

# Code of Conduct

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GRAHAM HEALTH SYSTEM

Corporate Compliance

GRAHAM HOSPITAL | 210 W. WALNUT STREET, CANTON, IL 61520

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## Overview and Introduction

### Mission Statement

To provide compassionate, quality health services, in a responsible and charitable manner, to the people and communities we serve.

### Values

#### Innovation

By Innovation, we mean we continuously improve our operations and environment by actively encouraging creative solutions.

#### Accountability

By accountability, we mean we accept responsibility and follow through to completion

#### Communication

By communication, we mean we openly share information in all directions in a timely manner.

#### Compassion

By compassion, we mean we exhibit empathy and care for others.

#### Teamwork

By Teamwork, we mean working together cohesively to achieve our common goal.

The Code of Conduct helps shape the culture of integrity for Graham Hospital Association (DBA Graham Medical Group, Graham Hospital, Graham Health System). This Code applies to all of us and is intended to outline the standards of behavior and working relationships that we are all expected to uphold on a daily basis. It is the responsibility of all Board members, medical staff, employees of the Health System, contract staff, volunteers and students to act in a manner consistent with this Code of Conduct and to hold others accountable to its terms and related policies.

The Code of Conduct is an important part of our Organizational Ethics and Compliance Program. It guides us in applying our core values to all we do and serves as a guide for moral, ethical and legal behavior. All individuals subject to this policy have an obligation to and are required to report violations of the Code of Conduct. The Health System has established a procedure that allows persons bound by the Code of Conduct to safely report unethical and illegal actions, without fear of retaliation.

The Code of Conduct is intended to be a comprehensive and easily understood document. Subjects are covered completely in some cases; however, due to the complexity of some subjects, additional guidelines or policies may provide further information.

The Code of Conduct serves as a valuable reference providing guidelines for all employees and medical staff. Behavior inconsistent with the Code of Conduct will be investigated. Violations can lead to disciplinary action, up to and including discharge.

The Code of Conduct does not alter the terms or conditions of your employment with Graham. Nor does it establish an employment contract or an assurance of continued employment with Graham.

## Our Responsibilities

All persons covered by the Code of Conduct are responsible for upholding high standards in all aspects of our work and our professional relationships. Responsibilities include, but are not limited to:

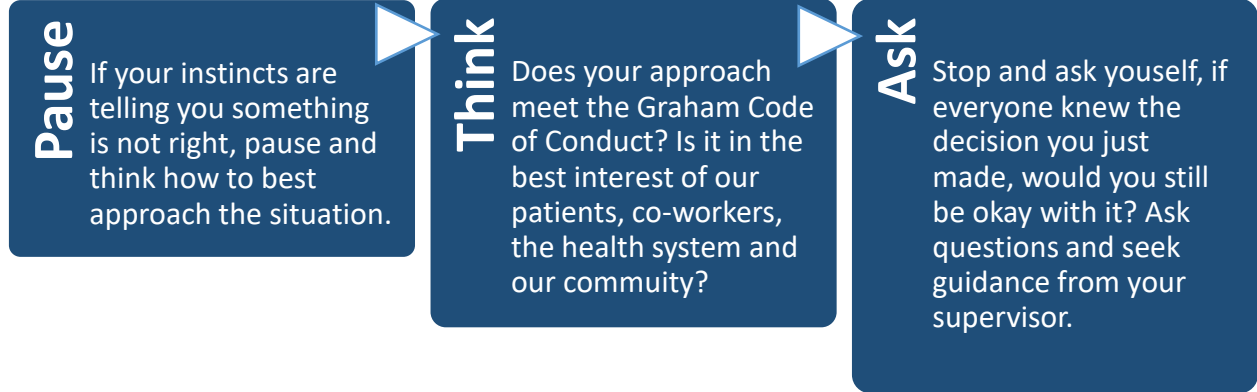
- Read and understand how the Code of Conduct applies to each of us.
- Using good judgment and seeking help when you are uncertain what to do.
- Understand and apply the principles and terms of the Code of Ethical Conduct in your daily work interactions.
- Assuming ownership and accountability for your own actions and behaviors.
- Speaking up and reporting concerns about actions you encounter that may be inconsistent with the Code of Conduct.
- Avoid discussing workplace conduct, concerns and conflicts in front of others.
- Always cooperate fully with all inquiries and investigations related to reported issues.
- Participate in training programs to further your understanding of the Code of Conduct, its application to your work at Graham, and your responsibilities.
- Consistently displaying leadership behaviors in all workplace interactions.
- Reporting inappropriate behaviors, as indicated in Health System policies.

