



Code of Conduct

Supporting our Mission through honest and ethical behavior



About Intermountain Health

Headquartered in Utah with locations in six primary states and additional operations across the western U.S., Intermountain Health is a nonprofit system of 33 hospitals, approximately 400 clinics, a medical group of nearly 5,000 employed physicians and advanced care providers, a health plan division called Select Health with more than one million members, and other health services.

With more than 68,000 caregivers on a mission to help people live the healthiest lives possible, Intermountain is committed to improving community health and is widely recognized as a leader in transforming healthcare. We strive to be a model health system by taking full clinical and financial accountability for the health of more people, partnering to proactively keep people well, and coordinating and providing the best possible care.

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- 33 Leaven Ministries Sponsor Health Care Sites
 - We Operate as a Nonprofit
 - The Emergency Medical Treatment & Labor Act (EMTALA) Applies

Code of Conduct Overview

Intermountain's Code of Conduct sets expectations and communicates Intermountain's standards for caregiver conduct. The Code of Conduct aligns with Intermountain's Mission, Vision, and Values and provides examples of how caregiver activities support our organizational goals. Specific subjects are highlighted to illustrate what to watch for and to provide guidance on how to handle these and other similar situations.

All caregivers at Intermountain must accept personal responsibility to act with the utmost integrity in all our activities and adhere to the policies, regulations, and laws that govern our work. Caregivers include employees, clinicians, trustees, volunteers, suppliers, contractors, and other business partners.

Expectations of all caregivers:

- Know and follow the Code of Conduct and applicable policies and procedures
- Complete Mandatory and Required Elements of Employment
- Keep up to date on current standards, required licensure, and other expectations
- Know and obey the law
- Promptly report concerns or possible violations
- Fully cooperate with investigations



Additional responsibilities for leaders:

Our leaders model our values and guide their teams to meet our ethical, legal, and regulatory requirements. Leaders are instrumental in creating an open and welcoming environment where team members are comfortable asking questions and raising concerns.

In fulfilling their roles, leaders are called to:

- Create an environment that builds relationships and encourages open communication
- Listen carefully, support caregivers who report concerns, and partner with a Human Resource Business Partner or Compliance team member for support
- Coach caregivers in a private setting away from others
- Take appropriate action
- Develop and implement a plan to cooperate with any investigation and follow up with caregivers on all reported concerns
- Offer the Employee Assistance Program for further coaching and support
- Oversee budgets to ensure fiscally responsible decisions in the allocation and approval of funds and corporate resources

Violations of our Code of Conduct — or the underlying laws, regulations, and policies — may result in corrective action up to and including termination of employment, suspension of privileges, termination of business relationships, civil or criminal liability, and/or financial penalties.



Our Mission

Helping People Live the Healthiest Lives Possible®

Our Values

We are leaders in clinical excellence

We believe in what we do

We serve with empathy

We are partners in health

We do the right thing

We are better together

Our Vision

Be a model health system by providing extraordinary care and superior service at an affordable cost

Our Brand Promise

Health for you, with you

Our Caregiver Promise

Together, for the healthiest lives

Mission for our Catholic entities:

"We reveal and foster God's healing love by improving the health of the people and communities we serve, especially those who are poor and vulnerable."



Intermountain Caregiver,

You are part of an incredible team, with the privilege to carry forward our mission and the responsibility to be a model health system. Achieving this requires a relentless focus on our patients, plan members, and their families as we live up to the trust they place in each of us.

This Code of Conduct sets clear expectations for caregiver behavior that aligns with Intermountain's Mission, Vision, and Values.

The Code also describes our individual accountability to act with ethics and integrity in every interaction we have with each other; with patients and members; with suppliers, contractors, and volunteers; and with our communities.

You are responsible to make sure your daily behavior lives up to Intermountain's high standards. This Code will guide you in that responsibility.

While we have different roles, we each share the duty to speak up and appropriately report any questionable activity through the channels described in this Code.

I appreciate your dedication to delivering extraordinary care and service to all Intermountain customers.

Sincerely,

A handwritten signature in blue ink, appearing to read "Rob Allen".

Rob Allen
President and CEO



We do the
right thing

We Speak Up, Ask Questions, and Report Concerns or Suspected Misconduct

Each caregiver is responsible to recognize and report when they suspect misconduct that could violate federal, state, or local laws; Intermountain's Code of Conduct; or Intermountain policy. By reporting misconduct, caregivers help contribute to the ethical culture at Intermountain.

Caregivers Who Report Concerns Will Be Protected from Retaliation and Intimidation

We take concerns seriously and value individuals who report concerns or misconduct. We recognize that our daily work gives each of us the opportunity to see problems before they become apparent to others or to management. Anyone who reports legitimate concerns, in good faith, will be protected from retaliation or intimidation. Reports can be anonymous and are appropriately investigated.

