Bassett Healthcare Network

CODE OF CONDUCT

A Message from Bassett Healthcare Network's President and Chief Executive Officer

Over the past century, we have been a beacon of hope and healing for our communities. Patients and professionals from across our region and beyond are attracted to Bassett because of who we are, what we stand for, and how we care for our patients. Our reputation as a premier health system wasn't built overnight. It is a work of resiliency, fortitude, excellence, and integrity that has been decades in the making. We are driven by a mission to serve others in our community. In many cases that means serving our own family, friends, and neighbors.

Building trust is not just about providing excellent care and service. Trust is also achieved through integrity. We must adhere to our commitments, demonstrate honorable and ethical conduct, and remain grounded in the values we hold true. This must guide our behaviors, actions, and decisions far beyond mere compliance with laws and regulations. It needs to be part of the fabric of who we are as accountable caregivers at Bassett, integrating ethical principles and decision-making into everything we do and every situation we encounter. This starts at the highest level: directors and executives consistently leading by example and embracing an open and transparent culture. Ultimately it is the responsibility of us all who proudly represent Bassett Healthcare Network. This type of culture is critical to keeping the trust of our patients, partners, and other stakeholders. The day-by-day commitment also sharpens our competitive advantage and drives long-term growth.

The following pages are intended to support you in this continued commitment together by providing a framework for guiding your daily behaviors, actions, and decisions.

If you have questions regarding this Code of Conduct ("Code") or encounter any situation that you believe violates this Code, you should immediately consult your supervisor, another member of management, or the Compliance Office. You also have the option to report compliance concerns anonymously to the compliance hotline (844-490-0002). Each of us has a responsibility to report our concerns about conduct we believe may be a violation of Bassett's Code. With the hotline you can do so without the fear of retaliation.

This Code reflects our strong reputation of caring for our patients and communities. Your adherence is critical to our future. We each strengthen our ethical culture one decision or action at a time.

Staci Thompson, MHA,
FACMPE
President & CEO

It is expected that all Covered Persons of Bassett will support and fully comply with the mission, vision, and values of the organization. It is also the expectation that all Covered Persons will work in an ethical manner and will abide by the Code of Conduct. If you encounter a situation that violates this Code, immediately consult your supervisor, or the Compliance Office.

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Bassett Healthcare Network and its related entities ("Bassett") is committed to conducting business in an ethical and honest manner and within the bounds of the law. This Code is intended to provide board members, corporate officers, employees, members of the medical staff, fellows, interns, students, volunteers, vendors, affiliates, contractors, independent contractors, subcontractors, and other agents of Bassett whether or not they are paid by Bassett ("Covered Persons") with guidelines for conduct related to Bassett.

The standards contained in this Code are important, and therefore any violation will be handled in accordance with applicable Human Resource policies and procedures of Bassett. In addition, referral of certain matters will be made to government and regulatory agencies as appropriate. The offender may also be responsible in a civil suit for losses or other damages caused by his or her inappropriate conduct.

COMPLIANCE RESOURCES AND CONTACT INFORMATION

Bassett promotes an environment that encourages all to seek answers to questions and to report issues and concerns. If you have questions or encounter any situation that you feel violates Bassett's Code, immediately consult your supervisor, a member of management, or the Compliance Office. You may also report compliance concerns anonymously to the Anonymous Compliance Hotline. Below you will find contact information for the Compliance Office.

Compliance Office:

Amy Mallery Rhone, CHC
Chief Compliance Officer/Vice President, Corporate Compliance
Phone: 607-547-6320

- Anonymous Compliance Hotline: 844-490-0002
- Anonymous Compliance Hotline: Website Reporting
- E-mail: amy.rhone@bassett.org
- E-mail: Compliance@bassett.org

Atanya Jones, MHA
Compliance Specialist
Phone: 607-547-6327

- E-mail: atanya.jones@bassett.org

Amy Porter
Compliance Analyst
Phone: 607-322-0244

- E-mail: amy.porter@bassett.org

CODE OF ETHICS

Bassett is an integrated healthcare system deeply committed to human dignity, confidentiality, and the building of relationships by providing excellence in healthcare services, educating practitioners and other healthcare professionals, and pursuing health research. Overall ethical behaviors are guided by the mission, values, and vision statements of Bassett. Covered Persons must embrace honesty and integrity in providing services and dealing with people in good faith.

The Board of Directors of Bassett has established the Code of Ethics in recognition of the Network's responsibility to our patients, staff, practitioners, and the community we serve. It is the responsibility of every Covered Person of Bassett to act in a manner that is consistent with this statement and its supporting policies.