## Leadership Responsibilities

Leaders, including all individuals in a position of supervisory responsibility are accountable for shaping the values-based culture within our organization. Therefore, the following are additional responsibilities that are expected:

- Serve as a role model for supporting our Mission, Vision and Values.
- Lead by example by complying with the Code at all times.
- Foster an environment in which employees feel comfortable coming to you with questions and concerns.
- Create and maintain a work environment that encourages collaboration, co-operation and professionalism.
- Clearly communicate expectations for high standards of ethical behavior to those you lead.
- Promote a culture of trust, open communication and respect.
- Encourage those you lead to ask questions and raise issues and concerns.
- Promoting an open communication in which issues may be raised for discussion without fear of retaliation.
- Comply with the Health System's non-retaliation policies.
- Investigate reports of violation of the Code, documenting, initiating appropriate action and seeking advice from subject matter experts when required (i.e. Human Resources, Legal/Privacy Office, Diversity, etc.).

When you are faced with a difficult situation:



## Violations of the Code of Conduct

The standards set forth in our Code are mandatory and must be followed. All Health System members will be held accountable for behaviors and actions inconsistent with the Code of Conduct.

The following are examples of activities that can result in disciplinary actions or sanctions:

- Participating in, or failing to report a violation of law, regulation, or Health System policy.
- Providing substandard, unsafe or medically unnecessary patient care.
- Falsifying records of any type.
- Theft or misappropriation of GHS assets, funds, equipment, supplies or other property.
- Retaliating against individuals who in good faith report issues and concerns.
- Deliberately filing false reports of violations.
- Actions that may be discriminatory, harassing, or bullying.
- Reckless or intentional actions or behaviors that jeopardize the privacy and security of personal health information and other confidential business information.

## Inappropriate Behavior

Inappropriate behavior is conducting oneself in a way that is undesirable, unsuitable, improper or incorrect. It is the Health System's exclusive right to manage and direct the workforce so as to maintain order, discipline and efficiency within the organization. It is also the Health System's function to establish and enforce rules and regulations to be observed in order that its obligations to its patients and the community are carried out.

Examples of inappropriate behavior or conduct include:

- Comments that are insulting, hurtful, disrespectful or rude.
- Threatening or abusive language directed at an individual.
- Degrading or demanding comments.
- Profanity or similar offensive language.

- Physical behavior with another individual that is perceived as threatening, intimidating or unwelcome.
- Discussing workplace conduct, concerns and conflicts in front of others.
- Passive-aggressive behavior — describes behavior that is passive in expression but is aggressive or malicious in intent and may include non-verbal behavior or body language that is irritating or offensive.

## Duty to Report

We are committed to ethical and legal conduct that is compliant with all relevant laws and regulations and to correcting wrongdoing wherever it may occur in the organization. Each employee has an individual responsibility to report any activity by any colleague, physician, subcontractor, or vendor who appears to violate applicable laws, rules and regulations of this Code.

### Reporting a Violation:

Graham ensures safe reporting mechanisms for any violations of the Code of Conduct. When you discover a problem or suspect something is wrong, it is your individual responsibility to report the activity. The Heath System maintains the confidentiality of any individual who reports concerns or possible misconduct. Graham takes all compliance reports very seriously and handles each one on a case-by-case basis.

#### If the Situation Involves:

- Workplace conduct issues
- Inappropriate behavior
- Harassment
- Discrimination
- Employee mistreatment
- Conflicts with coworkers
- Disciplinary issues

**CONTACT HUMAN  
RESOURCES**

#### If the Situation Involves:

- Fraudulent billings or coding concerns
- Medicare / Medicaid fraud & abuse
- Bribes or kickbacks
- Privacy issues such as inappropriate access and breaches of patient or employee confidentiality
- Lost or stolen electronic devices containing Protected Health Information (PHI)
- Violations of professional and business ethics
- Violations of patient rights
- Conflicts of interest
- Non-compliance with professional standards of practice

**CONTACT CORPORATE COMPLIANCE**

## Compliance Reporting Options:

- 1) Place a direct call the Corporate Compliance Officer, Holly Henline at ext. 2709
- 2) Contact the Compliance Hotline at ext. 7777
- 3) Send a direct email to the Compliance Officer at [hhenline@grahamhospital.org](mailto:hhenline@grahamhospital.org)
- 4) Mail questions or concerns to the Compliance Officer at:

Graham Hospital  
Attn: Corporate Compliance Officer  
210 W. Walnut St.  
Canton, IL 61520

We are committed to investigating all reported concerns promptly and confidentially and to the fullest extent possible. The Corporate Compliance Officer will coordinate findings from investigations and if indicated, recommend corrective action or changes that need to be made. All employees are expected to cooperate with all investigation efforts.