Intermountain supports a workplace where all caregivers are treated professionally, respectfully, and are not subject to harassment, retaliation, or intimidation. Intermountain's values of trust and mutual respect guide us toward being open to hearing and addressing concerns. Inappropriate or non-compliant behavior cannot be justified, ignored, or covered up.

- **Harassment** is unwelcome conduct that creates an environment that interferes with an individual's work performance.

- **Retaliation** is punishing an individual in response to asserting their right to be free from workplace discrimination including harassment.
- **Intimidation** is used to instill fear in another person. Examples of intimidation include stalking, bullying, or threats of harm.

Investigations surrounding incidents of harassment, discrimination, and inappropriate behaviors are conducted confidentially and will only be shared with those who have a legitimate need to know and in situations where we may be obligated by law to release information.

Concerns reported to Intermountain's Compliance Department are investigated, reviewed, and resolved in a way that is timely and appropriate. When an investigation occurs, confidentiality is maintained as much as reasonably possible, not only for the caregiver who reports the incident but also for those who may be subject to investigation. When required, we make disclosures and give reports to government agencies.

We Have Policies, Procedures, and Guidelines

Our Code of Conduct, and our policies, procedures, and guidelines (PPGs) provide specific guidance on requirements for caregivers at Intermountain. All caregivers are expected to read and understand this Code, access and utilize applicable policies, and seek other resources described in this Code.

Concerns can be reported to your supervisor or manager or directly to:

Compliance

Report a general compliance concern to a Compliance Officer found on the [MyIntermountain Compliance page](#), at ContactCompliance@imail.org, or by phone at [800.442.4845](tel:800.442.4845).

Examples might include:

* HIPAA privacy	* Facility licensure	* Discrimination against patients or visitors	* Conflict of Interest	* Anti-kickback or Stark
* Fraud, waste, and abuse	* EMTALA		* Billing/coding	

Anonymous Reporting

A concern can be reported anonymously through our third party vendor:

* Phone: [877.393.6752](tel:877.393.6752) * Online: www.ComplianceResource.com/hotline

Clinical Excellence

Report a clinical concern using the SafetyNet reporting system

Examples might include:

* Patient concerns about care	* Caregiver injury
* Patient safety concerns	* Workplace violence

Human Resources

Report an HR concern through AskHR via ServiceHub.

Examples might include:

- * Concerns/complaints about fellow caregivers
- * Pay or benefit questions
- * Any other employment-related question

We Have High Level Oversight and Support

Intermountain's Ethics and Compliance Program is led by our Chief Compliance Officer in partnership with the Intermountain Board of Trustees and President and CEO. In addition, each care site is assigned a Compliance Officer as a local resource.

Intermountain's Code of Conduct is approved annually by the Board of Trustees and applies to all caregivers, including employees, clinicians, trustees, volunteers, suppliers, contractors, and other business partners.

We Have Consistent Enforcement and Discipline Processes

We investigate each reported potential violation by reviewing facts and circumstances. When needed, we apply appropriate discipline based on the nature, severity, and frequency of the violation.

We Complete Mandatory and Required Elements of Employment

Each employee must take specific actions to maintain employment with Intermountain. These actions ensure caregivers safety and regulatory compliance. They also ensure Intermountain meets its business obligation to regulatory compliance, and to deliver safe and high-quality patient, member, and customer care.

Mandatory elements include annual Employee Health requirements, mandatory education, and the Conflict of Interest Disclosure. In addition, clinicians and some other positions must maintain basic competencies in their role, including current licensure, certification, and registration to practice as defined by their job description.

We Disclose Potential Conflicts of Interest

We identify and disclose situations where our personal interests may conflict with those of Intermountain.

A conflict of interest may arise if we have a personal or financial interest that could interfere or compete with the interests of Intermountain, or if we are in a situation to use our position with the company for personal gain. A conflict may also arise if a family member or other close relation owns or works for a company that does business or competes with Intermountain.

We disclose any circumstance that could be perceived as a conflict of interest, even if we do not think the situation would violate Intermountain's guidelines.

Possible conflicts of interest include:

- Outside employment — working in a job with assignments like those performed for Intermountain, or that may conflict with Intermountain jobs or assignments
- Payment for participating in activities, speeches, or forums that are related to our jobs or assignments
- Participating on a board of directors of a non-Intermountain entity





We believe
in what we do

We Protect Privacy and Confidentiality

While working or providing a service for Intermountain or its subsidiary companies, we are committed to safeguarding the privacy of patient, member, and caregiver information. This obligation applies even after we are no longer employed by, or associated with, Intermountain or its subsidiary companies.

