



Virginia Mason Health System

CODE OF CONDUCT

Introduction

Virginia Mason Health System (VMHS) strives to be the quality leader and fulfill our mission to improve the health and well-being of the patients we serve through our values of teamwork, integrity, excellence and service. We have a firm commitment to preserve the trust and respect of those we serve. The values in this Code of Conduct extend beyond our obligation to conduct our business in accordance with all applicable standards and laws.

This Code is designed to provide general guidance for our conduct. It does not address every situation where the exercise of integrity, honesty or ethical decision-making may be necessary. In some instances, more explicit guidance can be found in VMHS policy, procedure or standard process. However, the Code will be the guiding standard where explicit policy does not exist or an existing policy would appear to conflict with the Code. Violations of the Code or any policies or procedures will result in disciplinary action, up to and including termination of employment or privileges when warranted.

Our VMHS Board of Directors has adopted this Code of Conduct and instituted the Virginia Mason Corporate Integrity Program to clearly state the principles and standards of conduct necessary to demonstrate our commitment to our values, and to ensure compliance with laws that govern VMHS activities.

Virginia Mason's reputation has been built, and ultimately depends on individual integrity and collective actions of our workforce. This Code of Conduct applies to VMHS and all of its related affiliates, including, but not limited to, Virginia Mason Medical Center, Benaroya Research Institute at Virginia Mason, Virginia Mason Institute, and Health Resource Services, LLC. It governs the actions of all workforce members, including Board members, corporate officers, staff, medical staff, independent contractors, volunteers, students, and others working on VMHS property or associated with VMHS. Each workforce member is expected to read, understand and comply with the Code and request clarification when necessary.

Standards of Conduct

Through adherence to this Code, our workforce members should make sound ethical decisions during their day to day activities. This Code does not substitute for common sense, individual judgment, and personal integrity, for which we are all accountable. However, this Code describes common standards for our actions and attitudes. We must adhere to these standards to fulfill our vision and mission.

Focus on Patients

- We will provide exceptional quality care to our patients.
- We will treat our patients, visitors, and all other workforce members with courtesy and respect with our spoken and unspoken behavior.
- We will avoid any inappropriate and disruptive behaviors that may interfere with patient care delivery and services or any acts that interfere with the orderly conduct of the organization's or individual's abilities to perform their jobs effectively. Disruptive and inappropriate behavior includes, but is not limited to, abusive language, condescending voice intonation, angry outbursts, bigotry, bullying, demeaning behavior, offensive jokes, physical violence, and sexual misconduct.
- We will employ safe practices and maintain a safe environment for our patients, visitors and workforce. We will utilize our Patient Safety Alert program to identify potentially unsafe environments, practices, or patient care.
- We will respect patients' privacy rights by maintaining patient information in accordance with all laws and policies.
- We will ensure the integrity of research and the appropriate protection of human subjects.

Focus on Staff

- We will embrace open, honest, and fair communication.
- We will promote the reputation of VMHS with our honesty and integrity by not making false or misleading oral or written statements during the performance of our duties.

Focus on Corporate Responsibility

- We will operate in accordance with all applicable laws, regulations and standards.
- We will conduct our duties for the benefit and interest of Virginia Mason Health System and avoid conflicts and any appearance that our responsibility to VMHS might be compromised by outside obligations.
- We will take every reasonable precaution to ensure that our coding and billing is accurate, timely and in compliance with our policies and with laws and applicable standards governing these complex processes.
- We will prepare and maintain financial reports, accounting records, and all other business and patient care records accurately and completely, and in accordance with applicable standards.
- We will avoid offering or accepting inappropriate gifts or other things of value to or from our patients or vendors.

- We will provide equal opportunity in all aspects of employment and will not tolerate discrimination or harassment of any kind. Derogatory comments, unwelcome sexual advances and similar behavior are prohibited.
- We will be responsible to question, challenge and report any situations that potentially violate this Code, a VMHS policy, or applicable law, without fear of retribution or retaliation.

Reporting

We all are responsible for ensuring compliance with the Code. This responsibility includes an obligation to seek answers to questions regarding the Code, policy, or law and an obligation to report a potential violation of this Code. In either of these instances, our workforce members should contact their supervisor, a VMHS manager, the Corporate Integrity Department, or the Legal Services Department.

Additionally, VMHS has a secure and confidential Integrity Help Line at **(206) 515-5800** that may be used for inquiry or for reporting potential Code violations.

All inquiries and reports made to the Corporate Integrity department will be thoroughly investigated and if necessary, appropriate action taken to resolve the issue.

A supervisor or manager to whom a report of a suspected violation is made is obligated to pursue resolution and involve the appropriate administrators.

Virginia Mason Health System is committed to protecting those who, in good faith, report actions that they believe are violations to the Code or applicable laws. We will not engage in retaliation or reprisal against anyone who properly reports violations of law, regulation or policy. Anyone who feels that retaliation has occurred subsequent to a report of non-compliance should immediately notify Human Resources, the Compliance Officer, Corporate Integrity Department, or Legal Services Department.