

CODE OF ETHICS AND BUSINESS CONDUCT

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Code of Ethics and Business Conduct

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OUR NAME AND SYMBOL

MESSAGE FROM ERNIE SADAU

I'd like to begin by expressing my thanks to each and every one of you, our CHRISTUS Associates, directors and Health Care Partners. CHRISTUS Health has a big, expansive Mission *to extend the healing ministry of Jesus Christ*. But we cannot fulfill our Mission without the help and support of each of you.

Fulfilling a Mission like ours not only depends on your support, but it also calls each of us to high standards of conduct and behavior. This Code of Ethics and Business Conduct will help each of us understand and adhere to the stringent standards required of those who endeavor to extend the healing ministry of Jesus Christ. Please read and familiarize yourself with them, and don't hesitate to contact our Compliance team at the numbers included if you have any questions or concerns.



Thank you again for working with us to provide high quality, compassionate care and serve those in need of hope and healing. Together, we can truly make a difference in our neighborhoods and communities as we work together to extend the healing ministry of Jesus Christ.

Sincerely,

Ernie Sadau
President and CEO
CHRISTUS Health

MESSAGE FROM GREG EHARDT

As Ernie mentions in his letter, fulfilling the Mission of CHRISTUS Health requires our very best conduct and behavior. One of our primary goals in Compliance is to foster a proactive culture centered on trust and accountability, in which all Associates “do the right thing” each day, for our patients, health care partners, and for one another. This means working closely with each of you to ensure you have the tools you need to act ethically and be compliant in every decision.



CHRISTUS’s Code of Ethics and Business Conduct is a valuable guide to compliant decision-making, covering issues that may arise with fellow Associates, customers, vendors, competitors, and the general public. All Associates are not only expected to read the Code of Ethics and Business Conduct, but also implement its high standards in their everyday responsibilities. You are accountable to report any suspected violations and cooperate in company investigations. At CHRISTUS Health, we take all reports seriously, and any retaliation for good faith reporting is strictly prohibited. If you have questions about the Code of Ethics and Business Conduct you can contact the Compliance Hotline. You may also contact me directly at any time with questions or concerns. I’m always happy to hear from you, because compliance is everyone’s responsibility.

Thank You!

Gregory J. Ehardt, JD, LL.M.
Vice President and Chief Compliance and Privacy Officer
CHRISTUS Health

INTRODUCTION

Background

This *Code of Ethics and Business Conduct* outlines the principles CHRISTUS Health relies on to guide our professional decisions and articulates expected behaviors for CHRISTUS Associates, directors, and Health Care Partners (defined to include physicians, residents, fellows, students, other health professionals, volunteers, vendors, contractors and subcontractors, suppliers, and agents). As representatives of the organization and the ministry, we must strive to fulfill the Mission and work in accordance with our Core Values. CHRISTUS is committed to complying with all applicable federal and state laws in the countries and states where we operate. Our actions are filled with a spirit of mutual respect which encourages us to treat those we serve with compassion, especially those who are poor and vulnerable.

OUR HERITAGE

CHRISTUS Health is sponsored by three Catholic religious Institutions: the Congregations of the Sisters of Charity of the Incarnate Word of Houston and of San Antonio and the Sisters of the Holy Family of Nazareth. In 1866, three religious Sisters from Lyon, France arrived in Galveston, Texas to found the first private and Catholic hospital in Texas. Skilled in nursing, the Sisters came in response to Bishop Claude Marie Dubuis' call, *"Our Lord Jesus Christ, suffering in the persons of a multitude of sick and infirm of every kind, seeks relief at your hands"* and established the Congregation of the Sisters of Charity of the Incarnate Word of Houston. The healthcare ministry flourished and in 1869 the frontier community of San Antonio invited three Sisters to found a hospital and establish the Congregation of the Sisters of Charity of the Incarnate Word of San Antonio. By 1875, in Rome, a new Congregation of the Sisters of the Holy Family of Nazareth was founded by Mother Mary of Jesus the Good Shepherd. Responding to an invitation by Archbishop Feehan of Chicago, Illinois, the Sisters expanded their ministry to the U.S. in 1885. Our Sponsors came from diverse places, cultures and backgrounds, but always in response to a common call to devote their lives to caring for and serving the needs of the sick, the poor and the most vulnerable. That same spirit of unity amidst diversity continues within CHRISTUS Health where our Associates, partners and volunteers are aligned by our Mission, Vision and Core Values.

MISSION: TO EXTEND THE HEALING MINISTRY OF JESUS CHRIST

CHRISTUS Health is a Catholic health system whose Mission is to “extend the healing ministry of Jesus Christ.” We seek to improve the health of the communities where we serve and to enable those we serve to experience God’s healing presence. CHRISTUS is committed to our Core Values of Dignity, Integrity, Excellence, Compassion, and Stewardship.

CHRISTUS gives public expression to the healing ministry of Jesus Christ and has an formal and essential relationship with the Catholic Church in each of its markets. As a Catholic health care provider, CHRISTUS is committed to adhering to the relevant requirements of the *Code of Canon Law*, as well as Catholic moral teaching related to health care. In the United States, this teaching is expressed in the *Ethical and Religious Directives for Catholic Health Care Services* (“ERDs”) as promulgated by the United States Conference of Catholic Bishops. Consistent with Catholic moral teaching, CHRISTUS attends to the physical, spiritual, psychological, and social dimensions of all persons as it fulfills its ministry.

