	Policy	CC02-07
	Version	7.0
	Date of Last Revision	February 19, 2024
	Effective Date	December 5, 2011
<b>CODE OF CONDUCT POLICY AND PROCEDURE</b>		
Initial Edit By:	Kate Weidman, Director of Compliance & Training	Date: February 19, 2024
Last Reviewed By:	Policy Committee	Date: February 28, 2024
Last Approved By:	Board of Directors	Date: March 5, 2024
Review Cycle	Annual; Board of Directors- Annual	
Scope:	All Mosaic Health Board Members, Employees, Contactors, Agents, Consultants and Volunteers	
Regulatory Reference	N/A	

## DEFINITIONS

**Associate(s):** for this procedure includes the following individuals who act on behalf of Mosaic Health: Individual Contractors, Consultants, Volunteers, Interns and/or Students.

## POLICY

It is the policy of Mosaic Health to establish a Code of Conduct, to which all Mosaic Health Board Members, Employees, and Associates shall adhere. Such personnel will read and attest to Mosaic Health's Code of Conduct on an annual basis.

This Policy shall be reviewed periodically and updated consistent with the requirements established by the Board of Directors, Mosaic Health's senior management, Federal and State law and regulations, and applicable accrediting and review organizations.

## PROCEDURE

- 1) Board of Directors: The Mosaic Health Directors shall read and attest to the Mosaic Health Code of Conduct as part of new Board Member on-boarding process, and annually thereafter. The signed documents are stored with the Mosaic Health Compliance Officer.
- 2) New Employees of Mosaic Health read and attest to the Mosaic Health Code of Conduct during the new hire on-boarding process. Upon review, each new employee is required to complete an attestation stating they have reviewed and understand the content. This attestation is stored with their Conflict of Interest Attestation in the O:Drive.

3) Employees will re-attest annually. All such attestations are completed and recorded in the O: Drive along with Conflict of Interest Attestations. These attestations are accessible to the Mosaic Health Compliance Officer.

**RELATED POLICIES/PROCEDURES**

- CC01-13: Conflict of Interest Policy and Questionnaire
- CC01-14: Whistle Blower Policy and Procedure
- CC01-16: Excluded Individuals and Entities Policy and Procedure

*This Policy and Procedure shall be reviewed periodically and updated consistent with the requirements established by the Board of Directors, Mosaic Health’s senior management, Federal and State law and regulations, and applicable accrediting and review organizations.*

**Implementation Manager:** Chief Executive Officer

**Responsible Parties:** Compliance Officer



03-07-2024

\_\_\_\_\_  
Signature  
Chief Executive Officer

\_\_\_\_\_  
Date



03-09-2024

\_\_\_\_\_  
Signature  
Chair, Board of Directors

\_\_\_\_\_  
Date

VERSION HISTORY				
Version	Approved By	Revision Date	Description of Change	Author
1.0	Unknown	12/5/11	Initial Policy & Procedure	Unknown
2.0	Board of Directors	12/5/17	Applicable Changes	Lida Riedlinger
3.0	Board of Directors	2/21/20	Update Name & Format	Hilary Hagen
4.0	Board of Directors	4/6/21	Process Changes	Lida Riedlinger, CCO
5.0	Board of Directors	4/5/22	Updated Affected Individuals, Updated Code of Conduct	Kate Weidman
6.0	Board of Directors	4/4/23	Changes in Storage	Kate Weidman

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7.0	Board of Directors	3/5/24	Modification of New Employee Process; Modified Gifts	Kate Weidman
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REVIEW HISTORY	
Review Date	Reviewer
7/30/18	Lida Riedlinger, CCO

**EXHIBITS**

Mosaic Health Code of Conduct

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# MOSAIC HEALTH CODE OF CONDUCT

## INTRODUCTION

Mosaic Health has adopted a Compliance Program to ensure that the organization operates in full compliance with applicable laws and regulations.

An important component of the Compliance Program is a Code of Conduct (referred to as the “Code”), that sets out the basic principles which all of Mosaic Health Board members, officers, employees, interns, students and volunteers (referred to as “personnel or employees”) must follow.

Any questions about the Code or its applicability to a situation should be directed to Mosaic Health's Compliance Officer or a member of the organization's senior management team.

