**Code of Ethical Business and Professional Behavior**

This Code is a statement underlying several of the fundamental core values upon which TriHealth stands - including Stewardship and Respect for All People. It embodies the promise of TriHealth to adhere to all pertinent laws and regulations, its dedication to advancing the effectiveness and quality of its services and its commitment to adhere to a high standard of individual and organizational ethical and legal business practices.

It is the policy of TriHealth to comply with all applicable federal, state and local laws and regulations, both civil and criminal.

No employee has any authority to act contrary to the provisions of the law or to authorize, direct or condone violations offered by any other employee.

Any employee or agent of TriHealth who has knowledge of the facts concerning TriHealth activities that he or she believes may violate the law has an obligation, promptly after learning such facts, to report the matter to his or her immediate superiors.

TriHealth will take steps to communicate to employees, those standards and procedures relative to their responsibilities by requiring participation in training programs or by disseminating publications that explain in a practical manner what is required.

TriHealth will take steps to achieve compliance with its standards by utilizing control systems reasonably designed to prevent and detect improper conduct by its employees and agents. Additionally, by having in place and publicizing a reporting system, employees and other agents can report improper conduct by others within the organization without fear of retribution.

TriHealth will take all reasonable steps, including any necessary modifications to its standards and procedures, to respond appropriately to any identified offense and to prevent further similar offenses, including any necessary modifications to its program, to prevent and detect violation of law. A report on organization compliance will be made to the Board of Trustees on a periodic basis.

**Confidentiality**

In order to perform work, you may be exposed to information regarding patients, other employees or the organization that must be considered confidential. It is important that all employees of TriHealth take care not to discuss information outside the organization or with other employees unless it is required as a necessary part of your job.

When confidential information needs to be discussed in order to perform your work, care should be taken so that conversations are not overheard and privacy is not violated. Confidential information should not be discussed in public areas, such as hallways, elevators, stairwells and cafeterias.

Failure to protect confidentiality will lead to performance counseling up to and including termination.

**Conflict of Interest**

Employees are prohibited from acting under the influence or appearing to act under the influence of personal gain, financial or otherwise, to the detriment of the business interests of TriHealth.

A conflict of interest may occur if an employee's outside activities or personal interests influence or appear to influence his/her ability to make objective decisions in the course of his/her job responsibilities. A conflict of interest may also exist if the demands of any outside activities hinder or distract an employee from the performance of his/her job or cause him/her to use TriHealth resources for other than TriHealth purposes.

If an employee has any question about whether an outside activity might constitute a conflict of interest, he/she must obtain the approval of his/her supervisor before pursuing the activity.

In the event a conflict of interest or potential conflict of interest is identified, TriHealth may:

* Direct the employee or immediate family member to cease the activity giving rise to the conflict of interest.
* Request the employee's resignation.

In a case where the conflict of interest is not resolved to TriHealth satisfaction, the employee's involuntary termination of employment may occur.

Further details of this Conflict of Interest Policy can be found under Policies - Employee Relations.

**Diversity and Inclusion**

Diversity and inclusion drives quality. The objective of diversity and inclusion is to engage, and to include, a diverse set of thoughts, experiences and perspectives to positively impact quality.

At TriHealth, we foster diversity by continuously striving to create an environment in which all members feel welcome, where employees feel they can bring who they are to the table without leaving their identities at the door. Diversity is broad and inclusive to include the many dimensions of diversity as represented by our employees, physicians, nurses, volunteers, patients, customers, and community.

The purpose of our diversity initiative is to recognize, understand, and value all cultural differences and similarities in an effort to develop a healthier, more productive work environment. Effective diversity management also enhances our ability to provide quality services to our patients and customers. As a mission-based organization, our diversity initiative is another way of living out our values and making a difference in the communities we serve. We realize that there is no "end" to a process that effectively manages diversity and inclusion just as there is no "end" to living out our mission and values.

TriHealth is committed to maintaining an environment that is free of discrimination and will not tolerate any form of harassment or unlawful discrimination against any TriHealth personnel, nor our patients or customers. We do not condone comments, behaviors or off color jokes that are disrespectful, unkind or demeaning to others.

