



ANMED CODE OF CONDUCT

Revised 2024



A Letter from the Chief Executive Officer

Better Starts Here! At AnMed, our team is focused on delivering better health care and contributing to better life in our community. We live out this promise every day, within our walls and across our community.

Our commitment sits upon our five foundational values of Integrity, Accountability, Compassion, Collaboration and Innovation. These are powerful words representing even more powerful beliefs and actions. Our Code of Conduct is one way we clearly state and define our expectations of ourselves and one another. By understanding and honoring our Code of Conduct, we uphold our commitment to our values and how we deliver our purpose.

I like to say “Better Starts with Us.” It starts with you and with me. All of us together delivering on our promise of “Better Starts Here” together. I am honored that you are joining me in this special commitment.

A handwritten signature in black ink, appearing to read "W. Kenley", written in a cursive style.



William Kenley
Board Chair, CEO, AnMed



MISSION:

To provide exceptional and compassionate care to all we serve

BETTER STARTS WITH US

Our culture is a collection of our common beliefs, values and attitudes. By making a commitment to live this culture every day, we're ensuring that better starts with each one of us.

VISION:

Working together for better health and a better life

BRAND:

Better starts here

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INTRODUCTION

The AnMed Code of Conduct plays an important role in the Corporate Compliance Program by defining the standards of conduct expected of team members. The Code is also a tool designed to help us know what to do if we face a situation that we feel does not align with what is right or is not consistent with AnMed's values and guiding behaviors. There may also be times when the right course of action is unclear. In those situations, you should use your best judgement, this Code of Conduct and other AnMed policies as a guide. If you are still unsure, ask yourself these four questions about each course of action:

1. **Is it consistent with AnMed's values and guiding behaviors?**
2. **Is it illegal or unethical?**
3. **Would AnMed (or you personally) be compromised or embarrassed if it became public knowledge?**
4. **Is it unfair or inappropriate?**

AnMed is committed to creating a workplace where problems can be discussed openly and without fear of retribution. We encourage open communication and sharing concerns across all levels of our organization. Each team member has a personal responsibility to ensure that our actions are conducted in a manner that reflects the highest standards of honesty and integrity. Team members are encouraged to talk with their supervisor if they have any questions or concerns about an issue or anything contained in this Code of Conduct. Team members are also able to contact AnMed's Chief Compliance Officer or make an anonymous report on the Compliance Helpline by calling 833-215-0190 or making a report through the AnMed Employee Portal.

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ANMED'S CORPORATE COMPLIANCE PROGRAM

What is compliance?

Compliance is knowing and following the laws and rules. In simple terms, it is doing the right thing and knowing what to do if something isn't quite right. AnMed has a formal corporate compliance program, overseen by the Chief Compliance Officer. It is designed to detect, prevent and correct violations of the law or AnMed policies.

Why does it matter?

Our individual actions and the decisions we make impact the lives of those we serve, either directly or indirectly. The laws, rules and regulations were developed to make sure those individuals are protected. It is important that we act with high standards of integrity in the way we work and the way we live our lives. We can remain true to our mission and achieve our vision together by choosing actions that are in the best interests of our patients and our community.

What is my responsibility?

Compliance is everyone's responsibility. AnMed is committed to upholding the highest standards of ethical behavior. All individuals and businesses are required to follow the law, but health care organizations have a special responsibility to act in ways that protect the best interests of our patients.

This requires all team members to commit to:

- Have a basic understanding of the rules and following them,
- Understand the difference between right and wrong and choose to do the right thing,
- Immediately report any known or suspected violations of this Code of Conduct,

Resources are available to you if you need more information to understand your responsibilities.

1. Policies and Procedures can be found on the document portal.
2. Compliance Program information can be found on the Employee Portal by selecting Corporate Compliance under the "My AnMed" tab.

Leaders have extra responsibilities, including keeping their team members informed of compliance policies and monitoring the activities of their team to ensure compliance.

Accountability

Team members are held accountable for any violations of this Code of Conduct or AnMed policies. Violations of the law may be reported to law enforcement and be subject to criminal investigation and prosecution, as mandated by the law.

Scan to access
the Compliance
Helpline Weblink



REPORTING CONCERNS

Every team member has an obligation to report any situation believed to be a violation of the law, a violation of AnMed policies, unethical behavior or a violation of this Code of Conduct.

