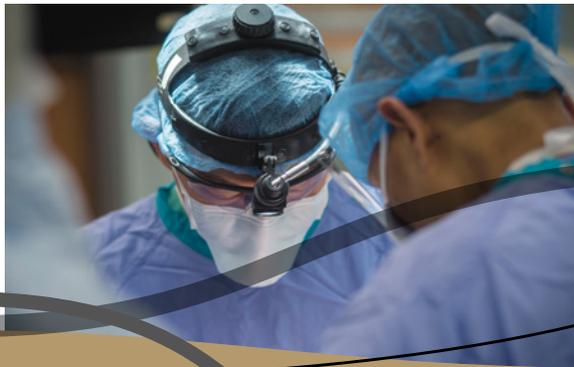


Code of Conduct



A Mission to Care. A Mission to Cure.

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A MESSAGE FROM DR. JULIE FREISCHLAG, CEO

One of the greatest assets of Wake Forest Baptist Medical Center is our commitment to the highest standards of ethical and lawful behavior. Our Code of Conduct provides guiding principles to ensure that our interactions and actions reflect professional, honest, respectful and caring behavior here at Wake Forest Baptist Medical Center.



In an increasingly complex health care environment, it is essential that we adhere to the rules, regulations and guidelines that govern our industry, including avoiding conflict of interest, protecting confidential information, conducting our work ethically, reporting compliance concerns and fostering a professional work environment.

Our Code of Conduct applies to all of us – staff, faculty, trainees, students, vendors and volunteers. As an academic medical center, we are leaders in patient care, research, education and innovation working to improve health. We must be able to rely upon each other to act with professionalism and integrity on behalf of our Medical Center.

Our guiding principles are built on the foundation of our values: Excellence, Compassion, Service, Integrity, Diversity, Collegiality and Innovation. Please take the time to understand and follow our Code of Conduct and continue your outstanding efforts to put our values into action every day.

A handwritten signature in black ink that reads "Julie Ann Freischlag, MD". The signature is written in a cursive, flowing style.

Julie Freischlag, MD
CEO, Wake Forest Baptist Medical Center

INTRODUCTION



A code of conduct describes standards that guide the behavior of people who make up an organization. Our organization, Wake Forest Baptist Medical Center, is comprised of Wake Forest Baptist Health (which includes North Carolina Baptist Hospital, Lexington Medical Center, Davie Medical Center, Wilkes Medical Center and other clinical subsidiaries/affiliates), Wake Forest University Health Sciences, Wake Forest School of Medicine and Wake Forest Innovations. The Code of Conduct was designed to support our vision, mission and values. When you are faced with an ethical question or issue, you should consult this Code along with existing policies and procedures for guidance.

The Code of Conduct cannot address every ethical issue that might occur. Employees are encouraged to seek guidance on any ethics or compliance issue by talking with their supervisor or another leader within their department. Steps for addressing suspected or known compliance violations are outlined on page 8.

Vision

Wake Forest Baptist Medical Center is a preeminent, internationally recognized academic medical center of the highest quality, with balanced excellence in patient care, research and education.

Mission

Wake Forest Baptist Medical Center's mission is to improve the health of our region, state and nation by:

- ▶ Generating and translating knowledge to prevent, diagnose and treat disease.
- ▶ Training leaders in health care and biomedical science.
- ▶ Serving as the premier health system in our region, with specific centers of excellence recognized as national and international care destinations.

Values

- ▶ Excellence—Demonstrate the highest standards of patient-centered care, education, research and operational effectiveness.
- ▶ Compassion—Respond to the physical, emotional, spiritual and intellectual needs of all.
- ▶ Service—Cultivate selfless contribution for the greater good.
- ▶ Integrity—Demonstrate fairness, honesty, sincerity and accountability.
- ▶ Diversity—Honor individuality and protect the dignity of all.
- ▶ Collegiality—Foster mutual respect, facilitate professional growth and mentorship, and reward teamwork and collaboration.
- ▶ Innovation—Promote creativity to enhance discovery and the application of knowledge.

Our Patient and Family Promise

We will:

- ▶ Keep you safe.
- ▶ Care for you.
- ▶ Involve you and your family.
- ▶ Respect you and your time.

GUIDING PRINCIPLES

Patient Care

We are committed to providing quality care while respecting the rights of our patients.