Senior executive leaders lead in creating a positive climate of learning, innovation, flexibility, inclusion, opportunity, and growth, while endeavoring to integrate diversity management into the typical operations of our organization. Our commitment to diversity and our values act as our guiding principles in all we do at TriHealth.

To learn more about TriHealth Commitment to Diversity, visit our Web site below or contact the Director of Diversity, Human Resources, or your supervisor.

**Drug-Alcohol Free Workplace**

TriHealth is committed to providing a safe and drug free workplace for all employees. TriHealth recognizes that its success is dependent upon the physical and psychological well-being of its employees. The use, consumption or being under the influence of controlled substance or alcohol on the job may create serious risks for the involved employee, other employees, and patients.

It is the policy of TriHealth to prohibit unlawful manufacture, distribution, dispensation, possession, sale or use of a controlled substance in the workplace or while engaged in company business off TriHealth premises. It is also

against policy for an employee to report to work under the influence of drugs or alcohol. Such conduct is also prohibited during non-working time if it impairs the employee's ability to perform on the job or threatens the reputation or integrity of TriHealth.

Employees who violate any aspect of this policy may be subject to performance counseling up to and including termination. At management's discretion, TriHealth may require an employee to successfully complete a rehabilitation program as a condition of employment.

**Electronic Media**

TriHealth systems, network, and facilities are intended solely for business use by employees, physicians, staff and other agents. TriHealth reserves the right to inspect, examine, and monitor the use of its computers, computer networks, e-mail, telephone systems (including voice mail), and all other electronic communication systems at any time and without notice to the extent necessary to ensure that electronic media and services are being used in compliance with the law and with this and other policies.

Systems are in place to monitor and record all Internet / Intranet usage. TriHealth wants the employee or the agent of TriHealth to be aware that its security systems are capable of recording each World Wide Web site visit, each chat, news group, or e-mail message, and each file transfer into and out of its internal networks, and it reserves the right to do so at any time.

No employee or agent of TriHealth should have any expectation of privacy as to his or her Internet / Intranet usage. Managers will receive Internet / Intranet activity reports and analyze usage patterns as requested.

All communications including text and images can be disclosed to law enforcement or other third parties without the prior consent of the sender or receiver.

Further information regarding this policy and others can be found in the Information System Section of the TriHealth Corporate Policy and Procedure manual.

Any employee or agent of TriHealth found to have violated this policy, breached confidentiality or abused the privilege of TriHealth facilitated access to electronic media or services will be subject to the performance counseling policy up to and including termination of employment.

**Team Member Identification Badge**

Identification (ID) badges are given to you and must be worn whenever you are on duty. ID badges must be worn so that your picture, name and department are easily seen and read. Your identification badge is your key to TriHealth. It permits access to parking, staff entrances and other controlled areas. Your badge also accesses the time and attendance system. It is also required in order to receive certain staff benefits such as cafeteria discounts.

You are the only person permitted to use your badge. You may not allow unauthorized employees to enter secured areas with your badge access. No other badge may be worn with your TriHealth badge except pins and badges in recognition of professional education or achievement and/or pins and badges distributed in connection with official TriHealth activities, such as United Appeal pins. Decorative stickers, masking tape, pins or other alterations are not permitted on badges.

If your name, department or job changes, you should return your old badge to Security and have a new one issued. Lost ID badges will be replaced for a charge in the TriHealth Security offices.

**Team Member Management Meetings**

TriHealth Administration meets periodically with employees to keep them informed of the plans, developments and programs of the organization, as well as to allow for employee comments, problems, suggestions, concerns and questions.

Employee / Management meetings allow for open communication between Administration and the employees. The meetings form the basis for meaningful employee participation and to TriHealth mission, values and goals.

All non-management employees are invited to the Employee / Management meetings. In addition, each department designates a representative who is responsible for attending the meetings and reporting the details back to their department.

The purpose of the Employee / Management meeting is to provide a vehicle for free discussion about any aspect of TriHealth. Discussion should not be a situation particular to one individual, but should be of general interest to other employees. It cannot be emphasized too strongly that any professional discussion at these meetings will in no way affect either employee's job evaluations or his/her future potential at TriHealth.