Any potential issue should be reported to your direct supervisor or manager, through the normal chain of command, or to the Corporate Compliance Department. If you are not comfortable speaking to your supervisor or manager, or a member of the compliance team, violations can be reported to our anonymous Compliance HelpLine by calling 833-215-0190 or by visiting the Compliance HelpLine Weblink at www.anmed.ethicspoint.com. The same steps can be used to ask a question or to have an issue clarified.

Non-Retaliation or Retribution

It is the policy of AnMed that retaliation in any form will not be tolerated against a team member who reports in good faith a compliance concern, an actual or potential violation of the Code of Conduct, or any AnMed policy.

The Compliance HelpLine

The Compliance HelpLine allows team members or other interested parties to report suspected violations of the Code of Conduct or federal, state or local laws and regulations without identifying themselves. The HelpLine is operated by a third-party vendor, not related to AnMed. The service forwards reports to Corporate Compliance, which investigates and resolves issues raised. The HelpLine is available 24 hours a day, 7 days a week. Callers can report issues in their preferred language. The HelpLine also offers the ability for the reporter to provide additional information at any time after the initial report or receive information regarding the status of the report.

Reporters will be provided a secure method to anonymously communicate with compliance staff in order to provide additional information regarding their report and check the status of the report.

Calls received to the Compliance HelpLine are not traced or recorded, nor are IP addresses traced for any individual using the weblink to enter a report. To the extent possible, Corporate Compliance will protect the confidentiality of all information reported.

Team members also can make a report through the Compliance HelpLine weblink by visiting www.anmed.ethicspoint.com.

Investigation Process

All investigations and their results are documented for all calls received and issues reported. Complaints are resolved as quickly as possible. When appropriate, the results of any investigation may be shared only with appropriate Human Resources team members, leadership and the Board of Trustees. The confidentiality of all individuals involved in any reported complaint will be protected to the extent possible. There may be a time that an anonymous report requires further follow-up. In these circumstances, we will do our best to maintain confidentiality of the identity of any person reporting a complaint or subject of the investigation.

Scan the QR Code
to access the
Compliance Helpline
Web Reporting



TREATMENT OF PEOPLE

Provision of Patient Care

As a health care provider, we dedicate ourselves to providing exceptional, high-quality care for our patients. We are committed to treating patients in a manner that preserves dignity, autonomy, self-esteem, rights and involvement in their own care. All team members contribute to a patient's health care experience, and it is the expectation that all activities are conducted with integrity, compassion and a concern for the human experience. The medical care our patients receive is medically necessary and appropriate.

Patient Rights

We all have an ethical and legal responsibility to comply with laws, regulations and AnMed policies related to patients' rights. Patients have the right to participate in, and make decisions about, their health care, including the right to refuse medical treatment, their freedom to choose the providers of their health services, their right to informed decision-making, and, as appropriate, care at the end of life. If team members become aware of ethical issues related to a patient's care, a nurse or appropriate supervisor is to be notified immediately.

Patient Privacy and Confidentiality

Patients also have the right to privacy and confidentiality. We collect information about patients' medical conditions, history, medication, and family illnesses to provide quality care. We realize the sensitive nature of this information and are committed to maintaining confidentiality. Protected Health Information (PHI) must be treated with the highest degree of privacy. PHI will be shared only under permissible disclosures or with an authorization as described in the HIPAA Privacy Rule. Team members do not use, disclose, access or discuss patient-specific information, including patient financial information, for non-job-related purposes or for their personal use. We make a commitment to our patients that we will use and disclose their personal health information only as described in the Notice of Privacy Practices. Privacy laws still apply when an individual leaves AnMed.

Non-Discrimination and Accommodation of Special Needs

AnMed acknowledges and respects individual patient differences. AnMed does not treat patients differently based on diagnosis, personal history, race, color, national origin, religion, age, gender, physical or mental disability, socioeconomic status, language, sexual orientation, family status, gender identity or expression. We provide care to patients based on their medical needs. We also provide care to anyone who presents with a medical emergency without discriminating based on these individual differences or the ability to pay. We recognize the responsibility to accommodate the special needs of our patients and will make every reasonable effort to follow local, state, and federal laws, rules and regulations that apply to such circumstances in a manner that respects the dignity of those involved.

