BJC CODE OF CONDUCT

BJC HealthCare and its member hospitals and services (together, "BJC" or "BJC HSOs") are committed to uphold the highest ethical standards and to comply with all laws and regulations. The BJC Code of Conduct provides guidelines, expectations and instructions for all BJC entities, functional areas, and workforce members. This Code of Conduct explains how to perform activities to ensure compliance with all applicable laws, regulations, policies and procedures.



BJC provides **compliance documents** and **activities** to help workforce members with compliance. BJC compliance activities include:

- Educating workforce members on the BJC Compliance Program and Policies
- · Helping workforce members interpret and apply the BJC Compliance Program and Policies
- Encouraging workforce members to report alleged violations of the BJC Compliance Program and Policies

The BJC Compliance Program and Policies are accessible at BJCnet, the BJC employee intranet site. Workforce members are expected to review, understand, and act upon the Program and Policies as required by the BJC Code of Conduct.

BJC's PURPOSE & MISSION:

BJC is committed to improving the health and well-being of the people and communities we serve. We do this through leadership, education, innovation, and excellence in medicine.

BJC's CORE VALUES:

- Compassion We promise to care about you.
- Respect We promise to treat you with dignity.
- Excellence We promise to do our best.
- Safety We promise to keep you safe.
- Teamwork We promise to partner with you.

BJC's GOAL & VISION:

BJC strives to be a national leader in health care delivery.

We support this goal by:

- Advocating for our patients' wellbeing
- Promoting clinical quality and patient safety
- Pursuing medical education and research
- Fostering employee satisfaction
- Maintaining financial stability

BJC's SHARED PRINCIPLES & ETHICAL REQUIREMENTS:

BJC expects all of its workforce members to act with high ethical standards. Workforce members should strive to improve our organization, serve our communities, and provide excellent care to our patients. All workforce members of BJC have an obligation to act fairly and honestly at all times. BJC employees, contractors, volunteers, trainees, and other persons performing work for BJC are workforce members. That includes unpaid work. Students in training at BJC-affiliated hospitals are also workforce members.

To be compliant, you must:

BE PRINCIPLED

You are expected to know and understand BJC's compliance policies and the laws and regulations that affect your job. If you are unsure about the legality and/or appropriateness of an action or proposed action, ask. Continue to ask questions until you receive an answer that makes sense to you. The goal is to get the right answer, not the easy answer.

As a BJC workforce member, you are expected to act with:

- INTEGRITY: You are positive, honest, and committed to BJC's mission.
- COMPASSION: You will provide exceptional service to patients, visitors, and colleagues by listening and responding with empathy.
- ACCOUNTABILITY: You will have a strong sense of commitment and ownership.
- RESPECT: You will treat all patients, visitors, and colleagues with dignity and respect for their cultures and backgrounds.
- **EXCELLENCE**: You are committed to a culture of excellence.

BE PROACTIVE

- · Be alert to situations that could result in illegal or unethical conduct.
- Report suspected violations.
- Seek help about following the Compliance Program.

BE SUPPORTIVE

- Support fellow workforce members who report suspected violations of the Compliance Program.
- Never react against someone who reports a suspected violation.

BE INFORMED

- Use BJC's compliance resources to understand the compliance requirements that apply to
- Participate in compliance activities to help understand the Compliance Program and Policies.

Resources are available to help you resolve compliance issues. The BJC Corporate Compliance website has all compliance policies readily available for review. The members of the Corporate Compliance department welcome inquiries from you and your fellow workforce members.

Any workforce member who breaks the law or the BJC Compliance Program will be subject to corrective action and possibly termination. This includes failing to follow the BJC Code of Conduct.

BJC has multiple reporting mechanisms available to assist workforce members with various issues

Follow the four-step communication process for raising Compliance concerns, which includes the following options:

- Discuss the issue with a supervisor.
- Speak to your department manager.
- Speak to a Compliance or Privacy Liaison and/or senior manager.
- Bring the matter to the attention of a BJC Corporate Compliance representative.

The BJC Compliance department may be reached via:

- Phone: 1-314-286-0678
- Email: compliance@bjc.org
- Online through BJC's network at intranet address: bjc.sharepoint.com/sites/BJCCorporateCompliance

You may also report issues through the following reporting methods. Reports are anonymous and confidential, with no fear of retaliation:

- Call the Ethics and Compliance Hotline at 1-800-525-BJC1.
- Make a report through the bjc.ethicspoint.com website.

Corporate compliance is about doing what is right for patients and their families, for workforce members and other professional colleagues, and for our BJC organization. We all must strive to proactively prevent the mistakes that lead to compliance problems. Proactive prevention begins with education. Knowledge is the most powerful weapon you can use to prevent compliance mistakes from happening. It is your responsibility to educate yourself about the BJC compliance policies and the basic laws and regulations that affect your job.

This Code of Conduct sets BJC's standard for all workforce members. It highlights the organization's strong commitment to the values of reliability, honesty, trustworthiness, and integrity. These values are vital for a successful health care organization. Each workforce member must promote our shared commitment to compliance in our daily work. Compliance is everyone's responsibility.

