

## Acknowledgement

I acknowledge that I have received a copy of the Building on Excellence Booklet describing the Baptist Healthcare System Standards of Conduct, and intend to comply with its terms throughout my employment with the organization.

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Signature

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Name (Please type or print)

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Date

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## Introduction

Baptist Healthcare System, (“Baptist”) recognizes that its employees are its greatest assets, and they are the keys to Baptist’s success. For this reason, it is Baptist’s commitment to select and hire well-qualified, service-minded people who will make the right decisions in difficult situations. It is the goal of Baptist to be known, not only for the quality of its services, but also, for the integrity of its people and its high standards of business conduct.

The mission, vision, and values of Baptist Healthcare System provide the foundation for Baptist’s Standards of Conduct. It is important that each employee of Baptist be familiar with our mission, vision, and values.

### Mission Statement

The Mission of Baptist Healthcare System is to continue our Christian heritage of service and to enhance the health of the people and communities we serve. Our vision is to be the healthcare leader in Kentucky.

Baptist Healthcare System will accomplish its mission to others and achieve its vision guided by the values of integrity, excellence, respect, stewardship, and collaboration.

Baptist is a dynamic and growing organization, and the environment in which it operates is one of increasing complexity. Our Corporate Responsibility Program sets forth guidelines for personal and professional behavior which all employees should follow. It is impossible to create a Standard of Conduct that will address every situation you may encounter during your career with Baptist; however, when faced with a difficult situation, you should stop and consider your actions in the context of the guidelines presented in this booklet.

## Standards of Conduct



To help us achieve our Mission in a practical, professional, and ethical way, we have established Standards of Conduct for all employees, agency personnel, volunteers and medical staff within our System:

- The business of Baptist Healthcare System will be conducted according to all applicable federal, state and local laws.
- All individuals working within Baptist will perform their responsibilities in light of our Mission and with honesty, integrity and professionalism.
- All individuals working within Baptist should perform their responsibilities in ways that avoid conflicts of interests; this includes our employees, agency personnel, volunteers, and the medical staff within Baptist.
- All billing by our hospitals will be for the services and items actually provided, in keeping with the rules of the government and other payers.
- When working with our medical staff, contractors and other healthcare organizations whether internal or external to our System, all Baptist Healthcare System employees will conduct themselves in keeping with applicable laws, in particular, those laws that prohibit fraud and abuse, waste, restraint of trade and improper benefits.
- All individuals within our Baptist Healthcare System Hospitals and offices will strive to maintain a cooperative relationship of mutual trust with all government agencies.
- Baptist Healthcare System will vigorously pursue its Corporate Responsibility Program to achieve all Compliance Objectives and to develop a culture of compliance throughout the System.
- Licensed and other professional employees working at Baptist are expected to adhere to any ethical standards required by their respective licensing agencies and to follow any ethical guidelines recommended by their professional associations.

## Patient Care



Baptist is committed to delivering quality care, products and services to its patients in a compassionate, respectful and efficient manner. Patients will be treated with dignity and respect at all times. Baptist will provide each patient with information regarding his/her rights and responsibilities and will endeavor to protect those rights throughout their care and treatment.

### Patient Bill of Rights and Responsibilities

We at Baptist respect you as an individual. Therefore, as a patient, you are entitled to rights and privileges. We have written the Baptist hospitals' Patient's Bill of Rights just for you – to explain the rights and privileges you can expect at Baptist hospitals. Our aim is to provide the highest level of care, on an equal basis, for all our patients. At Baptist hospitals, you have the right to:

- Receive fair and compassionate care at all times and under all circumstances.
- Be treated equally and receive the highest level of care, regardless of your natural origin, race, religion, sex, age or disability.
- Retain your personal dignity and receive care sensitive to your personal feelings and need for bodily privacy at all times while in our hospital.
- Receive personalized treatment, through an individual treatment plan administered by our qualified and experienced professional staff. This institution values patients' cultural, racial and religious heritage as a part of that treatment plan.
- Have your medical and personal information, examinations, consultations and treatment remain confidential.
- Receive visitors unless such visits harm your medical condition and affect your recovery.
- Send and receive mail without interference from hospital personnel or other parties.

- Conduct private telephone conversations with your family and friends.
- Examine and receive an explanation of your bill.
- Be informed of hospital rules and regulations that affect your activities and behavior as a patient.

