



ADIRONDACK HEALTH

Code of Conduct and Standards of Behavior

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WELCOME TO ADIRONDACK HEALTH

On behalf of our medical staff, board of trustees, and over 900 employees, welcome to Adirondack Health. I am grateful for your decision to help us provide sophisticated care to the residents and visitors of the North Country communities we serve. It is a responsibility we take very seriously, and one that I expect you – as a part of our team – will find both challenging and rewarding.

In caring for our patients, we oftentimes encounter them at their most vulnerable. They have placed their future well-being into our hands. As such, it is essential that we hold ourselves, and each other, to the highest standards of professional conduct and ethical behavior. This document lays out those standards, but by no means covers everything.

*You have likely heard of the Golden Rule, which reminds us: "Treat others the way you want to be treated." I ask that you go one step further here and strive every day to exercise the Platinum Rule: "Treat others the way **they** want to be treated."*

Should you have questions or concerns about any aspect of Adirondack Health's code of conduct or ethical standards, please do not hesitate to reach out to your manager, director, or me.



Aaron Kramer

President and Chief Executive Officer

Adirondack Health

ADIRONDACK HEATH'S MISSION, VISION AND GUIDING PRINCIPLES

Mission

We honor a mission of excellence, healing and compassion close to home that goes back more than a century and goes forward just as far.

Vision

To be the trusted guide to health and trusted provider of healthcare in the Adirondacks.

Guiding Principles

Compassionate, **A**ccountable, **R**espectful, **E**xceptional, **S**ervice

INTRODUCTION

This Code of Conduct and Standards of Behavior applies to all employees, medical staff, volunteers, and persons who are affiliated with Adirondack Health, including members of the Board of Trustees (here within referred to as “Employees”). Contractors and other non-employees are not covered by this Code, but Adirondack Health may impose similar ethical standards on such nonemployees, as appropriate.

Adirondack Health is committed to the highest standards of business conduct. Therefore, all employees, must be committed to the *highest standards* of business conduct while doing their jobs for Adirondack Health.

Adirondack Health values honest and ethical conduct and behavior. An employee should personally observe high standards of conduct so that the integrity of the Adirondack Health is preserved and the employee's office reflects ethical conduct.

While this Code may not address all possible ethical and compliance concerns that an employee may encounter in the workplace, it should be considered the primary source of information regarding conduct and standards of behavior. All decision-making should be made in the spirit of the goals of integrity and ethics set forth in this Code.

The standards of this Code do not affect or preclude other, more stringent standards required by law, by court order, or by the appointing authority.

An individual who becomes aware of a violation of this Code of Conduct, or any other policies, laws or regulations, must report the violation immediately to any of the contacts listed below under “Resources for Raising Concerns.”

ETHICAL FRAMEWORK

The framework of this Code is based on Adirondack Health's deep regard for a culture of integrity.

Adirondack Health commits to:

- **Honest and ethical conduct**
- **Using good judgment**
- **Taking responsibility for mistakes and ensuring that these are corrected or addressed**
- **Avoiding actual or potential conflicts of interest**
- **Full, fair, accurate, timely and understandable financial disclosure in reports and documents**
- **Compliance with applicable laws, rules and regulations**
- **Treating all employees, medical staff, volunteers, and other persons who are affiliated with Adirondack Health with respect**

Any individual covered by this Code of Conduct makes these same commitments by signing the acknowledgement form below.

When making a difficult decision, an employee needs to consider the legal and ethical implications of an action or inaction. But the employee is not alone: supervisors, directors, the Compliance Officer, and Human Resources (HR) staff are available and ready to provide guidance and support.

Any interpretation or waiver of this Code's provisions must be discussed in advance with the contacts listed under *Resources for Raising Concerns*.

EMPLOYEE RIGHTS AND COMMUNICATIONS

This Code in no way prohibits, limits or restricts employees from exercising any rights provided by law.

