

# Guided by Our Values

Code of Conduct





*Every day, we make choices about how to conduct ourselves. The practice of behaving honestly, ethically and with integrity is an individual responsibility. This Code of Conduct is a resource to ensure you understand what is expected of you and all those who represent our organization. These standards ensure that Allina Health and everyone who represents us works respectfully, lawfully and with integrity.*

*The Allina Health Code of Conduct is your guide for doing the right thing. It applies to every person who represents us: employees, physicians, 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.*

A handwritten signature in black ink that reads "Penny Wheeler". The signature is fluid and cursive, with a large initial "P".

**Penny Wheeler, MD**  
President and CEO



*Every day we are faced with making decisions — some are 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. The standards in this Code of Conduct are an extension of our values and are intended to provide a framework of the expectations for how to conduct yourself in an ethical and legal way in your role at Allina Health.*

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

A handwritten signature in black ink that reads "Kate Tarvestad". The signature is written in a cursive style.

**Kate Tarvestad**

Sr. Vice President and Chief Compliance 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.

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# Values

## Integrity

We match our actions with our words.

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## Respect

We treat everyone with honor, dignity and courtesy.

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## Trust

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

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## Compassion

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

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## Stewardship

We use our resources wisely.

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# Table of Contents

## 6 Overview

Purpose and relationship to Allina Health's Mission and Values and organizational policies  
Allina Health's Integrity & Compliance Program  
Application  
Your responsibilities  
Special role of leaders  
Discipline for violations

## 10 Patient care

Non-discrimination  
Patient rights  
Confidentiality of patient information  
Research  
Inducement

## 14 Business and workplace ethics

Fraud, waste and abuse  
Compensation and reimbursement documentation  
Business records  
Use of Allina Health resources  
Respectful workplace  
Confidentiality of Allina Health business information  
Conflicts of interest  
Vendor relations  
Physician transactions and referrals  
Protecting the environment

## 22 Government interactions

Interactions with government  
Political activity

## 24 Resources

Where to go with questions  
How to report a concern  
Non-retaliation

# Overview

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

Allina Health's Integrity & Compliance Program

Application

Your responsibilities

Special role of leaders

Discipline for violations

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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 set forth in this Code of Conduct are an extension of our organization's values and describe 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. Please review Allina Health's policies and procedures for additional, detailed information on the topics covered in this Code of Conduct.

## Allina Health's Integrity & Compliance Program

The Code of Conduct, along with the organization's policies and procedures, is an integral part of Allina Health's Integrity & Compliance Program. More information on the Integrity & Compliance Program can be found on the **Integrity & Compliance Department's homepage** on the Allina Health Knowledge Network (AKN). If you have questions about the Integrity & Compliance Program, please contact the Integrity & Compliance Department at **612-262-4900**.

## Application

This Code of Conduct applies to all Allina Health employees as well as volunteers, temporary employees and contractors, vendors and others as identified by Allina Health's Board of Directors. It applies to these individuals in all divisions, operating units, departments and subsidiaries of Allina Health.

## 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;
- listen to and respect questions and concerns raised by your colleagues;
- promptly seek guidance when you have a question or concern; and
- 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).

## 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;

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- 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.

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## DISCIPLINE FOR VIOLATIONS

*At Allina Health, you are expected to follow the standards set forth in this Code of Conduct at all times. If you knowingly violate these standards, you may be subject to corrective action. 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 Integrity & Compliance Department at **612-262-4900**.

# Patient Care

Non-discrimination

Patient rights

Confidentiality of patient information

Research

Inducement

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## Non-discrimination

We are committed to fostering an inclusive culture and to ensuring employees work collaboratively with colleagues and partners and with our patients and their family members. We do not discriminate, exclude or treat people differently on the basis of 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 and 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 maltreatment and to file a grievance should they feel they their rights were violated.

## **Confidentiality of patient information**

People entrust us to retain the confidentiality and privacy of their personal information. Not only is it the right thing to do, 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 to the extent needed and only with individuals who are authorized to receive such information.

## **Research**

The research Allina Health conducts helps advance the care of our patients. It is essential we protect the health information and rights of research participants. This applies to 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

It is essential that patient care decisions are guided by our patients' needs, preferences and values. To this end, Allina Health does not offer or give any special incentives to patients that is likely to influence them to use a particular provider, practitioner or supplier. There are specific exceptions to this regulation. Please contact the Integrity & Compliance Department for guidance.