Patients and/or their designated surrogate have the right to:

- Refuse to participate in clinical training programs or to be used in the gathering of data for research purposes, regardless of your payment source – government, personal or third party.
- Know the identity of the doctor responsible for your care.
- Be told of any medical procedures and tests that are to be carried out, the reason for the procedure and tests, and who will be conducting them.
- Talk with all those who are responsible for your care, have your questions answered, discuss your treatment plan and the expected results of your treatment program.
- Refuse treatment to the extent permitted by law and be told of the medical consequences of your actions.
- Expect reasonable continuity of care. You have the right to expect the hospital, your doctor, or another representative to explain the care you need after discharge from the hospital.

We at Baptist hope that you respect us as an institution established to provide quality care in a Christian environment. Therefore, as a patient, you have the responsibility to:

- Provide the hospital with the necessary financial information it needs to bill you or third party payors for services provided to you.
- Follow instructions provided in order to effect a positive outcome.
- Realize that the ultimate responsibility for your health is yours if you refuse treatment.
- Follow hospital rules and regulations.
- Reimburse the hospital for services provided to you.
- Treat employees and other patients as you expect to be treated.

### Questions to ask yourself

- ❖ *Do I always treat patients with respect and dignity?*
- ❖ *Do I avoid discussions concerning patient information in public areas or on mobile phones?*
- ❖ *Am I careful not to let my personal feelings or circumstances interfere with patient care?*
- ❖ *Am I careful not to leave patient files, reports or other information in areas that could be viewed by the public?*



## Workplace Behavior and Equal Employment Opportunities

Baptist is committed to a work environment that respects the rights, dignity and cultural differences of its employees, contractors, and agents. Sexual harassment, or any other form of physical, mental, or verbal abuse, is inappropriate and will not be tolerated.

Baptist is committed to equal employment opportunity in recruiting, hiring, evaluating, training, discipline, compensation, promotion, and termination. Discrimination against any employee, or applicant for employment, because of age, race, religion, sex, disability, national origin, or veteran status will not be tolerated.

### Questions to ask yourself

- ❖ *Do I respect the rights of those with whom I work?*
- ❖ *Am I careful not to let differences in beliefs or backgrounds affect the work environment?*
- ❖ *Am I careful not to let what I say or do offend my workers or make them uncomfortable?*
- ❖ *Do I treat others the way I wish to be treated?*
- ❖ *Do I tell jokes or make comments that have direct or indirect sexual, ethnic, etc., overtones?*

## Conflicts of Interest



All of us need to avoid conflicts of interest. A conflict of interest occurs when a relationship, influence, or activity impairs, or even gives the appearance of impairing one's ability to make objective and fair decisions in the performance of his/her job or which impairs Baptist's relationships with patrons and other health care providers. In other words, you should not place yourself in any situation that might force you to choose between your personal or financial interests and the interests of Baptist.

Here are some instances in which a conflict of interest may exist:

- Employment by a competitor or potential competitor while employed by Baptist.
- Direct or indirect ownership of, or substantial interest in, a company which is a competitor or a supplier of goods and services to Baptist.
- Acceptance of gifts (except as described in this booklet), payments, or services from those doing business or seeking to do business with Baptist.
- Serving as a director, officer, consultant or other key role with a company doing business, or seeking to do business or competing with Baptist.
- Hiring or contracting with a family member or friends to provide goods and/or services to Baptist.

In certain instances, conflicts of interests may arise despite your best efforts to avoid them. You should promptly, and fully, disclose to your supervisor any business or financial interest or relationship you, or a member of your family, have which might reasonably be construed as a conflict of interest.

## Questions to ask yourself

- ❖ Am I familiar with Baptist's Conflict of Interest policies?
- ❖ Do I ensure that my relationship with a competitor or supplier does not create the appearance of a conflict of interest?
- ❖ Do I refrain from using system data or property for personal gain?
- ❖ Do I protect information about Baptist from persons who could use that information inappropriately or for competitive advantage?
- ❖ Do I make sure that my family members are not involved in another business activity that might interfere with how I perform my duties as a Baptist employee?
- ❖ Am I engaged in any outside activities or employment which may be an actual or potential conflict of interest?



## Business Courtesies, Gifts and Customer/Supplier Relations

Baptist does not want to give or receive business obtained through the improper use of business courtesies, gifts or relationships. It is against the law, and Baptist policy, to give or receive any "remuneration" either in return for or to induce: (a) a patient referral; or (b) the purchase, lease or order of any good, facility, service or item. Remuneration is defined as anything of economic value, including a kickback, bribe or rebate, in cash or in-kind.