## CODE OF CONDUCT

- 1) One of Mosaic Health's strongest assets is a reputation for integrity, honesty, ethical behavior and decision making in serving Mosaic Health patients with the highest quality of health care. Mosaic Health strives to be an organization that consistently demonstrates respect to its patients, employees and volunteers, from all income levels and cultures.
- 2) Mosaic Health is committed to ensuring a just and safe environment for patients and their families, staff and visitors, promotes a culture of openness and honesty, and will operate in full compliance with applicable laws and regulation and with sound ethical standards. And through this “Code of Conduct” documents that achieving clinical and operational results by illegal acts or unethical conduct is not acceptable.
- 3) Each supervisor is responsible for monitoring the personnel under their supervision to verify that they are acting ethically and in compliance with applicable law, regulations, Mosaic Health policies/procedures, and this Code. Mosaic Health will provide the opportunity for personnel to acquire sufficient and appropriate knowledge to recognize compliance issues applicable to their duties. All personnel are responsible for obtaining such knowledge and appropriately seeking advice regarding such issues.
- 4) Personnel shall not give or receive any gift, payment, thing ‘of value’ or bribe to or from any patient with whom Mosaic Health has a relationship. “Of Value” is defined as no more than \$15.00 on a single occasion or several small gifts totaling no more than \$75.00 over the course of a calendar year. Patients providing food items to staff are excluded from this clause as they are not considered inducements.
- 5) For entities, vendors, or businesses with whom Mosaic Health has a business relationship or may have a relationship with, staff members cannot receive any gift or thing ‘of value’ including but not limited to: meals, conference fees, hotel accommodations, gift cards, etc. “Of Value” is

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defined as no more than \$15.00 on a single occasion or several small gifts totaling no more than \$75.00 over the course of a calendar year. Food brought to a site for collective consumption by a vendor may be accepted unless there is a stipulation or requirement for acceptance.

- 6) Personnel shall be honest in all dealings with patients, personnel and government agencies and representatives. No misrepresentation of any documentation or false billing or coding shall be given to patients, personnel or government agencies or representatives. Personnel certifying the correctness of records shall have knowledge that the information is accurate and complete, to the best of their knowledge, before giving such certification.
- 7) Personnel shall not have financial or other personal interest in a transaction between Mosaic Health's operated and/or sub-recipient health center locations, administration, vendors, suppliers, providers or patients.
- 8) No Mosaic Health funds or property shall be used for any political contribution or purpose. All personal contributions to political activities must in no way be associated with the individual's employment with Mosaic Health (for example; the mention of their employment with Mosaic Health).
- 9) No asset or property of Mosaic Health may be diverted for the personal use or benefit of any employee, Board Member, contractor or any activities outside of Mosaic Health.
- 10) Personnel shall not engage in any activity which competes with Mosaic Health's delivery of health care or interferes with the performance of their duties.
- 11) All of Mosaic Health's accounting and accounting records shall be performed and maintained in accordance with Generally Accepted Accounting Principles (GAAP). All transactions, payments, receipts, accounts and assets shall be completely and accurately recorded in Mosaic Health's books and records on a consistent and timely basis. No payment shall be approved or made with the intention or understanding that it will be used for any purpose other than that described in the supporting documentation for the payment. All information recorded and submitted to other persons must not be used to mislead those who receive the information or to conceal anything that is improper.
- 12) Books and records shall be created, maintained, retained or destroyed in accordance with Mosaic Health's purging and retaining records (business, health and non-electronic) procedures.
- 13) Personnel will not violate anti-trust laws, which are established in order to preserve a competitive marketplace. For example, there shall be no discussions or agreements with other healthcare centers for the purpose or intent of setting market rates for service charges or fees paid to providers or suppliers, or dividing up patient populations or geographic markets, or joint action to boycott or coerce certain patients, suppliers, or providers. Independent Provider Associations (IPA's) are exempt from this provision however, when in doubt, questions regarding state and federal antitrust law should be directed to Mosaic Health's Chief Executive Officer or Compliance Officer.