A Ministry of the Catholic Church

As a Catholic health care system, CHRISTUS conducts the ministry consistent with the social teachings of the Catholic Church, as expressed in the following principles.

- Solidarity with Those who live in Poverty – we serve the poor and vulnerable in our communities, walk with them in their plight, and advocate on their behalf;
- Holistic Care – we provide holistic care that attends to the physical, psychological, spiritual, and social dimensions of persons;
- Respect for Human Life – we bear witness to the sanctity of life from the moment of conception to natural death; (ERDs Parts Four and Five)
- Participatory Community of Work and Mutual Respect – we encourage Associates and Health Care Partners to push decision-making responsibility to the most appropriate level of the organization and to participate in decisions that affect their work; we provide support, training, and development needed to effectively exercise this responsibility;
- Stewardship – we use our resources wisely and efficiently in order to advance our Mission; we respect the environment and the natural resources found in God’s creation; and

- Act in Communion with the Church – we work collaboratively with the ordinary of the local diocese, as well as with other organizations within local dioceses to further our Mission and meet the needs of the local community.

Your Responsibilities

Every Associate and Health Care Partner is responsible for ensuring that CHRISTUS is an ethical organization. We are all representatives of CHRISTUS, and each one of us has the responsibility of ethical conduct and upholding our reputation. No organization can be ethical unless Associates, directors, and Health Care Partners actively participate in making it so. Accordingly, participation in the CHRISTUS Compliance Program is a condition of employment, Board appointment, and maintaining a business relationship with CHRISTUS. As such, you will be expected to:

- Review, understand, and comply with relevant Compliance policies and procedures;
- Attend trainings related to the Foreign Corrupt Practices Act, Privacy laws, Fraud Waste and Abuse, and other topics designed to promote compliance with applicable laws, regulations, and rules in your day-to-day activities;
- Know the name of your local Compliance Officer and Privacy Officer;
- Review compliance-related communications, particularly as they relate to your job duties;
- Promptly respond to requests for information or assistance in connection with Compliance Program activities, including investigations, monitoring, and auditing;
- Know, understand, and meet your obligation to report potential non-compliance, and ethics issues;
- Participate actively in CHRISTUS's efforts to investigate the scope, reason, and solution for any non-compliance incidents;
- Promptly report (through one of the available reporting mechanisms) any knowledge or suspicion of existing or potential compliance violations, including violations of this Code; and
- Uphold the Mission and Core Values of CHRISTUS, including the moral and social teachings of the Catholic Church as they relate to health care.

Everyone must work together to follow this Code and model CHRISTUS's Values in our behavior. Every Associate and Health Care Partner has the responsibility to act accountably, professionally, and

ethically, consistent with this Code and CHRISTUS policies. In addition, managers and leaders have additional responsibilities to lead by example, promote this Code to their Associates, give appropriate feedback, and take action when circumstances demand it. Individuals who violate this Code are subject to disciplinary action, up to and including termination.

The Compliance Program

The CHRISTUS Compliance Program is designed to foster legal and ethical conduct and to detect, correct, and prevent fraud, corruption, and non-compliance with this Code and applicable laws, rules, and regulations.

The Vice President and Chief Compliance and Privacy Officer is responsible for overseeing the Compliance Program, including auditing and monitoring programs. The Vice President regularly reports to the CHRISTUS Health Board of Directors, Audit and Compliance Committee. Compliance Department Associates, including Regional Compliance Officers, Privacy Managers, and Compliance Auditors, work together with the Vice President to promote compliance with laws, regulations, and corporate policies. The Compliance Department collaborates with other CHRISTUS departments as appropriate, such as Legal, Internal Audit, Human Resources, and Finance.

Reporting Concerns

You have the responsibility to report potential violations of law, regulation, policy, or this Code. As described below, you are protected from retaliation if you make a report in good faith.

CHRISTUS has an open-door policy, and Associates should feel comfortable reporting concerns to their immediate supervisor or Human Resources. Speak up if you think something is not right, even if you are not sure if misconduct occurred. If your issue cannot be addressed by your supervisor, talk to your regional leadership or Regional Compliance Officer. You may also contact the CHRISTUS System Compliance Department at (469) 282-2263. Your regional ethics committee or Mission leader is also available as a resource to help address concerns that you may have.

In addition, you always have the option of anonymously reporting concerns 24 hours a day to the Integrity Line:

- United States - (888) 728-8383
- Chile - 800-800-288, then 855-881-7199
- Colombia - 01-800-5-1-84500
- Mexico - 001-844-268-9569
- Online at <http://www.christusintegritylink.org>

Integrity Line complaints are received by professionals employed by an outside vendor who are trained to document your concerns. All reported issues will be investigated and addressed as appropriate.

You may also report compliance concerns directly to the federal government consistent with the False Claims Act qui tam provisions. CHRISTUS will not retaliate against any Associates who engage in lawful efforts in furtherance of investigations under the False Claims Act or other efforts to mitigate False Claims Act violations.

CHRISTUS maintains confidentiality to the fullest extent possible during reviews and investigations. Sometimes, the nature of an investigation or certain legal requirements may limit confidentiality, but if you make an anonymous report through the Integrity Line, CHRISTUS will never try to identify you, and your identity will remain unknown.