Baptist deals with many suppliers. It is our policy to select suppliers on the basis of such factors as price, quality, performance and suitability of products or services, quantity, delivery, service, and reputation. You should not accept or solicit any benefit from an existing or potential supplier that might compromise, or appear to compromise, your objective assessment of the supplier's products or services.

You should not require a supplier to give up trade with our competitors, or require a supplier to purchase our products or services in order to obtain, or retain, their

supply agreement with us. You must also respect and protect any confidential or proprietary information shared with you by a supplier.

Finally, you may not solicit, or use your position with Baptist, to secure a special discount or other favorable treatment for yourself or others not extended by the supplier to all Baptist employees.

This policy is not intended to preclude the acceptance, or giving, of common, non-cash courtesies, provided that: (a) the value of the gift is nominal in relation to the circumstances in which it was offered and accepted; and (b) it is not intended to influence a business transaction. Examples of acceptable gifts and gratuities include:

- An unsolicited, non-cash gratuity such as food and refreshments;
- Invitations to participate in regional sporting or entertainment activities that facilitate business relationships;
- Unsolicited advertising or promotional materials, such as a pen, calendar, paper weight, or other like memento;
- A gift from a personal friend or relative when it is clear that the motivation for the gratuity is the personal or family relationship and not any existing or potential business relationship;
- Periodic meals paid for by a supplier which occur in the normal course of business discussions or negotiations.

#### Questions to ask yourself

- ❖ *Do I always follow purchasing policies?*
- ❖ *Do I always reject any offer of cash from a customer or supplier?*
- ❖ *Do I refrain from accepting lavish gifts or entertainment from customers or suppliers?*
- ❖ *Do I assume that nominal gifts from suppliers do not influence a business transaction with Baptist?*



## Competition and Anti-trust

Baptist competes, aggressively, in an ethical and legitimate manner. It avoids all actions that are anti-competitive or otherwise contrary to laws that govern competitive practices in the marketplace. Unlawful practices include agreeing, or attempting to agree, to divide territories or customer lists with a competitor(s) or to make any other arrangement with a competitor(s) which artificially raises the price of services, or improperly reduces competition.

Never discuss or disclose price or market information with or to someone from another company unless you first consult with Baptist's Legal Department.

#### Questions to ask yourself

- ❖ *Do I refrain from relationships with competitors that may infer collusion or improper competition?*
- ❖ *Do I keep price or market information confidential?*

## Safety, Health and Environmental Matters



Baptist seeks to provide a healthy and safe workplace for its employees. Supervisors must ensure that all employees are properly trained in health and safety practices and precautions.

Baptist is committed to taking all reasonable steps to minimize the use and discharge of hazardous substances and to comply with all laws and regulations related to the safety of our employees and patients.

Baptist conducts, and participates in, a variety of research initiatives. Baptist is committed to taking reasonable steps to assure that we comply with all federal and state laws, regulations, and guidelines pertaining to scientific and clinical research.

Baptist has an obligation to its patients, and to the people of its communities, to ensure that employees are fit for duty when they report for work. For this reason, the illegal use, sale, or transfer of drugs is not permitted. In addition, you should not possess or drink alcoholic beverages in the workplace or report to work under the influence of alcohol. A violation in this area will be dealt with in a fair and consistent manner in accordance with our policies.

### Questions to ask yourself

- ❖ *When I see an unsafe situation or act, do I take appropriate action to report or correct the situation?*
- ❖ *Do I report to work under the influence of alcohol or drugs that may impair my job performance?*
- ❖ *Am I careful in handling hazardous materials?*
- ❖ *Are hazardous materials handled in accordance with policies?*



## Baptist Property, Technology and Confidential Information

Baptist assets, which are assigned or made available to employees, may be used only for authorized business purposes. Any other use, such as for after-hours charitable work, must receive prior approval from your supervisor.

Those of us who are given custody of Baptist equipment, or other assets, are expected to understand the proper use and maintenance of the equipment or asset. All Baptist assets, in the custody of an employee, are to be returned in acceptable condition, upon request or when the employee leaves Baptist.

Baptist considers confidential and/or proprietary information to be an asset of the company and such information should not be shared with others, including fellow employees, unless they need to know for a legitimate business reason. Similarly, it is Baptist's policy to respect the trade secrets and intellectual property rights of others and to refrain from obtaining or using this information in an unethical manner.

