimes called the “Anti-Dumping Law”. EMTALA requires hospitals with a dedicated emergency department to provide a medical screening exam to any individual who comes to the emergency department. In addition, necessary stabilization must be provided within the capability of the staff and facility for patients determined to have an emergency medical condition.

ENVIRONMENTAL RESPONSIBILITY: It is the policy of Mercy to manage and operate its business in a manner that respects our environment and conserves natural resources. You are expected to utilize resources appropriately and efficiently; to handle and dispose of all medical waste and hazardous materials in accordance with applicable laws and regulations; and to work cooperatively with the appropriate authorities to remedy any environmental contamination for which Mercy is responsible.

EXCLUDED INDIVIDUALS AND ENTITIES: Mercy does not knowingly employ, do business with or contract with an individual or entity that is excluded from participation in government health care programs. Mercy regularly searches the General Services Administration Excluded Provider List Service (EPLS) and the Office of Inspector General List of Excluded Individuals and Entities (LEIE). You are required to notify Mercy if an individual or entity associated with Mercy becomes excluded, debarred or ineligible to participate in government health care programs.
PRINCIPLE 2 (cont’d)
Comply with Laws, Regulations and Policies

**FALSE CLAIMS ACT:** Federal and state False Claims Acts (FCA) prohibit anyone from knowingly making, presenting or causing to be presented a false record or statement to obtain payment from a government program or conspiring to defraud any government program to get a claim paid or approved.

“Knowingly” means that the person or organization:
- knows the record or claim is false, or
- seeks payment while ignoring whether or not the record or claim is false, or
- seeks payment recklessly without caring whether or not the claim is false.

A few examples of false claims include someone knowingly billing Medicare for services that were not provided, or were not medically necessary; falsifying certificates of medical necessity; unbundling or billing separately for services that should be billed as one service; creating false medical records or treatment plans to increase payments; failing to report or refund overpayments or credit balances; and physicians billing without personal involvement for services rendered by students or a mid-level provider. Under certain circumstances, an inaccurate Medicare, Medicaid, VA, or Federal Employee Health Plan claim could become a False Claim.

**Whistleblower Protections.** A person (referred to as a “Whistleblower”) who knows a false claim was filed for payment can file a lawsuit in federal court on behalf of the government and, in some cases, receive a reward for bringing original information about the false claim to the government’s attention. The FCA protects the whistleblower from being fired, demoted, threatened or harassed by his/her employer for filing the lawsuit. If the whistleblower’s employer is found guilty of retaliation, the court can order the employer to re-hire the employee and pay the employee twice the amount of back pay that is owed, plus interest and attorney’s fees. The states where Mercy facilities are located also have state False Claims Acts that allow a similar lawsuit in state court if a false claim is filed with the state for payment, such as under Medicaid or Workers’ Compensation. Penalties for violation of the FCA are severe and can include imprisonment, criminal fines, civil monetary penalties and exclusion from participation in Medicare and Medicaid. Monetary penalties for violating the federal False Claims Act can be up to three times the value of the false claims, plus from $5,500 to $11,000 in fines, per claim.

The federal and state False Claims Acts that pertain to Mercy may be found at:

- **Federal False Claims Act:** Federal False Claims Act: 31 USC 3729-3733
- **Arkansas Medicaid Fraud False Claims Act:** A.C.A. §20-77-900
- **Kansas Medicaid fraud Control Act:** K.S.A. §21-3844
- **Louisiana—Medical Assistance Programs Integrity Law:** L.A.R.S. §46: 438
- **Missouri Health Care Payment Fraud and Abuse Act:** V.A.M.S. §191.905
- **Oklahoma Medicaid Program Integrity Act:** OK ST 56§1005-1007
- **Texas Medicaid Fraud Prevention Act:** V.T.C.A. Human Resources Code §§36.002 to 36.115
PRINCIPLE 2 (cont’d)
Comply with Laws, Regulations and Policies

Mercy’s Policy. Mercy’s Compliance Program includes monitoring and auditing for compliance that helps prevent or detect errors in coding or billing that could result in false claims:

- Mercy requires its co-workers who are involved with creating and filing claims for payment for services provided by Mercy to use only complete and accurate information to make the claims.

- Mercy expects that anyone with a concern about a possible false claim at a Mercy facility will promptly report the concern to his or her manager, Compliance Officer or to the Compliance Hot Line so that Mercy can investigate and correct any errors. (Contact information for your Compliance Officer is listed in Attachment I. The Compliance Hot Line is available 24/7 – Call 1-877-4MERCY2 or 1-877-463-7292.)