If you are involved in a compliance investigation, you are expected to keep the details of the process confidential. Preserving confidentiality protects the individuals participating in the process, while also allowing for a thorough and fair investigation. Any proposed exceptions to confidentiality must be discussed with the Compliance Department.

No Retaliation

CHRISTUS has open-door, non-retaliation, and confidentiality policies to promote transparency and to foster a safe and ethical environment. Retaliation against anyone who raises a concern or reports misconduct in good faith is strictly prohibited. Reporting “in good faith” means you actually believe the information you are reporting is true, even if that information is just a suspicion.

In addition, the False Claims Act provides protection against retaliation for “whistleblowers” who have been terminated, demoted, suspended, threatened, harassed, or otherwise discriminated against in the terms and conditions of employment in retaliation for filing a False Claims Act action.

We expect all Associates and Health Care Partners to speak up when they have concerns and not be fearful of retaliation. However, non-retaliation policies and laws do not protect you from civil, criminal, or disciplinary action regarding your own performance or behavior if you have been involved in unethical conduct.

DIGNITY

Respect for the worth of every person, recognition, and commitment to the value of diverse individuals and perspectives, and special concern for the poor and underserved.

Serving Our Communities

CHRISTUS is called to be involved in our communities, recognizing that our facilities do not exist in isolation but act alongside local and global communities. We have a responsibility to contribute to the common good by helping to improve economic, political, and social conditions in our communities by defending the dignity of all people and promoting their full development as human beings. Strengthening the overall health of our communities requires a special focus on service to persons whose social and economic conditions place them at the margins of society. (ERDs Part One)

Community Benefit

As part of contributing to the common good, CHRISTUS promotes and tracks its work in Community Benefit through standard budgeting and reporting practices, engaging in outreach initiatives that emphasize social action, and participating in advocacy programs that promote human dignity and seek justice and directs resources via the CHRISTUS Fund to improve community health. To further this work, CHRISTUS routinely conducts Community Health Needs Assessments and sets priorities with Community Health Improvement Plans to evaluate how best to serve its communities and also provides financial assistance to assure that the financially disadvantaged receive adequate health care.

Advocacy

In order to effectively promote the common good as it relates to the patients we serve, CHRISTUS advocates in the national and state legislatures, and with local government, to ensure access to health care for all persons. (ERDs #3)

Promoting Diversity and Inclusion

Since we promote human dignity with every encounter, CHRISTUS values diversity among our Associates and Health Care Partners and understands how it enhances the patient experience. We are committed to nurturing an inclusive work environment that respects diverse thoughts and backgrounds. We embrace the diversity of our team and our communities, supporting equal opportunity employment and Associate development programs designed to continuously encourage personal and professional growth.

Fostering Positive Relationships Among Associates

Treating Others with Respect

CHRISTUS honors the dignity of each Associate and Health Care Partner, and is committed to treating them respectfully and justly. Our associates and Health Care Partners are our most important resource. CHRISTUS endeavors to create an atmosphere where relationships are built on trust, enabling Associates to recognize and appreciate each other's contributions in an open and collaborative environment.

It is up to each Associate to help make CHRISTUS a safe, positive, and inclusive workplace. We expect Associates will treat other Associates, Health Care Partners, patients, and clients with dignity and respect. CHRISTUS expects Associates to be compassionate with one another, respecting others' personal beliefs, choices, and integrity. CHRISTUS does not tolerate acts of violence, including bullying, battery, intimidation, threatening, hostile behaviors, stalking, abuse, vandalism, possession or use of weapons, comments regarding intended violence, or any other conduct that management deems as violent or violating the dignity and respect of others.

CHRISTUS will not tolerate harassment in any form and will take all appropriate measures to prevent such behavior and is committed to take corrective action for violations identified.

Gifts Shared Among Associates

Associates should not feel pressured to give a gift to coworkers, and any gifts offered or received between Associates should be appropriate to the circumstances and made in accordance with CHRISTUS policies.

Fundraising Efforts

No one should ever feel compelled to participate in fundraising efforts undertaken by individual colleagues or Health Care Partners. When CHRISTUS opts to support various charitable organizations, such as Catholic Charities, Associates are free to choose whether to participate without fear of any workplace consequences.

Nepotism

Being a relative of a CHRISTUS Associate shall neither be an advantage nor a disadvantage to employment, promotion, transfers, reassignments, salary, or other condition of employment. An application will not be considered for employment if the applicant's employment relationship would result in a prohibited employment relationship, as defined by Human Resources.

Respect for Human Life

The Catholic Church's commitment to human dignity inspires an abiding concern for the sanctity of human life from conception to natural death. As a result, CHRISTUS does not perform, promote, or condone abortions, physician-assisted suicide, euthanasia, or sterilization. Abortion is defined as the directly intended termination of pregnancy before viability or the directly intended destruction of a viable fetus. (ERDs #45) However, CHRISTUS will perform medical procedures needed to treat a pathological condition in a pregnant woman when the procedure cannot be safely postponed till viability, even if it might indirectly result in the death of an unborn child. (ERDs #47)

Regarding medical care at the end of life, the legitimate refusal of disproportionate means to preserve life, like life-sustaining treatment, must be distinguished from euthanasia. (ERDs #60) The first is an appropriate acceptance of human mortality and the limits of medical science, while the second is a direct rejection of the gift of human life. Disproportionate means are treatments or procedures that, in the patient's judgment, either offer no reasonable hope of benefit or entail an excessive burden or expense on the family or community. (ERDs #32-33, 56-59)

CHRISTUS recognizes the right and duty of each person to protect and preserve bodily and functional integrity. Direct sterilization of men or women is not permitted. (ERDs #29, 53)

INTEGRITY

Honesty, justice, and consistency in all relationships

Complying with Laws and Regulations

Complying with the many laws and regulations that govern health care is an integral aspect of operating our organization consistent with our core value of integrity. CHRISTUS endeavors to comply with legal requirements in all its business functions.