Baptist intends to fully comply with all copyright, servicemark and software licensing laws. An employee may not make copies of computer software programs for personal or professional use. Doing so may be a violation of federal copyright laws.

### Questions to ask yourself

- ❖ *Am I careful not to use or share non-public information about Baptist for my own personal use?*
- ❖ *Do I respect the intellectual property rights of others?*
- ❖ *Do I make copies of software for personal or professional use?*
- ❖ *Do I use system copiers or hospital supplies, such as "scrubs," for personal use?*

## Proper Accounting and Recordkeeping



All Baptist records shall be prepared accurately, reliably, honestly and in accordance with established finance and accounting procedures. An employee must not enter false or misleading information into Baptist records.

Entries of cost, financial or similar business information shall be made only to the regularly maintained books and records of Baptist. No “off the books” transactions will be tolerated. Baptist maintains a system of administrative and accounting controls to: (a) safeguard its assets; (b) check the accuracy and reliability of its accounting data; (c) promote operational efficiency; and (d) encourage compliance with laws and regulations. All of us are responsible for proper accounting, and adherence to control procedures, to ensure that errors or irregularities are avoided or are identified and corrected in a timely manner.

All records, electronic or paper, should be stored in a safe and secure location for the period of time required by law, or Baptist’s record retention policy, whichever is longer. Records should be organized in a manner that permits prompt retrieval. Old or unneeded records, either in electronic or paper forms, should be properly disposed of, or purged, in accordance with Baptist’s record retention policy. An employee should never destroy, or alter, any document in anticipation of, or in response to, a request for those documents by any government agency or court.

### Questions to ask yourself

- ❖ Am I accurate in my timekeeping?
- ❖ Am I honest in filling out expense reports?
- ❖ Am I familiar with Baptist’s record policy and do I retain retention records in accordance with that policy?



## Billing

Baptist bills only for care and services rendered which are properly authorized and documented as medically necessary. Baptist will not tolerate anyone misrepresenting the services, supplies and equipment furnished, or extent of services, supplies and equipment rendered, in order to circumvent coverage limitations or to increase payments from third-party payers. We will take every reasonable precaution to ensure that our billing and coding work is accurate, timely and in compliance with our policies, and federal and state laws and regulations. Contacts made to obtain missing information must be properly and fully documented.

If you work in a billing or coding-related area, you are expected to understand and comply with all billing-related policies and procedures established by Baptist, as well as by all third-party payers (including Medicare and Medicaid) to which claims are submitted.

It is Baptist’s policy to refund any over-payments made as a result of billing errors and to notify the appropriate third-party payer and/or the patient of the problem. Certain government regulations, and most third-party payer contracts, require that patients pay co-insurance, co-payments and deductibles. For example, a practice of routinely writing off co-insurance, co-payments and deductibles may violate legal and contractual obligations and thus should be avoided, except in certain circumstances approved by your supervisor.

### Questions to ask yourself

- ❖ Are all bills for services supported by clinical documentation?
- ❖ Does the clinical documentation support the necessity for, and level of, the services provided?
- ❖ Do I alter bills in any way to avoid third-party payer edits or denials?



- ❖ *Am I ever instructed to process a bill in a way that is contrary to my understanding of third-party payer rules or regulations?*
- ❖ *Am I ever asked to change a code or bill in order to increase reimbursement, even though I believe another code with a lower reimbursement is more appropriate?*

## Admissions, Treatment and Referrals



Baptist provides emergency medical services to all patients regardless of their ability to pay. Charity care and other discounts for hospital services should be provided in accordance with Baptist's charity care policy. Standard clinical admission criteria that include medical necessity guidelines are used to determine whether or not an individual is admitted.

Baptist does not pay bonuses of any type to any employee, or other individuals working in the admissions process, based on the number of patients admitted or the length of the patients' stays.

Each patient is treated as an individual. Medical professionals develop treatment plans to meet the specific clinical needs of every patient utilizing a multi-disciplinary approach. Treatment is provided in the least restrictive environment that is appropriate to the individual patient's needs.

Discharge planning begins at the time of admission and continues throughout the treatment process. The patient, the patient's family and loved ones, and the clinical team are all involved in the discharge planning process. Patients are discharged with an aftercare or follow-up plan including interface with community organizations and support groups whenever possible. In cases where care is needed in the home, Baptist may offer, in accordance with federal laws and regulations, but does not require patients to utilize Baptist-owned or operated home health agencies.