- Mercy has a policy on non-retaliation to protect our co-workers from adverse action when they do the right thing and report any genuine concern in good faith.

- Mercy will investigate any allegation of retaliation against a co-worker for speaking up, and will protect and/or restore rights, as appropriate, to anyone who has raised a good faith concern.

GOVERNMENT INVESTIGATIONS: Mercy responds to government requests for information in a cooperative manner, while also preserving Mercy’s legal rights and the rights of its co-workers. If a co-worker receives an inquiry from a government investigator, whether oral or written, including but not limited to a subpoena, a search warrant, or other legal document regarding Mercy’s business, whether at home or in the workplace, the co-worker should immediately notify his or her supervisor, Compliance Officer or legal counsel.

Co-workers should not under any circumstances:

- Destroy Mercy documents in anticipation of a request for those documents from a government agency, even if the period for retention has expired.
- Alter Mercy documents.
- Lie or make misleading statements to government investigators during any investigation.
- Pressure anyone to hide information from or provide false /misleading information to government investigators.

HIPAA COMPLIANCE: Mercy is committed to compliance with the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the Health Information Technology for Economic and Clinical Health Act (HITECH Act). Contact your Privacy Officer with questions or concerns about compliance with HIPAA and the HITECH Act. (Contact information for your Privacy Officer is listed in Attachment I.)

For more information also see Principle 4: Maintain Confidentiality.
PRINCIPLE 2 (cont’d)
Comply with Laws, Regulations and Policies

STARK SELF-REFERRAL: Mercy co-workers are required to support compliance with laws prohibiting physician self-referral, generally known as the Stark Law. Under the Stark Law, a physician may not refer Medicare or Medicaid patients for “designated health services” to an entity with which the physician or an immediate family member has a “financial relationship” unless a Stark exception applies. Examples of designated health services are:

- Clinical lab services
- Physical therapy, occupational therapy and speech-language pathology services
- Radiology and other imaging services including nuclear medicine
- Radiation therapy services and supplies
- Prosthetics, orthotics and prosthetic devices and supplies
- Home health services
- Outpatient prescription drugs
- Inpatient hospital services
- Outpatient hospital services
- Parental and enteral nutrients, associated equipment and supplies

The determination of whether a financial relationship with a physician is permissible is very complicated and the list of designated health services may change from time to time. All of these arrangements must be reviewed and documented by legal counsel. Questions or concerns about arrangements with a physician or physician group should be referred to your Compliance Officer or legal counsel. (Contact information for your Compliance Officer is listed in Attachment I. The Compliance Hot Line is available 24/7 – Call 1-877-4MERCY2 or 1-877-463-7292.)
PRINCIPLE 2 (cont’d)
Comply with Laws, Regulations and Policies

**TAX EXEMPT STATUS RESTRICTIONS – Avoiding Improper Private Inurement:**
As a tax-exempt entity, Mercy has a legal and ethical obligation to use its resources in a manner that advances the public good, rather than the private or personal interests of any individual. Tax laws prohibit Mercy from:

- Compensating co-workers, physicians and vendors in excess of fair market value for services provided.
- Paying more than fair market value for products, services or leases.
- Taking part in a joint venture or other transaction that results in private benefit to a third party.
- Permitting any person to sell, buy, lease or use Mercy’s property at less than fair market value.

Mercy must accurately report payments to appropriate taxing authorities, and file all tax and information returns in a manner consistent with applicable laws.

**Political Activity.** As a tax exempt organization, Mercy must comply with certain Internal Revenue Service restrictions on political activities. While we engage in many advocacy efforts, there are limits on our political activities.

Some examples of activities in which Mercy may not be involved are:

- Sponsoring fund raising events to support a candidate for public office
- Contributing Mercy funds to a candidate for public office
- Opposing or supporting a candidate for public office
- Contributing Mercy funds to a PAC or political party
- Using Mercy resources to oppose or support a candidate for public office

Activities that are permitted include:

- Calling and/or writing elected officials, legislators and representatives of government agencies to express a view on an issue.
- Visiting political leaders to provide Mercy’s perspective on proposed legislation.
- Facilitating public forums or debates to raise awareness of issues and inform voters on the impact of proposed legislation on the community
PRINCIPLE 3
Act in Good Faith and Honesty in Business Transactions

You are required to accurately and honestly represent Mercy and not engage in any activity or scheme intended to defraud anyone of money, property or honest service.

