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COMPLIANCE
DIRECTOR &
PRIVACY
OFFICER
Department Corporate
Compliance

Code of Conduct

I. Scope

Organization Wide

II. Purpose Statement

The purpose of Oaklawn's Code of Conduct is to clearly define the standards of ethical and professional behavior expected of all workforce members. It serves as a guide to help each of us make responsible decisions, act with integrity, and uphold the trust placed in us by our patients, colleagues, and community.

This Code reinforces Oaklawn's commitment to doing the right thing, complying with all applicable laws and regulations, and fostering a respectful and safe environment where personal accountability and high standards of care are the foundation of everything we do.

III. Definitions

Discrimination: Treatment or consideration of, or making a distinction in favor of, or against a person, based on the group, class, or category to which that person belongs rather than on individual merit. This includes discrimination based on race, color, national origin, age, disability, religion, conscience (whether it's religious beliefs or moral convictions), sexual orientation, sex (including sex assigned at birth, gender identity, recorded gender, or pregnancy or pregnancy-related condition), HIV status, veteran or military status, or source of payment including but not limited to inability to pay, Medicare, Medicaid or the Children's Health Insurance Program (CHIP) for services or any other basis prohibited by federal, state, or local laws.

Oaklawn: The not-for-profit corporation Ella E.M. Brown Charitable Circle and all assumed names under which Ella E.M. Brown Charitable Circle does business, together with all subsidiaries or joint ventures

controlled by Ella E.M. Brown Charitable Circle.

Workforce (Workforce Member): A member of Oaklawn's workforce is any person who is employed by, or otherwise associated with, Oaklawn who may render decisions, advice or influence that will affect patient care, business decisions, or the best interests of Oaklawn. These include but may not be limited to: any board member, Senior Leadership member, Medical Staff member, department director, supervisor, coordinator, manager, buyer, or other individual who has a working relationship or is in a position of influence, that has a financial or commitment interest and is duly authorized by the governing body to conduct business for, or has the ability to influence matters on behalf of Oaklawn.

IV. Policy

All members of Oaklawn's workforce are expected to uphold the principles outlined in this Code of Conduct. This includes acting with integrity, complying with applicable laws and regulations, and following all organizational policies and procedures.

Compliance with Oaklawn's Code is a condition of employment, affiliation, or engagement with Oaklawn. Each individual is responsible for understanding how these standards apply to their role and for seeking clarification when needed. Violations of the Code, whether through actions, omissions, or failure to report concerns may result in corrective or disciplinary action, up to and including termination of employment or contract.

Organizational leaders have a heightened responsibility to model ethical behavior, support a culture of accountability, and respond promptly to compliance or conduct concerns. Oaklawn does not tolerate retaliation against anyone who raises a concern in good faith.

By working together and holding ourselves to high standards, we protect the health and safety of our patients, the well-being of our workforce, and the reputation of Oaklawn as a trusted community healthcare provider.

V. Code of Conduct

A. Introduction

1. Message from Oaklawn's President & CEO

To All Oaklawn Employees, Physicians and Partners,

Our mission – to provide personal, accessible, and high-quality care to improve the health and well-being of the communities we serve – requires the highest professional and ethical standards from each of us.

Our Code of Conduct provides a reference for the way we conduct business at Oaklawn. The Code's values and policies can help every workforce member, every day, make the best decisions and provide exceptional experiences to our patients, customers, community, and colleagues.

Oaklawn's reputation as an organization of integrity is one of our greatest assets. Our Code of Conduct will help us reach our vision of striving for perfect care every time.

Sincerely,

Gregg Beeg, FHFMA, FACHE

President & Chief Executive Officer

2. Purpose of the Code

The Oaklawn Code of Conduct serves as a clear guide for ethical, professional, and legal behavior. It outlines the standards we are expected to follow to ensure integrity in our work, protect those we serve, and maintain the trust of our patients, colleagues, and community.

3. Applicability and Scope

This Code of Conduct applies to all members of Oaklawn's workforce. This includes all employees, medical staff, providers, contractors, agents, vendors, students, volunteers, board members, and others affiliated with Oaklawn.

Regardless of role, title, or work location, each individual is responsible for reading, understanding, and following the standards outlined in the Code. These expectations apply to all Oaklawn activities whether clinical, administrative, operational, or financial and extend to all settings in which Oaklawn business is conducted.

Compliance with this Code is a condition of continued employment or affiliation with Oaklawn. Violations of this Code, whether through actions, omissions, or failure to report known concerns, may result in corrective action, up to and including termination of employment, contract revocation, or loss of privileges, in accordance with applicable policies and procedures.

B. Our Commitment to Ethical Conduct

At Oaklawn, we are committed to upholding the highest standards of ethical and professional conduct in every interaction, with patients, colleagues, business partners, and the broader community. We act with honesty and integrity to preserve the trust placed in us. We conduct ourselves as leaders, modeling professionalism that earns the confidence and respect of those we serve. Each of us shares the responsibility to meet these standards through our actions, decisions, and daily work.

