INTRODUCTION

Ellis Medicine is committed to the provision of quality healthcare in a lawful and ethical manner and that all covered parties will be treated courteously, respectfully, and with dignity. This Code of Conduct is intended for covered parties to affirm that open, honest communication internally and with external parties is expected and that violations of legal, behavioral or ethical norms are not tolerated.

The Organizational Code of Conduct is a vital tool in promoting and achieving our mission, vision and values (1249).

“Mission: To meet the health and wellness needs of our community with excellence.”

“Vision: To provide world class health care by providing patient centered care and collaborating with our physicians; by striving for results in the top 10% of available national comparative data bases by 2017.”

“Values
• Integrity: In all we do, be transparent in our actions, respect all confidences and treat all with dignity and respect.
  Safety: Ensure our patients, visitors, and staffs are kept safe at all times.
• Compassion: Demonstrate empathy towards our patients, reinforce that we care for them as individuals and make them feel like they are the only patient in the world.
• Excellence: (i) Provide superior care and exceptional service to our patients, visitors, and medical and hospital colleagues and (ii) continue to develop our skills and knowledge at a level to assure excellence in all we do.
• Stewardship: Carefully use the resources of equipment, materials and time that the community has entrusted to us to take care of them.”

This Code of Conduct applies to all members of the Ellis Medicine organization including but not limited to Trustees, Administration, Medical Staff, employees, volunteers, contractors and vendors. All of which will be referred to throughout this document as “covered parties”.

This policy recognizes that safety and quality thrive in an open and honest environment that supports working in teams and respecting other people, regardless of their position in the organization. In
recognition of the crucial need to maintain high quality and safe patient care, any behavior which could be reasonably inferred to undermine a culture of safety is unacceptable and can result in disciplinary action up to and including termination.

**POLICY STATEMENT**

It is the policy of Ellis Medicine, and those acting on the Organization’s behalf (agents of the organization) to conduct business and work together in a professional, cooperative, ethical and legal manner for the well-being of the patient.

**PURPOSE OF POLICY**

This policy is intended to provide standards by which covered parties of Ellis Medicine will conduct themselves in order to protect and promote organization-wide integrity and to enhance the ability of Ellis Medicine to achieve the organizational mission. The Code of Conduct contains Principles articulating the policy of Ellis Medicine and Standards which are intended to provide additional guidance to persons functioning in managerial or administrative capacities and to all covered parties of Ellis Medicine. Although, this policy is not intended to cover every possible situation that may occur it is a sound foundation of the expected behaviors that will guide every member of the Ellis Medicine team in making the correct choices.

**SCOPE**

Applies to all Ellis Medicine covered parties and others deemed appropriate by Senior Management, or the Board of Trustees.

**General Conduct Principles and Standards**

**Honesty, Integrity and Working Together**

Ellis Medicine strives for all relationships to be open and honest. Honesty is being forthcoming and truthful when interacting with others and ourselves. It ensures sincerity in our relationships both internally and externally. In that respect covered parties must conduct all personal and professional activities with honesty, integrity, respect, fairness, and good faith. Covered parties exercise due care in all matters relating to the discharge of duties and responsibilities.

Ellis recognizes that safety and quality of patient care is dependent on TEAMWORK, respect, open communication, and a collaborative work environment where all team members are accountable for modeling desirable behavior. Adherence to desirable behaviors will be enforced consistently and equitably among all, regardless of their position in the organization.

Covered parties must interact respectfully with each other and avoid actions and conduct that may be considered as unprofessional behavior. The inability to work with others and engaging in behavior that undermines a culture of safety is a sufficient basis for instituting (1) hospital employee disciplinary policies, including policy 3452- Work Rules and Disciplinary Actions or (2) Medical-Dental Staff review of and appointees actions related to appointment status (consistent with policy 6246- Medical – Dental Staff Conduct) within the hospital.

**Desirable Behavior Code of Conduct**

**Appearance**

- Dress professionally and appropriately for your job.
- Practice good personal hygiene, including hand hygiene, washing your hands before and after
entering the patient’s room/with contact.

- Wear your unadorned ID badge, easily visible at chest level.
- No head wear with the exception of that for professional, religious or medical reasons.
- Spacers, plugs, ear gauging, and facial/tongue piercings are prohibited. Pierced earrings or other such forms of jewelry may only be worn in moderation in the ear lobe, eyebrows and nasal cavities. Piercings may not be visible in other facial areas including but not limited to lips and tongues. Gauges of any size are not permitted. “Retainers” or clear earrings intended to maintain the pierced hole are acceptable, if necessary.
- Tattoos may be visible if the images or words do not convey violence, discrimination, profanity or sexually explicit content. Tattoos containing such messages must be covered with bandages, clothing or cosmetics.

