



Code of Ethical Conduct



Mission and Purpose of the Code of Ethical Conduct

Jupiter Medical Center strives to maintain a climate in which all team members and associates conduct themselves and perform their work in a manner consistent with the Medical Center's values. Jupiter Medical Center encourages open reporting and supports transparency with a policy of non-retaliation. In recognition of our responsibility to serve the community in an ethical manner, Jupiter Medical Center maintains processes which promote optimal health care, professional integrity, and high ethical standards in our business activities.

This Code of Ethical Conduct is designed to help ensure the organization demonstrates the highest legal and ethical standards. It outlines the general principles by which the organization does business. The Code of Ethical Conduct and Corporate Compliance program provide team members and associates with the information necessary to incorporate ethical practices into the performance of their duties. It is the responsibility of each team member and associate to ensure the principles outlined in the Code of Ethical Conduct are upheld.

Why Corporate Compliance?

The Jupiter Medical Center Corporate Compliance Program is critical to help assure ourselves that we are following governmental laws and rules for our continued success. This is important given the challenges and complexity we face in health care today – pressures to provide care more efficiently, manage costs, and abide by a growing number of health care laws and regulations. We are being watched by consumers, regulators and the public at large to be sure we are providing quality care, keeping costs down and obeying laws. The stakes are high. Even a perception of wrongdoing can tarnish our reputation of integrity and could trigger a government investigation resulting in severe financial penalties, loss of tax exempt status and a decline in business.

Our Goal

We care for people's health and wellness.

Our Mission

To deliver excellent and compassionate health care, advancing the well-being of the people we serve.

Our Vision

To be recognized as the leading healthcare organization in the region, the employer of choice, and the preferred partner of physicians.

Our Values

Respect
Integrity
Excellence
Courage
Teamwork Accountability

What Kind of Issues Should I Report?

The following are examples of violations or suspected violations you should report:

- Illegal activity
- Behaviors that violate the standards of conduct
- Discrimination/harassment
- Dishonest communication
- Violations of patient/employee confidentiality
- Inappropriate gifts, entertainment, and gratuities
- Stealing or misuse of funds
- Fraud, abuse, or false claims
- Environmental, health and safety issues
- Improper political activity
- Improper use of proprietary information

Confidential Reporting

All team members and associates have a responsibility to seek clarification with regard to questions they may have about the Compliance Program and to report, in good faith, actual or suspected failure to comply with laws, regulations, or organizational policies. Jupiter Medical Center team members and associates have several resources available to them for reporting compliance concerns. The preferred method is to follow the appropriate chain of command.

You may also get assistance for your questions and concerns by contacting Human Resources (for issues of employment conditions) or Security (for issues of physical safety and theft or abuse of property). The Director of Corporate Compliance can be contacted at any time with questions or concerns and will keep your report confidential to the fullest extent of the law.

Team members and Jupiter Medical Center associates not comfortable reporting concerns through the normal channels may contact the toll-free Compliance Hotline at 1-888-826-8433. The Hotline is a service operated by an independent organization. This service is available 24-hours a day and can be used anonymously at the request of the caller.

Non-Retaliation

Jupiter Medical Center promotes a work environment that encourages team members and associates to feel at ease when reporting concerns regarding legal or regulatory issues, policies, and procedures. Any form of retaliation against a team member or associate who identifies a perceived problem or concern, in good faith, is strictly prohibited. Anyone engaging in such retribution is subject to discipline up to, and including, dismissal.

Open Communication

Open and honest communication among team members is key to succeeding in the mission of the organization. Jupiter Medical Center requires candor and honesty from individuals in the performance of their responsibilities and in communication with others.

Supervisors and managers have a special obligation to set the right tone. They are expected to create a work environment in which ethics and compliance concerns can be raised and discussed openly without fear.

Respect

What may seem funny to one person can be very hurtful to another. Respecting one another means being sensitive about what we say and how we say it, and taking the feelings of others into consideration ahead of time.