- ▶ We make clinical decisions based on patient care needs.
- ▶ We interact with patients and family members in a caring, compassionate manner.
- ▶ We take steps to ensure that each patient understands his or her treatment needs and options.
- ▶ We respect each patient's right to ask about any aspect of his or her care.
- ▶ We do not discriminate against any person because of age, race, religion, gender, gender identity or expression, sexual orientation, disability, national origin, ability to pay, or for any other reason prohibited by regulation or law.
- ▶ We encourage patients to comment on their satisfaction or concerns about the care they receive.

Health and Safety

We are committed to maintaining a work environment that complies with all applicable health and safety laws.

- ▶ We handle all equipment, supplies and waste using proper equipment and techniques.
- ▶ We perform our duties free from the influence of alcohol, illegal drugs and improperly used medications.
- ▶ We provide and require the use of protective equipment and measures.
- ▶ We respond to reports of unsafe practices.
- ▶ We do not allow others to use our access privileges to secure locations.
- ▶ We are committed to protecting all persons in our care and on our premises as well as all members of our academic medical center from abuse and neglect, and we will report suspected abuse and neglect immediately.

Environment

We are committed to being an environmentally responsible institution.

- ▶ We comply with all environmental laws and regulations.
- ▶ We encourage recycling, and we seek new methods to reduce by-products and wastes that have a negative environmental impact.
- ▶ We dispose of all medical waste and other hazardous materials in accordance with applicable laws and regulations.

Research

We require all research to be conducted within legal and ethical standards.

- ▶ We are honest and accurate in our research applications.
- ▶ We use research funds for the appropriate purpose.
- ▶ We respect the right of individuals to refuse to participate in clinical studies without compromising their care.
- ▶ We conduct clinical trials and studies in accordance with requirements of the appropriate regulatory bodies.
- ▶ We follow all laws, policies and procedures relating to the care, transport and use of animal subjects in research.

Respect

We are committed to maintaining a work and educational environment in which we treat each other fairly and respectfully.

- ▶ We seek to understand both the similarities and differences of our colleagues and patients.
- ▶ We do not tolerate threats, discrimination, harassment, retaliation, intimidation or other disruptive behaviors.
- ▶ We report threats, discrimination, harassment, intimidation or other disruptive behaviors, regardless of the position of authority of the person(s) involved.

Conflicts of Interest

We avoid conflicts of interest in which a faculty or staff member's personal interest may compromise or appear to compromise his or her judgment in work-related matters.

- ▶ We disclose potential conflicts of interest and do not take part in making any decision affected by these interests.
- ▶ We do not permit a faculty or staff member to have influence over the conditions of employment of an immediate family member.
- ▶ We ensure that any secondary employment does not interfere with our job performance.
- ▶ We do not accept personal gifts of any kind from vendors.
- ▶ We do not accept gifts of more than nominal value from patients or patient family members.
- ▶ We do not pay for, or receive payment for, patient admissions or referrals for service.

Wake Forest Baptist Medical Center Resources

We protect Wake Forest Baptist Medical Center resources and intellectual property.

- ▶ We understand that the products and systems developed at work are the property of Wake Forest Baptist Medical Center.
- ▶ We do not use assets that belong to Wake Forest Baptist Medical Center for personal gain.
- ▶ We use electronic resources with good judgment and do not allow occasional personal use to interfere with work responsibilities.
- ▶ We respect patents and other forms of intellectual property.

Audits and Investigations

We cooperate fully and professionally with any internal or external audit or investigation.

- ▶ We notify the Audit and Compliance Office of all external requests, visits and inquiries from government agencies.
- ▶ We do not provide false or misleading information to auditors.
- ▶ We provide accurate and timely information for audits and investigations.
- ▶ We do not alter or destroy any document or record in anticipation of an audit or investigation.

Confidential Information

We protect confidential information related to our patients, donors, faculty, staff, trainees, students, research and Wake Forest Baptist Medical Center.

- ▶ We do not access confidential information without a work-related need to know, and we do not disclose confidential information to others who are not the authorized recipient or do not have a work-related need to know.
- ▶ We do not disclose confidential business information concerning Wake Forest Baptist Medical Center without the proper authorization or a specific legal requirement.
- ▶ We do not post confidential information to any social media site.
- ▶ We do not use information obtained from Wake Forest Baptist Medical Center for our personal financial gain, nor disclose it to others for their gain.
- ▶ We do not share passwords or send unsecured email.
- ▶ We properly shred and dispose of confidential information.
- ▶ We protect identifying information to reduce the threat of identity theft for our patients, faculty, staff, trainees, students, vendors and others.