We demonstrate our commitment by:

- Taking full responsibility for our roles, actions, and obligations.
- Seeking guidance when clarification is needed and raising concerns promptly so they can be addressed appropriately.
- Doing the right thing, even when it is difficult.
- Upholding professionalism in both our conduct and appearance.
- Listening attentively and encouraging open, honest dialogue.
- Admitting mistakes, offering constructive suggestions, and remaining open to improvement.

- Fostering a respectful, inclusive, and safe environment.
- Recognizing and appreciating the contributions of others.
- Never retaliating against those who speak up or act ethically.
- Honoring the legacy of those whose integrity and dedication have shaped Oaklawn's reputation for excellence.

1. Mission Statement

We will provide personal, accessible, and high-quality care to improve the health and well-being of the communities we serve.

2. Vision

Striving for perfect care every time.

3. Values

- **Respect**
- **Integrity**
- **Loyalty**
- **Diversity & Equity**
- **Quality**
- **Teamwork**
- **Leadership**

C. Standards of Conduct

1. Being Responsible: Personal and Leadership Expectations

It is the expectation that each of us will:

- Promote the mission, vision, and values of Oaklawn.
- Comply with all applicable laws, regulations, and Oaklawn policies and procedures.
- Seek assistance whenever we are unsure of the right course of action.
- Promptly raise concerns about actual or potential compliance or ethical matters.
- Help when asked, such as participating in investigations or reviews related to possible areas of concern.

For those who manage, supervise, or direct others, additional responsibilities apply. Leaders are expected to:

- Serve as role models of responsible and ethical conduct for all workforce members.

- Ensure that employees in their area(s) of responsibility participate in all necessary education and training, particularly in areas of ethics and compliance.
- Foster and sustain a culture that values responsible conduct, and where employees feel safe to seek guidance and report concerns.
- Make sure employees reporting to us comply with the Code and related, laws, rules, and policies.
- Never compromise ethical or compliant behavior in the pursuit of business objectives.

2. Asking Questions and Getting Help

If you are unsure about what to do in a situation you are faced with, ask for help. Getting the answer to a question in good faith is always the right thing to do. Talking with a member of the management team, the Compliance Department, or Human Resources is encouraged. These are the people who can help determine the most appropriate action.

3. Utilizing Resources

You are not alone in fulfilling your responsibilities. Oaklawn provides multiple resources to assist you:

- **Your supervisor or manager**- They are the first point of contact for questions related to your role and day-to-day responsibilities.
- **Other Management Team Members**- All members of management including the senior leadership team are available to help.
- **Human Resources**- Get help with employee relations issues, including fair employment, respectful treatment and employee privacy issues.
- **Compliance Department**- Get help with regulatory guidance, ethical standards, and compliance risk mitigation to ensure lawful and accountable operations.

Additionally, you may contact the **Corporate Compliance Hotline at (269) 781-6207** or the **Compliance Officer directly at (269) 789-7576**. All reports are treated confidentially to the extent allowed by law.

4. Understanding and Following Policy

All workforce members are expected to know and follow Oaklawn's policies and procedures, which provide the framework for ethical, safe, and compliant behavior. Policies and procedures are accessible through **PolicyStat** and can be easily located by searching relevant keywords. If you need assistance finding a policy or understanding how it applies to your role, you should reach out to your available resources. It is your responsibility to remain current by reviewing updates as they become available.

You are also encouraged to proactively review policies related to key risk areas, including but not limited to patient privacy, billing and documentation compliance, workplace safety, and professional conduct. Staying informed helps protect our patients, our colleagues, and Oaklawn's reputation for integrity and excellence.

5. Exceptions

Exceptions to this Code are uncommon and will only be permitted when aligned with the overall intent and spirit of the Code's standards. Exceptions to this Code require the written approval of the CEO of Oaklawn or his/her designee.

D. Raising Concerns and Reporting Misconduct

At Oaklawn, we believe that raising concerns is essential to preserving safety, integrity, and ethical standards. By reporting a concern **in good faith** with a sincere belief that a potential issue or violation may exist – you help protect patients, colleagues, and Oaklawn as a whole. Concerns may involve any individual or group connected to Oaklawn's operations, including employees, managers, supervisors, directors, physicians, suppliers, contractors, sub-contractors, or others. You are expected to report concerns related to actual or suspected violations of laws, regulations, or Oaklawn policies and procedures. Failing to report a known or suspected concern is treated as enabling misconduct and is inconsistent with Oaklawn's expectations. Silence in the face of wrongdoing compromises patient safety, the work environment, and the trust placed in us by the community. Self-reporting your own misconduct does not remove accountability, but it will be considered when determining corrective actions.

Reports may be made to your supervisor, manager, or director. If you prefer, you may contact the Compliance Department, Human Resources, or use the Compliance Hotline at **(269) 781-6207**. If you believe a concern was not addressed adequately, you are encouraged to escalate the matter through another available reporting channel. Taking this extra step will help make sure your concern is understood and thoroughly investigated.

