



SANJEEVAN HEART HOSPITAL

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As an organization, we are committed to honest and ethical behavior, and to conducting our business with integrity. The practice of behaving honestly, ethically and with integrity is an individual responsibility. We make decisions about how to conduct ourselves every day as we go about our work. Each of us is accountable for the actions that we decide to take.

CODE OF CONDUCT

The *Code of Conduct* is a vital part of how we achieve our mission and vision. It provides guidance to ensure that our work is accomplished in an ethical and legal manner. It emphasizes our common culture of integrity and our responsibility to operate with the highest principles and ethical business standards as we strive to care for our patients and each other with respect, honesty, compassion, teamwork and excellence.

Our *Code of Conduct* is to be used as a guide if you are confronted with a situation that raises questions about ethical business conduct. If you think a law, policy or our *Code of Conduct* is not being followed, you must report it to our Compliance Department. You should also report it to your supervisor. If you feel uneasy talking to your supervisor, voice your concern to the next supervisory level, up to and including the highest level of management. Stanford Children's Health and Stanford Health Care encourage open and honest discussion of issues with management. We are committed to providing an environment that allows reporting in good faith without fear of retaliation.

It is very important, as well as required, that you immediately report perceived violation of compliance law, policy or our *Code of Conduct* to the Compliance Department. Failure to report to the Compliance Department may result in disciplinary action, up to and including termination. Our Compliance Department will evaluate all reports promptly, completely and fairly.

You can report compliance concerns to the Compliance Department in one of the following ways:

- Contact the Compliance department
- Email your concern to us

If you report a compliance concern, be sure to include information that our Compliance Department will need to follow up, such as the location where your concern occurred or is occurring (for example, the hospital name and department), the date or dates of any incident, the names and job roles of individuals involved in the concern, a description of your concern and your name if you are comfortable letting us know. If you are not comfortable leaving your name, you may make an anonymous report.

Anyone making such a report is assured that it will be treated as confidential and will be shared with others only on a need-to-know basis. The findings of a compliance investigation are confidential to protect all involved in the investigation process. As a result, details and specific findings of a compliance investigation will be shared only on a need-to-know basis. The Chief Compliance Officer ensures that all reports will be thoroughly and fairly investigated and that appropriate action will be taken.

No adverse actions will be taken against someone for making a report in good faith or for cooperating with a compliance investigation in good faith.

INTEGRITY IN PATIENT CARE

At sanjeevan, we strive to ensure that the patient care we provide is

- **Safe** – avoiding injuries to patients from the care that is intended to help them;
- **Effective** - providing services based on scientific knowledge, best practice and cost-effectiveness;
- **Patient-centered and family-centered**– providing care that is respectful of and responsive to individual patient and family preferences, needs and values, ensuring that patients' values guide all clinical decisions;
- **Timely** – Reducing waits and sometimes harmful delays for both those who receive and provide care;
- **Efficient** – Avoiding waste, including waste of equipment, supplies, ideas and energy;
- **Equitable** – Providing care that does not vary in quality because of personal characteristics such as gender, ethnicity, geographic location, socio-economic status, sexual orientation or perceived disability.

Privacy of Patient Information

We collect information about a patient's medical condition, history, medication and family illnesses in order to provide quality care. We realize the sensitive nature of this information and are committed to protecting patient privacy. We do not access patient information, internally use patient information, or disclose patient information outside the organization except as necessary to perform our jobs. We are committed to complying with state and central privacy laws, and to assisting patients with exercising their patient privacy rights.

INTEGRITY IN BILLING AND FINANCIAL MATTERS

We are committed to timely, complete and accurate coding and billing, including the following

principles:

- We bill only for services that we actually provide, document, are medically necessary and ordered by a physician or other appropriately licensed individual;
- We respond to billing and coding inquiries and timely resolve inaccuracies in previously submitted claims that are discovered and confirmed;
- We make every effort to ensure that employees and subcontractors who perform billing or coding services have the necessary skills, quality assurance processes and appropriate procedures to ensure that billings are accurate and complete; and
- We do not knowingly present, or cause to be presented, claims for payment that are false, fictitious or fraudulent.

INTEGRITY IN THE WORKPLACE

Diversity and Equal Employment Opportunity

We promote diversity in our workforce at all levels of the organization. We are committed to providing an inclusive work environment where everyone is treated with fairness, dignity and respect. We make ourselves accountable to one another for the manner in which we treat one another and for the manner in which people around us are treated. We strive to create and maintain a setting in which we celebrate cultural and other differences and consider them strengths of the organization.

Workplace Violence and Workplace Safety

At Sanjeevan heat hospital we have zero tolerance for threats or acts of violence in the workplace. Workplace violence includes physical assaults or actions or statements that give us reasonable cause to believe that our personal safety or the safety of others may be at risk. Employees or medical staff who engage in physically abusive and/or violent behavior (even those made in jest) shall be subject to disciplinary action up to and including removal from SH facilities, termination of employment and/or referral to appropriate law enforcement agencies. If you perceive a certain behavior as physically threatening or intimidating, you should immediately report it to

- Your immediate supervisor
- The Compliance Department, including reporting concerns anonymously.

Workplace Health and Safety

In our continuing commitment to an environment of healing and good health, both hospital campuses are smoke free. As leaders in healthcare, we have an obligation to assert strongly the demonstrable risks of smoking. Smoking is not permitted anywhere inside the hospital buildings .

The use of illegal drugs and abuse of controlled substances in the workplace is prohibited. As a condition of employment, any involvement in the unlawful use, sale, manufacture, distribution or possession of controlled substances, illicit drugs and/or unauthorized use of alcohol in the workplace or working under the influence of such substances is prohibited.

INTEGRITY IN DECISION MAKING

Our *Code of Conduct* helps us to make ethical business decisions. However, it is not designed to address every issue. You may face a situation where the right course of action is unclear. Ask yourself the following questions when you are unsure of what to do:

- Is it inconsistent with our mission and values?
- Is it illegal?
- Is it unethical?
- Could it harm patients?
- Could it harm our co-workers, colleagues, or physicians?
- Could it harm government programs?
- Could it harm our financial health?
- Would our organization be compromised or embarrassed if it became public knowledge?
- Would we be uncomfortable reading about it in the newspaper?
- Is it unfair or inappropriate?
- Could it adversely impact our organization if everyone did it?
- Is it inconsistent with our policies or our *Code of Conduct*?