Physicians, and other health professionals, who are not employees of Baptist, are free to refer patients to any person or entity they deem appropriate. If you are in a position to make referrals, you should make such referrals based solely on the interests of the individual seeking care and treatment. Baptist does not make payments, or provide non-cash benefits, to anyone for providing a referral or to induce a referral.

### Questions to ask yourself

- ❖ *Am I aware of arrangements where individuals are paid for referrals?*
- ❖ *Do I know of situations where patients are not given adequate choice with regard to post-discharge care?*



## Community Involvement and Political Activities

Baptist strives to be a good corporate neighbor to the communities it serves. You are encouraged to participate, as a private citizen, in the political process, and as an advocate for religious and charitable organizations, so long as your participation does not (a) interfere with the satisfactory performance of your job duties; (b) bring discredit or embarrassment to Baptist; or (c) create a conflict of interest.

No Baptist funds, equipment, facilities or assets may be used to support a political party, candidate, holder of any government position or any community organization without appropriate senior management approval.

### Questions to ask yourself

- ❖ *Do I ever request Baptist to reimburse me through an expense report, or other means, that could be construed as a direct or indirect political contribution?*
- ❖ *Does any Baptist written material endorse a specific political candidate or solicit contributions to a political candidate?*
- ❖ *Do I ever express my political or religious views in the workplace in such a way that co-workers or subordinates may feel intimidated or harassed if they don't agree?*

## Dealing with Government Officials and Regulatory Agencies



Dealing with government officials is not the same as dealing with private parties. This is true whether the government is acting as a customer, payer, supplier, or regulator. Always secure advice from our Legal Department before entering into a contract with a government entity.

Do not give anything of value (such as a gift, hospitality, or entertainment) that is prohibited by government policy to an employee of a federal, state, or local agency with which Baptist is doing business or is seeking to do business.

Under the direction of the Legal Department, we will cooperate with requests for information from government auditors, investigators or other officials. Any demands or requests for information such as search warrants or subpoenas, should be immediately brought to the attention of the Legal Department.

Any employee who is contacted by a government agent in connection with an investigation, or request for documents, should immediately write down the agent's name, the name of the agency for which he/she works, the subject that he/she wants to discuss, and any other pertinent information. The employee should then contact his/her immediate supervisor and Baptist's Legal Department.

### Questions to ask yourself

- ❖ *Am I honest and forthright in my dealings with government officials and regulatory agencies?*
- ❖ *Do I, appropriately, seek advice from the Legal Department before entering into contracts or dealing with investigations?*



## Marketing and Media Inquiries

All Baptist advertising must be truthful and not misleading. Any claims about Baptist's services must be clearly supported by evidence to substantiate the claims made. All price advertising must accurately reflect the true charges for services. Baptist does not use advertisements or marketing programs that may cause confusion between our services and those of our competitors. False or misleading representations are not made to disparage the services or business of a competitor.

Because of the nature of our industry, we frequently receive requests from the media for information such as patient conditions, interviews with staff members, visitors or patients. All media requests should be handled in accordance with your hospital's policy for media inquiries. The unapproved release of sensitive or patient information could violate the law and/or have a negative effect on the customers we serve, as well as Baptist's reputation and interests.

### Questions to ask yourself

- ❖ *Do I verify the accuracy of information before providing it to others for use in marketing?*
- ❖ *Am I careful not to discuss hospital business with members of the media unless directed to do so by the Public Relations and Marketing Department?*
- ❖ *Do I make sure any employees under my direct supervision are aware of, and follow, Baptist's policies and procedures for dealing with media requests?*

## Getting Help



Baptist needs your help in order to follow the principles described in this booklet. We are responsible, as an organization and as individuals, to act in an ethical and legal manner. In certain instances, you may encounter situations or issues that may not be covered under our Corporate Responsibility Program. In these instances where you need additional guidance or direction on any ethics or compliance-related issue, you should seek the advice of your supervisor or review the various policies and procedures of Baptist and your hospital. You may also contact your hospital's Compliance Officer. If you are unable to seek, or are uncomfortable when seeking guidance from these sources, you should seek assistance from the System Compliance Officer or the Legal Department.

