MEMORANDUM FOR SUPPLIER REPRESENTATIVES

MEMORANDUM FOR SUPPLIER REPRESENTATIVES		
SUBJECT: Orientation for Supplier Represen	ntatives	
Date: 7/24/14		
to our facility and an explanation of our expec	to provide you, the supplier representative, with an orientation etations of your conduct and performance while working at s signature page will be kept on file to signify that you have	
	of completing the attached Supplier Representative e page to Materials Management. This orientation covers the	
- Mission - Vision - Values and Standards of Excellence - Accreditation & the Joint Commission - Identification - Patient Rights - Diversity in the Workplace - Infection Control - Fire Safety	 EAMC Emergency Codes Parking Risk Management Confidentiality Non-Disclosure Agreement Forensic Staff / Correctional Officers EAMC Corporate Compliance Policy EAMC Standards of Conduct EAMC Behavioral Expectations 	
	rou may be required to be credentialed through our Medical at 334-528-3285 for a determination of your status.	
	nt care (ie, performance of pacemaker nvolvement in the performance of clinical procedures or the	
B. Will be present in the OR, Cath L clinical procedure. This includes in-servicing	ab, or other clinical area involved in the performance of a g of new products and product evaluations.	
4. Your signature below signifies that you ha Supplier Representative expectations.	ve read the Supplier Orientation Packet and are familiar with	
Name (Printed):	Date:	
Company Represented:		
Company Phone		
Vendor Email:		
Signature:		

I <u>do/do not</u> (circle one) meet the credentialing criteria in paragraph 3. _____(initials)

Les Teel Director of Materials Management

EAMC shall also require all such contractors and vendors to certify that neither they nor any individual associated with them has been convicted of or are under a current investigation for a criminal offense related to healthcare or listed by a federal agency as debarred, excluded or otherwise ineligible to participate in a federal or state healthcare program and require them to notify EAMC if a final adverse action is taken against the consultant or contractor or is threatened either during or after the term of the agreement.			
The vendor, consultant or contractor shall also immediately advise EAMC if the services it provided to any other client of the vendor, consultant or contractor are the subject of an inquiry or investigation by any governmental agency or third party payor.			
EAMC shall require all contractors and vendors to certify they have a current flu shot during the influenza season as defined by EAMC.			
If no certification is available then the vendor will be required to sign a declination form and be required to wear a mask while visiting any patient/clinical areas.			
Vendor Signature:			
Date:			

EAMC ORIENTATION FOR SUPPLIER REPRESENTATIVES

This orientation guide has been designed to provide instruction and education to our facility. In order to satisfy your orientation requirements, you must read this entire booklet, sign the signature page, and return it to Materials Management within two weeks or before your next visit, whichever comes first.

Compiled in conjunction with: Education Department Performance Improvement Department Human Resources

Mission

High quality, compassionate health care.

Vision

To be a national leader in quality, cost and service.

Values

- ✓ INTEGRITY
- ✓ COMPASSION
- ✓ EXCELLENCE
 - ✓ RESPECT
- ✓ TEAMWORK

Values and Standards of Excellence East Alabama Medical Center

These values represent our core beliefs; those things we care about most. Values reflect and reinforce our culture. Values are the "soul" of an organization.

Standards of Excellence are those practices, actions, and behaviors that bring our values to "life." They describe what we and our customers should see, hear, and/or experience when interacting with each other. (Standards of Excellence are listed as the bullet-points under each of the values).

<u>Integ</u>	<u>rity</u>		
	Doing the right thing, even when no one else is looking or listening		
	Sharing information and making decisions based on fact and truth		
	Living up to the moral, legal and ethical standards of EAMC		
	Being a dependable source of information for the public		
	Practicing responsible use of our resources		
	Telling the truth; owning up to errors and mistakes		
	Being honest and trustworthy in words and actions		
Comp	<u>passion</u>		
	Being helpful, kind, friendly and courteous		
	Listening and responding without judgment		
	Being generous with your time and attention for others		
	Connecting with someone on a personal, emotional and/or spiritual level		
	Wanting to understand a situation in order to be supportive		
	Responding to people with care, concern, tenderness, and sensitivity		
	Reassuring and bringing comfort		
	Reducing another person's anxiety, fear, and distress		
	Doing for others as you would like done for you		
<u>Excel</u>	<u>lence</u>		
•	Focus on doing the job right, the first time, every time.		
•	Make accuracy a priority		
•	Utilize best practices and lessons learned from others		
•	Look for ways to continuously improve the way we do our work		
•	Desire and expect more than "average" outcomes and results		
•	Be a positive, productive community citizen who reflects favorably on EAMC's reputation		
•	Use national benchmarks to challenge performance		
•	Be a role-model in quality, cost management, and service to others		
•	Choose to give your personal best in each situation regardless of what others are		

doing

- Meet deadlines; communicate and negotiate alternatives when you will be unable to meet a deadline
- Use people's ideas and suggestions to change or improve the way we do our work

Respect

- Honor the privacy and dignity that all people deserve
- Value cultural diversity; remember that our differences make us stronger and better
- Listen and respond to others in a way that shows you heard, care, and understand
- Show consideration by minimizing hallway noise and other loud distractions
- Give credit where credit is due
- Inform customers about delays and waits
- Refrain from discussing our customer's business in public areas (hallways, elevators, dining areas, waiting rooms, etc.)
- Always knock before entering a closed door
- Refrain from unprofessional talk and gossip about each other
- Dress neat, clean, and professional—it shows that you respect yourself and others!
- Wear your ID badge so that it can easily be read by others
- Use language that the patient understands (free of medical jargon, healthcare abbreviations, etc.)
- Park your vehicle in non-restricted areas to show consideration for the patients,
 visitors, and guests of EAMC and to make it easier for them to access our facilities
- Refrain from using cell phones for personal calls in front of patients or customers.
 Cell phones should not be used in any patient care area or patient room for personal use(IP phones are exception; however they should only be used for communications regarding patient care)
- Discontinue personal phone calls once you enter an EAMC facility. Talking on a cell
 phone while walking through the hallways of EAMC should be considered
 disrespectful. We encourage you to be attentive to the needs of visitors and others
 once you enter an EAMC facility.