Honest Communication. Mercy requires candor and honesty from individuals in the performance of their responsibilities and in communication with our attorneys, auditors, patients and others.

Copyrighted and Licensed Materials. You may not copy or use any copyrighted, trademarked or licensed documents or computer programs without written permission. You shall not use or copy any customer, supplier or employee contract, document, computer system, software, publication, information or product when to do so violates a third party’s property right.

Gifts, Gratuities and Entertainment. You may not offer or ask for gifts or favors in exchange for influence or assistance in a transaction.

• Gifts from Patients. You are prohibited from asking for tips or gifts from patients. You may accept non-monetary gifts of a nominal value from patients. If a patient or other individual wishes to present a monetary gift, or a gift with more substantial value, he or she should be referred to your local Mercy foundation or the Mercy Foundation for Health Innovation.

• Gifts Influencing Decision-Making. You may not accept gifts, favors, services, entertainment or other things of value if doing so might influence decision-making or actions affecting Mercy. Also do not offer or give money, services or other things of value with the hope or expectation of influencing a decision by any purchaser, supplier, customer, government official or other person in your favor or to favor Mercy. You may not offer gifts to patients if the value of the individual gift exceeds $10.00, or the total value of gifts to a patient during one year exceeds $50.00.
PRINCIPLE 3 (cont’d)
Act in Good Faith and Honesty in Business Transactions

• *Gifts From Vendors and Vendor-Sponsored Entertainment.* You are permitted to accept gifts and/or entertainment from vendors only when there is no expectation of an action in return (no strings attached) and the gifts and entertainment have only nominal value. Remember that any gift or benefit (large or very small) is illegal if even just one purpose for the gift is obtaining business that is reimbursable by Medicare, Medicaid or other government programs. If you have a concern whether a gift or entertainment is allowed, consult with your supervisor. To the extent possible, gifts should be shared with other co-workers or your team.

• *Workshops, Seminars and Training Sessions.* Airfare, transportation and lodging arrangements may not be accepted for vendor-sponsored educational events, except when the Mercy representative is a presenter at the event. Reasonable meals may be accepted when these are appropriate to facilitate the educational purposes of the event.
PRINCIPLE 4
Maintain Confidentiality

Mercy co-workers who are in possession of or have access to confidential, sensitive or proprietary information have an obligation to protect and safeguard the information in a manner designed to prevent the unauthorized use or disclosure of such information. Any unauthorized use or disclosure of such information may result in disciplinary action up to and including termination.

- **Patient Information.** Patients we care for expect us to maintain confidentiality and security of the information we collect about them to provide them with quality care and perform other health care related job duties. We comply with HIPAA and HITECH Act requirements and state confidentiality laws. We do not use, disclose or access patient information except as needed to provide care, as required or allowed by law, or with written authorization of the patient or legal representative.

- **Proprietary Information.** Information, ideas and intellectual property assets of Mercy are important to organizational success. Information pertaining to Mercy’s competitive position, business strategies, pricing data, payment and reimbursement information, and information relating to negotiations with co-workers or third parties must be protected and may be shared only with co-workers having a need to know such information to perform their professional responsibilities. You are responsible to protect intellectual property rights, including patents, trademarks, copyrights and software licenses.

- **Personnel Records and Medical Staff Actions and/or Decision.** Medical staff and personnel files, salary, benefit and other personal information relating to medical staff and co-workers must be kept confidential. You are expected to exercise due care to prevent the release or sharing of personnel and medical staff information beyond those persons who need this information to fulfill their job functions.
PRINCIPLE 5
Avoid Conflicts of Interest

A conflict of interest occurs when a co-worker’s personal interests influence or appear to influence his or her ability to make objective decisions to act in the best interest of Mercy and/or Mercy’s patients. A conflict of interest may also exist if the demands of any outside activities hinder the performance of your job or cause you to use Mercy resources for other than Mercy purposes. You are obligated to keep yourself continually free from conflicts of interest in the performance of your responsibility at Mercy.