We routinely collect personal information about our patients and members to provide care. We understand how sensitive this information is and maintain its confidentiality accordingly. Consistent with privacy laws, we access, use, and disclose patient-identifiable information only to care for or serve the patient or member, obtain payment for care, or as allowed by law.

Clinicians should only access patient information where an established care provider relationship exists, a new patient relationship is developed, or a request for consultation or authorized quality review is made.

We Use Care with Protected Health Information (PHI) That Identifies Either Patients or Members

PHI includes any information that could identify patients or members. This identifiable information includes their name, medical record number, health plan number, picture, or any of the eighteen identifiers.

We do not discuss patients, members, and caregivers information with friends, family, or through social media. Discussing or describing patients or members through social media is against the law.

We Do Not View Our Own Treatment Information, or That of Our Family or Friends, Through Our Job-Related System Access When the Information Is Not Needed for Our Job Responsibilities

Appropriate access to our own health information is made through MyChart (or appropriate access tools), the Health Information Management Department, or by requesting a copy of your records from the facility that provided the treatment. Special proxy access for a dependent's health information may be available through MyChart or appropriate access tools.

Viewing or editing treatment information of a family member, coworker, or friend through your job-related system access, when the information is not needed for your job responsibilities, is a Health Insurance Portability and Accountability Act (HIPAA) violation.

We Hold Business Partners and Suppliers to the Same Standards When They Conduct Business on Our Behalf

Business partners and suppliers who process confidential information on behalf of Intermountain are required to comply with our privacy and security policies and all applicable laws and regulations. Business partners and suppliers are authorized to access, use, and disclose only the minimum necessary PHI needed to provide their contracted services.

We believe in what we do

We Support Caregiver Privacy

Just as we are careful to ensure the information of our patients and members is not disclosed through photos and video recordings, we use the same care to protect our caregivers' privacy. We may be asked by patients and others to be included in their photos or videos. We understand that these images can be used at the sole discretion of the individual recording the image. Accepting the invitation to be a part of the image is at the caregiver's discretion.

Caregivers are empowered to protect the privacy of themselves, patients, and other caregivers. Caregivers have the right to refuse being included in an image or recording.

We Respect the Privacy of Co-workers Who Become Our Patients

When caregivers become our patients, they are entitled to the same privacy and rights as any other patient. A patient's caregiver status should not impact their care or the confidentiality of their health information.

We Safeguard Personnel Information

We recognize that our personnel records contain sensitive information. Intermountain will not disclose these records outside of the company, except upon an individual's own request, for a legitimate business reason, or as required by law.

We Maintain Computer and Network Security and Protect the Confidentiality of Information Contained on Intermountain's Resources

We only use and access Intermountain's resources as necessary to perform our assigned functions. Intermountain's resources are critical to help provide care to patients and members.

Intermountain's resources include computers, phone systems, email, and internet access. To protect Intermountain's resources, passwords must be unique, kept confidential and not shared with anyone.

We maintain computer access security when we:

- Do not share our password or ID badge that may act as a password
- Log in and out when using a shared computer
- Close the browser when finished
- Log off computers when finished or away

We Protect Confidential and Proprietary Information When Transporting or Disposing

We protect confidential and proprietary information by:

- Following policies related to protecting such information
- Properly disposing of information which no longer needs to be maintained such as shredding documents that contain protected information
- Knowing and complying with agreements signed to protect the confidentiality of information — we are responsible for knowing what these agreements require and abiding by them

Secure Transportation and Transmission of Information

Whenever possible, convert and store paper documents in a safe and protected format. For transferring sensitive/protected information, use encrypted methods. To physically secure information and devices, place them out of view such as in a backpack or in the trunk of a car.

Report immediately the loss or theft of any company owned devices. Use unique passwords for your work account that are separate from personal accounts.