False Claims Act

We monitor for signs of false claims, such as improper billing. Associates and Health Care Providers must help in looking for signs of false claims and report concerns to Compliance or Legal.

Anti-Kickback Laws

CHRISTUS prohibits offering anything of value in order to influence an individual's decision to purchase, prescribe, recommend, or endorse a product or service reimbursed by a federal health care program (e.g.,

Medicare, Medicaid and Tricare). We never offer to pay anyone for patient referrals. Similarly, you are strictly prohibited from accepting any payments for referrals CHRISTUS makes.

Self-Referral Laws

As described in greater detail below, CHRISTUS follows the federal Stark Law and other laws that prohibit physician self-referral.

Health Insurance Portability and Accountability Act (HIPAA)

HIPAA is the primary law that governs protecting patient health information. Follow the guidelines in this Code and other CHRISTUS policies to safeguard patient information.

Excluded Persons

CHRISTUS does not contract with or do business with individuals or entities that have been excluded, debarred, suspended, or have otherwise become ineligible to participate in federally funded health care programs. You must disclose if you are under investigation for certain criminal or civil offenses for which you may become excluded, debarred, or suspended.

Credentialing

CHRISTUS requires that credentials, licenses and certifications to be maintained. We do not allow individuals with lapsed or revoked credentials to provide patient care.

Laws Specific to the Health Plans

In addition to laws that apply to CHRISTUS as a health care provider, CHRISTUS Health Plan also complies with laws specific to managed care payers. Persons or entities conducting business for the Health Plan will also receive copies of this Code and be expected to comply with these standards.

Working with Physicians and Other Referral Sources

CHRISTUS values its relationships with physicians; they are critical to the patient's healing process and fulfilling our Mission. CHRISTUS is committed to strengthening relationships with physicians while maintaining compliance with laws and regulations. Accordingly, our policies and procedures include the following practices:

- Associates and Health Care Partners who interact with physicians in leasing space, recruitment agreements, and arranging for physicians to serve in a leadership position in the facilities must comply with legal requirements governing relationships between facilities and physicians. Such arrangements must be in writing and approved by the Legal Department;

We accept patient referrals and admissions based only on the patient's needs and our ability to provide the service needed. CHRISTUS does not pay or offer to provide anything of value to anyone for referral of patients or Health Plan members;

- No CHRISTUS Associate or Health Care Partner, or any other person acting on behalf of our organization, is permitted to solicit or receive anything of value, directly or indirectly, in exchange for the referral of patients or Health Plan members; and
- CHRISTUS does not consider the volume or value of referrals that another health care provider has, or may make, to CHRISTUS when we make referrals to another party or when we consider entering into legally permissible relationships where financial remuneration is exchanged with physicians.

CHRISTUS recognizes that the relationship between providers and patients requires mutual respect, trust, honesty, and appropriate confidentiality. Ideally, providers and patients work together to further the healing process. (ERDs Part Three)

New Ventures

When considering new business affiliations, joint ventures, acquisitions, mergers, and partnerships, etc., CHRISTUS engages in a due diligence process to ensure that the new venture is compatible with the Mission, Core Values and Catholic Identity of the organization. Any major business transaction like this is governed by the moral principle of cooperation with the guidance of the Mission Integration department at the corporate office. (ERDs Part Six)

Values Based Decision-Making Process

- The Values-Based Decision Making Process is a tool to help leaders in CHRISTUS make important decisions that are aligned with our Mission and Core Values. It should be used when a department or team encounters an issue or situation in *day-to-day* operations where a number of important values are at stake, and: There seems to be no single “best” response;
- There is a recognized “difference of opinion”;
- There is uncertainty about the circumstances or the possible resolution; or
- It involves a major transaction or important decision.

Senior leaders, directors, managers, and other leaders are expected to use the Values-Based Decision Making Process when making significant decisions for CHRISTUS or their region. Contact your Mission leader for

more information about this process, or to request a facilitator to help guide decision makers through the process.

Maintaining Proper Vendor Relationships

CHRISTUS approaches consulting, subcontractor, supplier, and vendor (collectively, “Vendor”) relationships in a fair and reasonable manner, free from conflicts of interest and consistent with all applicable laws and good business practices. We select Vendors on the basis of objective criteria including quality, price, delivery, adherence to schedules, service, maintenance of adequate sources of supply, and past performance. CHRISTUS strives for appropriate confidentiality and integrity in purchasing and contracting process decisions, made on the entity’s ability to meet our needs.