Call the confidential and anonymous Jupiter Medical Center Compliance Hotline at 1-888-826-8433.



Emergency Care

Any patient entering Jupiter Medical Center's Emergency Department will receive a screening examination and stabilizing treatment, if necessary. These services will be performed regardless of the patient's race, color, religion, age, gender, national origin, physical ability, or ability to pay. Arrangements for emergency transfer will be made if the patient's medical needs cannot be met at Jupiter Medical Center and appropriate care is known to be available at another facility. Jupiter Medical Center follows the Emergency Medical Treatment and Active Labor Act (EMTALA) which states that a medical center "may not delay providing an appropriate medical screening examination...in order to inquire about an individual's method of payment or insurance status" (42 CFR 489.24(d)(4)(i)).

Jupiter Medical Center will follow reasonable registration processes for individuals for whom examination or treatment is required, including asking whether an individual is insured and, if so, what that insurance is, as long as that inquiry does not delay screening or treatment. Jupiter Medical Center team members may not unduly "discourage individuals from remaining for further evaluation" (42 CFR 489(d)(4)(iv)).

Health and Safety

Every team member is responsible for occupational safety in his or her workplace. Environmental protection, industrial hygiene, and work safety regulations must be strictly applied. Jupiter Medical Center must comply with all government rules and regulations to promote the protection of workplace health and safety. Team members and associates will strive to utilize resources efficiently, to recycle wherever possible, to dispose of waste in accordance with applicable regulations and policies, and to work cooperatively with the appropriate authorities to remedy any environmental contamination for which Jupiter Medical Center shall be responsible.

Team members and associates should become familiar with any organizational policies designed to protect all team members and associates from potential workplace hazards. In addition, team members and associates must perform their duties and responsibilities free from the influence of intoxicants, non-prescribed narcotics, illegal drugs, or other controlled substances.

Patient Care and Rights

Jupiter Medical Center team members receive training about patient rights and should treat patients in a manner that preserves patient dignity, autonomy, self-esteem, civil rights, and involvement in care. We strive to provide health education, health promotion, and illness-prevention programs in our effort to improve the quality of life of our patients and community.

Charity Care

Jupiter Medical Center continues to recognize its obligation of providing appropriate medical care regardless of ability to pay. Jupiter Medical Center was established with the mission to meet the health care needs of the community and assists individuals who are unable to pay by applying the objective criteria of its Charity Care policies and procedures.



Political Activity

Team members and associates may personally participate in, and contribute to, a political candidate, organization, or campaign. However, while acting in the capacity as a representative of Jupiter Medical Center, these individuals will contact the Compliance Department prior to making any agreement to contribute money, property, or services to a political candidate, organization, or campaign.

Maintaining tax-exempt status is critical to the continued vision of Jupiter Medical Center as well as the welfare of the community. Where the organization's experience may be helpful, the executive team may comment concerning legislation or regulations under consideration. Jupiter Medical Center may also analyze and take public positions on issues that relate to the organization's operations and/or mission.

Business Practices

Jupiter Medical Center requires all team members and associates to conduct their activities in a manner that demonstrates integrity and is consistent with the highest ethical business standards at all times. Team members and associates must represent Jupiter Medical Center accurately and honestly and must not act in a manner that purposely cheats anyone, including other companies or the government, of money, property, or services. Even if an activity, communication, or transaction is in technical compliance with the law, it is not right for Jupiter Medical Center if it is contrary to traditional notions or a common sense approach of what is the ethical thing to do. Team members and associates should act in good faith and in the best interests of Jupiter Medical Center, our patients and our community.

Purchasing Practices

All purchasing determinations must be made only in the best interests of Jupiter Medical Center and its patients, with the goal of obtaining the highest quality goods, products, supplies, and/or services at the optimal price, consistent with generally accepted purchasing practices. No purchasing decision will be made based upon any consideration that a team member, including but not limited to members of the Board of Trustees, executive team, management, team member, medical Staff, Jupiter Medical Center associate, or volunteer, will benefit either directly or indirectly by the business action.