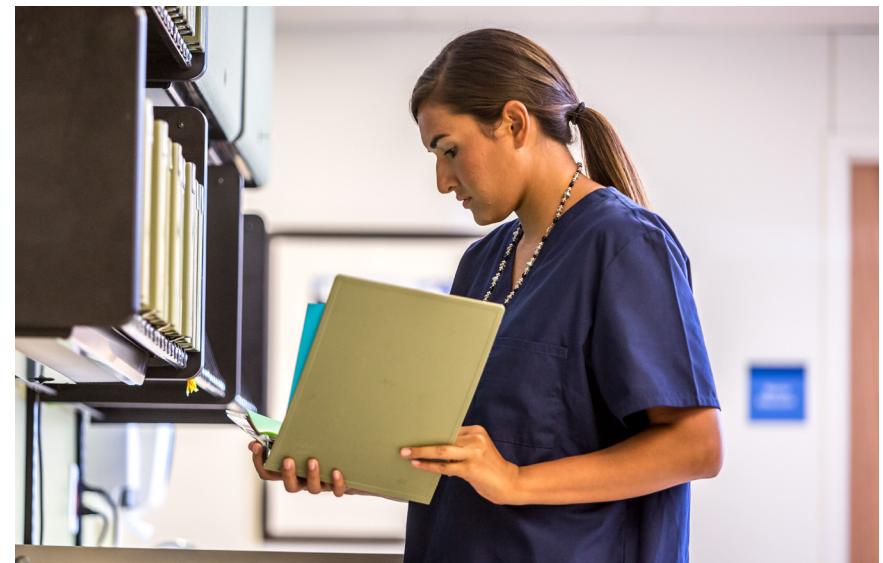
We are accountable for all activities that occur under our login including actions involving poor judgment or illegal/illicit activities. Such behavior may result in the termination of access to Intermountain's resources and may also result in termination of employment and criminal liability.

We Use Appropriate Communication Channels

We work with our Marketing and Communications Department to ensure accuracy as we prepare public presentations and media interviews. We do not act as a spokesperson for Intermountain without approval. We forward all media requests to Marketing and Communications. They also coordinate all requests made by external entities to record video on Intermountain property.

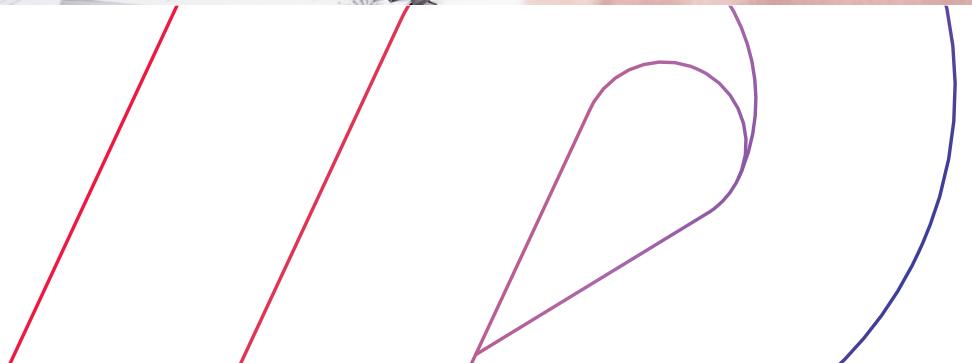
We Report When We Suspect a Privacy Violation

If there is a privacy breach of protected information, regulations require that we notify the individual and the federal government. This may include inappropriate access to family members' or coworkers' records.





We serve
with empathy



We Are Committed to Fair Practices, Equal Opportunity Employment, and Non-discrimination

We are committed to recruiting the most qualified caregivers from a diverse pool of applicants. Talent and performance serve as the basis for advancement within Intermountain.

We do not discriminate or make employment decisions based on a person's race, color, ethnicity, religion, gender, sexual orientation, gender identity, national origin, age, disability, protected military or veteran status, pregnancy, or genetic information.

We are committed to non-discrimination and accessibility for our caregivers, patients, members, and visitors. We are individually empowered and accountable to foster this environment in our actions and words.

We Value Relationships and Do Our Best to Foster an Inclusive and Supportive Environment for Those We Serve

We understand our patients are unique individuals, and we honor the dignity of each person. We provide care in a safe, effective, and efficient manner.

To do this, we:

- Inform patient of their rights and protect those rights
- Respect and support patients and, when permission is given, their chosen support team

- Provide information to make decisions regarding care, treatment, and services they are offered
- Listen with sensitivity and consider the informed preferences of patients, including informed decisions to discontinue care, treatment, and services
 - We ask for, accept, and follow advance directive and resuscitative measures
- Offer clinical and ethical consultations to patients and families if a conflict arises during a patient's treatment
- Protect our patients' dignity; respect their cultural, psychological, and spiritual values; and safeguard their personal information
- Honor each patient's choice of providers for post-hospital services

We Are Committed to Maintaining an Inclusive and Supportive Healing Environment for Those We Serve

We provide care based on the needs of the individual and do not discriminate. We comply with applicable state and federal laws. We do not tolerate discrimination of any individual based on age, race, color, ethnicity or national origin, religion, creed, language, disability, socioeconomic status, sex, sexual orientation, gender identity or expression, or veteran status in providing care and services.

We Assist Individuals Seeking Services With Special Communication Needs

We are committed to ensuring that all individuals, including those who have limited English proficiency, have meaningful access and equal opportunity to our services and programs.