Gifts with Vendors

The giving or accepting of gifts or entertainment by CHRISTUS Associates may not be taken into account in Vendor selection or continuation of Vendor relationships. CHRISTUS Associates must conduct themselves in a manner that leaves no doubt as to their integrity, impartiality, or loyalty to the best interests of CHRISTUS. Any decision to accept or give business-related gifts and entertainment should be based on prudent judgment, good stewardship, and the potential impact on the public image of CHRISTUS. No items of value may ever be given or accepted as a condition of conducting business with a Vendor, in exchange for providing or receiving preferential treatment for/from a Vendor, or in exchange for supplying or receiving confidential information to/from a Vendor.

Vendor Compliance with this Code

CHRISTUS will provide an electronic copy of this Code to all Vendors, which must acknowledge receipt and agree to comply with portions applicable to them and their services. CHRISTUS may terminate contracts with Vendors who violate this Code or applicable laws.

Non-Retaliation

A Vendor will not be retaliated against for good faith participation in the CHRISTUS Compliance program, including reporting potential issues, investigating issues, conducting self-evaluations or audits, and reporting to appropriate officials.

Avoiding Conflicts of Interest

Conflicts of interest occur when non-CHRISTUS responsibilities or loyalties affect (or appear to affect) your ability to prioritize CHRISTUS interests in carrying out your job responsibilities independently and objectively. A conflict of interest or the appearance of a conflict calls into question the legitimacy of business decisions and in some instances may be against the law. Examples of potential conflicts of interest include outside employment, personal investments, personal relationships, personal business opportunities, or community service to other organizations. Many potential conflicts of interest may be resolved in a simple and mutually acceptable way.

If you ever feel your motives may be questioned or there is an appearance of a conflict, you should disclose it and excuse yourself from making a decision regarding the conflicted issue. You must withdraw and allow others without a conflict to make decisions, for example in evaluating supply chain or vendor contracts where you or a family member have monetary interest, ownership, or employment in the potential vendor or company. Clinical decisions will be made without regard to compensation or financial risk to CHRISTUS leaders, managers, clinical staff, or licensed independent practitioners.

Depending on your role at CHRISTUS, you may be required to regularly report any actual or potential conflicts of interest by completing the CHRISTUS Conflict of Interest disclosure form. Further, any time a potential conflict develops, you must update your list of disclosures with Human Resources. If you have a question about whether an outside activity or situation presents a conflict, contact the Human Resources or Compliance Department.

To avoid conflicts of interest, Associates and Health Care Partners will:

- Conduct themselves in such a manner so that there is no occasion to distrust their integrity, impartiality, or loyalty to the best interests of CHRISTUS;
- Not solicit personal business or gratuities from patients, their families, physicians, or others doing or seeking to do business with CHRISTUS;
- Not accept cash, cash equivalents, or loans from any outside individual or entity, which does, or is seeking to do business with, or is in competition with CHRISTUS (excluding financial institutions);
- Not disclose or use CHRISTUS business information or assets for the personal gain or advantage for themselves, or others;

- Not provide payments or benefits of any kind to any Associate, physician, or health care professional or their family members in an effort to induce referrals;
- Not gain employment from any outside entity, which does, or is seeking to do business with, or is in competition with, CHRISTUS unless such employment has been approved in writing by your supervisor and will not interfere with your job responsibilities and conflict of interest policies;
- Not provide supervisory or consulting services to any outside entity that does business with, or is in competition with, CHRISTUS without the prior written approval of the Chief Executive Officer or Administrator of the facility or region or other approvals as required by CHRISTUS conflict of interest policies;
- Not knowingly compete, directly or indirectly, with CHRISTUS in the purchase or sale of real or personal property, interests, or services; and
- Not knowingly hold, directly or indirectly, a position or significant financial interest in any non-CHRISTUS business that provides goods or services to CHRISTUS or competes with CHRISTUS in providing services.

Preventing Corruption

Foreign Corrupt Practices Act Overview

The Foreign Corrupt Practices Act (FCPA) regulates U.S. companies doing business abroad. The FCPA makes it illegal for employees of U.S. companies, its subsidiaries, or agents to directly or indirectly give bribes or anything of value to a foreign government official, candidate for public office, political party or party official in order to gain an improper business advantage. The FCPA also makes it illegal to inaccurately record transactions in our records.

No Associate, or anyone acting on CHRISTUS’s behalf, shall offer, authorize, promise, or make a payment (including payment of non-monetary benefits) that is intended to improperly influence, or even appears to improperly influence, a foreign official to gain unfair business advantages. Employees of state-owned businesses are considered “foreign officials” for FCPA purposes. There is no monetary threshold—even the smallest bribe is prohibited.

To facilitate FCPA compliance, CHRISTUS performs FCPA-related due diligence reviews of foreign consultants, agents, and business partners.

Anti-Corruption and Anti-Bribery

Vendors must comply with all CHRISTUS policies on anti-corruption, anti-bribery, and anti-money laundering, including policy statements provided in this Code. No vendor acting on behalf of CHRISTUS may offer or pay, directly or indirectly, any bribe to any employee, official, or agent of any government, commercial entity, or individual in connection with the business of CHRISTUS. A bribe is anything of value offered or given with the intent to gain any improper advantage for CHRISTUS.