Goods, products, supplies, or services will not be purchased in return for a referral or the inference of a referral of patients. In addition, Jupiter Medical Center will not process or negotiate personal purchases for a team member, including but not limited to members of the Board of Trustees, executive team, management, team member, medical staff, Jupiter Medical Center associate, or volunteer.

Marketing Practices

Marketing efforts will concentrate on customer education about Jupiter Medical Center's broad range of services and its mission, vision and values. Marketing will embrace the highest code of ethics: responsibility, honesty and fairness and will represent Jupiter Medical Center services in a clear way in advertising and other forms of communication; this includes the avoidance of knowingly utilizing false, misleading, and deceptive promotion. Jupiter Medical Center marketing practices will not be directed at or designed to discredit a competitor or include any negative or harmful characterization of any event or individual. No direct inducement will be offered for physician service referrals.

Billing and Coding Practices/Cost Reports

Jupiter Medical Center will ensure that all billing to government and private insurance payers will truthfully represent the services provided and will conform to all applicable federal and state laws. Jupiter Medical Center will bill only for services rendered and properly documented in the medical record. Jupiter Medical Center will maintain continuing education and training for all team members involved with the claims process.

Jupiter Medical Center prohibits its management, staff, medical staff and associates from knowingly presenting, and/or causing to be presented, claims for payment or approval, which are false, fictitious, or fraudulent.

Jupiter Medical Center will ensure that ordering procedures and interaction with physicians are designed to encourage physicians to order only medically necessary tests for which reimbursement will be sought from a federally funded health care program.

Jupiter Medical Center will comply with Federal and State laws relating to cost reports. All issues related to the completion and settlement of cost reports must be communicated through the Chief Financial Officer.

Tax-Exempt Status

Jupiter Medical Center is a non-profit corporation exempt from taxation under the Internal Revenue Code. Jupiter Medical Center must comply with Internal Revenue Service regulations, engage in activities that further its tax-exempt charitable purpose, and use its resources to promote such purpose as opposed to serving the personal interests of any individual.

The use of corporate assets is restricted to business purposes only and compensation and other business arrangements must be granted impartial and fair basis. Members of the Board of Trustees, executive team, management, staff and associates are responsible for ensuring that Jupiter Medical Center's assets are used exclusively to further its mission and tax-exempt purpose.

In addition, since Jupiter Medical Center is a tax-exempt organization, it must deal with "insiders" of the organization in a manner that does not violate or give the appearance of violating these tax-exempt rules and regulations. An "insider" is defined as any individual who is in a position to influence control over the affairs of the organization. Accordingly, any payments provided to "insiders" by Jupiter Medical Center, whether made directly or indirectly, must be at arms-length and at fair market value with the services rendered.

Financial Reporting

Jupiter Medical Center maintains a high standard of accuracy and completeness in the documentation and reporting of all financial records. All financial reports, accounting records, expense accounts, time sheets, and other documents must accurately and clearly represent the relevant facts or the true nature of a transaction. No undisclosed or unrecorded funds or assets may be established. Jupiter Medical Center will maintain a system of internal controls to provide reasonable assurances that all transactions are executed in accordance with management's authorization and are recorded in a proper manner to maintain accountability of the organization's assets. Jupiter Medical Center's financial auditors have full access to all financial records and are entitled to the cooperation of its employees.



Anti-Trust And Gathering Information About Competitors

Anti-trust laws are designed to create a level playing field in the marketplace and to promote fair competition. Jupiter Medical Center applies sound financial judgment in establishing the pricing of services in the health care market and does not collaborate with its competitors in determining prices. Anti-trust laws can be violated by discussing with a competitor topics such as how prices are set, disclosing the terms of supplier relationships, allocating markets among competitors, or agreeing with a competitor to refuse to deal with a supplier.

It is not unusual to obtain information about our competitors through legal and ethical means such as public documents, public presentations, journal and magazine articles, and other published and spoken information. Generally, team members and associates should avoid discussing sensitive topics with competitors or suppliers.