## Non-Retaliation

It is your responsibility to report any concerns or inappropriate actions you know about. Consistent with our values, Graham maintains a Non-Retaliation Policy that prohibits retaliation against anyone who reports an incident in good faith. Ensuring compliance with all laws and regulations requires integrity and strong teamwork. We are all responsible for safeguarding our Health System, our employees, colleagues and our patients.

## Standards

### Respect, Rights and Responsibility

Graham is committed to fostering a healthy and positive environment that respects the personal worth, dignity and diversity of each member of the Health System community.

All Individuals are Subject to this Policy: Every person deserves to be treated fairly and equitably.

### Your Rights

- Work in a respectful environment.
- Be free from discrimination and harassment.
- Be assigned duties, privileges and promotions based on your job description, experience and performance; not on your membership in a specific group.
- Lodge complaints without fear of reprisal.

### Your Responsibilities

- Treat everyone throughout the Hospital / Clinic community with respect, compassion and dignity.
- Provide the same excellent quality of care and treatment to all patients.
- Report any discriminatory or harassing conduct in the Health System that you become aware of or witness.
- Make decisions about recruitment, work assignments, educational opportunities, promotions or terminations fairly and equitably.
- Fully and truthfully cooperate with investigations under the Policy.
- Keep confidential information confidential.

## Patients and Families Rights

It is expected that all individuals subject to this policy respect and honor the rights and responsibilities of patients. Patient rights and responsibilities are posted throughout the Health System in all public and patient care areas and on our website. Patients and families have the right to:

- Be treated with dignity and respect by everyone in the Hospital.
- Be free from discrimination and harassment.
- Receive, appropriate, accessible and equitable care.
- Lodge complaints without fear of reprisal.

For more information regarding rights and responsibilities, please see the Patient Rights and Responsibilities policy.

## Emergency Treatment

Graham complies with the Emergency Medical Treatment and Labor Act (EMTALA).

Graham:

- Provides emergency medical and (if necessary) stabilizing treatment to all patients, regardless of their ability to pay.
- Obtains financial and demographic information only after the patient's emergency medical needs are met.
- Does not consider the ability to pay as a factor in determining whether to admit or discharge patients.
- Only transfers patients to other facilities when we cannot meet their medical needs and only after they have been stabilized.

## Workplace Conduct and Employment Practices

### Conflicts of Interest

Graham Health System has built its reputation over the past 115 plus years and it has been earned through the efforts of its employees and providers. We avoid conflicts of interest by never using our position or Health System assets for personal gain.

Although our Code of Conduct does not list every situation, there are a few instances where conflicts typically arise:

- Outside activities or personal interests influence, or appear to influence, your ability to make objective decisions in the course of your job responsibilities.
- The demands of any outside activities hinder or distract you from the performance of your job or cause you to use health system resources for other than health system purposes.
- Making business decisions that could unduly benefit family or friends.
- Having financial or ownership interest in an entity that competes with Graham.
- A second job or service to another organization takes away your time, energy or talent from your position.
- Allowing a member of your family to receive personal benefits as a result of your position.

It is your obligation to ensure that you remain free of conflicts of interest. If you have any questions about whether an outside activity might constitute a conflict of interest, seek approval before pursuing the activity.

### Gifts

Graham protects its reputation by ensuring gifts are appropriate and legal. We do not accept anything of value (a gift) that may create a conflict of interest. Inappropriate gifts include:

- Any form of cash
- Gifts with a value exceeding \$25.00
- Gifts that would create an obligation

If a question arises regarding a gift, the employee handbook should be referenced.

### Communications and Marketing

Graham presents only truthful, informative and non-deceptive information in our materials and announcements. We engage in marketing and advertising activities to:

- Recruit employees
- Educate the public
- Provide information to the communities we serve
- Increase awareness of our services

### Social Media

Graham Health System participates in several social media platforms such as Facebook, Instagram, LinkedIn, etc. Social media platforms offer opportunities for interactive discussions. We realize information placed on social media sites can shape public opinion. While we respect your right to use social media, use it in a way that is consistent with our Code of Conduct.

- If you mention Graham Hospital, Graham Medical Group, Graham Health System or any part of Graham, you must make it very clear you are speaking on your own behalf.
- Posting of any confidential information is strictly prohibited.
- Posting of any material, including photos, that is discriminatory, obscene, slanderous or offensive is strictly prohibited.

### Artificial Intelligence (AI)

AI technologies are evaluated, approved, and used in alignment with HIPAA, industry regulations, and Graham's compliance requirements. The health system is committed to responsible AI practices that protect patient information, uphold ethical standards, and ensure regulatory adherence. AI shall not be used to independently diagnose, recommend treatment, or replace clinical judgment in any patient care context.

You are responsible for what you publish, always use good judgment.

Graham will not tolerate the use of social media to intimidate, harass, or discriminate against fellow employees.