This includes but is not limited to any activity that is protected under Section 7 of the National Labor Relations act, which includes the right of employees to speak with others about the terms and conditions of their employment.

Adirondack Health commits to protect and respect the privacy of its employees, clients, suppliers and contractors.

Adirondack Health commits to compliance with all applicable privacy laws, including international requirements.

Adirondack Health will maintain confidentiality of any reported concerns to the greatest extent possible by law. The information will be investigated thoroughly and promptly. Employees have the right to be free from retaliation and should receive support when taking any actions in furtherance of this Code's provisions.

EMPLOYER RESPONSIBILITIES

Adirondack Health values a culture of diversity, inclusion, dignity and respect.

Adirondack Health commits to providing an environment free of discrimination, harassment and retaliation.

Adirondack Health commits to complying with all applicable labor and employment rules and regulations, at the federal, state and municipal level.

HEALTH AND SAFETY

Adirondack Health commits to providing a safe and healthy workplace for all its employees.

EMPLOYEES HAVE A RIGHT TO WORK IN AN ENVIRONMENT FREE OF HARASSMENT, INTIMIDATION, AND WORKPLACE VIOLENCE.

As such, Adirondack Health prohibits behaviors that create an intimidating, hostile, or offensive work environment.

Behaviors that may be considered harassment or bullying include, but are not limited to:

- Staring or glaring, in a manner that is intimidating and clearly shows hostility
- Discounting an individual's thoughts, ideas or feelings ("Oh, that's a stupid idea") in meetings
- Invoking the silent treatment or blatantly ignoring a co-worker's views or comments
- Purposely excluding a co-worker from work-related or social activities
- Deliberately withholding vital work-related information or sabotaging a co-worker's contribution in order to cause embarrassment
- Spreading rumors or gossip or making false allegations about a co-worker to discredit him or her
- Hostile remarks, verbal attacks, threats, taunts
- Derogatory comments or jokes, insulting behavior or gestures
- Unwanted physical contact or physical assault

Adirondack Health prohibits any unlawful behavior, including discriminatory, harassing, or retaliatory conduct, on the part of its employees, officers, directors or business partners.

Threats or acts of violence - including intimidation, bullying, physical or mental abuse and/or coercion - that involve or affect our employees, will not be tolerated.

Definitions

Discrimination includes the unjust or prejudicial treatment of individuals based on race, color, religion, sex, age, disability, material status, creed, political views, or sexual orientation.

Harassment, as defined by the U.S. Equal Employment Opportunity Commission, is unwelcome conduct that is based on race, color, religion, sex (including pregnancy), national origin, age (40 or older), disability or genetic information.

Bullying is repeated, unwanted harmful actions that humiliate, offend, and/or cause distress in an individual, whether or not intended. Bullying includes actions that harm, undermine, and degrade.

It is not the intention, but the deed, which constitutes bullying and/or harassment.

Workplace violence, as defined by the National Institute for Occupational Safety and Health, consists of physically and psychologically damaging actions that occur in the workplace or while on duty.

Workplace violence may take many forms, including actual or implied threats, verbal or nonverbal behaviors, changes to the terms or conditions of employment, coercion, bullying, intimidation, or deliberate exclusionary behaviors. This includes, but is not limited to:

- Adverse employment action affecting an employee's salary or compensation
- Taking away opportunities for advancement
- Excluding an employee from important meetings
- Threatening an employee who has made a report
- Directing an employee who has made a report not to report to outside regulators
- Deliberately rude or hostile behaviors or speech
- Sabotaging, or deliberately subverting, obstructing or disrupting another person's work performance
- Creating or allowing the creation of a work atmosphere that is hostile toward an employee who has reported a concern

All employees will be treated with respect, regardless of race, color, religion, sex, age, disability, marital status, creed, or sexual orientation.

