



Guided by Our Values

Code of Conduct



Every day we are faced with making decisions — some more difficult than others. At Allina Health, we are guided by our mission, vision and values and are committed to doing the right thing each and every time we make a decision. Our values are key to all we do, whether we are interacting internally with our patients and co-workers, or externally with vendors, government agencies or payer sources.

With each decision, we need to ask ourselves...when we are living our mission, vision, and values, what would we do? And as members of our Allina Health community, we support each other by asking for and receiving feedback on decisions to ensure we continue to live out our mission.

The Allina Health Code of Conduct is your guide for doing the right thing. It applies to every person who represents us: employees, providers, officers, board members, volunteers, temporary staff, consultants, residents and students.

Thank you for the great work you do every day to ensure we remain committed and steadfast to our mission and our values. By doing so, you contribute to our culture where we do the right thing, each and every time.

Lisa Shannon

President and CEO



We make choices about how to conduct ourselves each day. The practice of behaving honestly, ethically and with integrity is a responsibility we all have, which impacts our patients, co-workers and community.

You have an obligation to comply with the standards outlined in this document and also to report any known or suspected violations of the Code of Conduct. If you are faced with making a decision and you are unsure of what the ethical and/or legal thing to do is, there are people and resources to help you that are outlined in this guide.

It is our commitment to the Code of Conduct standards that allows Allina Health to continue our mission to serve our communities. Thank you for helping us uphold our values in all that you do!

Kimberly Jordan

Chief Compliance and Audit Officer



Mission

We serve our communities by providing exceptional care, as we prevent illness, restore health and provide comfort to all who entrust us with their care.

Values

Integrity

We match our actions with our words.

Respect

We treat everyone with honor, dignity and courtesy.

Trust

We act in the best interests of our patients, physicians, communities and one another.

Compassion

We create a caring environment for our patients and one another.

Stewardship

We use our resources wisely.

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Overview

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Purpose and relationship to Allina Health's Mission and Values and organizational policies

Allina Health is committed to creating a working environment in which every staff member lives Allina Health's values in everyday decisions and actions. The standards in this Code of Conduct are an extension of our organization's mission, values and Our Commitment to Care.

The Code of Conduct describes how staff are expected to demonstrate these values in their relationships with patients, co-workers, the organization, the government, vendors, competitors and the community.

The Code of Conduct is intended to provide an overview of expected conduct but it is not your only resource. Review Allina Health's policies and procedures for additional information on the topics covered in this Code of Conduct.

Allina Health's Compliance Program

The Code of Conduct, along with the organization's policies and procedures, is an integral part of Allina Health's Compliance Program. More information can be found on the **Compliance Department's AKN page**.



Application

This Code of Conduct applies to the following groups in all divisions, operating units, departments and subsidiaries of Allina Health:

- employees
- volunteers
- temporary employees
- contractors
- board members
- vendors
- medical and professional staff
- interns
- students

Your responsibilities

You have a responsibility to read and be familiar with this Code of Conduct and related policies and procedures. In addition, you are responsible to:

- be aware of and follow the policies and procedures related to your work;
- promptly report any concern of a known or suspected violation of Allina Health's Code of Conduct (further information described in the How to report a concern section); and
- participate upon request in Allina Health's workplace investigations with full honesty, integrity and candor.

Special role of leaders

If you are a leader, you have additional responsibilities to:

- set an example of ethical conduct;
- foster a culture of integrity and compliance;
- foster a culture where your team members are comfortable asking questions;
- appropriately and timely respond to your team's questions relating to ethical conduct and assist staff in obtaining additional resources to resolve questions;
- ensure your team has access to and receives proper training and guidance on the standards contained in the Code of Conduct;
- ensure your team understands their responsibilities under the Code of Conduct and related policies and procedures;
- promptly address violations of the Code of Conduct; and
- address questions or concerns raised and do not retaliate against those bringing issues forward.

DISCIPLINE FOR VIOLATIONS

At Allina Health, you are expected to follow the standards as outlined in this Code of Conduct at all times. If you violate these standards, you may be subject to corrective action up to, and including termination and if appropriate, referral to local, state or federal law enforcement agencies. Specific disciplinary measures will be determined in accordance with policies or for union members, applicable collective bargaining agreements.

If you have a concern of known or suspected non-compliance, you are responsible to report it. You are strongly encouraged to first speak with your supervisor or manager about your concern. You may also contact the Compliance Department.

Patient Care

High-Reliability Organization – Our Commitment to Care:
Working Together for Safe and Reliable Care

Non-discrimination

Patient rights

Confidentiality of patient information

Research

Inducement

High-Reliability Organization – Our Commitment to Care: Working Together for Safe and Reliable Care

The work we do is profound and distinguishes us, it is the small things we do every day that define us.