Teamwork

- Acknowledge that everyone brings an area of expertise to the team
- Be willing to sacrifice your own preferences at times for the sake of the team
- Approach your work and community responsibilities with energy and a happy spirit
- Show optimism, positive thinking, and an openness for change and growth
- Provide solutions to problems, be patient, and seek ways to help the team improve
- Take pride in your work and feel responsible for the outcomes of our efforts; complete your tasks("hit your mark") or find someone who can help you
- Perform your work in a timely manner and pay attention to details
- Commit to the goals of your work area and the organization as a whole; look for opportunities to pitch-in and do more than just the minimum
- Celebrate accomplishments of the team's work; build each other up!
- Support the work of other departments—remember how difficult it would be to serve the customers/patients without everyone's involvement
- Communicate frequently with other departments so that care and service to the customer/patient is flawless
- Look for opportunities to improve your skill and share your knowledge with your coworkers—everyone wins!
- Be dependable; be a person your teammates can count on; report for work on time
- Think safety—for yourself, for your team, for your customers, for everyone

Pitch in to help keep our grounds and facilities clean and neat; pick up trash, remove clutter from shared spaces and hallways, etc.

Accreditation & the Joint Commission



Commission, and as an accredited organization, EAMC and its entities strive to provide services in accordance with all applicable standards of the Joint Commission.

If you would like to find out how healthcare organizations rate with the Joint Commission, you can go online at www.jointcommission.org and check out the online Quality Check where you can "check-up" on performance by reviewing the latest Quality Report. If you would like to voice a concern, you can contact the Joint Commission by mail, e-mail, or by fax. You may either submit your name and contact information or you may submit your concern anonymously. There will be no adverse actions taken against anyone for having reported quality concerns. You may contact the Joint Commission at:

E-Mail: <u>compliant@jointcommission.org</u>

Fax: 630-792-5636, Office of Quality Monitoring

Mail: Office of Quality Monitoring

One Renaissance Blvd.

Oakbrook Terrace, II. 60181

If you have questions about how to file a concern with the Joint Commission, you may call 800-994-6610, 8:30-5:00 weekdays. If you would like to voice a concern to someone in-house, you may call the compliance hotline at 334-528-1441.

Identification

Whenever you are at East Alabama Medical Center on official business, come first to Materials Management, sign in, and obtain an identification badge. If you arrive before 7:30am or after 5:00pm, wear a company badge with your name on it. As soon as possible after 7:30am, come to Materials Management to sign in and receive an identification badge. Return the badge to Materials Management and sign out when you are finished with your business. Do not leave your badge at the departments you are conducting business with. If you leave after 5:00pm or the Materials Management front office is closed, please slide the identification badge under the Materials Management front office door. If you do not have your identification badge, you may be asked to leave.

Patient Rights

Understanding patient rights will help us deliver the best care possible to the patient and/or their family. Patients have the right:

- To respectful care and privacy. This includes their health information (medical record).
- To be informed about the care they receive
- To accept or reject care
 - Advance Directives
 - Second Opinions
 - o Pain Relief
 - Restraints
- To information about their care in their language
- To know the names of the caregivers who treat them
- To have safe care
- To an up-to-date list of all their current medications
- To view their medical records
- To be accepted for treatment
- To have a patient advocate
- To understand their bill
- To understand their responsibility while at EAMC
- To receive clearly spoken and/or written information

Diversity in the Workplace

Diversity is simply the celebration of those things that make each of us unique! While we all make judgments about people based on our past experiences, when we make judgments before getting to know someone we "prejudge" them. Likewise, when we assume that everyone in a certain group is the same, we stereotype them by not seeing them as an individual. Prejudice and stereotyping hurt everyone because they keep us from knowing the unique person and limits our ideas and opportunities – not to mention making the person feel rejected or hurt. So what can you do?

- Be open about differences
- Do not assume anything
- Encourage questions
- Develop friendships
- Do not make someone a spokesperson for a group
- Do not tell ethnic or sexual jokes
- Make your feelings known if someone is unfair to another

And remember, mistakes happen...apologize if you have offended or feel you have been unfair, and forgive if you feel you have been offended.

Infection Control

Contact: Brooke Bailey @ x 4738 or pager 704-1354

GOOD HANDWASHING is the #1 defense against infection!

Please take note of the following hand washing hints:

<u>Sawitize</u> hands in the following circumstances:

- In between caring for patients/residents in the same room
- Before and after touching a patient/resident who is not in a room (stretcher, wheelchair, etc.)
- After removing gloves or touching dirty equipment, linens, or specimens

Use SOAP & WATEY in the following circumstances:

- Before eating
- ❖ After using the bathroom or when hands are noticeably dirty
- ❖ After caring for a patient who may have C. difficile
- When waterless hand sanitizer builds up

Other Helpful Hints:

- ❖ Do not use petroleum based lubricants with gloves
- ❖ Wear gloves and change them after each patient contact
- Immediately wash hands or other skin surfaces if exposed to blood or body fluids
- You can never be too careful
- Only you can take the steps to substantially reduce your risk of infection.