We are committed to making reasonable accommodations to ensure effective communication with individuals with disabilities. This also includes an obligation to provide effective communication to a patient's or member's companion who is an individual with a disability. Potential disabilities that may require communication accommodations include, but are not limited to, impaired hearing and sight, and learning disabilities such as dyslexia.

We provide communication assistance aids and services in a timely manner and free of charge. Aids and services that may be provided include, but are not limited to, qualified sign language interpreters, written information in alternate formats, foreign language interpreters, and information translated into other languages.

When communication assistance is needed, we use one of Intermountain's qualified interpreters. If a patient or family member insists on using someone other than a qualified interpreter (such as a family member or friend) a qualified interpreter should still be present to ensure that legal consent or other critical information is interpreted appropriately.

If you believe discrimination has occurred, report to the System Civil Rights Coordinator, the Civil Rights Coordinator designated by Care Site, or the Compliance Team.

More information can be found on Intermountain's website under "[About Us](#)".





Patients Who Are Subjects in Clinical Research

Clinical research is an important part of how we advance our Mission of helping people live the healthiest lives possible. We take our responsibility seriously and conduct clinical research activities observing legal and ethical standards.

We are committed to respecting and protecting the rights of individuals who agree to participate, as well as those who refuse, without compromising their care.

We expect caregivers involved in conducting clinical trials of investigational products and services to adhere to the highest ethical standards and do so in conjunction with IRB approval and Intermountain policies. These standards include completing research applications honestly and accurately and only utilizing research funds for the appropriate purpose. Additionally, all potential subjects invited to participate in a clinical trial are given a full explanation of their rights and responsibilities while participating in a clinical trial as well as alternative services that might be beneficial.



We are partners
in health

Intermountain values innovation that leads to extraordinary healthcare. Guidelines are in place to appropriately reward innovators and developers.

We are Honest and Fiscally Responsible with Intermountain Funds, and We Protect Intermountain Assets

We are careful with Intermountain funds to make sure they are used effectively. We abide by company policies and procedures for the secure handling of company funds. We accurately prepare financial records. We ensure that any funds we spend or approve are an appropriate use of Intermountain resources.

We respect and use Intermountain's resources for legitimate business reasons and encourage others to do the same. Intermountain's resources include, but are not limited to, property, funds, information, records, intellectual property, clinical and business equipment, computer systems, telephones, and the company name.

We Are Honest in Our Payroll Time and Attendance

We use our time at Intermountain to further the company's Mission. We accurately report and record our time. Misuse of paid time or Intermountain resources may be considered theft from Intermountain.

We clock in at the location closest to our work area. When we clock in, we are at our worksite and ready to begin work. We never clock in for someone else.

We Protect Our Benefits

We responsibly use company benefit plans for ourselves and other covered individuals and provide accurate information when doing so. We take steps to make sure that ineligible individuals are not covered under our plans.

We Protect Intermountain's Intellectual Property

We encourage caregivers to create and develop new inventions, processes, and technologies.

To protect Intermountain's interests, caregivers must not disclose proprietary materials or information unless authorized by applicable policies, procedures, guidelines, or Intermountain's Intellectual Property Office.

We Respect the Proprietary Information of Others

Just as we protect our own confidential information, we respect the proprietary and confidential information of others. This includes written materials, software, music, and other intellectual property.

We obtain copyright permission from the copyright holder prior to use. Permission is required for all non-governmental or non-public domain materials including print, audio, and video. Any software used at Intermountain must be licensed, approved, and used as outlined in the software owner's license agreements.

We Maintain Our Communities Confidence by Competing Fairly in the Market

We comply with antitrust laws. These laws are designed to promote fair competition. For example, we risk violating these laws by discussing certain aspects of Intermountain's business with a competitor such as how we establish our prices, the terms of supplier relationships, or agreeing with a competitor to refuse to do business with a supplier. We seek the advice of Intermountain's Legal Department prior to discussing potentially sensitive topics with competitors or suppliers.

We Interact With Suppliers Honestly

We value our suppliers as they play a role in the success of Intermountain. Suppliers include anyone providing products or services to Intermountain, including patient service and product providers;

physician or clinician service and product providers; and technical, maintenance, inspection, delivery, and construction personnel.

Our selection of suppliers is based on their ability to meet our business needs, rather than on personal relationships and friendships, or on any inducements or personal offers.

We do not take kickbacks or bribes from them, nor do we offer such inducements to them. When working with suppliers, we do so free from conflicts of interest and are compliant with applicable laws and fair business practices.

We do not request additional items or services from suppliers over and above their contracted service. For example, we do not ask for items such as pens, pencils, notepads, gift certificates, supplies, meals, etc. Gifts of any kind from suppliers are discouraged and not solicited.