**Team Member Representation Philosophy**

The management of TriHealth believes that the best interest of all employees will continue to be served by direct contact with management rather than through representation by an outside organization. Our philosophy is to treat employees as equitably as possible in every way. We feel we have an obligation to recognize individual abilities and ambitions of every employee. Above all, we want to be fair to our employees.

While third party representation may have a place in some organizations, TriHealth strongly believes there is not a need for third party representation. We feel through open communication and mutual respect we have resolved differences and misunderstandings in the past and will do so in the future. We continually try to maintain employee policies that offer fair; equitable and consistent treatment for each employee. All of us working together will continue to foster an atmosphere of open communication and mutual respect.

**Employment of Relatives**

Employees who are related may work in the same department, but not in a supervisor-subordinate relationship, as long as it does not create a conflict of interest.

Should a conflict of interest arise while employed or should employees in the same department become married creating a supervisor-subordinate relationship, one of the employees must transfer within 12 weeks. If the transfer is not completed, the employee with the least seniority will need to resign from TriHealth.

**Equal Employment Opportunity**

TriHealth is committed to a non-discriminatory environment for its employees. Each employee will be given equal treatment with regard to all terms, conditions and privileges of employment, including but not limited to recruitment, selection and opportunities for advancement. All employees working within TriHealth, in any capacity, are expected to carry forward this policy. The policy applies to all levels of employment regardless of membership in any class or group protected against employment discrimination by law, including race, color, religion, age, national origin, disability, veteran or military status sexual orientation, sex (including pregnancy), except where sex is a bona fide occupational qualification, gender identity or genetic information.

If you feel you have been subjected to unlawful discrimination or have witnessed discrimination see your supervisor and contact your Employee Relations Consultant.

**Harassment Free - Diversity Inclusive Workplace**

TriHealth recognizes the importance of fostering a work environment in which all individuals can thrive and are motivated to do their best, strengthened by their different backgrounds, perspectives, and life experiences. We are committed to maintaining a work environment that is free of harassment or unlawful discrimination against any TriHealth personnel or patient / customer by anyone, including employees, fellow employees, physicians, manager's supervisors, patients, customers, vendors, or visitors.

* **Responsibility**

Every individual at TriHealth is expected to avoid any behavior or conduct that could reasonably be interpreted as harassment. Although not required, everyone who works at TriHealth must also understand the importance of informing an individual whenever that individual's behavior is unwelcome, offensive, or inappropriate.

* **Definitions & Behaviors**

Harassment consists of unwelcome conduct whether verbal, physical or visual, that is based upon an individual's race, color, religion, age, national origin, disability, veteran or military status, sexual orientation, sex (including pregnancy), gender identity or genetic information. Harassment includes conduct that demeans or shows hostility or aversion toward an individual because of his/her race, color, religion, age, national origin, disability, veteran or military status, sexual orientation, sex (including pregnancy) gender identity, or genetic information.

**Discriminatory Harassment:**

Discriminatory harassment may include, but is not limited to, such inappropriate conduct as offensive verbal "kidding," "teasing" or jokes; foul or obscene language or gestures; displays of foul or obscene printed or visual material. For example, verbalized slurs, offensive comments and behaviors against a person based upon the individual's race, color, religion, age, national origin, disability, veteran or military status, sexual orientation, sex (including pregnancy), gender identity or genetic information are not tolerated at TriHealth.

Furthermore, as a general rule, TriHealth will not honor unlawful discriminatory requests for patient care.

**Sexual Harassment:**

Unwelcome sexual advances, requests for sexual favors, and other physical, verbal or visual conduct based on gender (opposite or same sex) may constitute sexual harassment. This conduct is unlawful when

1. Submission to the conduct is an explicit or implicit term or condition of employment;
2. Submission to or rejection of the conduct is used as the basis for an employment decision; or
3. The conduct has the purpose of effect of unreasonably interfering with a person's work performance or creating an intimidating, hostile or offensive work environment.

Sexual harassment is a violation of the policy and may include such unwelcome conduct as: inappropriate sexually-oriented verbal "kidding," "teasing," or jokes; foul or obscene language or gestures; displays of foul or obscene printed or visual material; inappropriate physical contact such as patting, pinching or brushing against another's body; and demands for sexual favors.