Emergency Treatment

We follow the Emergency Medical Treatment and Labor Act (EMTALA) in providing emergency medical screening examination and stabilization to all patients regardless of the ability to pay. Everyone who presents to the emergency department and requests medical treatment will be treated based on medical need or stabilized and transferred. In an emergency or if the patient is in labor, we will not delay the medical screening or necessary stabilizing treatment to seek financial or demographic information. We do not admit, discharge or transfer patients with emergency medical conditions based on their ability to pay or any other discriminatory factor. We do not transfer patients to other facilities unless we are unable to provide the care they need or if the patient requests to be transferred.

EMPLOYMENT PRACTICES

Diversity, Equality and Inclusion

At AnMed we acknowledge the value of individual and cultural differences, and we foster a work environment where the individuality and creativity of every team member is appreciated. We celebrate these unique qualities and the diversity of our team members.

AnMed is committed to providing equal employment opportunities to all teammates and applicants without regard to race, color, religion, sex, sexual orientation, gender, gender identity or expression, national origin, age, ancestry, marital status, disability, medical conditions related to pregnancy or childbirth, genetic information, or veteran status.

Individuals convicted of a criminal offense related to health care or who are not eligible to participate in federal health care programs are not eligible for employment at AnMed.

Licensing and Certification Renewals

Any team member who requires a professional license is required to maintain active status and provide proof of their credentials. Team members are not allowed to work without a valid license if their position requires licensure.

Workplace Safety

As valued AnMed team members, we are responsible for treating every individual with compassion, respect, consideration and dignity. We are accountable for our actions. Disagreements that result in conflict should be treated as opportunities for healthy learning and understanding between team members. Team members do not threaten others or create an atmosphere where any individual feels unsafe or intimidated. Disagreements that lead to verbal or physical, unprofessional, disruptive, or disrespectful misconduct are not tolerated. Threatening or violent behavior, possession of firearms, explosives, or other weapons on AnMed property, and the willful destruction of property is prohibited. Appropriate actions will be taken to eliminate these behaviors. Team members are allowed to express complaints concerning their well-being to their supervisor or direct manager, Department Director, or Human Resources. AnMed team members are obligated to immediately report workplace safety

concerns to their supervisor, Security or Human Resources. AnMed has zero tolerance for retaliation against team members who report a workplace safety incident.

Environmental Safety

AnMed is committed to providing a safe and healthy environment for patients, team members and the community. Policies and procedures are intended to protect team members from potential workplace hazards and help to ensure compliance with occupational health and safety laws and regulations as well as environmental laws and regulations relating to AnMed operations. Team members have a responsibility to become familiar with and understand how these policies and procedures relate to their specific job responsibilities.

Proper Controls of Medications

AnMed is legally responsible for the proper handling and distribution of pharmaceutical products as well as preventing unauthorized access to and misuse of pharmaceutical products. Team members may not use medications dispensed by AnMed's pharmacy for personal use, unless prescribed in accordance with policies and procedures. The unauthorized use of any prescription drug or controlled substance by any team member, including drug samples, is strictly prohibited. The storage, inventory, control and distribution of medications are in accordance with applicable laws, rules, regulations, policies and procedures. It is the responsibility of all team members to report any misuse or deviations to their supervisor, Pharmacy Leadership, Corporate Compliance or Human Resources.

Alcohol and Drug-Free Workplace

AnMed is committed to providing a safe and healthy environment for our patients and team members. All team members are expected to report to work free from the influence of alcohol, illegal drugs or controlled substances (narcotics). Illegal possession, use or distribution of drugs at the workplace is prohibited. Team members are responsible to immediately report any instance of anyone who appears to be under the influence of alcohol or drugs to a supervisor, Security or Human Resources.

BUSINESS PRACTICES

Honesty and integrity serve as the basis for managing our business transactions at AnMed. We use our best skills and judgment to benefit AnMed and those we serve.

Accounting and Recording Keeping

AnMed is committed to accurately recording transactions and accounting procedures in accordance with applicable legal requirements and in compliance with tax and financial reporting requirements. A system of accounting controls is maintained to ensure the accuracy of accounting, billing and record-keeping. Transactions are recorded and conform to generally accepted accounting principles. All team members are responsible for accurate and honest record keeping. Records and computer files are properly disposed of in accordance with applicable document retention schedules. Records are never destroyed in anticipation of litigation or government investigation. Accurate cost reports and other required reports are filed that conform to applicable rules and regulations. Any concerns regarding questionable accounting or auditing matters or the improper destruction of records should be reported to the Chief Compliance Officer or the Compliance HelpLine.