Accepting or seeking anything of significant value from contractors or service providers should be reported.

We Review and Sign Contracts Based on Signing Authority

We sign or agree to contracts only if we are authorized by policy to do so. Contracts obligating Intermountain are required to receive a legal review, unless specifically exempted in policy. This applies to all legally enforceable agreements that create an obligation for Intermountain.

We Ensure the Confidentiality of Material Non-public Information

Intermountain is actively engaged in new growth opportunities and at times may be involved in discussions with publicly traded companies. We do not communicate material non-public information, either directly or indirectly, to anyone, including family, friends, or acquaintances.

Material Non-public Information:

- Information is material if a reasonable investor would consider it important in deciding whether to buy, sell, or hold a security. Any information that is likely to affect the price of a company's securities is material, and any information that would motivate you or others to trade in a security is material.
- Information is non-public if it is not generally known by the public. Accordingly, if an individual becomes aware of information that is not widely available to the investing public, such information is non-public.

We Exercise Good Judgment and Discretion When Accepting Gifts From Patients and Members

We treat all our patients and members with equal care and concern without the need for extra expressions of gratitude or rewards. We refer individuals wishing to give larger donations to Intermountain's Foundation.

In the event a patient or member gives an employee a non-perishable gift for recognition purposes of a value greater than \$50.00, the employee should seek guidance from their leader, and as needed, consult with Compliance and Human Resources. The final decision on acceptance of the gift will be made in alignment with our Code of Conduct and Intermountain policies..





We are
better together

Intermountain has a Non-Retaliation Policy. We take concerns seriously. Inappropriate or non-compliant behavior cannot be justified, ignored, or covered up.

Employee Relations Philosophy

- Intermountain strives to create the healthiest work environment possible
- We achieve this through our commitment to dealing directly with caregivers in a one-on-one, open-door setting
- We feel this open-door philosophy promotes open and honest dialog, accountability, and trust, in a mutually respectful manner, rather than through a third-party representative
- We make this commitment together to establish a work experience for our caregivers that is safe, inclusive, collaborative, and engaging without fear of retaliation

We Refrain From Soliciting Caregivers, Patients, Members, or Visitors for Unauthorized Products or Services

We don't solicit other caregivers, patients, members, or visitors for unauthorized products, memberships, or other causes during scheduled work time or in immediate patient care areas. Work time includes both our working time and the time when others are working.

Unauthorized promotional material may not be distributed in patient care areas at any time, for any purpose.

Prohibited solicitation and distribution activities include the following:

- Displaying items for sale in work areas or engaging in any other formal or informal sales activities related to a personal business
- Placing decals on facility fixtures, ID badges, property and/or equipment

Leaving unauthorized literature, sign-up sheets, order sheets, buttons, stickers, coupons, etc. in work areas is not distribution; it is considered littering and is prohibited.

We Do Not Tolerate Discriminatory, Inappropriate, or Disruptive Behavior

We treat each other with honesty and mutual respect. We do not tolerate any form of discrimination, harassment, violence, or threats of violence.

We act professionally. We refrain from making inappropriate comments, using gestures, sharing degrading or humiliating jokes, using racial slurs or epithets, or acting in ways that may be construed as harassing or disruptive.

We report when these occur and have processes in place to address inappropriate or disruptive behaviors through our corrective action processes and medical staff bylaws.

We Observe an Alcohol- and Drug-free Workplace

When we report to work, we do so fit for duty and free from the influence or impairment of alcohol and drugs.

We Maintain Appropriate Relationships

We avoid working relationships where one family member reports directly to another family member, including one's spouse, parents, siblings, grandchildren, etc.

In addition, individuals who supervise another employee with whom they are involved in a romantic or intimate relationship must report the relationship to their supervisor/manager. This includes both direct and indirect supervision, such as when a physician or advanced practice provider (APP) oversees the work of the other



employee. We also disclose any romantic or intimate relationship we have with an Intermountain supplier or business partner.

We avoid developing romantic or intimate relationships with our patients where one did not exist when care was established.

We Display Appropriate Identification

We always wear our Intermountain, Select Health, or subsidiary company identification badge while on duty in a facility.





We are leaders in
clinical excellence

At Intermountain, caregivers should expect to be held accountable for their actions.

We Maintain Our Required Licenses, Privileging, and Professional Credentials to Perform Our Jobs

We understand the scope of practice that our licensure or credentials permit us to perform and stay within those boundaries. When a job requires a license or specific credentials, we only allow individuals with current and valid licenses and credentials to perform those functions.