References: Policy HR0044, *"Disruptive Behavior and Workplace Violence Prevention"*
HR0023, *"Harassment/Sexual Harassment"*

ENVIRONMENT

Adirondack Health commits to protect the environment in which the business operates.

As such, Adirondack Health pledges to engage in sustainable growth operations, conserve resources and reduce waste wherever possible.

CONTRACTING

Adirondack Health negotiates and enters fair and equitable contractual arrangements with reputable vendors and individuals who meet the needs of our organization.

All arrangements will comply with applicable federal and state regulations. Prior to the execution of any agreement, Adirondack Health will verify that all contracted parties are eligible to participate in federal and state funded health care programs.

All contracts will be in writing and reviewed and approved by the appropriate Executive Group member.

References: AD0050, *"Contract Management"*
MM1001, *"Materials Management – Objectives, Philosophy, and Policies"*

CORPORATE COMPLIANCE

Adirondack Health is committed to operating under the highest ethical and moral standards, and ensuring that our organization, in all its activities, complies with applicable state and federal laws, regulations and guidelines.

Our corporate compliance program is designed to detect and prevent noncompliance with applicable laws throughout the organization. The program is overseen by the Adirondack Health Board of Trustees to assure the scope and operation of the compliance program is appropriate and to maintain the Board's oversight with respect to the program's implementation and effectiveness.

FINANCIAL INTEGRITY

Adirondack Health commits to full, fair, accurate, timely and understandable disclosures in periodic reports and compliance with all applicable rules and regulations.

Specifically, Adirondack Health commits to comply with all applicable competition laws, anti-corruption laws, international trade controls and other applicable regulations.

In addition, Adirondack Health commits to implement money-laundering prevention methods in its business practices.

ADIRONDACK HEALTH'S LEADERSHIP

All Adirondack Health supervisors, directors, and other leaders shall demonstrate their commitment to a respectful workplace by ensuring and promoting an environment where all patients and employees treat each other with respect, dignity, and honesty.

Leadership will investigate all reported incidents of abuse, harassment, or discrimination in an objective, timely, and sensitive manner.

Retaliation against any individual who has made a report in good faith is strictly prohibited.

EMPLOYEE RESPONSIBILITIES

Employees acknowledge that it is their responsibility to read, understand and comply with the Code of Conduct and to implement Adirondack Health's vision of an honest and ethical workplace with a culture of integrity.

All employees are required, in all forms of communication, to present honest and factual information. It is every person's responsibility to provide information that is truthful, fair, accurate, complete and sensitive to needs of the public.

Acceptable behaviors at Adirondack Health includes those that create and foster a positive, collaborative, supportive, and safe environment among employees.

Unacceptable behaviors at Adirondack Health includes those that interfere with effective communication and negatively impact performance and favorable outcomes. This behavior is not supportive of a culture of safety and may compromise the quality of patient care.

Examples of unacceptable behaviors include, but are not limited to:

- Abusive behavior, including both verbal and nonverbal, such as intimidation or personal attacks
- Threats of violence, assault/battery, intentionally damaging property, or throwing of objects, instruments, or equipment
- Any activity that constitutes sexual harassment or sexual assault
- Communication addressed to its recipient with the intention of intimidating, undermining, or belittling
- Intentional violations of Adirondack Health patient safety related policies and procedures
- Deliberate avoidance or refusal to perform assignments, functions, and/or other duties and responsibilities that are an integral part of an individual's job expectation
- Inappropriate comments or illustrations made in patient medical records or other official documents, reflecting disparaging remarks about a patient, the quality of care received or attacking another staff member

CONFLICTS OF INTEREST

Employees have a duty of loyalty to Adirondack Health. Employees commit to acting in the interest of Adirondack Health and avoiding any activities or relationships that would lead to a potential or actual conflict of interest, or to the appearance of a conflict of interest.

This includes the promotion or advancement of any Adirondack Health business activities with outside parties in which an employee or an employee's family member or close personal friend has an ownership or financial interest.