TO REDUCE YOUR RISK OF EXPOSURE:

By being in a healthcare facility you are at risk for exposure to blood borne pathogens, including Hepatitis and HIV. Good infection control habits are no longer an option but a necessity. They could mean the difference between life and death. You must treat all blood or body fluids as if they are contaminated. Many people carry infections without symptoms. You can never be too careful. Only you can take the steps to substantially reduce your risk of infection. Assume all patients are infectious and treat them the same. Use appropriate personal protective equipment (PPE). If your duties involve a task that may soil clothes with debris, dust, or dirt, follow these guidelines:

- Practice hand washing
- Do not eat, drink, smoke, apply lip balm/makeup or handle contact lens in patient areas
- Wear protective equipment such as goggles, masks, and aprons
- Prior to leaving the work area, make sure all loose debris is removed from your clothing (maintenance/construction personnel)
- If you must enter a room marked with special signage indicating Isolation Precautions, you must follow all posted guidelines (if maintenance/construction personnel, you must call engineering director or infection control nurse)
- Do not touch any bag or container that has the universal biohazard sign
- You cannot wear the special N-95 HEPA respirator without being fit-tested for it
- Follow your company/school's specific safety and self-protection policies

IF YOU SHOULD HAVE ANY EXPOSURE

- Report to infection control nurse immediately (1586 or beeper 091)
- Contact house supervisor if weekend or holiday
- All exposures are <u>confidential</u>

Fire Safety

Contact: Safety Officer, Randy Causey @ x1345 ~or~ pager 705-9154

It is the policy of the organization to have random fire drills on each shift. Everyone is expected to participate and be familiar with the proper procedures to follow. <u>Never</u> use the elevators during a fire (or drill) – there are <u>no exceptions!</u> Familiarize yourself with the location of exits and stairwells. Smoke doors are located throughout the building. These doors are held open by magnetic devices that automatically release upon activation of the fire alarm system. Evacuation routes are posted throughout the building in the corridors.

Race Rescue anyone in immediate danger

Alarm Activate the fire alarm

Contain Contain the fire

Extinguish Extinguish the fire if your safety can be assured

FIRE SAFETY TIPS:

✓ Fire Code: "Dr Red"

✓ Clearance: "Dr. Green, Long Distance"

- ✓ When in a smoke filled room or corridor, stay close to the door.

 Crawl if possible.
- ✓ If you are in a situation where you must pass through flames, soak yourself with water. If possible, wrap yourself in wet sheets or blankets.
- ✓ Evacuation plans are posted throughout the facilities. Know two routes out.
- ✓ Be very familiar with directions from where you are. Remember, in a smoke filled area, you cannot see to find your way.

EAMC EMERGENCY CODES DIAL 6600 TO REPORT TYPE AND LOCATION

WORKPLACE VIOLENCE: NEED SECURITY IMMEDIATELY (STAT) - Call phone number 6600 and state "Page CODE GRAY STAT" (to the specific area) INFANT/CHILD ABDUCTION - Indicates an infant/child is missing. Call phone number 6600 and state "Page CODE PINK" (to the specific area). FIREARM THREAT - Observer should exit the scene quickly and call phone number 6600 and state "Page CODE SILVER" (to the specific area). Security will be notified, will return missing person to their proper place and - "CODE GREEN WALKER ALL CLEAR" will be paged. Provide as much information on the threatening person and location. Law Enforcement will respond to the situation. This may include but is not limited to a violent/combative person, a criminal activity or other situations where Security is required This applies to any incident where hospital Security personnel are needed STAT for a security or workplace violence emergency. FIRE - Call phone number 6600 and state "Page CODE RED" (to the specific area). Then follow the R.A.C.E. protocol: SEVERE WEATHER - "CODE WHITE" usually indicates a tornado or hurricane force winds approaching with potential danger staff will take all necessary steps to ensure patients are placed away from windows or glass, cover with blankets if necessary. - Male or female and an age will be announced overhead to alert all staff to search for a missing patient, resident or visitor. CARDIAC / RESPIRATORY ARREST - Call phone number 6600 and state "Page CODE BLUE" (to the specific area) The operator will alert Visitors with an overhead announcement using plain language. Staff will direct Visitors to safety. ALL employees should move as far away from the CODE SILVER location as possible and close patient room doors. ELOPEMENT - Call phone number 6600 and state "Page CODE GREEN WALKER" (to the specific area). include age and gender of child – "Code Pink Male infant or Code Pink Female Age 3" for example. All employees will monitor exits and STOP ANYONE with a baby / child or package and ask for identification. Call phone number 6600 to report suspicious people and Security will coordinate the appropriate response. EAMC Emergency Color Codes For CHILD emergency, state "PEDIATRIC CODE BLUE" (to the specific location or room number) This does not include a Brearm Threat (Code Silver); in that situation, Law Enforcement will respond. If it is not safe to remain in your area; RUN, HIDE and FIGHT, if encountered by the gunman. if possible, seek a safe place to remain until "CODE SILVER ALL CLEAR" is paged. When located, call phone number 6600 to report where the person has been found. Provide information of the room number or very specific location of the emergency When fire alarm has been cancelled - "CODE RED ALL CLEAR" will be paged. When alarm has been cancelled – "CODE WHITE ALL CLEAR" will be paged When the missing child is found - "CODE PINK ALL CLEAR" will be paged. The appropriate medical emergency response team will respond. Contain fire and smoke – close doors/windows Extinguish fire and evacuate when necessary Remove anyone in danger Activate the fire alarm. SILVER /ALKER WHITE CODE CODE BLUE CODE GREEN

Effective April 1, 2016 @ 8 a.m.

Parking

Contact: Security @ x1348

It is the policy of East Alabama Medical Center that all patients and visitors have easy access to the facility. Therefore, all employees, students, interns, and non-employees providing services for the medical center should park in designated areas. The first level of the parking deck is reserved and should not be used. Parking on the second, third and fourth levels is acceptable. Violation of this policy will result in possible towing of your vehicle. EAMC is not responsible for any damage that may occur as a result of failure to follow the appropriate parking policy.

Risk Management

Contact: Risk Manager, x1815

Any event, which involves medical error, unanticipated outcome, hazardous condition, "near miss", or other injury or potential injury involving a patient, employee, visitor, or other customer, should be reported in the online Safety Registry. It is your responsibility as a non-employee to report any occurrence that you witness to the supervisor or manager of the area where it occurs. Reports should be made as soon after the event as possible. Call Special Services at ext. 1348 for assistance if the event involves a visitor and an injury is sustained. If the occurrence includes a complaint, the same process should be followed. Management addresses all complaints.

Confidentiality

Information regarding patients and Medical Center activities is strictly confidential. It is not to be discussed either in or out of the Medical Center with anyone not directly concerned with the patient's care and treatment. Violation of this policy will be grounds for immediate termination.