Affiliated Physicians

In order to meet all standards regarding referrals and admissions, Jupiter Medical Center adheres to two primary rules:

- Jupiter Medical Center does not pay for referrals. Patient referrals are based solely on the patient's clinical needs and our ability to render services. Civil and criminal penalties and exclusion from federally funded health care programs can result from violation of this rule.
- Jupiter Medical Center does not accept payments for referrals we make. No Jupiter Medical Center team member or any other person is permitted to solicit or receive anything of value, directly or indirectly, in exchange for the referral of patients.

Gifts/Business and Patient Relationships

Jupiter Medical Center conducts its business relationships according to ethical and legal standards. Business courtesies (gifts) offered by vendors or physicians with the intent to influence a business decision should not be accepted by members of the Board of Trustees, executive team, management, staff, or associates. Team members and associates, in turn, will not offer business courtesies to vendors or physicians with the intent to induce the procurement of any goods or services.

Jupiter Medical Center permits the acceptance of nominal value non-cash, unsolicited courtesies and gifts as long as the value of the gratuity in relation to the circumstances in which it was offered, is not intended to influence a business transaction or decision making of the team member or associate.

Members of the Board of Trustees, executive team, management, staff, medical Staff, and volunteers should not accept gifts or courtesies from patients, their family members, or friends if they are intended to influence the quality of care provided. Occasionally, patients or families desire to reward caregivers for excellent care. As long as these gifts are entirely unsolicited and nominal in value they may be accepted. To the extent practical, these gifts should be shared with co-workers. If you have any questions regarding the nature of a gift, contact your immediate supervisor or the Compliance Office.

Proprietary Information

Members of the Board of Trustees and management team are required to disclose outside business and/or financial arrangements that may give the appearance of a conflict of interest with Jupiter Medical Center business operations. To avoid the appearance of a conflict of interest, all team members and associates are encouraged to disclose the potential conflict to their immediate supervisor or to the individuals involved with business or clinical decisions.

All decisions and actions should be based on sound business or clinical judgment, not personal gain. A conflict of interest occurs when a team member or associate's business judgment is, or will be, influenced by personal interests which will cause the interests of Jupiter Medical Center to be compromised.

Confidential Patient Information

Jupiter Medical Center policies and procedures are designed to maintain and protect the confidentiality of Protected Health Information (PHI). Every team member and associate has an obligation to actively protect and safeguard confidential and sensitive information. PHI will be used only for the purpose for which it was given. Confidential patient information should not be discussed in public areas such as cafeterias, elevators, and corridors. Team members and associates will be educated on and required to follow the applicable federal regulations and face corrective action up to, and including, termination.

Confidential Business Information

Jupiter Medical Center, its team members and associates are in possession of, or have access to, a wide variety of confidential, sensitive, and proprietary information. Confidential business information includes personnel data maintained by the organization, pricing and cost data, information pertaining to acquisitions and affiliations, financial data, strategic plans, marketing strategies and techniques, supplier and subcontractor information, and proprietary software. The inappropriate release of such information could injure or otherwise damage individuals, business partners of Jupiter Medical Center, and/or Jupiter Medical Center itself. Violating this confidence is a violation of the code of conduct and is subject to corrective action up to, and including, termination.

Security of Information and Electronic Media

Computer passwords must be kept confidential and sharing of passwords is strictly prohibited. Team members, associates and any individual granted access to these systems, will abide by the systems' security policies. All communication systems, email, internet access, and voice mail are the property of Jupiter Medical Center and are used for business purposes. While highly restricted personal use of these systems is permitted it should not be assumed that these communications are confidential or private. Jupiter Medical Center reserves the right to periodically access and monitor these communications.

Human Resources (Employment, Work Environment, Safety)

Jupiter Medical Center will comply with all laws, regulations and organizational policies related to non-discrimination in all personnel actions (hiring, staff reductions, transfers, terminations, evaluations, recruiting, compensation, corrective action, progressive discipline, and promotions.) Jupiter Medical Center will make reasonable accommodations to the known physical and mental limitations of otherwise qualified individuals with disabilities and will not discriminate with respect to any offer, or term or condition, of employment.