When everyone consistently demonstrates Our Commitment to Care in interactions with patients and each other, we fulfill Our Promise and deliver an exceptional experience in which the safety of our patients and employees is ensured.

I build trusting relationships by

- offering a smile and a friendly greeting
- introducing the team and explaining their roles
- actively listening and responding with empathy
- assuming that everyone is acting with the best intentions
- encouraging you to ask questions and giving you answers.

I build a consistent and reliable environment for care

...with my attitude by

- thinking of safety first
- being prepared
- focusing on what I'm doing
- having a questioning attitude

...with my communications by

- sharing information in a way you can understand
- keeping you informed and setting clear expectations
- communicating with colleagues to ensure seamless transitions
- speaking up when things don't seem right

...with my consistency by

- following standard procedures to keep you safe
- building and practicing safe habits
- speaking up if policies and procedures are not followed.

Non-discrimination

We are committed to fostering an inclusive culture ensuring employees work together with colleagues, partners, patients, and their family members. We do not discriminate, exclude or treat people differently based on race, color, creed, religion, national origin, age, sex, disability, sexual orientation, gender identity, marital status, veteran status, or any other classification protected by federal, state or local law.

Following these inclusion and non-discrimination practices in every interaction with our patients and with each other is essential to providing exceptional care to all those we serve.

Whenever possible, we honor and provide for the cultural, religious, language or other needs of patients and families. We also provide free aids and services to patients with visual and hearing impairments. In addition, we provide free translation and interpretation services to patients whose primary language is not English.

Patient rights

Upon admission, we provide our patients with information regarding their rights as patients. You are responsible for upholding these rights, including, but not limited to, the right of patients to participate in their plans of care, be free of harm and to file a grievance should they feel their rights were violated.

Confidentiality of patient information

Patients trust us to retain the confidentiality and privacy of their personal information. We are obligated to maintain the privacy of our patients by state and federal health information privacy laws. This means you should access only the patient health information needed to do your job. Additionally, you should share patient health information only with individuals who need to receive such information, such as co-workers directly involved in the patient's care.

Research

The research Allina Health conducts helps advance the care of our patients. We must protect the health information and rights of research participants. This applies to the research of human subjects involving Allina Health staff, facilities, patients or data. All research conducted at an Allina Health facility or by Allina Health staff or agents must follow applicable policies and procedures and may require prior approval.

Inducement

Patient care decisions must be guided by our patients' needs, preferences and values. Allina Health does not give any special incentives or gifts to patients that are likely to influence them to use a particular provider, practitioner or supplier. There are specific exceptions to this regulation.

Business and Workplace Ethics

Respectful workplace

Fraud, waste and abuse

Compensation and reimbursement documentation

Business records

Use of Allina Health resources

Confidentiality of Allina Health business information

Conflicts of interest

Vendor relations

Physician Agreements, transactions and referrals

Protecting the environment

Respectful workplace

Allina Health is committed to providing equal employment opportunity to all qualified individuals, regardless of their: race, color, creed, religion, national origin, sex, sexual orientation, gender identity, disability, age, marital or familial status, covered veteran status or status with regard to public assistance. We do not tolerate any form of harassment or unwelcome conduct that creates an offensive, hostile or intimidating environment.

To fulfill our commitment, we rely on you to perform your work responsibly and professionally, treat colleagues in a way that upholds our mission and values, and to report it immediately if you believe you have been the subject of discrimination or harassment, or have witnessed or become aware of such an incident.

Fraud, waste and abuse

We are dedicated to preventing, detecting and reporting all fraud, waste and abuse. We expect that employees:

- submit claims to the government, insurance companies, or others that accurately reflect services provided;
- enter into contracts that provide for payments to others that represent fair market value;
- disclose and make necessary repayments of overpayments; and
- maintain accurate and complete records.



Compensation and reimbursement documentation

You are responsible for accurately documenting your time worked and paid time off. Additionally, you are responsible to ensure that your requests for reimbursement for business-related expenses are appropriate, reasonable and documented appropriately. If you knowingly submit inaccurate timecards or expense reports you will be subject to disciplinary action.

Business records

Allina Health is committed to maintaining accurate documentation for all business reporting and record keeping. All documentation you create and maintain in business reports and records must be accurate. This includes, but is not limited to:

- expense reports
- cost reports
- research reports
- accounting records
- legal records
- compliance records
- financial records



Knowingly falsifying business reports and records is a violation of this Code of Conduct and may constitute fraud and you will be subject to disciplinary action. In addition, retaining documents for the periods required by law and Allina Health's retention policy is required.

Use of Allina Health resources

Allina Health's resources, including supplies, staff time and talent, technology, internet access and financial resources are intended to facilitate the performance of company work. With the exception of reasonable, minimal personal use, you should use company resources for business purposes only.