NON-DISCLOSURE AGREEMENT (Vendor Only)

THIS NON-DISCLOSURE AGREEMENT ("Non-Disclosure Agreement") is made and entered
into as of this day of,	200 ("Effective Date"), by and between EAST
ALABAMA HEALTH CARE AUTHORITY	/ d/b/a EAST ALABAMA MEDICAL CENTER
(hereinafter referred to as "Hospital") and	(hereinafter
referred to as "Vendor").	· ·

WHEREAS, Vendor provides certain goods and/or services to Hospital and/or Hospital's patients and;

WHEREAS, in connection with the provision of those goods and/or services, Vendor has access to Hospital's premises and Confidential Information and;

WHEREAS, in order for Vendor to have access to Hospital's premises and Confidential Information, Hospital requires that Vendor protect the privacy and confidentiality of the Confidential Information.

NOW, THEREFORE, in consideration of the foregoing and of the covenants and agreements set forth herein, Vendor, intending to be legally bound, agrees as follows:

- 1. Confidential Information. For purposes of this Non-Disclosure Agreement, "Confidential Information" means information whether oral, written or recorded in an electronic format or other medium (other than that which is public knowledge) about the business, activities, operations, or facilities of Hospital, including but not limited to its methods, techniques, and processes; development, costs and pricing of its products and services; business and marketing strategies and plans; financial data, personnel data; all trade secrets pertaining in any respect to Hospital's business; and other non-public information furnished to or obtained by Vendor form or on behalf of Hospital. "Confidential Information" shall also include Protected Health Information ("PHI") as that term is defined in 45 CFR 164.501, including, without limitation, any information, whether oral or recorded in any form or medium: (i) that relates to the past, present or future physical or mental condition of an individual; or (ii) the provision of health care to an individual; or (iii) the past, present or future payment for the provision of health care to an individual; and (iv) that identifies the individual or with respect to which there is a reasonable basis to believe the information can be used to identify the individual. Any notes, papers, databases or other items that contain, embody, discuss, describe, refer or relate to Confidential Information shall likewise be considered Confidential Information within the meaning of this Non-Disclosure Agreement. All Confidential Information shall at all times and for all purposes be considered the property of Hospital.
- 2. Non-Disclosure Covenants. Vendor acknowledges that it is providing certain goods and/or services to or for the benefit of Hospital and/or Hospital's patients and in connection with the provision of those goods and/or services is in a position of trust and confidence. In particular, Vendor and Hospital recognize that to maintain a high quality of service to Hospital and/or Hospital and/or Hospital's patients, which benefits both Vendor and Hospital economically, Vendor may come into contact with or have access to Confidential Information. During the term of this Non-Disclosure Agreement, Vendor agrees as follows:
 - **a.** Vendor shall not use or disclose Confidential Information in any manner except for the sole purpose of performing Vendor's services to Hospital and/or Hospital's patients. Further, Vendor shall not use Confidential Information in any manner that would constitute a violation of any local, state or federal laws, rules or regulations.
 - **b.** Vendor shall not disclose or communicate any Confidential Information to any other person or entity other than Vendor's employees who have a need to know such

Confidential Information in order to perform the responsibilities of their job with Vendor on behalf of Hospital.

- **c.** Vendor shall implement appropriate administrative, technical and physical safeguards as are necessary to prevent the use and/or disclosure of Confidential Information, other than as permitted by this Non-Disclosure Agreement.
- **d.** Vendor agrees to use reasonable care to avoid the disclosure or dissemination of any Confidential Information.
- **e.** The obligations set forth in this Section 2 shall survive termination of this Non-Disclosure Agreement, regardless of the reasons for termination.
- **3. Term and Termination.** This Non-Disclosure Agreement shall commence on the Effective Date and will remain effective during the time that Vendor provides goods and/or services to Hospital and/or Hospital's patients.
- **4. Injunctive Relief.** In the event of a breach by Vendor of any of its obligations hereunder, Hospital shall have, in addition to any other rights and remedies available at law or in equity, the right to obtain injunctive relief without the necessity of proving actual damages or that any irreparable harm would or might result from a failure to obtain injunctive relief, it being acknowledged and agreed to by all parties hereto that any such breach will cause irreparable harm to Hospital and that monetary damages alone will not provide an adequate remedy.
- **5. Indemnification.** Vendor shall indemnify and hold Hospital, and its employees, officers, directors, independent contractors, agents and representatives, harmless from and against all claims, liabilities, judgments, fines, assessments, penalties, awards or other expenses, of any kind or nature whatsoever, including, without limitation, attorneys' fees, expert witness fees, and costs of investigation, litigation or dispute resolution, relating to or arising out of any breach or alleged breach of this Non-Disclosure Agreement by Vendor. The obligations set forth in this Section 5 shall survive termination or expiration of this Non-Disclosure Agreement, regardless of the reasons for termination.
- **6. Binding Effect; Modification.** This Non-Disclosure Agreement shall be binding upon, and shall inure to the benefit of, the parties hereto and their respective permitted successors and assigns. This Non-Disclosure Agreement may only be amended or modified by mutual written agreement of the parties.
- **7. Waiver.** The failure of either party at any time to enforce any right or remedy available hereunder with respect to any breach or failure shall not be construed to be a waiver of such right or remedy with respect to any other breach or failure by the other party.
- **8. Severability.** In the event that any provision or part of this Non-Disclosure Agreement is found to be totally or partially invalid, illegal, or unenforceable, then the provision will be deemed to be modified or restricted to the extent and in the manner necessary to make it valid, legal, or enforceable, or it will be excised without affecting any other provision of this Non-Disclosure Agreement, with the parties agreeing that the remaining provisions are to be deemed to be in full force and effect as if they had been executed by both parties subsequent to the expungement of the invalid provision.
- **IN WITNESS WHEREOF**, Vendor has caused this Non-Disclosure Agreement to be executed in its respective name by its duly authorized representatives, as of the day and year first above written.

Forensic Staff/Correctional Officers

All patients under the custody of a law enforcement agency who receive healthcare services from East Alabama Medical Center must be guarded on a continuous basis during their stay.