Vendor Obligations

The FCPA includes the behavior of agents acting on CHRISTUS's behalf. Therefore, all CHRISTUS Vendors must agree to comply with FCPA and other anti-bribery laws. No Vendors or party acting on their behalf will offer, authorize, promise, or make a payment or non-monetary benefit:

- To or for the use or benefit of any foreign government official;
- To any other person where the Vendor knows or has reason to suspect that any part of such payment will be given or paid by such other person to any foreign government official; or
- To any person where such payment violates any laws, decrees, regulations, or policies having the force of law in the country where the person is or the laws of the United States.

Vendors must not have been convicted of, pleaded guilty to, or charged with any offense involving fraud, corruption, or bribery in any jurisdiction or country. If at any time during the term of the relationship with CHRISTUS the Vendor or any affiliate is convicted of, pleads guilty to, or is charged with any offense involving fraud, corruption, or bribery in any jurisdiction or country, the Vendor must immediately notify CHRISTUS.

Vendors must immediately inform CHRISTUS if a possible violation by the Vendor of FCPA or anti-corruption related policies has taken place. Further, if any government official or any relative of a government official solicits, asks for, or attempts to extort, any money or thing of value from the Vendor on behalf of CHRISTUS, the Vendor shall refuse such solicitation, request, or extortionate demand, and immediately report the event to CHRISTUS.

Responding to Government Investigations

CHRISTUS cooperates with government investigations to the extent it is appropriate and legally permissible to do so. If you receive a written request for information from a government official, please contact your Regional General Counsel or another attorney in the Legal Department.

There may be occasions when a government investigator or agent appears at a CHRISTUS facility to execute a search warrant. Associates should cooperate with lawfully executed search warrants by asking for a copy of the warrant and contacting the Regional Compliance Officer or Regional General Counsel. Associates should never consent to a search and should limit searches to the scope of the warrant to protect sensitive patient and business information.

Government agents may ask to interview Associates. Associates are under no legal obligation to talk with agents without a subpoena, but Associates may speak with agents if they choose to do so. Associates voluntarily speaking with government agents have the right to terminate interviews at any time.

Ethics Committees

Each region has an Ethics Committee composed of Associates and Health Care Partners from that region. The committee's role is to:

- Review and approve ethics-related policies;
- Organize ethics education for Associates and Health Care Partners;
- Improve processes by integrating ethics concepts into daily work-flows;
- Provide ethics consultation on clinical and organizational issues; and
- Interact with the community on ethics-related topics.

Ethics Consult Teams

Every facility has an Ethics Consult Team which is responsible for responding to ethics consults at that location. The teams are composed of Associates and Health Care Partners who have undergone training to respond to ethics consults. Anyone may ask for an ethics consult at any time. To learn how to make an ethics consult, contact your Mission leader or a member of the Ethics Committee.

EXCELLENCE

High standards of service and performance

Providing Quality Patient Care

CHRISTUS is committed to providing our patients with safe, effective care of the highest quality in a supportive, respectful, and compassionate environment. We expect you to:

- Participate in the delivery of excellent patient care;
- Support our drive to improve quality;
- Promote evidence-based practices;
- Participate in initiatives to improve patient safety and reduce harm;
- Listen to patients;
- Practice within your scope of education, skill, and clinical privileges;
- Speak up if you have concerns, ideas, or questions related to patient quality; and
- Encourage patients to raise their concerns or questions with Patient Relations or Hospital Administration.

Achieving Accreditation

Accreditation by The Joint Commission and other accrediting bodies is an important symbol of the high level of care CHRISTUS provides. Associates and Health Care Partners should engage with representatives from accrediting agencies and external surveyors honestly and directly. On occasion, accrediting or governmental agencies may conduct surveys in our facilities. CHRISTUS responds with openness and accurate information. No action should ever be taken to directly or indirectly mislead or obstruct surveyor activities. Associates and Health Care Partners must never conceal, destroy, or alter any documents or make misleading statements to the agency representative, or attempt to cause another CHRISTUS representative to fail to provide accurate information, obstruct, or delay the communication of information or records relating to a possible violation of law.

Marketing Properly

Marketing is a tool for CHRISTUS to promote its excellent services in ways that help patients and the community learn about CHRISTUS facilities and the services they provide. CHRISTUS recognizes and respects the patient's right to effective and understandable promotional and marketing information. CHRISTUS also respects that patients have the right to HIPAA-compliant marketing, where facilities have not improperly is

closed patient information for third-party marketing purposes. In marketing its services, CHRISTUS will:

- Maintain the appropriate confidentiality and privacy of all patients, Associates, Health Care Partners, customers, and clients;
- Provide written information appropriate to the age, understanding, and language of the patient;
- Be truthful and provide information and education that is beneficial to the audience and designed to inform and not to mislead;
- Provide information based on facts that are supportable by reliable data and within applicable legal requirements;
- Not damage the reputation of another institution or system;
- Present claims that are fair and can be supported when making comparisons to competitors or competitive offerings; and
- Adhere to all marketing requirements set forth by law and regulatory agencies, including but not limited to the Affordable Care Act (ACA), the Centers for Medicare and Medicaid Services (CMS), and the Uniformed Services Family Health Plan (USFHP).