We Do Not Employ or Contract With Individuals Who Have Been Excluded From Participating in Federally Funded Healthcare Programs

We do not employ or contract with individuals or entities who have been excluded from participating in federally funded healthcare programs, nor are they permitted to practice or bill through Intermountain.

Exclusion checks are run against State Medicaid databases, the Department of Health and Human Services, Office of Inspector General's List of Excluded Individuals/Entities, and the System for Award Management List maintained by the US General Services Administration.

We Carefully Review Financial Relationships With Physicians and Other Healthcare Practitioners for Compliance With the Anti-kickback and Stark Laws

Laws and regulations put strict requirements on financial relationships between Intermountain and physicians. All financial agreements with physicians must be carefully reviewed and approved by the Physician Contracting Department. There is risk whenever we give something of value (money, services, gifts, trinkets, etc.) to physicians, other providers, or the general public.

Before we give anything away for free, or at a discount, we review the situation with our supervisor and Compliance.

We do not accept payments for referrals or authorizations to accept patients. We are not permitted to directly or indirectly solicit or receive anything of value in exchange for referring our patients to a provider.

We do not pay for referrals. We accept patient referrals and authorizations from other providers based on the patients' medical needs and our ability to render the needed services.

We Ensure Accuracy of Records and Reporting

We depend on accurate and reliable information to make responsible business decisions. Accuracy of records includes business records such as financial transactions and reports, and personnel, insurance, and medical records.

We are committed to providing accurate and complete medical record documentation to support our coding and billing processes. We are fair, accurate, and timely with our documentation and billing processes, and follow all related laws, regulations, and policies. All individuals who edit or update medical records — electronic and

paper — provide complete and accurate information and do not alter, hide, or destroy information that is part of the official record. Additionally, all medical record documentation is maintained to follow legal and policy requirements.

We Keep Our Workplace Safe

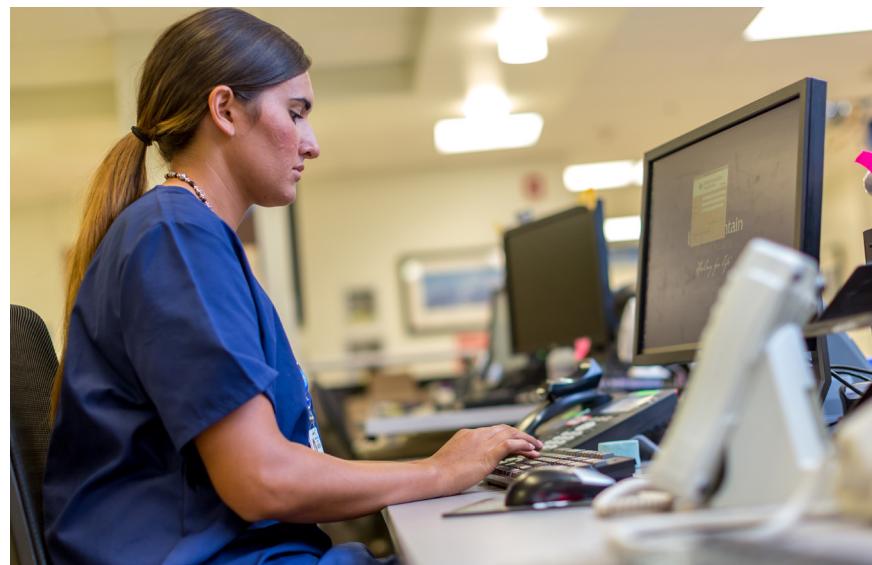
We follow policies regarding workplace safety. We make sure Intermountain campuses are safe places for patients, members, visitors, and caregivers. We complete required safety training. If we see a hazardous condition, we respond appropriately.

We comply with all laws, regulations, and Occupational Safety and Health Administration standards. As required, we report certain injuries, inspections, illnesses, and motor vehicle accidents.

We Document and Report Events So That We Can Improve Our Processes and Reduce the Risk of Harm

When an unexpected event impacts, or may impact, the quality of patient care or the safety of our patients, members, visitors, or ourselves, we report these incidents through the appropriate channels.

Additionally, several government agencies have implemented time-sensitive error reporting requirements. Our reporting obligations may begin the minute any Intermountain caregiver knows of an error. It is our responsibility to report to our supervisor or to Compliance as soon as a mistake in billing or breach of patient confidentiality is suspected.



We Follow All Laws and Regulations

We are committed to knowing, understanding, and abiding by all laws, regulations, and policies that apply to our jobs or assignments. We refrain from conduct that may violate any laws pertaining to fraud, waste, and abuse of government funds.

We are required to report all suspected violations through the proper internal channels for investigation.