Confidentiality of Allina Health business information

You may not use or disclose confidential Allina Health information except as necessary for the performance of job-related duties. Confidential information is defined as information that is not available to the public, including but not limited to:

- information systems
- marketing strategies
- operational details
- safety and quality review information
- strategic business plans
- financial and pricing information

This requirement applies even after your employment or work assignment with Allina Health ends.

Conflicts of interest

You have a duty at all times to conduct the business of Allina Health in an impartial and unbiased manner and in the best interest of Allina Health. Any outside business activities that interfere with your ability to fulfill your responsibilities to Allina Health can be harmful to your performance, your coworkers, patients and the organization. A conflict of interest exists when you have a financial or any other professional or personal relationship or interest that makes it difficult for you to exercise independent judgment or act in Allina Health's best interests.



When you have a relationship or interest that might create a conflict of interest, you must discuss it with a manager or supervisor to make sure that relationship or interest does not interfere with your ability to exercise independent judgment. You are required to disclose potential conflicts of interest and follow any plan put in place to manage the potential conflict.

Vendor relations

You are expected to work in the best interests of our patients and Allina Health when doing business with others. Decisions and actions you take must be based on the needs of the patients, families, the organization and the community we serve. Therefore, you may not offer, solicit, or accept gifts or entertainment that would, or would appear to, influence your decisions on behalf of Allina Health.

Unsolicited gifts of less than \$50 may be accepted from Non-Health Industry Vendors. These gifts may not be Cash, Gift Cards or other Cash Equivalents of any value. You may not accept a gift of any value from a Health Industry Vendor.



Physician agreements, transactions and referrals

Allina Health structures its transactions with physicians to comply with federal Anti-Kickback and Stark Laws. Under these laws, Allina Health is prohibited from paying for referrals or receiving anything in exchange for referrals. You should not solicit, offer, or accept anything in return for patient referrals or negotiate an arrangement that involves the exchange of value for patient referrals. You should reference the Allina Health Legal Department AKN page and consult with the Allina Health Legal Department if you are negotiating an arrangement with a physician, physician group, or other provider that makes referrals to Allina Health.

Protecting the environment

Allina Health is committed to protecting the health and safety of its patients, visitors and employees. You are expected to respect the environment and strive to conserve natural resources in your role at Allina Health by using and disposing of resources safely, appropriately and efficiently. This helps promote the health of our community and the environment.

Government Interactions

Interactions with government

Political activity

Excluded provider

Interactions with government

If you are approached by a government investigator or receive a subpoena or other request for information related to an investigation of Allina Health or its business practices, you should contact the Allina Health Legal & Risk Services department or Compliance department. You are expected to cooperate with Allina Health to respond in any investigation and you are expected to tell the truth. Failure to tell the truth may itself constitute a violation of the law. Under no circumstances should you attempt to hide evidence or to destroy or alter any documents or other evidence.

Political activity

Allina Health supports you personally contributing to, and participating in, political organizations or campaigns as an individual as long as you use your own money, time and resources. You should not use Allina Health resources to personally support a particular political candidate, party, organization or committee. However, if you would like to support legislative initiatives that are important to Allina Health's patients, employees and communities, you are welcome to do so through Allina Health's Policy Action Network.

Excluded provider

Allina Health makes reasonable efforts to determine the eligibility of all Allina Health employees, Vendors, and Affiliated Parties to participate in Federal and State Health Care Programs and all non-government health care programs. Should you become excluded from participation in Federal or State Health Care programs immediately notify your supervisor.

If you have a concern of known or suspected non-compliance, you are responsible to report it. You are strongly encouraged to first speak with your supervisor or manager about your concern. You may also contact the Compliance Department.

Resources

Where to go with questions

How to report a concern

Non-retaliation

Where to go with questions

Allina Health's policies and procedures provide additional, detailed information about conduct expectations and requirements. Many of these policies are available in your department, through Human Resources or on the AKN. If you need assistance finding a policy or if you have questions not answered in the available policies, contact your leader or Human Resources at **612-262-4688** for assistance.

How to report a concern

If you have a concern of known or suspected non-compliance, you have an obligation to report it. You are strongly encouraged to first speak with your supervisor or manager about your concern. Another option is contacting Allina Health's Integrity Line at **1-800-472-9301**.

The Integrity Line is a 24-hour telephone resource managed by Compliance Line a third-party vendor. Reports to the Integrity Line may be made anonymously.



Non-retaliation

Allina Health is committed to creating an environment that encourages and protects those who report unethical behavior, illegal activity or policy violations. You will not be retaliated against because you, in good faith, report unethical behavior or violations of law, regulations, or company policy. This means that Allina Health will not take any adverse employment action against you or any associated third parties for calling attention to illegal or unethical acts involving Allina Health. Examples include:

- Health care billing compliance concerns
- Health care quality or safety concerns
- Workplace concerns, such as harassment or discrimination

See the Non-Retaliations Policy in Workday for additional information.



Allina Health

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