COMPASSION

Service in a spirit of empathy, love, and concern

Protecting Patient Rights

Consistent with the inherent dignity of every human being, CHRISTUS recognizes the rights of patients and treats them with respect and compassion. (ERDs Part Three) Thus, CHRISTUS is committed to the doing the following:

- We strive to provide quality care to all patients regardless of race, color, age, religion, creed, national origin, gender, sexual orientation, disability, or citizenship. You should promptly report to your supervisor any alleged or perceived abuse, neglect, harassment, or discrimination of a patient.
- We provide interpretation and translation services as needed.
- We respect each patient's cultural, psychosocial, spiritual, and personal values, beliefs, and preferences. We recognize the rights of patients and families to express these within the confines of applicable law as long as patient treatment is not interfered with and others are not harmed.
- We honor the right of patients to be involved in all aspects of their care and treatment.
- We provide spiritual care personnel – clergy, chaplains, and volunteers - to minister to the religious and spiritual needs of all those we serve,

including the availability of sacraments for those who request them. The “Standards of Excellence for Spiritual Care” clarify the role and purpose of the provision of spiritual care within the system. The Standards also serve to provide structure, direction, and content that foster consistency and excellence. CHRISTUS requires spiritual care associates to have appropriate professional preparation and credentials. (ERDs Part Two, #10-22)

- We respect the special needs of dying patients. We have policies and procedures for patients to withhold or withdraw life-sustaining treatment and disproportionate means, and to provide comfort during the dying process. (ERDs #32-33, 56-59) The Regional Ethics Committee and Ethics Consult Team at each facility is available to provide education and ethics consults related to ethical concerns that arise in end-of-life care. (ERDs # 37)

CHRISTUS recognizes that patients have the right to receive a treatment or service as long as that service is within the defined services of the facility, is medically appropriate or within the standard of care, and is not contrary to the Catholic moral tradition. If CHRISTUS cannot treat provide a treatment because it does not meet these criteria, CHRISTUS has policies and mechanisms to arrange for the prompt and safe transfer of patients consistent with regulatory requirements. In these instances, CHRISTUS:

- Ensures that patients are never transferred based on their inability to pay for the services, but due to the local facility’s inability to provide the type and quality of care required by the patient’s wishes, condition, or diagnosis; and
- Obtains informed consent from the patient or surrogate decision maker, and involves the attending physician in transfer decisions.

Handling Patient Grievances

CHRISTUS informs patients, families, surrogate decision maker, Associates, and Health Care Partners about the complaint resolution process, and responds to such concerns from patients and their families when brought to its attention.

- Formal processes for addressing grievances and resolving conflicts are available.
- CHRISTUS also informs patients about their right to file a complaint with federal and state authorities.
- Patients can freely voice complaints and recommend changes without being subject to coercion, discrimination, reprisal, or interruption of care, treatment, or services.

Safeguarding Protected Health Information

We collect information about the patient's medical condition, history, medication, and family illnesses in order to provide the highest quality care. CHRISTUS understands the sensitive nature of both protected health information and personally identifiable information. We are committed to maintaining the security and confidentiality of this information.

Consistent with HIPAA, we do not use, disclose, or discuss patient-specific information, including patient financial information, with others unless it is necessary to serve the patient or required by law. With the exception of emergencies, patient information will be released only to persons authorized by law or by the patient's written authorization, consistent with HIPAA and the CHRISTUS Health Notice of Privacy Practices (NPP).

As a CHRISTUS Associate or Health Care Partner, you will:

- Only access protected health information when required to complete your job responsibilities.
- Keep all log-in information and passwords confidential and secure.
- Properly store PHI -- not transmit it to vendors or other parties over unsecure channels (such as unsecure emails, Google drive, or other unapproved methods). Contact IM Security if you have a business need to transmit a large data file.

Protecting Research Participants

Research is an important part of modern health care, and CHRISTUS supports scientifically meritorious research that may benefit our patients and communities. Associates and Health Care Partners conducting research should protect the rights of research participants, and uphold the highest ethical, scientific, and medical standards in all clinical research activities.

CHRISTUS does not tolerate research misconduct, which includes issues such as failing to identify and manage investigator/institutional conflicts of interest, proceeding without Institutional Review Board approval, falsifying results, or copying results from other studies without performing the investigation. As in all record-keeping, our policy is to only submit accurate and complete records, including costs, related to research and grant activities.

CHRISTUS reviews all protocols in relation to its Mission and Core Values and the Institutional Review Board weighs the relative risks and benefits to the research subjects. Individuals who are offered the oppor-

tunity to participate in a research project or clinical trial are fully informed of the following:

- Potential discomforts, risks, and expected benefits of the research;
- Alternative services that might be beneficial to them;
- The procedures to be followed, in particular, those that are experimental in nature;
- Refusal to participate in or voluntarily withdraw from a study does not compromise the patients' access to services or other benefits to which they are otherwise entitled;
- The extent to which personally identifiable private information will be held in confidence or disclosed as part of the research study; and
- The need for follow-up after completion of the project or trial.

CHRISTUS obtains informed consent from all participants before the subject starts participation.

Using Social Media and Photography

CHRISTUS will obtain written authorization from patients for any recording or filming that will be disclosed to individuals for purposes other than treatment, payment, or health care operations. Associates will not take pictures of patients on personal devices.

Social media can play an important role in our personal and professional lives. As a representative of CHRISTUS, you are encouraged and expected to use discretion and care when sharing content, opinions and experiences on social media and other internet forums. In general:

- Be truthful, accurate, professional, and respectful;
- Follow copyright laws;
- Do not disclose proprietary information about CHRISTUS;
- Refer all media inquiries and opportunities to the System Communications/Marketing team;
- Do not post patient information or photographs, even if the patient is not identified, without the patient's written permission.