Ownership
- Treat our customers like family.
- We are all responsible for service recovery: listen, apologize and resolve.
- Accept and enthusiastically perform the responsibilities of your job.
- Follow up. Close the loop. Complete the task.
- Keep Ellis Medicine clean and safe.
- Act like an owner, using company resources as if they were your own.
- Be a team player. “That’s not my job” is not in our vocabulary.

Communication
- Smile and use eye contact.
- Use a quiet voice, be aware of noise levels.
- AIDET – Acknowledge, Introduce, Duration, Expectation, Thank you.
- Provide for patient privacy and confidentiality.
- Communicate in a manner appropriate to the receiver understands.
- Use proper phone etiquette, “Good morning. This is John in the Emergency Department. How may I help you?”
- Listen without interrupting.

Respect
- Show compassion and be kind.
- Facilitate a healing environment.
- Use courtesy titles (Dr. Mr. Mrs., etc.)
- Realize that differences in culture/diversity exist.
- Manage up.
- Take advantage of every opportunity to recognize staff for a job well done.
- Be creative with your praise.
- Cooperate and collaborate with all.
- Be considerate of others. Personal use of cell phones and electronic devices is restricted to breaks/meal times and in non-patient areas.

Attitude
- Be positive.
- Recognize problems as opportunities for improvement: be part of a solution.
- Be accountable and responsible: do not make excuses or blame others.
- Bring your ‘A’ game: leave personal business and problems at home.
- Embrace and be open to change.

Unprofessional Behavior
Unprofessional behavior is behavior that undermines a culture of safety and impedes the quality of patient care. The following are examples of such unacceptable unprofessional behavior.

- Conduct which may be detrimental to patient safety, delivery of quality patient care, disruptive to hospital operations, or constitute fraud and abuse.
- Non-constructive criticism made in such a way as to intimidate, undermine confidence, belittle, or imply stupidity or incompetence.
- Abusive or intimidating treatment of others, including patients, including the use of abusive or demeaning terms and unnecessary sarcasm or cynicism.
- Impertinent and inappropriate comments made in patient medical records or other documents impugning the quality of care in the hospital or attacking particular physicians, nurses/staff or hospital policy.
- Profane and abusive language.
- Failing to work in a cooperative manner with covered parties, family members, or visitors.
- Bullying, intimidating, insulting, aggressive, or assaulting behavior.
- Physical attacks, throwing things, pushing or slapping or any unwanted touching.
- Threats of violence, retribution, or litigation.
- Harassment, humiliation, or coercion of covered parties, patients, family members, or visitors.
- Boundary violations with patients, family members, staff or other care providers.
- Jokes or non-clinical comments about race, ethnicity, religion, sexual orientation, age, physical appearance or socially socioeconomic or educational status.

Organizational Information

Covered parties are expected to provide officials and constituents of the organization information that is factual, complete, objective, timely and understandable. In that respect, covered parties are expected to act in good faith, responsibly and objectively with due care, competence and diligence, without any misrepresentation of material facts and without allowing independent judgment to be subordinated.

Covered parties are required to report potential or perceived conflicts of interest in accordance with 9050 Conflicts of Interest.

Covered parties are bound by restrictive covenants that define the limitations and restrictions on relationships with vendors and outside parties. 9309 Anti-kickback Guidelines for Payments, Discounts, Gifts and Meals and 9100 Employee Relationships with Healthcare Vendors outline issues related to non-compliance with expected behavior.

Compliance with Rules

Ellis Medicine will strive to ensure all activity by covered parties or agents of the organization are in compliance with applicable laws. Covered parties are required to comply with all applicable laws, rules and regulations of all governmental authorities, as well as other private or public regulatory agencies to which the organization is subject whether or not specifically addressed in these policies. If questions regarding the existence of, interpretation or application of any law arise, they should be directed to the Chief Compliance Officer of Ellis Medicine.

Practice and Promote Ethical Behavior

Covered parties have a responsibility to practice and promote the compliance policies and collective social ethical practices at Ellis Medicine. Each covered party is responsible and required to report situations of possible illegal or fraudulent activity or suspected compliance violations to their immediate supervisor or the Compliance and Fraud Hotline at 1-888-253-7864, https://ellis.alertline.com or via postal mail to:

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Audit and Compliance Department
Ellis Medicine
1101 Nott Street
Schenectady, New York 12308

All correspondents wishing to remain anonymous may do so. All efforts will be made to keep the identity of correspondents confidential as permitted by law.

**Prompt Reporting of Suspected Violations**
Each covered party is required to promptly report any violations of this policy to either the Corporate Compliance Officer or his/her designee or to Human Resources. All covered parties are expected to assist in the resolution of any identified compliance issues. Non-compliant behavior, including encouraging, directing, facilitating or permitting non-compliant behavior, failure to report a concern or assist in an investigation may be deemed misconduct, a violation of this code, and subject to Ellis' policy (#3452) on Work Rules and Disciplinary Actions.