Some examples of activities that may be considered a conflict of interest for co-workers or their spouses and other immediate family members (spouse, parents, grandparents, children, grandchildren, siblings, in-laws, adopted, half, and step members of the family) are described below:

- **Outside Financial Interest.** If you have ownership in or a consulting or employment relationship with any outside entity that does business with Mercy, this arrangement must be reviewed by your manager. Stock ownership or other investments in publicly held companies do not constitute a conflict of interest when the value of the stock or other investments does not exceed five percent (5%) of the corporation’s stock. Mercy may determine, following a review of the relevant facts, that the arrangement does not constitute an unmanageable conflict of interest if these activities do not conflict with or affect your work performance.

- **Relationships with suppliers, purchasers or competitors.** Avoid personal ties to or bias toward vendors.

- Representation of Mercy by a co-worker in any transaction with a business in which he or she or a family member has personal interest.

- Disclosure or use of confidential, special or inside information about Mercy particularly for personal profit or advantage of the co-worker or a family member.

- Personal use of Mercy property and/or Mercy information.

- Competition with Mercy by a co-worker, directly or indirectly, in the purchase, sale or ownership of property or property rights or interests, or business investment opportunities.
• **Participation on Boards of Directors/Trustees.** You are encouraged to be active in your community, including serving on civic or charitable organization boards. When considering serving on a board keep the following in mind:

⇒ Do not vote on matters that could affect any Mercy entity.
⇒ When serving on a board be sure to do so only in your individual capacity. Do not speak as a representative of Mercy unless you have written authorization from your Mercy leaders to do so.
⇒ You must obtain approval from your leader prior to serving on a board of any organization that may compete with or provide services for Mercy.
⇒ Consult with your leader and/or human resources prior to accepting any compensation for board services provided during normal work hours. These payments must typically be paid directly to Mercy. This does not include reimbursement for expenses due to board participation.
⇒ Mercy retains the right to prohibit membership on any outside board of directors where membership conflicts with the best interests of Mercy.

• **Honoraria.** You are encouraged, with the permission of your supervisor, to participate as faculty and speakers at educational programs and functions, and to write research papers and articles. However, any honorarium in excess of incurred expenses shall be turned over to Mercy unless you used paid time off (PTO) or personal time to attend the program or that portion of the program for which the honorarium is paid, or in the case of authorships, used PTO or personal time to perform the research and writing.

**Conflict of Interest Policy.** Directors, officers and certain other co-workers are Covered Individuals for purposes of Mercy’s Conflict of Interest Policy and are required to participate in an annual Conflict of Interest disclosure process. The Conflict of interest Policy can be found on Mercy’s website.
PRINCIPLE 6
Be a Good Steward of Mercy Assets

Mercy’s assets (including financial resources, human talents, supplies, equipment and reputation) must be used only to further Mercy’s ministry. As responsible stewards of Mercy resources you are expected to:

- Keep accurate and complete financial reports.
- Only use Mercy assets to further our health care ministry — not for personal business or benefit.
- Not use Mercy equipment, supplies, materials or services for unauthorized purposes.
- Use Mercy assets prudently for both business travel and entertainment.
PRINCIPLE 7
Engage in Education and Professional Development

You are responsible for educating yourself and the co-workers you supervise regarding this Code and applicable federal, state and local laws. In addition to training on and receipt of this Code during new co-worker orientation, Mercy requires all co-workers to participate in mandatory training tailored to the co-worker’s job responsibilities. Leaders are responsible for ensuring that each co-worker they supervise completes all mandatory annual training.

Each year all Mercy co-workers will execute an acknowledgement of compliance in connection with their annual performance review, certifying a commitment to uphold the principles and standards set forth in the Code of Conduct and to uphold Mercy’s mission.

Educational Conferences and Seminars. Mercy encourages attendance at professional and trade association conferences and seminars for professional growth and development.

Reimbursement for attendance is subject to the discretion of each co-worker’s supervisor, who will consider applicable budgets and policies.
How Do I Ask a Question or Report a Concern?

As a Mercy co-worker, you have the most direct link to our patients and our operations and are in the best position to identify areas for improvement. Mercy relies on you to provide feedback and report potential problems so that corrections and improvements can be made as needed to support continuous improvement in the quality of our services.

You are encouraged and expected to use any or all of the following options, as needed, to get information or report a concern so you can “Do the Right Thing” and also support your fellow physicians and co-workers in doing the same.