- 14) Personnel shall not engage in unfair competition or deceptive trade practices, including misrepresentation of Mosaic Health's services or operations. Personnel shall not make false or disparaging statements about competing healthcare centers and/or their providers and services in an attempt to coerce their patients into becoming a patient of a Mosaic Health center.
- 15) Strict confidentiality must be maintained concerning Mosaic Health's patients and the services provided to them and all HIPAA and New York State SHEILD Act rules shall be observed at all times. All personnel shall maintain the confidentiality of Mosaic Health's business information and of information relating to Mosaic Health's patients, providers, vendors and suppliers. Personnel shall not use any such confidential or proprietary information except as is appropriate for Mosaic Health's patients and staff engaged in the receipt or delivery of healthcare services. Mosaic Health personnel shall not seek to improperly obtain or to misuse confidential information of other healthcare centers.
- 16) Personnel will follow safe work practices and comply with applicable safety standards and health regulations.
- 17) Personnel are responsible for ensuring that the work environment is free of discrimination or harassment due to age, race, gender, identity, ethnicity, disability, sexual orientation or veteran status.

## **REPORTING OF VIOLATIONS**

Illegal acts or improper conduct may subject Mosaic Health to severe civil and criminal penalties, including large fines and exclusion from certain types of business.

Any personnel who suspects or becomes aware of any violation of this Code or any illegal activity shall promptly report the violation or illegal activity in person, by phone or in writing to one of the following persons:

- Compliance Officer
- President/Chief Executive Officer
- The appropriate department head or any other senior manager.
- Board Chairperson - [board@mosaichealth.org](mailto:board@mosaichealth.org)

An anonymous report may also be made by calling the compliance hotline.  
585-287-8846 or 205-875-6347

- 18) Any person who has a question about whether particular act(s) or conduct may be illegal or violate the Code should contact one of the officials listed above.
- 19) Personnel may report illegal acts or a violation of this Code anonymously. Mosaic Health will take all reasonable precautions to maintain the confidentiality of those individuals who report illegal activity or violations of this Code and of those individuals involved in the alleged improper

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activity; whether or not it is determined that improper acts occurred. Failure to abide by this confidentiality obligation is a violation of this Code.

- 20) It is Mosaic Health's policy to promptly and thoroughly investigate reports of illegal activity or violations of this Code. Personnel must cooperate with these investigations.
- 21) It is a violation of this code for personnel to punish or conduct reprisals in regard to personnel who have made a good faith report of, or cooperated in the investigation of, illegal acts or violations of this code.
- 22) Personnel who violate the Code or commit illegal acts are subject to disciplinary measures or actions up to and including termination and reporting to the proper authorities. Personnel who report their own illegal acts or improper conduct, however, will have such self-reporting taken into account in determining the appropriate disciplinary action.

### **GOVERNMENT INTERVIEWS OR INVESTIGATIONS**

Mosaic Health Board Members, Officers, Employees, Interns, Students, Volunteers (referred to as "personnel or employees") shall cooperate fully and promptly with appropriate government interviews, investigations and subpoenas into possible civil or criminal violations of the law. It is important, however, that in this process the organization is able to protect the legal rights of Mosaic Health and its personnel. To accomplish these objectives, any government inquiries or requests for information, documents or interviews should be promptly referred to the Privacy Officer, CEO or Compliance Officer. It is a Mosaic Health requirement that any employee, Board Member, Associate or volunteer who is interviewed by a government official must report this occurrence to the CEO and/or Compliance Officer immediately or as practicable.

# Signature Certificate

Reference number: EQAGU-S98FS-PQ3JQ-ZHYBO

## Signer

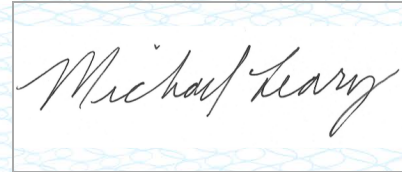
## Timestamp

## Signature

### Michael Leary

Email: mleary@mosaichealth.org

Sent: 06 Mar 2024 15:47:38 UTC  
Viewed: 07 Mar 2024 15:12:52 UTC  
Signed: 07 Mar 2024 15:13:36 UTC



### Recipient Verification:

✓ Email verified 07 Mar 2024 15:12:52 UTC

IP address: 24.213.225.19  
Location: Pittsford, United States

### Lydia Rivera-Warr

Email: roccityroadsideassistance@gmail.com

Sent: 06 Mar 2024 15:47:38 UTC  
Viewed: 09 Mar 2024 15:52:51 UTC  
Signed: 09 Mar 2024 15:53:34 UTC



### Recipient Verification:

✓ Email verified 09 Mar 2024 15:52:51 UTC

IP address: 174.208.32.38  
Location: Buffalo, United States

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