By signing this Code, you attest that you are either free of any conflict of interest or that you have disclosed any potential conflicts to Adirondack Health.

Reference: Policy HR0040, "Conflict of Interest"

GIFTS, ENTERTAINMENT AND PAYMENTS

Employees have an ethical obligation to conduct business on competitive terms, and not based on any advantage procured by offering, making or receiving business amenities, gifts, entertainment and/or payments. *Business amenities* are anything of value or anything that provides value.

Gifts include anything of tangible or intangible value,

including cash and discounts. *Entertainment* includes meals, event tickets or passes.

Offering valuable business amenities may create the appearance that business decisions are made on factors other than the terms and conditions of a contract and could subject to the employee and Adirondack Health to liability for violating local, state, US and international laws regulating fraud, bribery and corruption.



It is okay for a department, clinical unit, or clinical practice to accept a modest perishable gift such as a floral arrangement, box of cookies, candy or similar food items to be shared by staff members. These often come from patients, families, peers, and physicians because of appreciation or to celebrate holidays.

Promotional items such as pens, notepads, mugs or similar items may be accepted from a vendor, business associate, individual or organization if they are nominal in value (\$15 or less).



Employees commit to follow all internal policies and practices on offering, making and receiving gifts, entertainment and payments, including all procedures regarding prior authorization for making gifts and offering entertainment on behalf of Adirondack Health.

Employees will exercise extreme caution when making any offers of business amenities to government officials and public-sector employees. Employees commit to comply with federal, state and local laws with respect to off-duty political activities, including canvassing, fundraising and campaigning.

Reference: Policy CC021, "Gifts, Honoraria, Entertainment, Sponsorship, and Business Courtesy"

USE OF ADIRONDACK HEALTH RESOURCES

Employees commit to using Adirondack Health resources in a responsible and ethical manner and to protect Adirondack Health resources from misuse, damage or theft.

Employees should follow security protocols, be aware of their surroundings and report any suspicious activity to their supervisor or director.

Employees also commit to refrain from using Adirondack Health resources for personal benefit or to promote a personal outside activity or interest.

Employees should receive authorization prior to engaging in any outside activities, such as lecturing or writing, which could draw on Adirondack Health proprietary or confidential information.

EMAIL AND SOCIAL MEDIA

Adirondack Health's electronic communications systems must be used for [business purposes only](#).

Employees personal use of Social Media should be done on their own equipment and time and shall not include information on, or photos of, our patients and/or residents.

Reference: Policy HR0050, "E-mail, Internet, Intranet, and Computer Use Policy"

CELL PHONES

It is the policy of Adirondack Health to minimize disruptions of patient care or customer service due to cellular device use.

Use of cellular phones must not interfere with the patient care or visitor relations and customer service.

Usage of cell phones and other IT devices are to be used out of direct patient care and visitor areas and on employee's scheduled break times. Use of personal cellular devices to photograph or video record any patient or visitor is strictly prohibited.

Reference: Policy AD0109, "Cellular Device Usage"

PRIVACY

Employees have a responsibility to safeguard data and information privacy in accordance with applicable law and contracts, corporate policies and practices and internal work rules.

Employees should access, use, share, transfer and retain any data or information only for legitimate business purposes and in a secure manner.

REPORTING CONCERNS

All employees have a duty to report potential violations of the Code in good faith.

If an employee is confronted with an issue or problem and is unsure of what to do, then that employee should contact one of the contacts listed below in *Resources for Raising Concerns*.

In addition, employees should communicate any relevant suggestions including, for example:

- Ways that processes may be improved;
- Ethical issues that may be emerging and need to be included, examined, or reviewed;
- Possible additions to the Code based on factors such as business development or organizational change.

CORPORATE COMPLIANCE RESPONSIBILITIES

All Adirondack Health Employees are responsible for compliance and have a duty to report potential or actual compliance issues.