# Business and Workplace Ethics

Fraud, waste and abuse

Compensation and reimbursement documentation

Business records

Use of Allina Health resources

Respectful workplace

Confidentiality of Allina Health business information

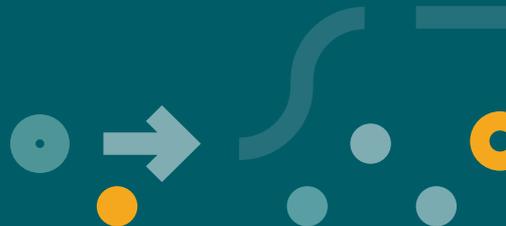
Conflicts of interest

Vendor relations

Physician transactions and referrals

Protecting the environment

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## Fraud, waste and abuse

We are dedicated to serving our communities and, are committed to preventing, detecting and reporting health care fraud, waste and abuse. There are a number of federal and state false claims laws in place to prevent health care providers from defrauding the government or abusing government resources (see Allina Health's False Claims Act policy for specific information on federal and state false claims laws). 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 up to, and including, termination and if appropriate, referral to local, state or federal law enforcement agencies.

## **Business records**

Allina Health is committed to maintaining accurate documentation in all business reporting and record-keeping and retaining documents for the retention periods required by law and Allina Health's retention policy. All documentation you create and maintain in business reports and records must be accurate. This includes, but is not limited to, expense reports, costs reports, financial reports, research reports and accounting, financial, legal and compliance records. Knowingly falsifying business reports and records is a violation of this Code of Conduct and may constitute fraud. If you improperly or fraudulently document business reports and records you will be subject to disciplinary action.

## **Use of Allina Health resources**

Allina Health's resources, including supplies, staff time and talent, technology 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.

A decorative graphic in the top right corner of the page. It features a teal background with a yellow circle at the top right. Below it, there are three teal circles of varying sizes and a light blue arrow pointing upwards. A light blue curved line also originates from the top right and points towards the arrow.

## 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.

## **Confidentiality of Allina Health business information**

You may not use or disclose confidential information that you learn or gain access to as a result of your employment or relationship with Allina Health, except as necessary for the performance of job-related duties. Confidential information is information that is not available to the public, including but not limited to Allina Health's information systems, marketing strategies, operational details, strategic business plans and 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 in Allina Health's best interest. You are required to cooperate with the Audit and Compliance Committee of the Board of Directors, or the General Counsel and the Chief Compliance Officer as the committee's designees, in the administration of Allina Health's conflict of interest disclosure process.

## 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.

## Physician 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 refer to 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

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## 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 Integrity & 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.

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 Integrity & Compliance Department at **612-262-4900**.

# Resources

Where to go with questions

How to report a concern

Non-retaliation

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## 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, Human Resources at **612-262-4688** or the Integrity & Compliance Department at **612-262-4900** 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. You may also contact the Integrity & Compliance Department at **612-262-4900**. 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 a third-party vendor. Reports to the Integrity Line may be made anonymously unless you give authorization for your name to be used. The third-party vendor sends a report to Allina Health regarding each call it receives and Allina Health then conducts any necessary investigations.



## **Non-retaliation**

Allina Health prohibits retaliation or discrimination against individuals who report known or suspected known violations of the Code of Conduct and/or federal or state law or regulation, or situations in which the quality of care provided by a health care facility or provider violates established standards and poses a potential risk to public health or safety. Federal law also protects staff from retaliation and discrimination in the terms and conditions of their employment based on lawful acts of the staff done in furtherance of a federal false claims action.



**HUMAN RESOURCES**

**612-262-4688**

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**INTEGRITY & COMPLIANCE**

**DEPARTMENT 612-262-4900**

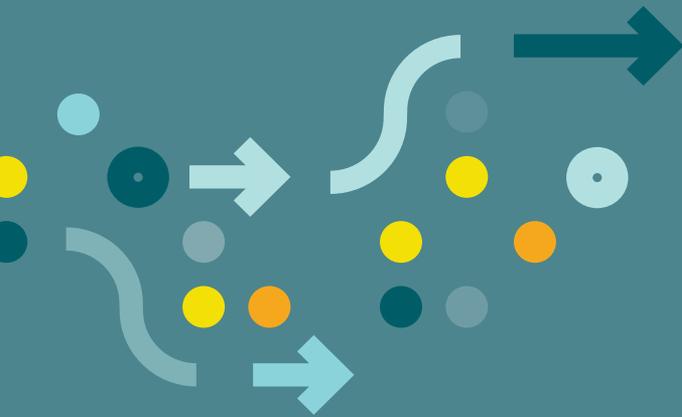
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**ALLINA HEALTH 24-HR INTEGRITY LINE**

**1-800-472-9301**

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If you have any questions or are not sure what the right thing to do is, ask for guidance! You can contact the Integrity & Compliance Department at [corporatecompliance@allina.com](mailto:corporatecompliance@allina.com) with any compliance questions.



Allina Health

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[allinahealth.org](http://allinahealth.org)