DEFINITION OF ADMINISTRATIVE RESTRAINT:

To provide protection for physicians, nurses, hospital personnel, visitors, and other patients and to prevent the escape of the prisoner, the law enforcement officer may use external restraints unless they directly interfere with required medical care. The patient's physician must approve the use of restraints. If handcuffs or leg shackles are deemed necessary, the nurse assigned to the patient must be aware of the location of the key, in the event of an emergency. A sign should be placed at the head of the bed stating: "Metal restraints in use. Remove prior to defibrillation".

DEFINITION OF CLINICAL RESTRAINT AND SECLUSION:

Restraint is defined as the direct application of physical force to an individual to restrict his/her freedom of movement. The physical force may be human, a mechanical device, or a combination thereof. It may be equipment or material attached or adjacent to the patient's body that he/she cannot easily remove that restricts movement or normal access to one's body.

Seclusion refers to the involuntary confinement of a person in a locked room or preventing them from leaving.

East Alabama Medical Center Corporate Compliance Policy

- 1. It is the policy of East Alabama Medical Center (hereinafter referred to as "the Medical Center") to comply with all the applicable federal, state and local laws and regulations, both civil and criminal, as well as those pertaining to the tax-exempt status of the Medical Center. As used in this policy and in the Standards of Conduct, the term "East Alabama Medical Center" or "the Medical Center" means East Alabama Medical Center and each of its divisions, subsidiaries, and operating or business units.
- 2. In addition to complying with the law, it is also the policy of the Medical Center to comply with the standards of conduct which are adopted from time to time by the Board, the President or the Compliance Committee.
- 3. No employee, agent or medical staff appointee of the Medical Center has any authority to act contrary to the provisions of these laws or standards of conduct or to authorize, direct or condone violations by any other employee, agent or medical staff appointee.
- 4. Any employee, agent or medical staff appointee of the Medical Center who has knowledge of activities that he or she believes may violate the law has an obligation promptly after learning of such activities, to report that matter to his or her immediate supervisor, director, vice president, President, or the Compliance Office. Reports may be made anonymously and employees will not be penalized for truthful reports. Failure to report known violations, failure to detect violations due to negligence or reckless conduct or making false reports shall be grounds for disciplinary action, including termination. Any reports of harassment or other workplace-related problems shall be referred to Human Resources.
- 5. The Medical Center will take steps to communicate its standards and procedures to all employees and agents by requiring participation in training programs and by disseminating information that explains in a practical manner what is required. This will include dissemination of this policy, Standards of Conduct and Acknowledgement of Receipt of this Policy by each employee.
- 6. The Medical Center will take steps to achieve compliance with its standards by utilizing monitoring an auditing systems reasonably designed to detect misconduct by its employees and agents by having in place and publicizing a reporting system whereby employees and other agents can report misconduct by other within the organization without fear of retribution.
- 7. This Corporate Compliance Policy will be consistently enforced through appropriate disciplinary mechanisms, including, as appropriate, discipline of individuals responsible for failure to detect violations. The appropriate form of discipline will be case-specific.
- 8. After a violation has been detected, the Medical Center will take all reasonable steps to respond appropriately and to prevent further similar violations, including any necessary modifications to its program to prevent and detect violations of law.
- 9. This policy is intended to communicate current policies regarding compliance. The Board reserves the right to change, modify, or waive all provisions herein. If any employee has a question concerning a particular provision contained herein or concerning any practice not addressed in this document, he or she should consult with the Compliance Officer.

East Alabama Medical Center Standards of Conduct

1. INTRODUCTION

This document summarizes East Alabama Medical Center's Code of Business Conduct for compliance with legal and ethical business practices. East Alabama Medical Center requires strict adherence to the letter and spirit of all laws applicable to the conduct of our business and demands high standards of integrity and sound ethical judgment from our personnel. The policies and procedures set forth here must continue to govern the conduct of every aspect of the business of East Alabama Medical Center and its subsidiaries.

This booklet cannot cover every situation confronting East Alabama Medical Center personnel in the day-to-day conduct of our many activities. In the final analysis we must rely on the individual judgment and personal ethical and moral standards of each employee to maintain the Medical Center's standard of honesty and integrity in the conduct of its business.

2. GENERAL POLICY

It is East Alabama Medical Center's policy to observe and comply with all laws, rules and regulations applicable to the conduct of its business in all counties in which it operates and to require all East Alabama Medical Center personnel to avoid any activities which could involve or lead to the involvement of East Alabama Medical Center or its personnel in any unlawful practice. The employment of East Alabama Medical Center personnel or the use of East Alabama Medical Center assets for any unlawful purpose is strictly forbidden. In addition, East Alabama Medical Center is committed to the achievement, for itself and its personnel, of high standards of business and personal ethics to the end that East Alabama Medical Center and all of its employees will merit and rightfully enjoy the respect and esteem of the public, the healthcare community, patients, suppliers, and governmental and regulatory authorities.

It is the personal responsibility of all employees to acquaint and familiarize themselves with the legal standards and restrictions applicable to their assigned duties and responsibilities and to conduct themselves accordingly.

East Alabama Medical Center will, of course, exercise its lawful right to appropriately inform and advise legislators and regulatory authorities of its views with respect to proposed legislation and rulemaking and will contest in the courts arbitrary and unreasonable regulations or legal interpretations. The responsible exercise of these rights does not in any way compromise East Alabama Medical Center's basic commitment to a policy of adherence to the law.

Over and above the strictly legal aspects involved, all East Alabama Medical Center personnel are expected to observe high standards of business and personal ethics in the discharge of their assigned responsibilities. Simply stated, this requires the practice of honesty and integrity in every aspect of dealing with other East Alabama Medical Center employees, the public, patients, the healthcare community, suppliers, and governmental and regulatory authorities. It also requires discretion in any relationship with persons or firms with whom East Alabama Medical Center transacts or is likely to transact business, and the avoidance of the disclosure of information secured in the course of East Alabama Medical Center employment to others, which may place employees in a conflict of interest situation to the possible detriment of themselves.