Because the subjects of ethical behavior and compliance with laws and regulations are important, Baptist also has created the Compliance Line. The Compliance Line is available to any employee who has a question or concern about any legal or ethical question. The Compliance Line is also available to employees who observe violations of the Standards of Conduct described in this booklet, or HIPAA Privacy and Security regulations or other violations of laws and regulations. Baptist wants to make it clear to you that you can raise these concerns without any fear that you will be disciplined or terminated for doing the right thing. We only ask that you tell the truth, as you understand it.

The Compliance Line is not intended to replace the current procedures and processes in place in your hospital for communicating information and resolving conflicts or problems. For example, you should continue to utilize your hospital's policies and procedures for resolving issues such as employee grievances and risk management issues.

The Compliance Line is operated by an independent contractor and is available to all employees, seven days a week, 24 hours a day. The number is **1-800-783-2318**. Compliance Line calls are forwarded to the System Compliance Officer within 24 hours. Emergencies are forwarded immediately. You may ask your questions or report suspected unethical or illegal acts without giving your name if you so desire. Compliance Officers will investigate and respond to all Compliance Line inquiries. You will be able to follow-up on the status of your inquiry, if you wish. Again, no action will be taken against any employee who, in good faith, reports information to the Compliance Line.



## Application

Many individuals and organizations that are not employed by Baptist work closely with us as board members, independent contractors, students, medical professionals, volunteers, and business partners. Each of these groups is expected to honor and abide by all applicable Standards of Conduct in our Corporate Responsibility Program while working in our hospitals or conducting business with, or on behalf of, Baptist.

## Training and Review



Baptist provides training to all employees and other parties, as considered necessary, regarding our Corporate Responsibility Program and the Compliance Line. In addition, many of you will receive specialized training on subjects such as billing and coding that relate specifically to your jobs. In order to measure the effectiveness of the Corporate Responsibility Program and our training programs, Baptist also will conduct ongoing audits in these areas.

This training will be effective if each of you participates, and the Corporate Responsibility Program will only be successful if you do your part. Those of you who are supervisors and managers are responsible for making sure your employees attend training and participate, honestly, in any audits. Remember, **you** are Baptist Healthcare System to our patients, our business partners and the communities we serve.

I acknowledge that I have reviewed a copy of the Baptist Healthcare System's Code of Conduct and understand its content and the consequences of failing to follow it.



## Contact Resources

System Compliance Officer	(502) 896-5000
Baptist Hospital East Compliance Officer	(502) 896-7010
Western Baptist Hospital Compliance Officer	(270) 415-7105
Baptist Hospital Northeast Compliance Officer	(502) 222-3455
Baptist Regional Medical Center Compliance Officer	(606) 523-8646
Central Baptist Hospital Compliance Officer	(859) 260-6009
Legal Department	(502) 896-5000
Compliance Line	1-800-783-2318

Baptist Healthcare System

Dear Fellow Employees,

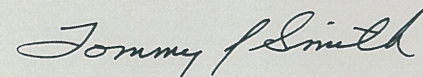
Baptist Healthcare System ("Baptist") has always been committed to the highest standards of business conduct and compliance with applicable laws and regulations. This commitment reflects our belief that the best way for Baptist to fulfill its mission and serve its patients is for us, as its employees and representatives, to be honest, ethical, and fair in our business practices and personal behavior.

This booklet has been prepared to provide you with a clear understanding of what is expected in the work environment. A Corporate Responsibility Program containing Standards of Conduct has been developed by a task force and approved by the executive leadership of Baptist and our hospitals, as well as the Baptist Board. This program is a reaffirmation of our long-term commitment to compliance and quality of services to our patients and the communities we serve.

Our Corporate Responsibility Program was designed to serve several purposes: (1) to ensure that all employees share in the responsibility for keeping Baptist in full compliance with all applicable laws, regulations, and policies governing business practices; (2) to communicate the commitment of Baptist to compliance with laws, regulations, and ethical business practices; and (3) to familiarize all employees with the basic legal principles and standards of behavior expected in the workplace.

We have contracted with an outside firm for an independent, toll-free Compliance Line to provide employees with a way to report possible violations of our Corporate Responsibility Program or other violations of laws and regulations. Employees who call the Compliance Line may remain anonymous and have my assurance that there will be no acts of retaliation or retribution against anyone acting in good faith who reports a perceived problem or concern.

I pledge the full commitment of Baptist to the Standards of Conduct set forth in our Corporate Responsibility Program. Our continuing success is dependent upon maintaining our commitment to compliance with all applicable rules, regulations, policies and standards governing appropriate delivery of high quality healthcare services.



Tommy J. Smith  
President and Chief Executive Officer