Adirondack Health's Corporate Compliance Officer investigates all compliance concerns to detect possible violations in applicable laws, regulations and guidelines. The extent of the investigation will vary depending on the concern.

Potential compliance problems will be promptly, fairly, and thoroughly investigated by impartial investigator(s).

Any employee who makes a report in good faith will be protected from retaliation and intimidation.

FINANCIAL INTEGRITY

Employees commit to exercising prudence and responsibility when keeping financial records, preparing financial statements, submitting reimbursement forms and making public disclosures.

Employees commit to following all applicable laws, regulations and accounting principles and to execute all duties and responsibilities with integrity and care.

DISCIPLINE

Failure to adhere to this Code may constitute grounds for disciplinary action for misconduct, up to and including termination. Violations include:

- Failing to adhere to the provisions of the Code;
- Failing to report promptly a suspected violation of the Code;
- Encouraging another to commit a violation of the Code;
- Retaliating against another employee for reporting a concern; and
- Failing to implement the provisions of the Code according to one's role and responsibilities.

In addition, any deviation from performance standards or internal policies may result in disciplinary action.

When violations of the hospital's policies and procedures or other improper or inappropriate conduct occur, the progressive discipline procedures should be initiated, as determined by the employee's supervisor, in consultation with Humana Resources, AH's disciplinary policies, and collective bargaining agreements (if applicable).

The procedures for Medical and Associate Medical Staff will be followed as described in the Medical Staff Bylaws and Peer Review policy.

RESOURCES FOR RAISING CONCERNS

Individuals who need guidance may contact any of the following numbers for assistance.

If anyone is ever in doubt as to how to approach a business transaction or decision, he or she should contact the below entities for assistance.

In addition, if any employee is in doubt concerning the proper application of this policy, he or she should promptly discuss the matter with his or her supervisor or any of the below contacts or departments.

HUMAN RESOURCES

Questions and concerns relating to employee conduct or behavior, may be directed to the Human Resources (HR) department either in person or by phone at (518) 897-2427.

Employees may also contact the HR Director directly at (518) 897-2598.

Employees may submit a **confidential** report via SafetyZone under the "**Code of Conduct**" Form.

CORPORATE COMPLIANCE

The Compliance Officer has an open-door policy regarding reports of violations or suspected violations of the law and this Code of Conduct or questions concerning adherence to the law and this Code of Conduct.

The **Compliance Hot Line** is available for the reporting of compliance concerns at **518-897-2661**. The hotline is connected to a confidential voicemail that is accessible only by the Compliance Officer.

Employees may also report using the confidential email Compliance@adirondackhealth.org, interoffice mail, USPS, or **Safety Zone** via the confidential "Corporate Compliance" Form.

CONFIDENTIALITY

To protect the interests of those who report concerns and any others involved in the investigation of the concern, confidentiality will be maintained throughout the process to the fullest extent practicable and appropriate under the circumstances.

It is important that all parties involved work to ensure that that individual privacy and confidentiality are respected.

The investigation will be limited to only those individuals who must be contacted to fulfill the responsibility to investigate, provide a respectful workplace, and resolve the situation.

Any breach of confidentiality is subject to appropriate disciplinary action.

ADIRONDACK HEALTH STANDARDS OF BEHAVIOR ATTESTATION

I hereby acknowledge and certify that I have read and understand Adirondack Health's Code of Conduct.

By signing below, I agree to abide by this code of conduct and standards of behavior during my term of employment or affiliation with Adirondack Health.

I understand that it is my duty to recognize and report any suspected violations of these standards and/or any compliance issues. I will seek advice from my supervisor, Human Resources, or the Compliance Officer concerning appropriate actions that I may need to take to comply with the standards.

I also understand that failure to comply with these standards may result in disciplinary action, up to and including termination of employment or affiliation.

Signature: _____ Date: _____

Printed Name: _____

Title: _____

Department/Location: _____

Please return a copy of this signed form to the Human Resources department