## Workplace Violence

Every employee deserves to work in a safe environment. Graham is committed to maintain a workplace free of intimidation, threats or acts of violence. Graham will not tolerate harassment by anyone based on the diverse characteristics or cultural backgrounds of others.

- Degrading or humiliating jokes, photographs, slurs, intimidation, or other harassing conduct is not acceptable in our workplace.
- Any form of sexual harassment is strictly prohibited. This includes:
  - Unwelcome sexual advances.
  - Requests for sexual or other favors in conjunction with employment decisions.
  - Verbal or physical conduct of a sexual nature that interferes with an individual's work performance or creates an intimidating, hostile, or offensive work environment.

Harassment also includes incidents of workplace violence. Workplace violence includes:

- Theft and other commercial crimes
- Stalking cases
- Violence directed at the employer or employees
- Terrorism
- Hate crimes

As part of our commitment to a safe workplace, we prohibit employees from possessing firearms, other weapons, explosive devices, or other dangerous materials on health system property.

## Quality of Patient Care

Quality patient care is our greatest commitment, team members are our greatest asset, excellent patient experience is our greatest accomplishment, and the health of our community is our greatest responsibility.

## Diversity, Inclusion and Nondiscrimination

Graham is committed to promoting a broad work environment and respects what each individual brings to our health system, education, background, gender, race, ethnicity, working and thinking styles, religious background and technical skills.

Graham continues to strive to incorporate multicultural diversity and inclusion awareness to our patient care and throughout the health system. Graham complies with applicable Federal civil rights laws and does not discriminate on the basis of race, color, national origin, sex, age, disability, gender identity or gender expression.

Graham is committed to:

- Respectful and equitable care for all
- Use of inclusive language
- Ensuring accessible communication

Graham provides reasonable modifications that protect the privacy and independence for individuals with disabilities, appropriate auxiliary aids and services, and language assistance services, free of charge

and in a timely manner. These resources may be obtained by contacting the House Supervisor. Services include but are not limited to:

- Qualified sign language interpreters
- Translators
- Information written in other languages

For grievances, Graham Health System follows its Patient Complaint and Grievance Policy which may be found on the MCN Policy Manager portal. To file a discrimination complaint with the Office for Civil Rights (OCR), the following website may be accessed:

<https://ocrportal.hhs.gov/ocr/smartscreen/main.jsf>

Information regarding Graham's notice of nondiscrimination may also be found on the Graham Health System website <https://www.grahamhealthsystem.org/>

## Compliance with Laws and Regulations

### Antitrust

Graham complies with applicable antitrust and similar laws that regulate competition. Antitrust laws are designed to create a level playing field in the marketplace and to promote fair competition. Graham does not discuss or make agreements with competitors regarding:

- Pricing or pricing terms.
- Dividing up customers or geographic markets.
- Joint action to boycott or coerce certain customers, suppliers or providers.
- Sharing of business information.

In general, avoid discussing sensitive topics with competitors or suppliers.

### Fraud, Waste and Abuse

Graham follows policies and procedures to prevent, detect, deter and correct fraud, waste and abuse in accordance with federal and state laws.

Graham accurately and legally codes and bills Medicare, Medicaid and all third party payors. Graham does not:

- Forge patient billing.
- Bill for services or supplies that are not rendered medically necessary, nor documented.
- Misrepresent a diagnosis or procedure code in order to obtain a higher payment.
- Destroy any information considered part of the patient medical record.
- Mishandle or improperly report financial transactions.
- Falsify or alter any record or report, such as:
  - Payroll
  - Time records
  - Expense accounts
  - Cost reports

## Financial Reporting

Our business involves reimbursement under government programs that require the submission of certain reports of our costs of operation. We will comply with Federal and State laws relating to all cost reports. Graham follows these guidelines:

- Utilize generally accepted accounting principles to maintain and report accurate financial statements.
- Maintain a financial reporting system that provides timely, accurate and comprehensive disclosures.
- Promptly report concerns involving accounting, financial reporting, use of assets and internal controls.
- Record all transactions, payments and receipts timely, accurately and in a consistent manner.
- Shall not create false or misleading entries in any financial record.
- Shall not take any action to fraudulently influence, coerce, manipulate, mislead or obstruct any auditor engaged in an audit for the purpose of misrepresenting the organization's financial condition.

## Use of Company Assets

Graham uses company assets for business purposes only. Company assets are the information, equipment and supplies we use in our work every day. We handle our company assets with care and protect them from loss, theft, misuse and fraud. We are responsible to:

- Use supplies, equipment & inventory for work purposes only.
- Use our time on the clock for assigned job duties.
- Non-exempt employees report all time worked and take meal and rest breaks.
- Use software as authorized and keep information confidential.
- Be good stewards of health system funds and assets.
- Protect our business strategies & data.

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