



Policy # & Policy Title: LR.03.016 Code of Ethics and Professionalism
Effective Date: 07/05/2023

Policy:

At Thompson Health it is of paramount importance that we always conduct our day-to-day activities in an ethical and responsible manner.

Thompson Health CARES Values are an expression of organizational and personal beliefs and convictions. In this statement, we publicly profess how our values will guide our organization’s behavior in five areas of organizational activity: Community Accountability, Patient and Resident Care, Organizational Conduct, Fiscal Practice and Marketing. This statement will assist us in weighing our values and choosing among alternate courses of action in decision making and policy setting. A complementary and abbreviated statement of our values is part of the Thompson Health Code of Ethics and Compliance Code of Conduct, also available on the Intranet, under Legal & Regulatory Affairs and is also attached at LR.01.001.00.01.

CONFLICT OF INTEREST

Associates and Board members must refrain from participating in any activity or business venture which could create actual or perceived conflicts with the interests of Thompson Health. Specifically, they may not accept personal payment, including tips, favors, excessive business entertainment or other benefits from any supplier or customer of Thompson Health, nor take any action as a representative of Thompson Health for

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ETHICS IN FISCAL PRACTICE

Guided by Our Value of Commitment:

We will ensure all documentation, coding and billing is accurate, complete and in compliance with all laws, regulations and regulatory guidance. We will retain reputable, independent accounting firms to conduct our annual financial audits to be performed with the highest ethical standards.

Guided by Our Value of Respect:

We will comply with all applicable state and federal laws and regulations that apply to our business transactions and competitive practices.

Guided by Our Value of Service:

We will engage in ethical and sound financial and billing practices expected in the health care industry.

ETHICS IN MARKETING

Guided by Our Value of Respect:

We will reflect integrity, honesty, and high professional standards in all marketing efforts. We will not seek to damage the professional reputation of other organizations or individuals.

MORE INFORMATION

Any Affected Individual who seeks more information about this Code or is aware of a violation of this Code may reach out to their Thompson Health Supervisor (for associates), Associate Services (for associates) or call the General Counsel/Chief Compliance Officer at 396-6714 or the Compliance Hotline at **585-756-8888**.

Ethics consults may be requested in accordance with _____

Supervisor's Procedures for Implementation:

SUPERVISOR'S COMMITMENT

Supervisors are responsible for setting the proper example regarding our Code of Ethics and Professionalism. Questions of interpretation pertaining to this policy are to be referred to Associate Services or the General Counsel/Chief Compliance Officer. The supervisor must immediately notify Associate Services or the General Counsel/Chief Compliance Officer if they believe that an associate or other Affected Individual is involved in an activity that might violate our Code of Ethics and Professionalism.

References:

Committee Review: Ethics Committee Last Approved: 07/05/2023

Joint Commission: N/A

NYSDOH: N/A

Other References: LR.01.001.01 Ethics Consultation Procedure

LR.01.001.00.01 Thompson Health Code of Ethics and Compliance Code of Conduct

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LR.03.015 Compliance Code of Conduct
LR.01.003 Corporate Ethics Statement