

**WEST VIRGINIA UNIVERSITY HEALTH
SYSTEM
POLICY AND PROCEDURE MANUAL**

**Policy V.023S
1st Effective 12/31/2018
Revised 01/18/2021

Reviewed 07/11/2022**

CODE OF ETHICAL CONDUCT

SCOPE:

All West Virginia University Health System (WVUHS) Entities*

PURPOSE

The Code of Ethical Conduct affirms WVUHS' commitment to providing quality services, while complying with all legal, professional and ethical obligations that apply to our various business practices, and to establishing and maintaining a corporate culture that enables all of us to fulfill all those obligations. WVUHS employees are expected to know and adhere to all legal requirements that pertain to their area of responsibility.

The WVUHS Board of Directors has adopted a Corporate Compliance Program to ensure that WVUHS operates in full compliance with applicable laws and ethical principles. The program is intended to demonstrate, in the clearest possible terms, WVUHS' absolute commitment to the highest standards of ethics and compliance with all applicable laws, policies, rules and regulations. The Chief Compliance Officer and the WVUHS Audit and Compliance Board Committee provide program direction and ensure WVUHS has a risk-based process that (1) builds compliance consciousness into daily operations, (2) monitors the effectiveness of compliance activities and (3) communicates instances of noncompliance to appropriate senior management for corrective action.

Core Principles

Our workforce is expected to know and act in ways reflective of our service standards.

1. Honest communications;
2. Respect for patient's rights including confidentiality and privacy as well as respect for our employees and co-workers;
3. Fairness in our business dealings including disclosure to address any potential or perceived conflicts of interest;
4. Equal opportunity to work in a positive work environment;
5. Partnership with other providers;
6. Commitment to our patients, our employees, our physicians, our payors, our regulators, our suppliers, and our volunteers to act with fairness, dignity, and responsibility to make our hospitals and our communities better places to work and live;
7. Civic duty to comply with federal, state, and local laws, rules and regulations;

* West Virginia University Health System adopts this policy and procedure for WVU Hospitals, Inc.; Summersville Regional Medical Center; WVUHS Home Care, LLC; WVUHS Medical Group; Reynolds Memorial Hospital; Berkeley Medical Center; Jefferson Medical Center; Potomac Valley Hospital of W.Va., Inc.; United Summit Center; United Hospital Center, Inc.; Wheeling Hospital, Inc.; Barnesville Hospital Association; United Physician's Care, Inc.; St. Joseph's Hospital of Buckhannon, Inc.; Camden-Clark Memorial Hospital Corporation; Camden-Clark Physician Corporation; Braxton County Memorial Hospital, Inc.; Jackson General Hospital; Wetzel County Hospital; Uniontown Hospital; Allied Health Services, Inc.; West Virginia United Insurance Services, Inc.; Accountable Care Organization of West Virginia, LLC (ACO); AHS, LLC; and Gateway Home Health Care, LLC

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8. Leadership to motivate change;
9. Integrity and zero tolerance of criminal activity, or conspiracy to commit a crime.
10. Accountability and responsibility for our actions and attitudes.
11. Excellence is considered the standard of quality services.

Ethical Behavior

WVUHS has an ethical responsibility and obligation to the patients and the community it serves. WVUHS has established and implemented an organizational ethics policy and committee to provide a moral framework for its business and patient care operations. The organization's guiding principle is simple: Do the right thing. All clinical decisions are based on patient care needs. When faced with a tough ethical decision, review the following checklist:

- Does the action comply with WVUHS policies and procedures?
- Is the action legal?
- How would the action look to your family and friends, our patients and the general public if it were published on the front page of the newspaper?
- Would the action make you feel bad if you did it?
- Are you being fair and honest?
- Is the action consistent with WVUHS' Code of Ethical Conduct?
- Is the action wrong? Are you unsure? If so, ask until you get an answer.

Ethical behavior is the responsibility of every WVUHS employee. Each one of us has a personal obligation to report any activity that appears to violate applicable laws, regulations, rules, policies, procedures or standards of ethical conduct.

PROCEDURES

1. Compliance issues should be addressed through normal administrative channels through an employee's immediate supervisor, an executive level manager, Human Resources, or as appropriate you may contact your Compliance Officer, call the Compliance Hotline at 1-855-236-2041, or file a report of concern on the Compliance Hotline website at: <http://www.wvuhs.ethicspoint.com/>. The hotline is an anonymous way for employees to report suspected wrongdoing, including fraud, waste and abuse; violations of federal and state laws; and any other unethical behaviors.

Related WVUHS Policies

WVUHS Policy IX.035 Reporting Conduct of Individuals That Are Not WVUHS Employees
WVUHS Policy IX.045 Compliance Hotline Protocols
WVUHS Policy IX.060 Organizational Ethics

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