Code of Conduct

Care New England

Compliance Line
1.877.TELLCNE
(1.877.835.5263)
cnecompliance@carene.org

MyComplianceReport.com
User Access ID: CNE
Dear Colleague:

Care New England Health System (“CNE” or “Care New England”) is dedicated to building an exemplary health care system (the “Mission”). Our vision is for Care New England to be recognized nationally for quality care, academic excellence, and innovation. At Care New England, we put our patients and their families at the center of all we do. In our day-to-day interactions with patients, families, and each other, our actions and decisions are guided by the following Core Values: Accountability, Caring and Teamwork.

The Code of Conduct (the “Code”) reflects our commitment to maintaining the highest standards of integrity, honesty and ethical responsibility in all aspects of our operations and professional and business conduct. This commitment means more than just doing the best job possible, but is our commitment to Doing The RIGHT THING. The Code has been developed to help all of us conduct our daily activities in accordance with all applicable federal, state and local laws, regulations, ethical standards and policies and procedures that govern the way we provide care and conduct business. We ask that you take the time to read and understand this Code.

If you have any questions regarding anything in this Code, or if you encounter any situation that causes you to question any conduct or conversations, you should immediately report your concern to your supervisor/manager, the Compliance Officer and/or the CNE Compliance Office Hotline (the “ComplianceLine”) by dialing 1.877.TELLCNE (1.877.835.5263), by submitting a report through MyComplianceReport.com, User Access ID: CNE or sending an email to cnecompliance@carene.org.

We all have a duty to report any suspected ethical or compliance issues and/or other potentially improper conduct even if it does not directly involve us. Please know that when calling the ComplianceLine, you may choose to remain anonymous and confidentiality will, to the extent permitted by law, be protected if you do choose to identify yourself. Further, it is a violation of this Code for anyone to retaliate against you if you, in good faith, ask a question or raise concerns about ethics or compliance, or report conduct that may be improper.

We look to each of you, as valued members of the Care New England team, to help us carry out our Mission, provide care and conduct our business in an ethical and legal manner by Doing The RIGHT THING. Living our Core Values makes us who we are.

Best Regards,

James E. Fanale, MD
President and Chief Executive Officer
Mission
To be your partner in health.

Vision
To create a community of healthier people.

Values
Care New England’s organizational values emphasize individual contributions and a team approach that fosters (ACT) Accountability, Caring, and Teamwork.

ACT Values

Accountability
Set clear expectations, provide timely feedback, and follow through.
Do what you say you are going to do, and be fair about it.
Take ownership of your responsibilities.

Caring
Acknowledge and respond to the needs and challenges of every person.
Create an environment that encourages respect and appreciation.
Offer support, information, and hope.

Teamwork
Listen and value each person’s voice.
Ask, “How can I help?”
Support the work of each team and each team member.

Purpose
CNE is dedicated to maintaining excellence and integrity in all aspects of our operations and professional and business conduct. Accordingly, CNE is committed to conformance with the highest ethical standards and compliance with all applicable laws and regulations not only in the delivery of health care but in our business affairs and dealings with employees, administrative staff, physicians, agents, third party payers, and the communities served by CNE.
CNE recognizes that our reputation for integrity, honesty and ethical responsibility is essential to the continued philanthropic, and community support necessary for the long-term success of CNE. This Code of Conduct (the “Code”) has been adopted by the Board of Directors of CNE as part of the CNE Compliance Program (provided on carenet) for the purpose of demonstrating the foregoing commitments and to set forth the standards by which Individuals are expected to conduct themselves to ensure the protection and promotion of organization-wide integrity and to enhance CNE’s ability to achieve its Mission. Please see “Scope” for the definition of “Individuals.”

Scope
This Code applies to all directors, officers, committee members, employees, non-employed medical staff, medical students, and volunteers of CNE and each of its Affiliates (hereinafter may be individually referred to as “you” or “Individual” or, collectively, the “Individuals”).

In addition, those individuals or entities, including, but not limited to, any contractor, subcontractor or vendor engaged, through contract or other arrangement, to represent or act on behalf of CNE or its Affiliates must review and observe this Code to ensure that all actions are conducted in a manner that protects and promotes organization-wide integrity and enhances CNE’s ability to achieve its Mission.

Who is an Affiliate?
“CNE Affiliate” shall mean all Care New England hospitals, all Care New England health care entities and each other Care New England entity that is a direct or indirect subsidiary of Care New England.