While reporting concerns is encouraged, intentionally submitting a false report is not considered good faith reporting and may result in disciplinary action, including potential termination of employment or affiliation with Oaklawn.

Question: What does "in good faith" mean?

Answer: "In good faith" means submitting a report based on an honest belief that an actual or potential problem exists. Certainty is not required, but your report should be made truthfully and without malice.

Question: If I report a concern, will I get into trouble?

Answer: No. You will not be reprimanded or subject to discipline if you suspect and report in good faith that something is wrong.

1. Non-retaliation

Oaklawn strictly prohibits retaliation against anyone who raises a concern or reports suspected misconduct **in good faith**. Retaliation violates Oaklawn's policies and undermines our commitment to a respectful and open environment.

Retaliatory actions may include harassment, intimidation, exclusion, or other adverse treatment resulting

from reporting a concern. Anyone found to have engaged in retaliation will be subject to disciplinary action, including potential termination of employment or affiliation with Oaklawn.

If you believe you have been retaliated against, or suspect retaliation against someone else, report it immediately to Human Resources, the Compliance Officer, or via the Compliance Hotline. All reports will be investigated, and action taken as appropriate.

Oaklawn is committed to maintaining a culture where individuals feel confident and supported when raising concerns.

2. Addressing Errors and/or Misconduct

Addressing misconduct is critical to upholding Oaklawn's values and protecting the trust placed in us by our patients, healthcare and business partners, and the community. Oaklawn will investigate all reports of potential errors and misconduct. If an issue is verified, we will take corrective action to address the matter and help prevent it from recurring, which may include:

- Identifying the root cause of the issue.
- Implementing changes to reduce future risks.
- Notifying applicable governmental agencies, when required.
- Making restitution to affected parties.
- Reporting and returning identified over-payments.
- Issuing disciplinary action if a blatant or intentional violation has occurred.

Corrective actions may range from counseling and suspension to restitution or, in more severe circumstances, termination of employment and referral to regulatory or law enforcement agencies. See the **Performance Expectations Policy** in PolicyStat for more information.

This Code of Conduct is not an employment contract and does not encompass all requirements or expectations. For additional guidance, please refer to related policies and procedures. Oaklawn reserves the right to revise this Code periodically so to ensure it accurately reflects to Oaklawn's evolving requirements and activities.

3. Confidentiality and Anonymity

All reports made to the Compliance Department are treated confidentially to the extent allowed by law. You may choose to report any concerns anonymously if you wish. Providing as much detail as possible will help ensure a thorough and effective review of all reports.

E. Workplace Conduct and Behavior

We are committed to building respectful, honest, and professional relationships with everyone we encounter. Each interaction reflects not only on us as individuals but on Oaklawn as a whole.

We demonstrate this commitment by:

- Respecting the rights, privacy, and confidentiality of patients and customers.

- Serving others with professionalism, kindness, and dignity.
- Maintaining appropriate professional boundaries in all patient encounters.
- Providing compassionate, patient-centered care based on individual healthcare needs.
- Ensuring marketing materials are honest, accurate, and transparent.
- Safeguarding patient and business information at all times.
- Creating a respectful, harassment-free, and inclusive work environment.
- Conducting fair and ethical business practices with vendors, suppliers, and contractors.
- Upholding fair competition and responsible practices with competitors.
- Acting in the best interest of our patients, colleagues, and community.

We recognize that the quality of care we provide depends on strong collaboration across all roles, clinical and non-clinical. Every team member contributes to our mission of delivering personal, accessible, and high-quality care. Together, we strive for excellence in every interaction and every service, every time.

1. Respect for Patient Rights and Responsibilities

You are expected to treat everyone with dignity and respect. Oaklawn prohibits discrimination based on any basis prohibited by federal, state, or local laws.

We involve patients and their family or designated representatives in all aspects of care, as appropriate, including making informed decisions about diagnosis, treatment options, risks and benefits, and the right to refuse care.

The appropriate screening, diagnostic and treatment services are provided to all patients with emergent conditions, without regard to the patient's ability to pay.

Rights and responsibility information is available for all patients. Oaklawn's Policy on Patient Rights and Responsibilities can be found in PolicyStat.

2. Health Insurance Portability and Accountability Act (HIPAA)

We comply fully with the Health Insurance Portability and Accountability Act (HIPAA) to safeguard patient information. As a member of Oaklawn's workforce you must follow and be knowledgeable on Oaklawn's HIPAA Privacy and Security policies and procedures. Relevant policies can be found in PolicyStat.

3. Confidentiality

As a workforce member at Oaklawn, you are entrusted with confidential information about our patients and operations. You are required to safeguard this information and only access, use, or share it when necessary to perform your job and as permitted by Oaklawn policies, procedures, or applicable laws.