3. INTEGRITY OF RECORDS AND COMPLIANCE WITH ACCOUNTING PROCEDURES

Accuracy and reliability in the preparation of all business records is mandated by law and is of critical importance to the corporate decision-making process and to the proper discharge of East Alabama Medical Center's financial, legal and reporting obligations. All business records, expense accounts, vouchers, bills, payroll, service records, reports to government agencies, and other reports, books and records of East Alabama Medical Center must be prepared with care and honesty. False or misleading entries in such records are unlawful and are not permitted. No officer or employee, whatever his/her position, is authorized to depart from East Alabama Medical Center's policy or to condone a departure by anyone else. All corporate funds and assets must be recorded in accordance with applicable corporate procedures. Violation of these policies is grounds for disciplinary action.

Compliance with accounting procedures and internal control procedures is required at all times. All employees must insure that both the letter and the spirit of corporate accounting and internal control procedures are strictly adhered to at all times. Employees should advise the responsible person in their department of any shortcomings they observe in such procedures.

Each Subsidiary, Operating Unit and Department will meet required record-keeping obligations. No record will be falsified, back-dated, intentionally destroyed or otherwise tampered with to gain a real or perceived advantage for East Alabama Medical Center.

4. BILLING FEDERAL HEALTH PROGRAMS & OTHER PAYORS

East Alabama Medical Center will use its best efforts to comply with all rules and regulations regarding claims for payment under the Medicare, Medicaid, and other third party payors. Submission of claims for payment and cost reports to Medicare, Medicaid and other federal health programs will be in accordance with current reimbursement rules, policies and procedures promulgated by the Centers for Medicare and Medicaid Services, the state Medicaid agency, any applicable fiscal intermediary or carrier, or other agency with responsibility for the program in question. Clinical and reimbursement staff shall use their best efforts to communicate effectively and accurately with each other to assure compliance.

5. IMPROPER PAYMENTS; BRIBES & KICKBACKS

Payments or other items of value in the nature of "kickbacks" or "bribes" intended to induce or reward favorable decisions or actions are not to be offered, made, solicited, received or tolerated in connection with any of the Medical Center's business.

No employee or agent of the Medical Center shall, in violation of any applicable law, offer or make, directly or indirectly through any other person or firm, any payment of anything of value (in the form of compensation, gift, contribution or otherwise) to:

- Any person or firm employed by or action for or on behalf of any customer for the purpose of inducing or rewarding favorable action by the customer in any commercial transaction; or
- Any person or firm employed by or action for or on behalf of any governmental agency for the purpose of inducing or rewarding any action or the withholding of any action by such agency in any governmental matter.

All payments shall be made by check or bank wire, and shall be supported by written documentation in sufficient detail to identify the work or services performed on behalf of the Medical Center. Each person receiving payment must agree to comply with all applicable laws in acting on the Medical Center's behalf.

The provisions of this Section are not intended to apply to gifts not of substantial value or ordinary and reasonable business entertainment. From time to time, personnel may accept entertainment, but only if the entertainment is reasonable, occurs infrequently, and does not involve lavish expenditures. Care should be taken to avoid accepting gifts or entertainment that could be construed as "bribes" or "kickbacks". Any questions related to the appropriateness of gifts or entertainment should be referred to the Compliance Officer.

When community organizations, governmental agencies or others have published policies intended to provide guidance with respect to acceptance of entertainment, gifts or other business courtesies by their employees, such policies must be respected. Everyone should exercise sound discretion in authorizing any entertainment or gifts. Nothing stated herein should be construed in any way as encouragement to make or receive such entertainment or gifts.

6. MEDICARE-MEDICAID ANTI-FRAUD AND ABUSE

Under federal law, it is unlawful for any person to solicit, offer, pay or receive anything of value to or from any other person to induce or in return for:

- The referral of any individual to a provider or any other person for the furnishing of any item or service for which payment may be made under any governmental program; or
- Obtaining any service or item for which payment may be made under any governmental program.

In order to ensure compliance with the law, it is the Medical Center's policy that every agreement between the Medical Center and a physician or other referral source must be in writing and must be approved in accordance with the Medical Center's guidelines for such contracts, as promulgated in the Guidelines for Physician Contracts. Under no circumstances should agreements be tired expressly, by implication or by "private understanding" to referrals of business.

The Medical Center has promulgated more detailed guidelines, which address the various arrangements with physicians and other referral sources. Those guidelines (Guidelines for Physician Agreements) should be consulted and followed.

7. HEALTH, SAFETY and EVNVIRONMENT REQUIREMENTS

The Medical Center and each of its affiliated facilities is subject to the requirements of numerous federal, state and local laws, regulations and rules which promote the protection of health and safety and the environment. It is the Medical Center's policy to comply with all health, safety and environmental laws and regulations. Employees are expected to understand those requirements that apply to their area of responsibility and to seek advice whenever they face an issue raising possible health and safety or environmental concerns. Employees should consult with their supervisor or the Compliance Officer when they encounter issues raising possible health, safety or environmental concerns.

It is also important for employees to advise the Medical Center of any serious workplace injury, the discharge of any hazardous substances into the environment, or any situation presenting a danger of injury or discharge. In many instances, the Medical Center must report such events to governmental authorities quickly and accurately. This information will also help the Medical Center mitigate any damages as a result and will help prevent such incidents either from happening or from happening again.

8. CONFLICT OF INTEREST

It is the Medical Center's policy that conflicts of interest should not be allowed to exist or remain existing in place of those instances where actions or activities of an individual on behalf of the Medical Center also involve (a) the obtaining of a personal gain or advantage by such individual, (b) an adverse effect upon the interests of the Medical Center or (c) the obtaining by a competitor of any gain or advantage to the detriment of the Medical Center. The following are some examples of some potential conflict of interest situations:

- Holding a financial interest in, or engaging in activities on a consulting basis, or otherwise, with a firm, which provides services, supplies or equipment to the Medical Center.
- Speculating or dealing in services, equipment or supplies which are purchased by the Medical Center or if the individual stands to gain financially due to his/her position with the Medical Center.
- Accepting favors, gifts or entertainment which others may perceive to be substantial enough to influence such individual's selection of goods or services for the Medical Center, or to influence such individual's judgment in otherwise representing the Medical Center. Acceptance of perishable or other gifts not of substantial value or reasonable personal entertainment is not improper, but care must be exercised to be sure that the continuation of such matters does not gradually build up into an embarrassing obligation.
- Acquisition by purchase of lease of real estate in which it is known that the Medical Center might have an interest, or which may appreciate in value because of the Medical Center's possible interest in nearby property. An employee should not acquire any financial interest in a hospital or business when the acquisition of such hospital or business is or could be under consideration by the Medical Center.