- Speak with a supervisor
- Contact your local Compliance or Privacy Officer
- Contact the Ministry Chief Compliance & Privacy Officer
- Call the Compliance Hot Line

To report a concern anonymously,

call the Compliance Hot Line at

1-877-4MERCY2
(1-877-463-7292)

The Compliance Hot Line is available 24 hours a day, seven days a week. Reports made using the Hot Line are received by trained staff employed by an outside vendor who document and forward information to your local and/or Ministry Chief Compliance Officer for appropriate action. These reports are not traced or recorded. You may remain anonymous if you wish. If you choose to identify yourself, there is no guarantee that your identity will remain confidential. However, when you identify yourself it is easier for the Compliance Officer to provide you with a direct response.
How Do I Ask a Question or Report a Concern?

**Training and Education.** Mercy conducts training and education to help you understand and comply with our expectation that you conduct yourself ethically and responsibly. This education and training is provided annually and at the time you join the organization. In addition, many co-workers receive periodic specialized training on subjects such as billing, coding, confidentiality, safety, environmental issues and regulations that relate specifically to their jobs.

**Consequences of Failure to Comply with the Mercy Code of Conduct.** There are a variety of potentially serious consequences if we fail to comply with laws, regulations and Mercy policies and procedures. The consequences to Mercy include risks to patient safety, refund of payments received from government programs, civil or criminal liability, exclusion from federal payment programs and loss of tax-exempt status. In addition, co-workers may be subject to disciplinary action, including suspension or termination of employment, termination of contractual relationship or removal from office or board membership. Individuals may also be prosecuted and subject to substantial fines.

Our core values and Code of Conduct describe guiding principles that help us maintain an ethical and compliant culture and avoid the consequences described above. It is our responsibility to understand and follow these standards of conduct. Contact your manager, local or Ministry Compliance Officer or the Compliance Hot Line with questions or concerns. No retaliatory action will be taken against anyone who makes a good-faith report of a compliance or ethics concern.

Please keep this Code of Conduct handy and use it as a reference to do your part to promote the values and ethics of Mercy Health.
**ATTACHMENT I – Contact Information**

**LOCAL COMPLIANCE OFFICERS**

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<thead>
<tr>
<th>LOCATION</th>
<th>NAME</th>
<th>PHONE</th>
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<tbody>
<tr>
<td>Carthage</td>
<td>Mike Wardlow</td>
<td>417-659-6315</td>
</tr>
<tr>
<td>Fort Scott/Independence</td>
<td>Lana Brewster</td>
<td>620-223-7092</td>
</tr>
<tr>
<td>Fort Smith</td>
<td>Renea Gibson</td>
<td>479-314-7817</td>
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<tr>
<td>Hot Springs</td>
<td>Becky Cordell</td>
<td>501-622-2349</td>
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<td>Mike Wardlow</td>
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<td>Laredo</td>
<td>Elizabeth Casso</td>
<td>956-721-7411</td>
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<td>New Orleans</td>
<td>Rex Menasco</td>
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<td>Oklahoma</td>
<td>Shelia Henson</td>
<td>405-752-3827</td>
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<td>Rogers</td>
<td>Michelle Bass</td>
<td>479-338-3353</td>
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<tr>
<td>Springfield</td>
<td>Faye Griffin</td>
<td>417-820-2676</td>
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<tr>
<td>St. Louis/Washington</td>
<td>Tony Krawat</td>
<td>314-628-3816</td>
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**LOCAL PRIVACY OFFICERS**

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<td>Carthage</td>
<td>Cathy Cole</td>
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<td>Fort Scott/Independence</td>
<td>Lana Brewster</td>
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<td>Fort Smith</td>
<td>Marilyn Frazier</td>
<td>479-314-6266</td>
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<tr>
<td>Hot Springs (Clinic)</td>
<td>Amy Bernard</td>
<td>501-622-6500 x9</td>
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<tr>
<td>Hot Springs (Hospital)</td>
<td>Renee Williams</td>
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<td>Joplin</td>
<td>Tracy Clark</td>
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<td>Oklahoma</td>
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<td>405-752-3827</td>
</tr>
<tr>
<td>Rogers</td>
<td>Michelle Bass</td>
<td>479-338-3353</td>
</tr>
<tr>
<td>Springfield</td>
<td>Shawn Barton</td>
<td>417-820-8780</td>
</tr>
<tr>
<td>St. Louis/Washington</td>
<td>Tony Krawat</td>
<td>314-628-3816</td>
</tr>
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Mercy Chief Compliance and Privacy Officer
Susan Hannasch (314-628-3671)
Compliance Hot Line

1-877-4MERCY2