Your responsibilities include:

- Preventing unauthorized access, use, or disclosure of confidential information.
- Accessing only the minimum necessary information required for your job.
- Following Oaklawn’s HIPAA, privacy, and security policies at all times.
- Cooperating with Oaklawn’s monitoring of system access and understanding that there is no expectation of privacy when using Oaklawn systems.
- Treating all documents, including emails on Oaklawn systems, as business records subject to legal review or disclosure.
- Reporting suspected unauthorized system access to the HelpDesk at 269-789-3920, and suspected misuse or disclosure of confidential information to the Compliance Department at 269-781-6207 by the end of the business day on which the concern is identified.

You may not use your Oaklawn credentials to access your own medical records or those of family members. Like all patients, you must follow standard patient access procedures. For more details, please review Oaklawn’s “Confidentiality Policy” in PolicyStat.

Question: Does Oaklawn allow me to look up my spouse’s lab results or bills using my work access? What about my own test results?

Answer: No, you may not look up your family members or your own medical information using work access. Information is available via the patient portals and the Health Information Management department is ready to help you with your request.

4. Social Media

You are free to use social media in your personal life; however, it is important to ensure that your posts do not harm Oaklawn’s reputation, working relationships, or public trust. Do not share anything that could interfere with your job responsibilities, disrupt teamwork, or damage the professional environment we work to maintain.

Sharing any patient-related information on social media is prohibited; doing so is a serious violation of Oaklawn’s policies. Examples of prohibited activities include:

- Sharing or posting any image or video of a patient – even if the face is blurred or not visible.
- Sharing or posting patient stories or case details even without names, describing a patient’s condition, diagnosis, or treatment in a way that could reasonably identify them.
- Commenting on patient outcomes or care. Publicly discussing a patient’s recovery, discharge, or death.
- Messaging, commenting, or chatting with patients on personal platforms or devices breaches professional boundaries and can expose PHI (e.g., texting a patient or using another form of social media to contact a patient or their family like Facebook Messenger, Instagram Direct, Snapchat, WhatsApp, Telegram, Signal, TikTok, X, Discord, or LinkedIn Messaging).
- Sharing details about internal investigations, disciplinary actions, or coworker performance on social media.
- Entering any confidential or patient information into a non-Oaklawn application or website (e.g., ChatGPT, Grok, Google Bard, Bing AI, Perplexity, Google, Yahoo, Bing, Facebook, TikTok,

Reddit, X, Instagram, SnapChat or WhatsApp).

5. Diversity and Inclusion

Our work environment is stronger when we include people from a multitude of backgrounds, experiences, and many perspectives. We all share the responsibility to:

- Reflect on how culture influences our thinking.
- Ask questions and listen with the intent to understand.
- Recognize how different cultures approach the same work in different ways.
- Use input from diverse perspectives to inform decision-making.
- Provide culturally sensitive and respectful patient care.

For more information, please see the **Professional Conduct** policy in PolicyStat.

6. Respectful Treatment and Harassment-Free Environment

Everyone at Oaklawn is expected to treat others with dignity and respect. Oaklawn does not tolerate any type of legally prohibited harassment or discrimination whether verbal, physical, written, implied, or otherwise- whether involving employees, physicians, practitioners, vendors, or customers. All violations will be promptly investigated and reported to the appropriate authority as needed. For additional information see the **Discrimination & Harassment** policy in PolicyStat.

7. Workplace Violence

Oaklawn maintains a zero-tolerance standard regarding any type of abusive, intimidating, harassing, threatening, or coercive behavior on Oaklawn property. This includes conduct occurring in or around any Oaklawn-owned or leased facility or devices, including adjacent sidewalks, walkways, driveways, and parking areas, and the use of Oaklawn-issued devices.

Any behavior that endangers others or causes fear will be investigated and addressed promptly. Misconduct may result in corrective action under Oaklawn's **Performance Expectations** policy and, where applicable, legal action. Refer to the **Workplace Violence** policy in PolicyStat for more details.

F. Professional Relationships

At Oaklawn, we recognize that how we work with colleagues, business partners, and physicians directly impacts our ability to serve patients and the community. We are committed to maintaining respectful, ethical, and compliant relationships in all areas of our operations.

1. Relationships with Colleagues

A positive, collaborative environment is essential to our success. Trust, accountability, and professionalism strengthen our ability to deliver safe, high-quality care.

You are expected to:

- Provide the best quality customer service.
- Strive for perfect care every time.
- Treat everyone with respect and dignity.
- Work as part of a team.
- Hold yourself and others accountable.
- Communicate openly, clearly, and honestly.
- Uphold high ethical standards in all interactions.

2. Relationships with Contractors and Vendors

We work with and rely on contractors and vendors to support the delivery of care. All relationships must be managed fairly, transparently, and in accordance with applicable laws and Oaklawn's procurement standards.

We base vendor selection, negotiations, and contract awards on objective criteria – not personal relationships. We promote competitive procurement practices whenever possible and follow established procedures to ensure ethical decision-making.