All conflict of interest questions should be disclosed to the appropriate manager, the Compliance Officer or the Compliance Committee pursuant to the procedures outlined in this policy. Corrective action generally will include focus on eliminating the conflict of interest between the individual and the Medical Center. Appropriate disciplinary actions may also be taken including the termination of employment of the employee and of contracts and relationships with suppliers, contractors, physicians and other parties involved in such conflicts.

Managers, Directors, Vice Presidents and the principal officers of each subsidiary, are charged with the responsibility of seeing that employees who occupy positions which could place them in conflict of interest situations receive, read and understand the Conflict of Interest Provisions. These employees are required to submit, at least annually, conflicts of interest certificates stating that they understand and are in compliance with the policies and procedures contained in this provision.

9. HIRING EMPLOYEES FROM COMPETITORS AND THE GOVERNMENT

It is the Medical Center's policy to deal fairly with competitors and to respect the right of competitors and others in getting and using competitive information. Care should be exercised in the recruitment and employment of former or current employees or consultants of competitors.

The recruitment and employment of former or current US government employees by private industry is subject to complex rules which change frequently and vary by employee. In some situations, these rules also apply to members of the U.S. government employee's immediate family. Similar rules may also apply to

current or former state or local government employees or legislators and members of their immediate families.

Each situation should be considered on a case-by-case basis. If a former government employee or consultant becomes an employee or consultant of the Medical Center, care should be exercised to insure that such employee or consultant complies with all U.S. government conflict of interest laws with respect to activities for on behalf of the Medical Center.

Employees should consult with the Human Resources Department or the Compliance Officer on issues related to recruitment and hiring of former or current employees and consultants of competitors or of governments.

10. ANTITRUST COMPLIANCE

It is East Alabama Medical Center's policy to make its own commercial decisions on the basis of what is considered to be in the best interests of East Alabama Medical Center, completely independent and free from any understanding or agreements with any competitor. This policy requires absolute avoidance of any conduct which violates, or which might even appear to violate, those underlying principles of antitrust laws which forbid any kind of understanding or agreement between competitors regarding prices, terms of sale, division of markets, allocation of patients or customers, or any other activity that restrains competition, whether by providers or patients. No officer or employee, whatever his/her position, is authorized to depart from East Alabama Medical Center's policy or to condone a departure by anyone else.

It is the Medical Center's policy to strictly comply with federal and state antitrust laws in order to promote free and fair competition. The following guidelines summarize the basic principles of antitrust laws. They are intended to assist you in recognizing possible antitrust issues and avoiding conduct that may prompt expensive and time-consuming investigations. They are not intended to define the dividing line between legal and illegal conduct. Because it is not always clear whether a business practice may violate antitrust laws, employees should consult the Medical Center's Compliance Officer for advice whenever they face a business issue raising possible antitrust concerns.

It is the Medical Center's policy to strictly limit relationships with competitors because such relationships frequently raise antitrust issues. Any understanding or agreement that has the effect of reducing or eliminating competition, controlling prices, allocating markets or excluding competitors is prohibited.

Relationships with patients, customers or suppliers also raise antitrust issues in certain circumstances, particularly if the Medical Center occupies a significant market position in its geographic region. The Compliance Officer should be consulted before (1) conditioning the sale of one product or services on the requirement that the patient or customer also buy another of your products or services, (2) refusing to deal with suppliers (including physicians) who sell to, or otherwise benefit, competitors; and (3) refusing to do business or deal with patients, customers or suppliers for competitive reasons, such as to lessen competition or to attempt to create or maintain a monopoly (e.g. refusing to deal with suppliers who sell to customers who are price-cutters).

It is important that common sense and good judgment be used to avoid antitrust problems. Avoid discussing any prohibited or sensitive subjects with a competitor unless you are proceeding with the advice of the Compliance Officer. Do not provide any information in response to an oral or written inquiry concerning an antitrust issue without first consulting the Compliance Officer.

11. POLITICAL CONTRIBUTIONS & ACTIVITY

It is East Alabama Medical Center's policy to comply strictly with all applicable and valid laws and regulations relating to the making of corporate political contributions. No political contributions either by payment or by gift may be made or authorized to be made with Medical Center funds or resources (either directly or through employee expense reimbursement) to any candidate for public office, campaign, fund, political party or organization unless such payment, gift or contribution is expressly permitted by state and federal law. Monetary contributions so approved shall be made only by corporate check payable to the candidate or political committee in question.

East Alabama Medical Center encourages its employees at all levels to exercise their rights of citizenship by voting, by making personal political contributions if they wish to do so with their own funds, and by being otherwise politically active, in support of candidates or parties of the employee's own personal selection. It should be clearly understood that such political activity by East Alabama Medical Center employees is not permitted on or in the property of the Medical Center and must be engaged in strictly in employees' individual and private capacities as responsible citizens and not on behalf of East Alabama Medical Center.

12. NONDISCRIMINATION

East Alabama Medical Center is firmly committed to a policy of nondiscrimination in employment and to the cause of equal employment and advancement opportunity for all. East Alabama Medical Center fills its job requirements by selecting from the available labor force those applicants best qualified to perform the work in safety to themselves and others. It is East Alabama Medical Center's policy not to discriminate against any employee or applicant for employment because of race, color, religion, sex, age, national origin, or handicap.