Accuracy in Billing

We understand the importance and take reasonable precautions to ensure that billing and coding is accurate, timely and in compliance with policies and procedures as well as federal, state laws and regulations. We bill only for services provided, properly authorized and documented as medically necessary. All overpayments due to errors or oversights by a payer are refunded promptly and in accordance with laws and regulations. The waiver of copayments, co-insurance and deductibles violates legal and contractual obligations and is, therefore, prohibited.

Business Courtesies

Accepting or asking for personal gifts from patients, their families or vendors could create the appearance of an obligation to the patient, their families or vendor, therefore, it is the policy of

AnMed to not allow gifts or other incentives that can improperly influence a business relationship or arrangement. However, it is acceptable to accept a perishable gift from a patient, their family members or a vendor if the gift can be shared within the department or unit. Should a person or organization wish to make a cash donation, we direct the donor to the AnMed Foundation. Questions regarding the appropriateness of a gift should be directed to your supervisor or manager, or Corporate Compliance.

Conflicts of Interest

To continue to ensure the confidence and trust of those we serve, AnMed team members will not participate in any activity in which we might receive an improper personal gain or advantage. A conflict of interest occurs when a relationship, influence or activity impairs, or gives the appearance of impairing, your ability to make objective and fair decisions that may cause you to put your personal or financial interests ahead of the interests of AnMed. A conflict of interest may include outside employment, personal investments, financial relationships or business opportunities. It is impossible to list every circumstance that could create an actual or potential conflict of interest; therefore, additional information is available in AnMed's Conflict of Interest Policy found on the document portal located on the Employee Portal. The AnMed Conflict of Interest Policy requires team members to disclose the conflict of interest to the Chief Compliance Officer, who will evaluate and resolve in accordance with the policy.

Confidentiality

In addition to protecting patients' protected health information, team members have the responsibility of protecting the confidentiality and security of business information. Any information learned or created by team members must be treated confidentially, even after termination of employment, including but not limited to personnel information such as salaries, benefits or disciplinary actions, or business information such as financial, marketing or planning information.

Use of Resources

It is the responsibility of each team member to help preserve AnMed's assets, including work time, materials, supplies, equipment and information. AnMed facilities, property and personnel are authorized only for business and patient care-related purposes and not for personal use.

Political and Community Activities

Team members are encouraged to participate in political and community activities provided that these activities are performed on their own time, do not create a conflict of interest, do not interfere with the team members' performance or bring discredit to AnMed. The personal political views of AnMed team members are not representative of AnMed's views, nor does AnMed support or participate, either directly or indirectly, in any political campaign.

Marketing and Advertising

Marketing and advertising our services are an important element in educating and maintaining the trust of the communities we serve. We strive to present only truthful, accurate, fully informative and non-misleading information in our materials and announcements. In accordance with laws and regulations, our price transparency accurately reflects the true charges for services.

Excluded Parties

People or organizations that have been sanctioned by the Officer of Inspector General, General Services Administration or who appear on any state agency's list of excluded individuals are not permitted to do business with AnMed in any capacity. Initial and monthly screenings are conducted to ensure that AnMed remains eligible to participate in federal and state health care programs.

If a team member or provider is notified of, or becomes excluded from, participation in federal or state health care programs at any time, they must notify the Chief Compliance Officer immediately.

Inquiries and Interactions with Outside Entities

From time to time, team members may be contacted by a member of the media to provide a statement or questions about a patient's condition or to request an interview with staff members, visitors or patients. To prevent an unapproved release of sensitive information that could have a negative effect on those we serve, as well as AnMed's reputation and interests, all media requests are handled by the Marketing Department.

Under the direction of Corporate Compliance and the Office of General Counsel, AnMed cooperates with requests for information from government auditors, investigators and other officials. If team members are contacted by a federal or state government official outside the normal course of business, they must immediately call Corporate Compliance, AnMed's General Counsel or the administrator on call.

In the event they are contacted by a law enforcement officer, team members must contact the Security supervisor to assist with the request.