For more information, refer to Oaklawn's policies on Vendor Management, Vendor Evaluation, Performance Expectations, and Gifts, Gratuities, and Business Courtesies in PolicyStat.

3. Relationships with Physicians

Our relationships with physicians – whether independent or part of a group – are subject to strict regulatory oversight. Any compensation or support provided by Oaklawn, such as medical directorships, office space, staff time, or equipment use, must comply with legal requirements, including Stark Law, provider-based rules, and tax-exempt status regulations.

All such arrangements must be reviewed and approved by Oaklawn's corporate counsel, leadership, and the Compliance Office to ensure full compliance with applicable laws and standards.

4. Employment and Respect in the Workplace

Oaklawn is committed to providing a fair, respectful, and inclusive work environment. We comply fully with all applicable federal, state, and local employment laws and do not discriminate on any basis prohibited by law. If you believe you have experienced discrimination, you are encouraged to contact the Executive Director of Human Resources or the Compliance Officer so that the matter may be reviewed and addressed.

G. Operational Integrity

The integrity of Oaklawn's operations is vital to the trust we maintain with patients, payers, partners, and the community. We are all responsible for using resources wisely, protecting sensitive information, and ensuring that business practices meet the highest ethical and legal standards.

- We protect information from misuse, improper access, or disclosure.
- We monitor and audit activities to ensure compliance and transparency.
- We follow good business practices to prevent fraud, waste, and abuse.
- We ensure that claims are coded, billed, and processed accurately.

We will:

- Record business information and transactions accurately, completely, timely and honestly.
- Address performance or behavior concerns respectfully by first speaking with the individual involved. If the issue persists, we will escalate through the proper chain of command.
- Be responsible stewards of Oaklawn's operations, knowing that patient care depends on the strength and integrity of our systems.

1. Resource Oversight and Reporting

It is the expectation of the Oaklawn management team to monitor and oversee their operations for compliance with Oaklawn policies/procedures, laws, and regulations. Any concerns or suspected violations must be reported to the Compliance Department.

Caring for our patients is our highest priority, and that includes maintaining the well-being of workforce members. We are expected to act with awareness, sound judgment, and a commitment to safety.

2. Health, Safety, and Substance Use

a. Health and Safety

Oaklawn is committed to providing a safe, healthy, and supportive environment for workforce members, patients, families, visitors, and the public. You are expected to understand and follow all health and safety policies/procedures that apply to both the organization and your specific job responsibilities. If you experience a workplace injury or observe a potentially hazardous situation, you must report it immediately to your supervisor or the designated safety officer so appropriate action can be taken.

b. Substance Use and Diversion

Oaklawn is committed to maintaining a safe, healthy, and drug-free workplace. Workforce members are prohibited from using, possessing, or being under the influence of alcohol, illegal drugs, or any substance – including prescription or over-the-counter medications – that impairs their ability to perform their job duties safely, responsibly, and in accordance with Oaklawn's standards.

This does **not** prevent clinical staff from handling, administering, or managing medications as part of their professional responsibilities. Authorized access to medications for patient care is expected and permitted in accordance with applicable policies, procedures, and licensure requirements. If you become aware of or suspect diversion, you must immediately report this to a manager, Human Resources, or the Compliance Department. Reports made in good faith will be treated seriously and confidentially.

All workforce members may, at the discretion of Oaklawn, be required to be tested for potentially impairing medication, drugs, or substances, legal or illegal, prescribed or unprescribed, prior to and/or,

during the performance of their duties. If you are experiencing a substance use issue, Oaklawn encourages you to seek support through the Employee Assistance Program (EAP). Self-reporting concerns before patient safety is compromised will be addressed with respect and in accordance with applicable policy.

3. Technology Use and Data Integrity

You are expected to use our technology and information systems responsibly and in accordance with our policies. Protecting patient information, business data, and system integrity is part of your role.

Below are key expectations you must follow:

- Only access files, programs, and systems that you are authorized to use, and only when needed to perform your job. Having the ability to access information does not automatically mean you have the right to access or use that information.
- Never share your password with anyone or allow another person to use your credentials. You are responsible for all actions taken using your credentials.
- Always log off or lock your computer or device when you step away.
- Secure devices when taking them off-site or leaving them unattended. Keep them out of sight and in secure areas.
- Only install software or download applications with approval and assistance from Oaklawn's IT Department.
- Use Oaklawn's communication systems — such as computers, email, Internet access, telephones, and voicemail — for business purposes only.
- Ensure any confidential information you send by email or online is encrypted or secured following Oaklawn's security guidelines.
- Understand that Oaklawn may monitor, or audit system use and communications as part of routine security.

It is everyone's shared responsibility to protect both physical and electronic information.

Question: An employee does not have access to a program they need. Can I share my password to help them?

Answer: No. NEVER share your password or allow another person to use your credentials. You are responsible for ALL activity completed under your login, and sharing your credentials is a violation of Oaklawn policy.