In addition, it is East Alabama Medical Center's policy to refuse to enter into any contract or agreement which would have the effect of discrimination against United States persons or firms on the basis of race, color, religion, sex, age, national origin or handicap.

13. COMPLIANCE WITH OTHER LEGAL & REGULATROY REQUIREMENTS

The Medical Center, through its subsidiaries and affiliates is in the business of providing a wide range of healthcare services in different counties. These services generally may be provided only pursuant to appropriate federal, state and local certificates of need, licenses, permits and accreditation and are subject to numerous laws, rules and regulation, including but not limited to access to treatment, consent to treatment, medical record-keeping, access and confidentiality, patient's rights, terminal care decision making, medical staff membership and clinical privileges, corporate practice of medicine restrictions and Medicare and Medicaid regulations. Like other businesses, the Medical Center is subject to federal and state labor statutes and discrimination laws, securities laws and regulations, state corporation or partnership laws, consumer protection laws, tax laws and general and professional liability laws.

It is the policy of the Medical Center that every employee should be familiar with the legal and regulatory requirements applicable to such employee's areas of responsibility. Employees are not expected to become expert in every legal and regulatory requirement and should consult with their supervisor or the Compliance Officer for advice whenever they face an issue raising possible legal or regulatory concerns.

14. REPORTING VIOLATIONS

All personnel should report known or suspected violations of these policies to their supervisors, the appropriate Medical Center executive, or the Compliance Officer. All possible measures shall be taken to protect the anonymity and confidentiality of the reporting individual where warranted.

15. DISCIPLINE

Failure to comply with this code may result in disciplinary action, including warnings, suspensions, termination of employment or such other actions as may be appropriate under the circumstances.

16.APPLICABILITY

"Medical Center" as used in this Code means East Alabama Medical Center, the subsidiaries which it controls, and all operations of East Alabama Medical Center and such subsidiaries. The terms "officer", "director", "personnel", "employee", "agent", "medical staff appointee", and "volunteer", include any person who fills such role or provides services on behalf of the Medical Center or any of its divisions, subsidiaries, or operating or business units.

17. QUESTIONS

Routine questions concerning the Code should be referred to the employee's immediate supervisor, or at the employee's discretion to the appropriate designated corporate executive (department director or vice president) if necessary and appropriate under the circumstances.

18. DISTRIBUTION

Distribution of the Code will be made to designated corporate executives for further distribution as appropriate to their personnel.

19. COMPLIANCE

The responsibility for compliance with this Code, including the duty to seek interpretation when in doubt, rests with each employee.

Behavioral Expectations East Alabama Medical Center

As an employee of East Alabama Medical Center, you join a team that is **DEVOTED** to serving our customers – **including patients**, **physicians**, **fellow employees**, **and our community**. You have the opportunity to help us make all of our customers feel special by treating them like we all want to be treated – with courtesy, dignity, respect, and professionalism. The following are specific behavioral expectations that all EAMC employees should follow when serving our patients, physicians, fellow employees, and our community.

Courtesy

- Greet others in hallways, elevators, and workstations with a kind word or smile.
- · Assist people in finding their way; escort them to their destination if necessary.
- When assisting a patient or visitor, make eye contact, introduce yourself, and explain why you are there.
- End each encounter with a warm and positive comment.
- On an elevator, always smile and speak to fellow passengers; hold the door open for others.
- On an elevator when transporting patients in wheelchairs, always face them toward the door and exit with care. If transporting a patient on a bed or stretcher, politely ask others to wait for another elevator.
- Pause before entering an elevator so you do not block anyone getting off.

Respect/Confidentiality

- Respect privacy and dignity; knock and wait for a response before entering; close curtains or doors during exams and procedures; be sure patients are well covered when ambulating, in a wheelchair, or on a stretcher.
- Use a guiet, respectful tone of voice at all times.
- Discuss confidential or sensitive information about patients, employees, physicians, or hospital business only with those having a valid need to know, and do so privately, never in public places.
- Be sensitive to cultural differences.

Responsiveness

- Respond quickly to requests for help.
- Provide the services or information requested of find someone who can.
- Tell patients and family members approximately how long they will wait, how long procedures will take, and explain any delays; always thank them for waiting.
- All employees are responsible for answering call lights.
- Anticipate patients' needs so they will not have to use their call lights.
- Check on patients one hour before shift change to minimize requests during report.

Communication



- Listen carefully; do not interrupt; give people your full attention.
- Update family members periodically at least hourly while a patient is undergoing a procedure.
- Offer information on procedures, tests, and processes.
- Know how to operate the telephones in your area. Provide the correct number before transferring a call. Get the caller's permission before putting him/her on hold, and thank the caller for holding.
- Answer calls within three rings. Identify your department and yourself.
- Keep people informed while resolving issues or getting answers to questions.

Teamwork

- Treat coworkers with courtesy, honesty, and respect. Welcome newcomers.
- Avoid last minute requests and offer to help fellow employees whenever possible.
- Do not chastise or embarrass fellow employees in the presence of others.
- Follow through in meeting deadlines and keeping promises.
- Address problems by going to the appropriate supervisor.

Ownership, Image, & Attitude

- Take pride in East Alabama Medical Center as if you own it because you do.
 Accept the responsibilities of your job and adhere to policies and procedures. Live the values of EAMC.
- Present a positive image; be clean and dress professionally.
- Wear the name badge or nametag so that the name is clearly visible at all times while on duty.
- Limit eating, drinking, and smoking to designated areas.
- Avoid personal conversations with coworkers when providing patient care or other customer service.
- Make no inappropriate or negative comments about patients, coworkers, physicians, or East Alabama Medical Center in the presence or within hearing of any internal or external customer.
- Demonstrate pride in East Alabama Medical Center by keeping areas clean and safe.
- Pick up litter any place in the hospital and dispose of it properly. Clean up spills and return equipment to its proper place.

As part of the EAMC team, I will treat everyone with the same dignity and respect I want for myself and will conduct myself in accordance with East Alabama Medical Center's Behavioral Expectations as outlined above.

Signature:	_ Date:
Print Name:	_ Emp. #:

D E V O T E D
To Customer Service