Additional information regarding potential violations of this policy and reporting such violations may be found in related policies including but not limited to:

- Harassment: Policy 3142
- Work Rules and Disciplinary Action: Policy 3452
- Workplace Violence: Policy 3458
- Medical-Dental Staff Conduct Within The Hospital: Policy 6246
- Corporate Compliance Program: Policy 9000

**Privacy and Confidentiality**
Ellis Medicine covered parties must maintain the confidentiality of patient and other confidential information in accordance with applicable legal and ethical standards. Ellis Medicine and its covered parties are in possession of and have access to a broad variety of confidential, sensitive and proprietary information, the inappropriate release of which could be injurious to individuals, business partners and Ellis Medicine itself.

Each covered party has an obligation to actively protect and safeguard confidential, sensitive and proprietary information in a manner designed to prevent the unauthorized disclosure of information. Covered parties are required to respect the confidentiality of information acquired in the course of performing work responsibilities, except when legally obligated or authorized to disclose such information. Information obtained through the course of performing work responsibilities should not be utilized for personal advantage.

Multiple policies addressing the confidentiality of information have been developed as a result of NYS Regulations and the Health Insurance Portability and Accountability Act (HIPAA). Policies addressing the requirements of confidentiality with respect to protected health information (patient information) are detailed in the Comprehensive Privacy Policy, #10001. The Comprehensive Privacy Policy explains in general detail the requirements and lists all of the policies related to protected health information.

All of the policies relating to protected health information are available via the Ellis Organizational Policy Manual in the subfolder titled HIPAA. These policies should be reviewed to ensure that the requirements of compliance are well understood.
Organization Assets
Each covered party is required to achieve and demonstrate responsible use of, and control over, all assets and resources employed or entrusted to them or to areas within their responsibility. Covered parties are expected to protect physical and intellectual property and information against loss, theft or misuse. Intellectual properties include patents, trademarks, marketing, copyrights, and software.

Protection of assets requires that internal controls be present and functioning as intended to mitigate risk inherent to a specific process. Covered parties are required to report detected deficiencies to their manager or to the Audit and Compliance department for review.

Sharing Knowledge
Ellis Medicine is committed to direct and candid dialogue to ensure business decisions are based on complete information. In order to achieve this goal, information, resources, ideas and related information are shared with appropriate staff in a collaborative effort. This will lead to quality patient centered care and achievement of organizational objectives.

Collaboration requires a culture of teamwork and organized cooperation. Each covered party is expected to work together to provide quality patient care and the achievement of organizational objectives.

Procedures
The Code of Conduct shall be disseminated periodically to all covered parties and to new employees and volunteers during new employee orientation and to new vendors at the inception of a relationship with that vendor. The Code of Conduct shall be available to all covered parties as part of the electronic Organizational Policies Manual. All covered parties are responsible to ensure that their behavior and activities are consistent with the Code of Conduct.

On an annual basis, employees are required to complete the attached Code of Conduct Acknowledgement. Management reserves the right to require any other party to compete the acknowledgement.

REFERENCES
Behaviors and Standards - Pledge to MEE

ORIGINAL IMPLEMENTATION DATE: 11/3/04
REVIEW DATE: 5/12, 12/15, 10/17, 11/19, 4/21
REVISED DATE: 6/09, 12/12, 12/14, 10/15, 11/17, 4/19

REVIEWED BY:
Privacy Officer
Vice President, Human Resources
Senior Director, Human Resources
Director Organizational Development

Attachments– acknowledgement
Attachment I – Code of Conduct Acknowledgement

I hereby certify that I have read and understand the Ellis Medicine Code of Conduct and will adhere to the following principles and responsibilities in the performance of my duties as a Covered Party of Ellis Medicine and others deemed applicable by management or the Board of Trustees.

— Act with honesty and integrity, avoiding conflicts of interest involving personal and professional relationships. Act in good faith, responsibly and objectively, with due care, competence and diligence, without any misrepresentation of material facts and without allowing my independent judgment to be subordinated

— Will treat others with respect and courtesy and behave in a professional manner at all times while avoiding disruptive behavior.

— Provide other officials and constituents of the organization information that is factual, complete, objective, timely and understandable;

— Comply with rules and regulations of all governmental authorities as well as other private or public regulatory agencies to which the Organization is subject;

— Practice and Promote ethical behavior among other covered parties of the Organization;

— Respect the privacy and confidentiality of information acquired in the course of my work, except when authorized or legally obligated to disclose such information, and refrain from the use of such confidential information for personal advantage;

— Achieve responsible use of, and control over, all organizational assets and resources employed or entrusted to me;

— Share my knowledge with others and maintain skills important and relevant to the needs of my constituents;

— Promptly report to my immediate supervisor, the Chief Compliance Officer, his/her designee or Human Resources any suspected violations of this Code which I have knowledge of;

— Recognize that violations of this Code will result in disciplinary action.

I understand that violations of this Code are a serious matter and may result in disciplinary action up to and including termination of employment or contractual agreement.

Signature: _______________________________

Title: ___________________________________

Date: ___________________________________

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