4. Protecting Confidential and Proprietary Information

How we handle business and proprietary information directly affects Oaklawn's reputation and relationships. You are expected to:

- Use information only for authorized purposes.
- Avoid disclosing, discussing, or displaying information inappropriately.
- Prevent unauthorized access and report concerns promptly.

Responsible handling of information builds trust with patients, partners, and colleagues and protects Oaklawn's integrity.

Confidential business information must be stored securely and only shared with individuals who are authorized and have a legitimate need to know. This applies to both Oaklawn's internal operations and information belonging to vendors or partners.

Confidential information includes:

- patient information
- business practices
- customer lists
- clinical information
- employee data
- contract information
- employee lists
- financial data
- affiliation information
- marketing strategies
- pricing and cost information
- strategic plans
- proprietary software

Always confirm that recipients of information understand and will comply with confidentiality expectations.

5. Accurate Recordkeeping and Documentation

Oaklawn's reputation for integrity depends on the accuracy and reliability of our recordkeeping. All records must be complete, timely, truthful, and easy to understand. We must never alter or falsify a record or create one that misleads, hides, or misrepresents the intent of a transaction.

Records may include:

- Business documents such as payments, receipts, applications, contracts, bids, and account or asset documentation
- Correspondence such as letters, memos, emails, and other forms of communication
- Electronic files stored on computers or other devices.
- Operational, financial, clinical, claims-related, administrative, and regulatory records

We are required to follow generally accepted accounting principles and other applicable standards when creating and maintaining financial records. All entries must truthfully reflect the actual event or transaction.

Maintaining accurate records also helps:

- Prevent unintentional loss or improper disclosure.
- Protect Oaklawn from penalties, fines, and legal risk.
- Ensure we meet regulatory and audit requirements.

The Record Control Policy, available in PolicyStat, provides detailed guidance on appropriate documentation, storage, and retention practices.

Failure to maintain proper records may result in serious consequences. Under federal and state False Claims laws and the Federal Civil Remedies Act, individuals and organizations can face significant penalties for poor or improper recordkeeping. These laws apply to inaccurate documentation, misrepresentations, or any record used in support of a false claim or reimbursement request.

If you are involved in creating, reviewing, approving, or submitting records of any kind, it is your responsibility to:

- Understand the purpose behind each transaction.
- Confirm the accuracy and completeness of the information.
- Ask for guidance if you have questions or concerns.
- Ensure the timely entry of the information.

When in doubt, speak with your supervisor or contact the Compliance Department.

6. Service Billing, Coding, and Payment Practices

Oaklawn bills patients and third-party payers for medically necessary services. Exceptions, such as elective procedures (e.g., cosmetic surgery), are handled under separate guidelines.

- We must never knowingly make or use a false or fraudulent claim for payment. Likewise, we may not knowingly make or use a false record or statement in connection with a claim. All services must be properly documented, coded, and billed according to payer requirements and Oaklawn policies. Documentation must be complete and accurate.
- Co-payments and deductibles must be collected as required.
- Validated overpayments must be reported and returned promptly.
- Patient billing questions should be addressed clearly and respectfully.

We are also responsible for safeguarding payment data. Customer and financial information must only be accessed, shared, or stored as necessary for your role. For more information, please see Information Security related policies in PolicyStat.

H. Protecting Oaklawn's Reputation

At Oaklawn, our reputation has been earned through years of commitment to patient care, professional excellence, and ethical behavior. Each of us plays a role in upholding that reputation through our actions, decisions, and daily interactions.

You are expected to:

- Avoid conflict of interest.
- Uphold professional standards of conduct.
- Maintain appropriate licensure, credentials, and qualifications.
- Take ownership of our responsibilities and work environments.
- Collaborate respectfully to resolve concerns.
- Strive for excellence in our roles, guided by integrity and service.

Our reputation is sustained through our dedication to competence, ethical decision-making, and a shared commitment to Oaklawn's mission and values.

1. Avoiding Conflicts of Interest

A conflict of interest occurs when personal interests or those of a family member or close associate interfere, or appear to interfere, with your ability to make decisions in Oaklawn's best interest. Even the appearance of a conflict can affect trust.

Some conflicts can be managed with disclosure and safeguards. Others may require you to remove yourself from decisions or activities altogether. If you believe a conflict may exist, disclose it immediately to your supervisor or the Compliance Department.

Examples of potential conflicts include:

- Outside personal activities: Relationship with an Oaklawn supplier, vendor, customer, provider, business partner, or competitor.
- Outside professional activities: Employment or consulting for another organization, especially if it uses your professional expertise. Examples include:
 - Serving as a consultant to a competitor or supplier
 - Accepting sponsorships or attending supplier-hosted events without authorization
 - Participating in vendor surveys or panels
 - Serving as a board member for an organization with competing interests.
- Distribution: distributing or posting materials for an outside organization or cause.
- Financial interests: Owning or benefiting from a business that works with or competes against Oaklawn.
- Business opportunities: Using information gained through your role at Oaklawn to benefit yourself or another organization.
- Family or close relationships: Hiring, supervising, or conducting business with a family member or close friend, or providing them patient care.
- Solicitation: Promoting personal businesses, services, or outside interests during work hours or on Oaklawn property.
- Political activities: Engaging in campaign activity in a way that appears to represent Oaklawn. Lobbying or advocacy related to public policy must be coordinated with Legal.

a. When and How to Disclose

Ask yourself:

- Would someone question my ability to remain objective?
- Could this relationship affect my decision-making at work?
- Could I or someone close to me benefit financially or personally from the situation?
- Would I feel uncomfortable if others inside or outside Oaklawn knew about it?