While such conduct often can be unlawful sexual harassment only when it is both unwelcome and either severe or pervasive, TriHealth nonetheless discourages any such conduct in the workplace, regardless of the circumstances and regardless of whether it is unlawful.

* **Non-Retaliation**

There will be no retaliation against anyone for reporting discrimination or harassment, or for cooperating with the investigation of a complaint of discrimination or harassment. TriHealth will honor a complainant's request for confidentiality regarding any complaint and the result of its investigation to the fullest extent practicable.

* **Reporting Harassment**

Employees who feel they have experienced or witnessed discrimination or harassment should immediately notify an Employee Relations Consultant (or their Supervisor when Employee Relations is not available). Supervisors who become aware or observe discrimination or harassment must immediately notify the Employee Relations Consultant.

When the investigation determines someone has violated this policy, appropriate corrective action will be taken. This may include discipline or discharge of the offender. The Employee Relations Consultant will facilitate an investigation of the alleged harassment or discrimination and will advise the complaining person of the outcome.

If complaints are substantiated, appropriate corrective actions will be taken that are believed to be sufficient to prevent any further discrimination, harassment or retaliation from occurring up to and including termination. TriHealth may impose discipline for inappropriate conduct regardless of whether the conduct constitutes a violation of the law.

Further information concerning the Harassment-free & Diversity Inclusive Workplace can be found on Policies - Employee Relations.

**Personal Appearance**

TriHealth supports a professional and appropriate atmosphere where you must dress neatly and appropriately for your job. You are to dress according to the standards that are established in your departments.

You may be required to wear a uniform for your job. TriHealth uniforms should not be worn off duty. TriHealth uniforms must be returned upon leaving the employment of the organization.

Showing pride in your appearance and dress not only benefits you, it also contributes to TriHealth image of providing quality services. If, in the opinion of your supervisor, your attire or grooming is inappropriate you will be advised of such and may be asked to leave the work place to attend to the matter before returning to work. Continual violations of this policy may result in performance counseling up to and including termination. Additional details of this policy can be found in the Personal Appearance Policy under Policies - Employee Relations.

**Personal Beepers and Cellular Phones**

Employees are not permitted to carry personal beepers or cellular phones during work time. For special circumstances, your director may authorize an exception.

**Personal Property**

Responsibility for loss or theft of valuables cannot be assumed by TriHealth. It is strongly suggested that you do not bring valuables to work with you.

**Safety**

TriHealth is committed to protecting employees, the facility, the patients, the environment and the public from injury, illness, fire, or other recognized hazards. TriHealth has instituted a comprehensive safety program designed to comply with local, state and federal rules and regulations. As a condition of employment, your completion of annual mandatory education is a condition of your employment at TriHealth. See your supervisor to determine which program is geared to your job classification. The failure to perform assignments safely could result in performance counseling up to and including termination. To find out more about the specific safety procedures in your work area, contact your supervisor.

**Smoking**

In keeping with our commitment to establish a safe and healthy work environment, all TriHealth facilities have been designated as smoke free. Smoking is prohibited anywhere in TriHealth including patient rooms, patient or public rest rooms, corridors, offices or waiting rooms.

**Social Media**

TriHealth prohibits TriHealth personnel from participating in Social Media during work time, unless an exception has been granted by the TriHealth Security Council or the Corporate Communications Department. However, they are free to do so on their own time, provided in doing so they do not violate this policy or any other TriHealth policy.

Although TriHealth respects employees' right to self-expression, only specific, designated TriHealth employees have the authorization to speak on behalf of TriHealth in social media. If you utilize social media (e.g., Twitter, Facebook, MySpace, blogs, etc.) you should review the Social Media polices in their entirety on LinkNet (08\_HIPAA 19.00) HIPAA: Social Media: Text Messaging, Cell Phones, and Other Electronic Devices; (05\_CC07.00) Social Media: Creating Corporate Sponsored Sites and Becoming an Official Spokesperson; (13\_ER31.00) Social Media.