Medical Billing and Records

We follow our established billing practices to ensure the accuracy of claims submitted for payment.

- ▶ We make efforts through policies, procedures and actions to prevent, detect and correct fraud, waste and abuse within the health care system.
- ▶ We strive to be accurate and complete in our patient documentation.
- ▶ We accurately bill for services rendered and supplies utilized.
- ▶ We do not knowingly submit a false claim for payment. We understand that the federal False Claims Act establishes liability for any person who knowingly submits or causes the submission of a false claim to the government for payment.
- ▶ We report any knowledge of fraud, waste, abuse and/or a false claim submission through the established reporting channels.
- ▶ We understand that staff, faculty, trainees and students are protected from retaliation when they report a false claim to Wake Forest Baptist Medical Center leadership or outside agencies.
- ▶ We refund payments received in error, and we notify the payer of the reason for the refund.

Political Activity

We are not engaged in political activities as an organization, nor do we use Wake Forest Baptist Medical Center resources for these activities.

- ▶ We do not direct faculty or staff members to make political contributions to any political party or candidate.
- ▶ We respect the right of each staff and faculty member to participate in, or refrain from participating in, political activities.

Education

We maintain a professional environment that supports the development of our trainees and students.

- ▶ We support and nurture the development and wellness of our trainees and students.
- ▶ We comply with all applicable laws and regulations of our accredited education programs.
- ▶ We use the *Student Handbook* as a guide and resource.
- ▶ We are fair and impartial in grading, evaluations, promotions and grievances, and follow our policies and procedures for addressing concerns.
- ▶ We comply with all statutes and regulations that protect the privacy of education records.

Resolving Compliance Issues

Staff, faculty, trainees and students are required to report any known or suspected violations of laws and regulations, or of Wake Forest Baptist Medical Center policies. This may involve situations in which you observe a violation, hear about a violation or suspect that a violation may have occurred. If you observe improper behavior by anyone in the workplace, regardless of the individual's position of authority, you are responsible for reporting it immediately.

Step 1

If you are unsure about the legality or appropriateness of an action or proposed action, think of the following:

- ▶ Is it ethical?
- ▶ Is it legal?
- ▶ Is policy being violated?
- ▶ Will it reflect negatively on you or Wake Forest Baptist Medical Center?

You may seek guidance on any ethics or compliance issue by contacting leadership within your department, Human Resources, the Audit and Compliance Office or the Compliance Hotline.

Step 2

If you know about or suspect a compliance violation, discuss your concern with your supervisor. If you are not comfortable addressing the topic with your supervisor, seek another leader within your department.

Step 3

If the problem is not resolved or acted upon, contact the Audit and Compliance Office, Human Resources or the Compliance Hotline.

Contacting the Audit and Compliance Office

Compliance concerns may be addressed in person, by phone, by mail, by email or anonymously through the Compliance Hotline.

Location: Piedmont Plaza II

Phone: 336-713-4949

Email: compliance@wakehealth.edu

Mailing address: Wake Forest Baptist Medical Center Compliance Office
Medical Center Boulevard
Winston-Salem, NC 27157

Contacting Human Resources

Employment concerns may be addressed with Human Resources by calling 336-716-6078 or your Human Resources Employee Relations contact person.

Compliance Hotline

The Compliance Hotline is operated independently by The Network, Inc. and is available to staff, faculty, trainees and students 24 hours a day, seven days a week. Your report can be made anonymously, if you choose. No attempt will be made to determine your identity.

Phone: 1-877-880-7888 (toll-free)

Online: www.tnwinc.com/reportline/international

Reports submitted through the Hotline are handled and investigated by the Audit and Compliance Office with assistance from other areas as needed.

Reporting Protection

Wake Forest Baptist Medical Center is committed to protecting staff, faculty, trainees and students who, in good faith (honestly and without malice), report a known or suspected compliance violation.

- ▶ We strive to create an environment where individuals feel comfortable expressing their concerns about compliance issues.
- ▶ Harassment or retaliation in response to reporting compliance concerns is not tolerated and should be reported to the Audit and Compliance Office.

Care has been taken to provide the most accurate, up-to-date information in this Code of Conduct. However, our knowledge base can sometimes change more rapidly than we are able to update information. If the information contained within this Code does not agree with policies or procedures in place, the current policies or procedures should govern your actions.



Code of Conduct

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Additional information on the topics covered in this **Code of Conduct** can be found on the Audit and Compliance Office website at: intranet.wakehealth.edu/Departments/Audit-and-Compliance/