If the answer to any of these is yes or even maybe you must disclose the situation for review.

Steps to take:

- A. Remove yourself from related discussions or decisions until the circumstance is reviewed.
- B. Contact the Compliance Department at 269-789-7576 for guidance or assistance.
- C. Complete the conflict-of-interest disclosure form and submit it to the Compliance Department. The form will be reviewed by the compliance team and a management plan will be developed, if needed.
- D. Update your submission. Should your circumstances change, it is your responsibility to update and submit the appropriate forms to the Compliance Department within the required time frame.

2. Gifts, Gratuities, and Business Courtesies

At Oaklawn, we conduct business with honesty, fairness, and professionalism. Gifts, gratuities, and business courtesies must never be offered or accepted to influence decisions or create the appearance of favoritism.

Key expectations:

- Never offer or accept cash or cash equivalents (e.g., gift cards).
- Modest, non-cash items from patients or their family may be accepted when shared with the department (e.g., cards or snacks or flowers).
- Substantial gifts must be declined or referred to the Development Department.
- You must not solicit or suggest gifts or favors from vendors, patients, or others.
- Any gift or offer that may violate these standards must be reported to your supervisor or the Compliance Department.

Gifts or business courtesies must comply with all applicable laws and must never be tied – directly or indirectly – to patient referrals or business decisions. Relationships with vendors, physicians, and business partners must remain professional, objective, and compliant with Oaklawn policy.

Refer to Oaklawn's Gifts, Gratuities, and Business Courtesies Policy in PolicyStat for detailed guidance, including requirements for tracking and reporting, physician gift thresholds, and pre-approval for special circumstances.

3. Maintaining Licensure and Professional Qualifications

Each of us plays a vital role in delivering high-quality care and services. We are expected to:

- Maintain all licenses, certifications, credentials, and accreditations required for our roles.
- Comply with applicable federal, state, and local laws and regulations.
- Adhere to the professional standards of our respective disciplines.

You are responsible for knowing what qualifications apply to your role and ensuring they remain current.

4. Disclosure of Exclusions

Individuals who are excluded from participating in federal and state funded healthcare programs (Medicare, Medicaid, etc.) must notify the Compliance Department immediately. Exclusions may result from:

- Criminal convictions (e.g., healthcare fraud, drug offenses, financial misconduct)
- Loss, suspension, or surrender of licensure.
- Defaulting on healthcare-related education loans or service obligations

This requirement applies to all employees, physicians, medical staff, students, volunteers, contractors, and vendors affiliated with Oaklawn.

I. Compliance with Laws and Regulations

1. Regulatory Inquiries and Oversight

Oaklawn is committed to providing accurate and truthful information to the public and regulatory agencies. Only individuals authorized to speak on behalf of Oaklawn may respond to external requests for information. We take our regulatory responsibilities seriously. During inspections, audits, or surveys, we are expected to be cooperative, courteous, and transparent. We must always provide complete, factual, and timely information to all regulatory agencies and external auditors.

You are prohibited from:

- Concealing, destroying, or altering documents or records.
- Providing false or misleading information.
- Obstructing, delaying, or interfering with an audit or investigation.
- Encouraging or instructing others to withhold or misrepresent information.

2. Marketing, Communications, and Press Releases

Oaklawn communicates with honesty and transparency. All marketing and advertising activities are intended to inform the public, support recruitment, and increase awareness of our services. We only use truthful and accurate information, and we obtain permission from patients, staff, and others before using

photos, video, or identifying details. If you are contacted by the news, media, or journalists for information about Oaklawn, please refer all inquiries to the **Marketing Department**. Only authorized individuals may release information on behalf of the organization.

3. Fair Competition and Antitrust Laws

Oaklawn is committed to fair and lawful competition in all areas of healthcare delivery. We fully comply with federal and state antitrust laws, which are designed to ensure a level playing field and prohibit collusive or anti-competitive behavior.

You must never engage in any agreement, formal or informal, with competitors to:

- Fix prices or pricing policies.
- Divide markets, customers, or geographic areas.
- Boycott other providers or businesses.
- Coordinate bids, discounts, or terms of service.

We independently determine our pricing, reimbursement terms, and service offerings based on legitimate business factors, including costs, market conditions, and industry benchmarks. We do not consult with competitors when making these decisions.

Joint ventures, mergers, or affiliations that may involve competitor discussions must be reviewed by Oaklawn's corporate legal counsel to ensure compliance with antitrust regulations.