Intermountain management will report violations of law to the appropriate authorities. The Federal False Claims Act makes it illegal for any person or organization to knowingly make or file a false claim for payment from the federal government. Provisions allow an individual who knows that a false claim was submitted for payment to file a lawsuit in federal court on behalf of the government.

We Follow Environmental Regulations

We abide by all laws, regulations, and company policies relating to the protection of the environment. We strive to manage and operate our business in a manner that respects our environment, conserves natural resources, and complies with environmental laws and regulations. We are committed to:

- Utilize resources appropriately and efficiently
- Recycle where possible and dispose of all waste in accordance with applicable laws and regulations
- Work cooperatively with the appropriate authorities to remedy any environmental contamination for which Intermountain may be responsible

We Encourage Individuals to Take an Active Interest in Government Processes

If we choose to participate in a political process outside of our job responsibilities, we will do so as individuals and not as representatives of Intermountain. It is our responsibility to report any lobbying activity on behalf of Intermountain to the Government Relations Department for appropriate reporting.

We Are Responsible in Our Lobbying Efforts

Lobbying government officials is a sensitive activity requiring strict controls. For this reason, Intermountain Government Relations directs any lobbying efforts. Any contribution, gift, service, or exchange that would constitute a bribe is strictly prohibited.

We Comply With Anti-corruption and Anti-bribery Laws

We will not directly or indirectly give, offer, or promise anything of value to any government official or employee, or referral source, with the intent to obtain or retain business or secure an unfair business advantage. We will not solicit or accept anything of value from any person or entity seeking, entering or conducting a business transaction with Intermountain that may compromise or appear to compromise our business decisions.

If an employee is reimbursed for attending any event where a legislator is in attendance, the event needs to be reported to the Intermountain Government Relations Department.

We Support Internal and External Audits

Audits are routinely performed to assess areas for compliance. These audits are performed by internal and external auditors with experience in the area under review. When asked, we participate fully in these audits. If corrective action is needed, a written plan is developed and implemented to ensure compliance.

We Cooperate With, and Document, Government Inquiries and Investigations

Intermountain is regulated by state and federal agencies. From time to time, we may encounter officials responsible for regulating various aspects of healthcare or other business practices.

If we receive a request for information from a government investigative agency, external surveyor, or enforcement agency, either on-site or through correspondence we:

- Notify our manager and/or administrator
- Notify Compliance or the legal team by calling the Compliance Hotline or your local Compliance representative
- Carefully preserve documents related to a known or possible government investigation

Caregivers must never:

- Conceal, alter, or destroy any relevant documents
- Cause another caregiver to provide inaccurate information
- Obstruct, mislead, or delay the communication of information or records relating to a possible violation of law





In Areas Where...

Leaven Ministries Sponsor Health Care Sites

We follow the Ethical and Religious Directives for Catholic Health Care Services (ERDs, 2018). These ERDs provide additional ethical standards and authoritative directives for conduct and care delivery in Catholic institutions, and in institutions where there are agreements to follow the Ethical and Religious Directives.

We Operate as a Nonprofit

Nonprofit organizations are formed to operate for the benefit of the communities they serve. Surplus funds are used to cover operating expenses and are typically reinvested to further charitable and social welfare causes. We engage in activities to further our charitable and social welfare mission, including responsible financial activities. This means we:

- Avoid compensation arrangements in excess of fair market value
- Avoid actions that inappropriately create revenues for Intermountain, such as intentionally billing claims incorrectly
- Submit accurate financial reports to appropriate taxing authorities
- File all tax returns and information in a manner consistent with applicable laws

We are bound by local, state, and federal tax law to make sure that we operate for the benefit of the community and not for the

benefit of any private individual or group. All payments and business dealings must be reasonable and may not provide an excessive financial benefit to any party.

Intermountain's community benefit includes providing charity care (services provided at reduced or no cost), funding school and community-based clinics, sponsoring health fairs, giving to other nonprofit health-related organizations, etc.

The Emergency Medical Treatment & Labor Act (EMTALA) Applies

Intermountain complies with EMTALA, which ensures all patients receive emergency services regardless of the patient's ability to pay.

Our emergency departments, labor and delivery, and behavioral health Access Centers provide a medical screening examination to patients requesting treatment to determine if an emergency medical condition exists. If the patient has an emergency medical condition, we provide stabilizing treatment within the hospital's capacity or capability, or an appropriate transfer is made to a hospital that has capacity or capability.

Intermountain does not delay medical screening exams or necessary stabilizing treatment in order to determine a patient's ability to pay. We provide these services irrespective of any state laws or mandates that apply to specific procedures.

For more information related to compliance with EMTALA, please see the Compliance homepage on intermountainhealth.sharepoint.com.

Notes



36 South State Street | Salt Lake City, UT 84111

October 2025