Contracts

Contract negotiations at AnMed are based on the best interests and needs of the organization, not on personal interests. Team members manage contractor and supplier relationships in a fair, ethical and reasonable manner consistent with all applicable laws and best business practices. If a team member has a personal interest with any contractor, the team member is not permitted to be involved in the negotiation or signing of contracts or approving payments for that contractor. In accordance with the Contracts Management Policy, only authorized individuals are permitted to enter into agreements or sign an agreement on behalf of AnMed.

SAFEGUARDING SYSTEM PROPERTY AND TECHNOLOGY

Electronic Media

All communication systems, electronic mail, intranet, internet access, telephones, pagers, and voicemail that are the property of AnMed are to be used for business purposes only. Team members using computer and facility telephone devices should assume no expectation of privacy in anything created, stored, sent or received on the computer or telephone device. Team members may not use AnMed devices, electronic mail or the internet to view, post, store, transmit, download, or distribute any materials that are threatening, maliciously false, obscene or sexually harassing. Content and use of AnMed devices are monitored consistent with applicable policies and procedures.

Team members are provided with a unique, individually assigned user ID. Sharing passwords or leaving computers unlocked while unattended may allow an unauthorized person to gain access to sensitive information regarding AnMed patients, team members, vendors or others we do business with, is therefore prohibited.

Social Media

Always be respectful of AnMed, patients and fellow team members when posting to social media. It is inappropriate to criticize or complain about patients, as well as share organizational information that the public or general population has no knowledge to at the time. Team members also may not post confidential or proprietary information about AnMed. Photographs and recordings of patients are protected by HIPAA and should never be posted on any social media or the internet. Team members should not respond to complaints made by patients or the public regarding AnMed on social media or other internet sites.

Copyright and Intellectual Property

AnMed protects and respects intellectual property including patents, trademarks, service marks, software licensing and copyrights. Team members commit to compliance with applicable federal, state and local laws, rules and regulations that protect intellectual property. All intellectual property created by team members of AnMed in the course of their employment is the property of AnMed.

Always be respectful of AnMed, patients and fellow team members when posting to social media.

LAWS AND REGULATORY COMPLIANCE

AnMed is committed to following all laws and regulations and conducting business in a legal and ethical manner. If errors or occurrences of noncompliance are discovered, AnMed will promptly correct the issue and, if required, notify the appropriate agency. Team members are required to report known or suspected violations of laws or regulations immediately to a supervisor, member of management, Chief Compliance Officer or the Compliance HelpLine.

False Claims Act

Fraudulent or false claims submitted for payment to federal or state government-funded programs, such as Medicare, Medicaid or Tricare are a violation of the False Claims Act. AnMed bills only for services provided by eligible providers and properly code and document those services. Billing errors or overpayments that are discovered are promptly refunded.

Federal Anti-Kickback Statute and The Stark Law

AnMed does not pay for referrals, either in cash or by gift, or offer any payment or gift to induce or influence a patient's decision about where to seek care. AnMed does not pay physicians based on the volume or value of referrals made. All arrangements made with a physician or other individuals who make referrals are reviewed by the Chief Compliance Officer and General Counsel to ensure compliance with applicable laws and regulations.

Antitrust

Antitrust laws are designed to promote fair competition. AnMed operates in a highly competitive environment. AnMed requires compliance with antitrust and other laws governing competitive activities. AnMed avoids activities that conflict with laws that govern competitive practice, and AnMed uses written policies to govern interactions with competitors, customers and suppliers.

AnMed is committed to following all laws and regulations and conducting business in a legal and ethical manner.

ACKNOWLEDGEMENT AND COMMITMENT

The standard set through this Code of Conduct is intended to demonstrate the absolute commitment of AnMed to the highest standards of ethics and compliance. This Code of Conduct and our policies and procedures, serves as a guide to living out AnMed's Values and Guiding Behaviors. It is our responsibility as team members to be aware of policies and procedures that pertain to our work and follow those policies and procedures. All team member are required to acknowledge and confirm that the Code of Conduct has been made available to them. Team members must also agree they have a duty to report any suspected violations of the Code. Finally, team members are asked to fully commit to conducting themselves in accordance with the Code and AnMed's Values and Guiding Behaviors.

This Code of Conduct and our policies and procedures, serves as a guide to living out AnMed's Values and Guiding Behaviors.



800 North Fant Street | Anderson, SC 29621 | 864-512-1000 | AnMed.org