

SAINT JOSEPIC COTTAGE HOSPITAL

COMPLIANCE.

&

ETHICS

MANUAL

COMPLIANCE & ETHICS PROGRAM OVERVIEW

WHAT ARE OUR KEY CORPORATE VALUES?

Performance.

We commit to deliver and demonstrate excellence in everything we do. We are accountable, and responsible fulfilling our pledge to safeguard the welfare of each patient in lawful and principled manner.

Integrity

We do not compromise ethics. We strive to maintain a culture of ethical behavior and a commitment to compliance with the law. We also strive to detect and prevent wrongdoing. We demand honest, honorable, and effective behavior from every member of our team and anyone working at St. Josepic Cottage Hospital in any capacity.

Transparency

We are all humans and sometimes make mistakes, but at St. Josepic Cottage Hospital we have the courage to acknowledge our mistakes and do whatever is needed to address them. As such, we value, open, honest, and clear communication- up, down, and sideways – and pledge to protect all those that are forthright from retaliation and/or intimidation.

WHAT IS IN OUR COMPLIANCE AND ETHICS PROGRAM

Our compliance and ethics program (the “program”) includes.

- (1) a Code of Conduct
- (2) written policies and procedures
- (3) education and training programs
- (4) ongoing monitoring and auditing to assess compliance.
- (5) multiple ways for you to report incidents of noncompliance including anonymous and without threat of retaliation or intimidation.
- (6) disciplinary actions will be taken against individuals found violating the program and

- (7) oversight of the programs by the appointed Committee Members

WHO HAS TO PARTICIPATE?

Every member of our team, regardless of salary, position, or title, as well as any individual or company working at or with St. Joseph Cottage Hospital in any capacity, must participate in the program.

IS PARTICIPATION VOLUNTARY?

This Program is not optional. St. Joseph Cottage Hospital requires you to wholeheartedly participate in our program. The success and effectiveness of our Program depends on the commitment to its doctrines by all employees and business associates. We rely on your involvement in helping us identify and address illegal, unethical, or other wrongful activity-past, present, or future. All St. Joseph Cottage Hospital's workforce are required to follow not only the provisions of the Program, but also its implicit ideals.

WHAT WILL HAPPEN IF I DON'T FOLLOW THE PROGRAM?

Failure to be compliant can result in sanctions against you, including termination of employment or relationship, civil or criminal fines, program exclusion and /or imprisonment.

WHY HAVE A COMPLIANCE AND ETHICS PROGRAM?

The program helps provide an opportunity to improve the quality of care that our patients receive. This is always our primary goal. It also helps us to operate lawfully, reduce liability and provide an effective way for us to demonstrate our commitment. Good charting/documentation demonstrates the high level of care which we provide. We want all employees and business associates, regulators, our potential referral bases, patients, and their loved ones to realize the good work we do.

WHY AM I RECEIVING A COMPLIANCE MANUAL?

The attached manual (the. "Manual") is designed to help us work together to be more ethical, compliant with regulations and to better detect and prevent illegal or unethical activity in St. Joseph Cottage Hospital. The manual is not a complete list of rules and regulations, nor is it intended to prescribe a specific response to every conceivable situation. It offers a framework of principles and minimum standards to assist you in recognizing ethical and regulatory compliance issues and help in determining an appropriate response as specific situations arise. You must use your judgement in applying these guidelines to the unique circumstances you face. When unsure as to the proper way of dealing with certain challenge that occurs, please, consult with the management or any closest member of the compliance and ethics committee (the. "Committee") or call the compliance and ethics (the "Hotline ") for guidance. -0716559907/0768066507/952-261-7522

The Manual is not an employment contract: its policies and directives do not create a contract with, nor are they intended to be relied upon by third parties.

LETTER FROM PROPRIETORS

Dear Valued Staff,

At St. Josepic Cottage Hospital, our pursuit of providing high quality of care goes together with our unwavering commitment to compliance and ethics. Please do not jeopardize your integrity or that of St. Josepic Cottage Hospital. Faithfully follow our compliance and ethics Program. Help us to establish and maintain a culture where we are all accountable, strive to identify and correct errors as they are discovered, act proactively and foster honesty. We are driven by the belief that honor and virtue need not be compromised in the pursuit of excellence. Working together as a team, openly and honestly communicating with one another without fear of retribution, we will succeed.

We are all humans and sometimes we make mistakes, but at St. Josepic Cottage Hospital, we have the courage to constantly attempt to improve, acknowledge our mistakes and do whatever it takes to address them. As such, we value open, honest, and clear communication, and pledge to protect all those that are forthright from retaliation.

This program is not optional. We rely on your involvement in helping us identify and address illegal, unethical, or other wrongful activity. Failure to be compliant can result in sanctions against you, including termination of relationship, civil or criminal fines, program exclusion and /or imprisonment.

We enthusiastically endorse St. Josepic Cottage Hospital 's compliance and ethics program, which embodies these values and charts a path to upholding them in practice, aiding St. Josepic Cottage Hospital to better detect and prevent illegal or unethical activity. On behalf of the ownership and leadership, we express our full support for this invaluable program and request that each of you review this manual thoroughly and incorporate its directives in carrying out your duties. Indeed, we expect no less from every member of our team and those providing services to St. Josepic Cottage Hospital.

Yours Truly

Management

COMPLIANCE & ETHICS MANUAL

Adherence in St. Josepic Cottage Hospital 's Compliance and Ethics program (the "program") is mandatory and is a condition of employment and working at or with St Josepic cottage hospital in any capacity. Carefully review this manual and seek guidance from administrator, human resources, any of the corporate compliance officer, any member of the compliance committee, or dial the Hotline, should you require any clarification regarding the program or the law. Any staff member, service provider or business associate who has knowledge of, or suspects in good faith, a violation of the program is required to report such incidents to any of the following: administrator, human resources, any of the corporate compliance officer, any member of the compliance committee, directly or through the Hotline in a timely manner 0716559907/0768066507/952-261-7522.

Should any staff member, service provider or business associate be found to have violated one or more of the terms of the program- including but not limited to failing to report a known violation of the program- he or she may face disciplinary action, up to and including termination of employment or relationship. Indeed, adherence to the program will be a factor in performance evaluation and may affect advancement and compensation decisions, both positive and negative.

1.Mission & Values

St. Josepic Cottage Hospital ("Facility") provides services that assist each patient in attaining or maintaining his or her highest practicable physical, mental, and psychosocial well-being.

We are also dedicated to- and are committing significant resources to-promoting a culture of ethical behavior and a commitment to compliance with the law and detecting and preventing wrong -doing.

The Facility holds its owners, operators, officers, managers, department heads, employees, members of the medical staff, vendors, suppliers, independent contractors, service providers, business associates and volunteers (collectively, "personnel" or "staff") to the highest ethical , legal and business standards in the performance of their respective duties.

We demand honest, honorable, and effective behavior from every member of our team, and anyone associated with the St. Josepic Cottage Hospital in any capacity.