Extreme care must be taken regarding information about patients, our employees and our business. All rules that apply to our TriHealth communications also apply to Social Media use, including:

* Respect those we serve
* Respect privacy
* Respect business confidentiality
* Respect copyright laws

TriHealth monitors Social Media. If an employee's actions are found to violate this Policy, the employee will be subject to disciplinary action, up to and including termination.

Work standards are necessary to make sure we all have a common understanding of what types of behavior and conduct are expected. This allows us to consistently enforce a set of standards that creates a positive work environment and earns the respect and confidence of ourselves, co-workers, patients and visitors.

Types of conduct and behavior that TriHealth considers inappropriate, includes but is not limited to the following:

* Excessive tardiness and/or absenteeism
* Improper attire or appearance
* Failure to wear ID badge or wear it in the appropriate manner
* Violation of TriHealth parking regulations
* Failure to maintain sanitary or good housekeeping conditions
* Wasting time, loitering or absent from work area without permission
* Unauthorized or extended meal periods or breaks
* Smoking or use of smokeless tobacco products in unauthorized areas
* Posting, altering or removing material on Hospital bulletin boards or property without authorization
* Failure to report safety events
* Careless or unsafe work habits
* Unsatisfactory work performance
* Reporting a false reason for an absence
* Conduct disruptive to fellow employees
* Conduct by an individual working in the organization that intimidates others to the extent that quality and safety could be compromised
* Failure to exercise reasonable care or courtesy and incivility in dealing with patients, guests or other employees
* Revealing or disclosing confidential information
* Gambling while on TriHealth premises
* Unauthorized use or possession of alcohol, controlled substances, or illicit drugs on TriHealth premises
* Malicious or deliberate abuse of TriHealth property
* Negligence involving patient care
* Dishonesty, misrepresentation, or making false statements including intentionally reporting false information or making a bad faith claim of any kind
* Insubordination
* Off duty misconduct
* Harassment
* HIPAA Violations
* Violations of Social Media policies
* Inappropriate Use of a TriHealth computer
* Sleeping on the job
* Menacing / Assault
* Falsification of time cards
* Deliberate falsification of TriHealth records
* Theft or removal of TriHealth property without authorization
* Workplace violence
* Unauthorized possession of firearms or weapons on TriHealth property
* Leaving without permission / Job abandonment
* Failure to attend or complete mandatory corporate compliance training
* Failure to maintain active licensure or required certifications
* Solicitation or acceptance of tips or gifts from a patient or a patient’s family (excludes consumable goods of nominal value such as candy, flowers, etc.)

**Team Member Code of Conduct**

* Failure to comply with the requirements of TriHealth Nicotine / Tobacco Cessation Program
* Failure to comply with the Corporate Compliance Plan, Code of Ethical Business and Professional Behavior and/or Corporate Compliance Policies or Procedures
* Making unauthorized recordings or using surveillance equipment of any kind (audio, digital, video, etc.,) of the premises, conversations, meetings, etc. or taking unauthorized photography of any kind
* Failure to cooperate in an investigation when the employee is the subject of the investigation

**Violation of any policy or procedure in the TriHealth Policy and Procedure Manual or Employee Handbook**

This list cannot be all encompassing. TriHealth reserves the right and will exercise the right to take appropriate action, including discharge for certain conduct not specifically delineated in this policy, when in the judgment of TriHealth, the violation warrants such action.

Failure to comply with the Employee Code of Conduct may result in performance counseling up to and including termination.

Our goal is to create and maintain an environment supportive of our mission and values. Being professional, ethical, and respectful are all behaviors which support our mission and will demonstrate to our customers our caring and compassionate standards.

**Team Member Code of Conduct**

**Handbook Acknowledgement**

I understand that it is my responsibility to read the handbook and speak with my supervisor or Human Resources if I have questions about the material contained within. I also understand that the handbook is merely a summary of TriHealth companies' human resources guidelines. These guidelines are not a contract of employment between me and TriHealth or any of its subsidiaries and may be changed at any time, without notice, at the discretion of TriHealth.

I further acknowledge that by signing this handbook below I am acknowledging that I have read and understood its content.

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Student Acknowledgment Date

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Cincinnati Public Schools Representative Date

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TriHealth Human Resources Representative Date