There may be specific requirements for CHRISTUS-sponsored electronic and social media materials. Associates should obtain approval before posting content related to CHRISTUS products and services.

CHRISTUS recognizes and respects Associates' rights to freely communicate with one another about benefits and terms and conditions of employment, including on social media platforms. Refer to the Human Resources Policy on Social Media for additional information.

STEWARDSHIP

Wise and just use of talents and resources in a collaborative manner

Complying with Billing and Coding Requirements

As a CHRISTUS Associate or Health Care Partner, you must document business activity accurately and completely and protect the confidentiality of CHRISTUS and patient information. In addition, you will:

- Prepare and maintain data, records, and reports of the patient and the organization accurately and truthfully, and adhere to applicable standards in maintaining all records;
- Provide patients with advance information, where possible, about charges for which they will be responsible;
- Submit claims for payment or reimbursement only for services that were actually provided and medically necessary while avoiding false, fraudulent, or incorrect claim submission;
- Cooperate with an established auditing and monitoring function to validate accuracy of claims submission;
- Make sure that all submitted claims are properly coded and documented, and filed according to all applicable laws and regulations. We do not submit claims that are exaggerated or fictitious;
- Respond promptly to concerns and review potential errors, and once quantified, submit timely correction of identified errors;
- Engage in respectful and honest dialogue with governmental agencies, commercial payers and patients;
- Engage contractors who demonstrate appropriate skills, quality control processes, and systems to ensure accurate completion of assigned duties to facilitate accurate cost report completion and submission;
- File on time, complete and accurate external reports. These include cost reports, tax reports, plans of correction, and reports to private accrediting entities such as The Joint Commission.

If you notice an error in a claim or report, you should fix it before it is submitted. If you are unsure how to proceed, ask a manager or your Regional Compliance Officer for help.

Keeping Accurate Business Records

We make every effort to protect our patients' and CHRISTUS's reputation. We work hard to make patient medical records clear, complete, and reflective of the care received by the patient. Likewise, we treat with care organizational documents such as claims and financial statements. When we sign our names to a document, we are confirming that document is

true and correct, to the best of our knowledge. You shall not sign other people's names or use their passwords.

CHRISTUS documents, both medical and business, are retained in accordance with the law and our record retention policy. No one may remove or destroy records prior to the specified date without first obtaining permission from the Legal Department.

Using Our Resources

CHRISTUS is committed to being a good steward of our resources, including financial resources, equipment, electronic systems, supplies, and information.

- You may use CHRISTUS resources only for CHRISTUS business purposes, consistent with relevant policies and procedures.
- You must correctly use and care for all CHRISTUS property and equipment entrusted to you.
- You must maintain inventories and keep all supplies secure, consistent with relevant policies.
- You will dispose of surplus or obsolete items according to relevant policies and procedures.

All CHRISTUS communications systems, including computers, email, intranet and internet access, telephones, and voicemail are to be used for business purposes, in accordance with our Information Management policies and procedures. Users may assume these communication tools are not private, and CHRISTUS reserves the right to monitor and/or access content consistent with our policies.

Protecting Confidential and Proprietary Information

CHRISTUS's confidential and proprietary information is another asset that we must safeguard and secure to be a good steward of resources. Confidential information means any information that is not publicly known or is restricted to a limited audience. Examples of CHRISTUS's confidential information include: personnel information, patient lists, vendor pricing or contract terms, research data, intellectual property, financial information, and legal/business records.

Do not disclose CHRISTUS's confidential information in casual conversations or in public places. Only share confidential or sensitive information with those who have a legitimate and lawful need to know. If you are unsure of whether a request is legitimate, ask your supervisor or the Legal Department. Contact the Legal Department to put a non-disclosure agreement in place with vendors or other third parties when appropriate.

Investing Responsibly

Being a good manager of our invested funds is an important part of our core value of stewardship. CHRISTUS Treasury and other leaders engage in prudent investment strategies. In addition, CHRISTUS has a responsibility to use its assets to promote health and human dignity. Therefore, CHRISTUS has adopted policies to direct its investment managers to invest assets in an ethical and socially responsible manner.

Responding to the Call

Catholic health care is an answer to the call of Jesus to serve the sick, suffering, and dying, especially those who are poor or vulnerable. This vocation is founded on a commitment to promote and defend the human dignity of all people we encounter. The Associates and Health Care Partners of CHRISTUS continue this work in the communities we serve. Our Mission and Core Values provide a foundation and direction for our work as we care for our brothers and sisters who come to us in need.



OUR NAME AND SYMBOL

In 1999, the Congregations of the Sisters of Charity of the Incarnate Word of Houston and of San Antonio consolidated their U.S. and International health systems to create CHRISTUS Health. The name “CHRISTUS” comes from the Latin word for “Christ” and proclaims publicly the core of our mission, *“to extend the healing ministry of Jesus Christ.”* It also exemplifies the heritage and spirituality of our three Sponsoring Congregations who recognize Jesus Christ as the Incarnate Word; the love of God made flesh and sent to live among us. Our logo is a cross which combines both the medical and religious meanings for that symbol. Purple is a color of resurrection and the royalty of Christ while the flowing banner reaffirms our hope in new life and our commitment to progress and move forward in our service to our communities.

www.christushealth.org

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