Each team member has the right to work in an environment free of harassment. Humiliating jokes, slurs, intimidation, or other harassing conduct is not acceptable in the workplace. Harassment includes incidents of workplace violence, aggressive acts that include verbal threats to use physical force, physically harming another, shoving, pushing, or brandishing a weapon in any manner. Any form of sexual harassment is strictly prohibited.

Jupiter Medical Center team members must comply with government regulations and rules and with organizational policies and practices that promote the protection of workplace health and safety. Policies have been developed to protect all team members from potential workplace hazards. Team members who observe or experience any form of harassment, discrimination, workplace hazards or violence should report the incident to their immediate supervisor, Human Resources and/or utilize the Corporate Compliance mechanisms in place for reporting concerns.

Licenses and Certifications

Jupiter Medical Center will not allow any team member or independent contractor to work without applicable and valid professional licenses, certifications or other credentials. Team members are responsible for maintaining the current status of all their credentials and shall comply at all times with Federal and State requirements applicable to their respective disciplines. Jupiter Medical Center may request and require evidence that an individual has a current license or credential status.



Internal Investigations

Jupiter Medical Center will investigate all reported concerns promptly and confidentially to the extent possible. The Director of Corporate Compliance will coordinate any findings from the investigations and recommend corrective action or changes that need to be made. All team members are expected to cooperate with investigation efforts.

Regulatory Compliance and Accrediting Agencies

Jupiter Medical Center is committed to complying with all applicable laws and regulations. We will cooperate with and will be courteous to all government inspectors and provide them with factual and accurate information to which they are entitled during an inspection. No team member or Jupiter Medical Center associate must ever conceal, destroy or alter documents, lie or make misleading statements to a government inspector. Jupiter Medical Center will also deal with accrediting bodies in a direct, open and honest manner. No action should ever be taken with an accrediting body that would mislead them directly or indirectly. The Medical Center will provide team members with the information and education necessary to assure they comply with applicable laws and regulations.

Acknowledgement Process

Jupiter Medical Center requires all team members to sign an acknowledgement confirming they have received a copy of this Code of Ethical Conduct and understand it represents policies of the organization. New team members will receive their copies during orientation. Each team member's annual performance review will assess adherence to and support of Jupiter Medical Center's Code of Ethical Conduct and participation in related activities and training.

This Code of Ethical Conduct provides information about particularly important areas of responsibility. It is intended to prompt team members to seek counsel in case of doubt. Such counsel will be provided by supervisors of the relevant department(s).

Corrective Action

"Corrective action" is viewed as a means of correction and instruction. Violators of the Jupiter Medical Center Code of Ethical Conduct are subject to Jupiter Medical Center's Human Resource Department progressive "Corrective Action" policy and procedures. Action can take the form of a verbal warning, written conference record, suspension, and termination depending on the nature, severity, and frequency of violation. Corrective action is administered to all team members in a uniform manner.



Making a Report

If you would like to report possible misconduct or obtain guidance on an ethics or compliance concern please contact:

Director of Corporate Compliance
Jupiter Medical Center
561-263-5999

Jupiter Medical Center also maintains a Compliance Hotline at 1-888-826-8433.

The Compliance Hotline is a confidential, toll-free number. It's available 24 hours a day, seven days a week and is managed by a third-party independent organization.

All reports are forwarded for investigation. Reports made to the Compliance Hotline can be anonymous at the request of the caller.

Jupiter Medical Center promotes a work environment that encourages team members and associates to feel at ease when reporting concerns regarding legal or regulatory issues, policies and procedures. Any form of employment retaliation against a team member or associate who, in good faith, identifies a perceived problem or concern, is strictly prohibited.

 JUPITER MEDICAL CENTER

1210 SE Dixie Hwy., Jupiter, FL 33458 • 561-263-2234
jupitermed.com