

<b>University of Louisville Hospital</b>		<b>POLICY/PROCEDURE</b>	
<b>Subject:</b> <b>CODE of CONDUCT</b>		<b>Policy no.</b> <b>859-0103</b>	<b>Page:</b> <b>1 of 2</b>
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## Code of Conduct

### Purpose

The University of Louisville Hospital (ULH)/James Graham Brown Cancer Center (BCC) is committed to conducting its business ethically and in compliance with all federal and state laws, regulations, interpretations thereof, and the Code of Conduct (also known as the Corporate Compliance Handbook). The ULH/BCC will maintain and update as appropriate a written Code of Conduct to provide guidance on employee and organizational responsibilities related to compliance. The standards address specific issues related to reimbursement, financial relationships, quality of care, and other critical areas.

### Policy

1. ULH/BCC will develop, maintain, and update as appropriate a written Code of Conduct to provide employees and agents with guidance on requirement for conduct related to employment or engagement by the ULH/BCC.
2. The Code of Conduct will describe important parts of the compliance program including but not limited to the problem resolution process, employee hotline, and non-retaliation policy.
3. All employees and agents will be provided a copy of the Code of Conduct and participate in training sessions on a regular basis that include a review of the documents.

### Procedures

1. The Vice President of Compliance & Ethics in consultation with legal counsel is responsible for the periodic update of the ULH's/BCC's Code of Conduct.
2. The Corporate Compliance & Ethics Committee and the Board of Directors will be responsible for oversight and final approval of the Code of Conduct.
3. The Code of Conduct will be written at a basic reading level, avoiding complex language and legalese. At a minimum, it should address critical areas such as compliance with laws and regulations, human resource practices, quality of care/services, conflicts of interest, proprietary rights, confidentiality, safety, and reimbursement practices.
4. The Code of Conduct will address specific areas of potential fraud, the prevention and detection of fraud, waste and abuse, or similar wrongdoing.
5. The Code of Conduct will address major issues identified by the U. S. Sentencing Commission Guidelines and the Office of Inspector General.

6. The Code of Conduct will address human resources related compliance issues such as sexual harassment, discrimination, and abusive practices, as well as the ULH/BCC commitment to quality of care.
7. Applicable policies and the Code of Conduct will be provided to all executives, managers, employees and those with whom business is conducted, as appropriate, and including agents, physicians, and independent contractors. Copies will be provided to all new employees as part of the new employee orientation. All recipients of the document will sign a receipt that acknowledges: receiving a copy and agreeing to abide by the provisions of the document.
8. The Vice President of Compliance & Ethics will ensure that all employees and agents receive training related to the contents of the Code of Conduct to help them understand how it applies to everyday work situations. The Vice President of Compliance & Ethics will ensure that documentation is maintained to evidence those employees and agents who have received such training.
9. The Officer of Compliance & Ethics will include in the report to the Corporate Compliance & Ethics Committee and the Board of Directors that status of training, along with any recommendations for updating or improving the contents of the Code of Conduct.
10. The Vice President of Compliance & Ethics is responsible for investigating possible violations of the Code of Conduct and enforcement of disciplinary action when necessary.
11. Written confidentiality and nonretaliation policies will be referenced and included as part of the Code of Conduct for the purpose of encouraging communication and the reporting of incidents of suspected fraud or other wrongdoing.
12. The Code of Conduct will include instructions on the option of reporting of fraud, abuse, suspected violations of the Code of Conduct, or other suspected wrongdoing directly to the Officer of Compliance & Ethics without having such reports being first reported to supervisors or other personnel.
13. The Code of Conduct will provide written guidance on how employees and agents may report suspected violations of federal or state law, regulations, interpretations thereof, or the Code of Conduct without fear of retribution or retaliation to an organization hotline or other mechanism that bypasses management.
14. The Code of Conduct will include description of the procedures for handling disciplinary problems.