What if an Affiliate and/or a department within an Affiliate adopt policies or procedures that relate to the same subject matter addressed in this Code?
You are expected to become familiar with this Code and adhere to its requirements. In the event that an Affiliate and/or department within an Affiliate adopts a policy or procedure that relates to a subject matter addressed in this Code and is applicable to your position, the more restrictive policy or procedure will prevail.
Core Standards

This Code is based on the following core standards:

• **Compliance:** Individuals are expected to comply with all applicable federal, state and local laws, regulations, ethical standards, and policies and procedures.

• **Business Ethics:** Individuals are expected to accurately and honestly represent CNE and any Affiliate in all matters and must not engage in any activity or scheme intended to defraud anyone of money, property or honest services.

• **Business Relationships:** Any business transaction involving CNE or any Affiliate, including transactions with vendors, contractors and other third parties, must be based upon quality, value, terms, and conditions that are in the best interests of CNE and its Affiliates and free from improper or extraneous influences.

• **Confidentiality:** Individuals are expected to actively protect and safeguard confidential, sensitive, and proprietary information of CNE and its Affiliates and to prevent unauthorized disclosure of any such information.

• **Conflicts of Interest:** Individuals are expected to avoid participation in decisions regarding engagements of organizations that will create or perpetuate a conflict of interest.

• **Protection of Assets:** Individuals are expected to strive to preserve and protect the assets of CNE and its Affiliates by making prudent and effective use of the resources of CNE and its Affiliates and, as required by an Individual’s position, by properly and accurately reporting the financial condition of CNE and its Affiliates.
STANDARDS OF PROFESSIONAL AND
BUSINESS CONDUCT

CNE is committed to a corporate culture of compliance that promotes, through full support and encouragement of CNE and its Affiliates, an environment in which all Individuals continuously strive to perform their responsibilities and conduct their relationships with patients, families, and others in a professional, honest, and ethical manner and in compliance with all applicable federal, state and local laws, regulations, ethical standards and policies and procedures.

Demonstrated commitment to compliance is a part of each Individual’s job description and annual performance evaluation. Every Individual is expected to:

• Read, understand, and adhere to this Code.

• Understand and recognize the legal, regulatory, and compliance obligations, as well as any published CNE policies, that apply to your work area and job responsibilities.

• Seek guidance from their supervisor/manager, Human Resources, the Compliance Officer, or the ComplianceLine 1.877.TELLCNE (1.877.835.5263), MyComplianceReport.com, User Access ID: CNE, or sending an email to cnecompliance@carene.org when you have any question about legal and regulatory obligations and policies that apply to your duties and responsibilities or when you have questions about conduct you may have seen or heard about.

• Report to their supervisor/manager, Human Resources, the Compliance Officer, or the ComplianceLine by dialing 1.877.TELLCNE (1.877.835.5263), MyComplianceReport.com, User Access ID: CNE, or sending an email to: cnecompliance@carene.org any suspected ethical or compliance issues and/or other potentially improper conduct (even if it does not involve you) that you believe may violate any legal or regulatory obligation or any policy.

Every Individual with management responsibility is expected to demonstrate our commitment to a corporate culture of compliance to those they supervise by:

• Demonstrating a personal commitment to compliance.
• Encouraging those you supervise to raise and resolve compliance related questions without fear of retaliation by actively supporting such efforts.

• Ensuring that those you supervise are thoroughly trained and continuously educated in legal, regulatory, and policy obligations that apply to their work.

• Appropriately monitoring performance to ensure that applicable legal, regulatory, and policy obligations are met by those you supervise.

• Rewarding behavior that exceeds the above expectations and appropriately disciplining behavior that does not meet expectations.

**Honest Communication**

CNE, each Affiliate and others speaking on behalf of CNE or an Affiliate should exercise candor and honesty in the performance of their responsibilities and in communication with CNE’s attorneys and auditors. CNE, each Affiliate and others speaking on behalf of CNE or an Affiliate must not make false or misleading statements to any patient, person or entity doing business with CNE or an Affiliate.

Please refer to [carenet](#) (search “Compliance”) for more information about CNE’s Compliance Program.

*Individuals have a responsibility to report any suspected ethical or compliance issues and/or other potentially improper conduct. Any Individual who takes these steps in good faith will not be disciplined or subject to retaliation. Any Individual who becomes aware of retaliatory action toward an Individual for reporting an issue and/or other potentially improper conduct should contact his or her supervisor/manager, the Compliance Officer at (401) 453-7534, and/or the [ComplianceLine](#) by dialing **1.877.TELLCNE (1-877-835-5263)**. You may also make a web report at [www.MyComplianceReport.com](#). User Access ID: CNE or send an email to cnecompliance@carene.org.*