In addition, Oaklawn prohibits sharing current or future compensation data with other healthcare organizations. While we may participate in general compensation surveys, such surveys must meet legal guidelines to ensure objectivity and protect against collusion.

4. 21st Century Cures Act- Preventing Information Blocking

Oaklawn is committed to promoting transparency and ensuring patients can access their health information when they need it. Federal law prohibits "information blocking," which occurs when someone knowingly prevents or delays access, exchange, or use of electronic health information (EHI) without a valid reason. This includes refusing to share records with patients, other healthcare providers, or authorized third parties.

We must:

- Provide patients with timely access to their electronic health information.
- Share information with other healthcare providers or authorized parties when appropriate and allowed by law.
- Avoid unnecessary delays, restrictions, or burdens that interfere with access or sharing of health data.

Exceptions may apply in certain cases, such as to prevent harm or protect privacy, but these exceptions must meet specific criteria. For questions or concerns, contact the Compliance or Health Information

Management Departments.

5. Preventing Fraud, Waste, and Abuse

Oaklawn is committed to following federal and state laws that protect against healthcare fraud, waste, and abuse. All workforce members are expected to act honestly and ensure that all claims for payment are accurate and truthful.

A. False Claims Laws:

1. The **Federal False Claims Act** is a law that helps protect taxpayer money. Breaking this law can lead to fines and paying back three times the amount of money the government lost. It makes it illegal to knowingly:
 - a. Ask the government to pay for something that was not true or right.
 - b. Use a false document or lie to get paid by the government.
 - c. Work with others to trick the government into paying money it should not.
 - d. Hide or lie about money that should be paid back to the government.
 - e. Keep Medicare or Medicaid overpayments and not return them within 60 days.
 - f. Say you received something from the government when you did not.
 - g. Buy property from the government when you know the person selling it is not authorized to.
 - h. **Example:** If someone charges Medicare for a service they did not actually provide, that constitutes fraud.
This law also allows people to report fraud on behalf of the government. These are called “whistleblower” cases. People who report in good faith are protected from getting in trouble for doing the right thing.
2. The **Michigan False Claims Act** is similar but applies to our state Medicaid program. If someone breaks this law, they can face jail time, fines, and be ordered to pay the state back for what was taken. It’s illegal to:
 - a. Lie to get Medicaid benefits or help someone else get them unfairly.
 - b. Hide facts that would affect someone’s right to get Medicaid.
 - c. Offer or accept bribes for referring people for services paid by Medicaid.
 - d. Give false information about a health facility to get government money.
 - e. Work with others to trick the state into paying a false claim.

B. **Non-Retaliation and Whistleblower Protections:** If you suspect fraud, waste, or abuse, you are encouraged to report your concern in good faith. Oaklawn strictly prohibits retaliation against anyone who raises a concern or helps in an investigation.

C. **Anti-Kickback Statute:** This law says you cannot give or receive anything of value (like gifts, money, or favors) in return for referring patients or choosing a service that is paid for by Medicare, Medicaid, or other government programs. Even if you did not mean to break the law,

it can still count as a violation.

- D. **Freedom of Information Act (FOIA):** This act makes information from governmental agencies available for the public to request. There are limitations on what information the Center for Medicare and Medicaid Services (CMS) will provide. However, private or protected health information must never be shared unless required by law and approved through proper channels.

Violating these laws can result in serious penalties, including fines, repayment of funds, and in some cases, criminal charges. For more details, see Oaklawn's **Whistleblower, False Claims, and Gifts and Business Courtesies** policies in PolicyStat.

VI. References

- 21st Century Cures Act, 45 CFR Part 171
- Anti-Kickback Statute, 42 U.S.C. § 1320a-7b
- Deficit Reduction Act (DRA) of 2005, Public Law 109-171, § 6032
- False Claims Act, 31 U.S.C. § 3729-3733
- Federal Program Exclusion Authority, 42 U.S.C. § 1320a-7
- Freedom of Information Act, 5 U.S.C. § 552
- HIPAA, 45 CFR Parts 160, 162, and 164
- Michigan False Claims Act, Michigan Compiled Laws § 400.601 et seq.
- OIG's General Compliance Program Guidance
- Physician Self-Referral Law, 42 U.S.C. § 1395nn; 42 CFR § 411.350 et seq.

Approval Signatures

Step Description	Approver	Date
	Gregg Beeg: EXEC-PRES-CEO	8/18/2025
	Andrew Poole: EXECUTIVE	8/15/2025
	Jaclyn Liston-Crandall: EXECUTIVE	6/5/2025
	Theresa Dawson: EXECUTIVE	6/5/2025
	Marla Stuck: EXECUTIVE DIRECTOR	6/5/2025
	Juanita Armstrong: EXEC ASST-MGR MED STAFF	6/3/2025

Brianna Hayes: COMPLIANCE
DIRECTOR & PRIVACY
OFFICER

6/3/2025

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