Our behavior will be guided by the following general principles:

- Everyone deserves to be treated with dignity, respect, and courtesy.
- In all the various settings in which Bassett provides patient services, evidence-based standards of care will be utilized and patient expectations for care, regardless of the patient's ability to pay, will be consistently met.
- Professional staff shall conduct their practice within the scope of their licenses and the privileges accorded to them through Bassett's appointment and credentialing processes.
- Patients (or their healthcare agent, surrogate, or appropriate family member) will be involved in the decision making for the care that is delivered.
- Professional staff, and other staff within their scope of practice, shall inform all patients about the therapeutic alternatives and the risks and benefits associated with the care they are seeking.
- In all circumstances, patients will be treated in a manner that respects their cultural, religious, and language needs.
- The New York State Patients' Bill of Rights and the New York State Parents' Bill of Rights guide our behavior with patients and their families. The New York State Patients' Bill of Rights and the New York State Parents' Bill of Rights are distributed to patients upon admission and posted conspicuously in public areas. Bassett disseminates information publicly to teach its Covered Persons, patients, families, and community members about advance directives, healthcare agents, and other topics related to patient rights.
- Bassett recognizes that patients, family members, visitors, community members, and Covered Persons have the right to register comments about care and services without the fear of reprisal. Concerns shall be promptly acknowledged and investigated. All complaints shall be resolved to the fullest extent possible.
- Bassett acknowledges every patient's freedom to choose alternative facilities or methods of care. Patients will be notified of any Bassett association with alternative facilities.
- Clinical research is conducted ethically, in a manner that protects and respects the rights of patients, and in compliance with federal and state laws and regulations. Patients have the right to withdraw at any time from a research study and shall not have their care impacted in any way.
- The material and financial resources of Bassett will be managed with integrity and honesty, following best practices and principles of sound stewardship.

MISSION	VISION	VALUES
WHO WE ARE Improving the health of our patients and the well-being of our communities.	**WHERE WE'RE GOING** Through advanced integrated clinical services, education, and research, we aspire to be a model of excellence for health, creating remarkable patient experiences and better living.	**WHAT WE BELIEVE IN** • Courage • Unity • Excellence

THE COMPLIANCE PROGRAM:

The Compliance Program has been established to prevent the occurrence of illegal or unethical behavior, to stop any such behavior as soon as reasonably possible after it has been discovered, to discipline the individuals involved (including those who know of violations but fail to report them), and to recommend and implement changes in policy and procedure necessary to avoid a recurrence of any prior violation.

REPORT VIOLATIONS:

It is important to Bassett that all Covered Persons have an effective way to get an answer to any question they may have about how to perform their jobs in compliance with the Code and applicable rules and regulations. It is also important for Covered Persons and other individuals to report any instance of a known or suspected violation of this Code.

If a Covered Person has a question or concern or believes that someone is conducting their business in an illegal, unethical, or otherwise questionable manner, or violates Bassett's policies, it is preferred that the Covered Person first contact their supervisor or their Bassett contact to discuss the matter.

There are times, however, when either the response the Covered Person receives may be inadequate or the Covered Person may feel uncomfortable discussing the matter with their supervisor or Bassett contact. In those cases, the Covered Person should contact the Compliance Officer or call the Compliance Hotline ("Hotline").

Covered Persons may contact Bassett's Compliance Office directly at any time, without going to their supervisor, Bassett contact, or Compliance Liaison.

Compliance Hotline: 844-490-0002

All calls and/or web reports to the Hotline are confidential, and the reporter may remain anonymous. Follow-up on reports is available by a return call to the hotline. In addition to other monitoring tools, Bassett relies on its Covered Persons to report coding, billing, and other compliance concerns. Covered Persons who, in good faith, report a possible violation of law, regulation, policy, or procedure, will not be subjected to retaliation, retribution, or harassment. A Covered Person who knowingly and purposefully misinforms Bassett or falsely reports an issue is subject to sanctions or disciplinary action up to and including termination of employment or their arrangement. Any Covered Person who conducts or condones retribution, retaliation, or harassment in any way will also be subject to sanctions or discipline, up to, and including termination.

BASSETT'S COMMITMENT TO COMPLIANCE

Bassett strives to:

1. Comply With the Law

Bassett is subject to numerous local, state, and federal laws pertaining to all aspects of its operation. Covered Persons are required to understand and abide by those laws which are applicable to them in the performance of their jobs and avoid any impropriety, dishonesty, or wrongdoing.

2. Provide Excellent Patient Care

Covered Persons shall strive to treat patients with empathy, kindness, and compassion. Each patient is an individual and should be treated as such. Each patient should be respected, with his or her needs and desires considered, as healthcare decisions are made. Steps shall be taken so that each patient understands his or her treatment needs and options, treatment methods utilized, and treatment outcomes. Bassett will provide services in a manner that does not discriminate against any person because of age, race, religion, gender identity and expression, sex, sexual orientation, disability, national origin, source of payment or for any other reason prohibited by applicable state and federal law. At all times, competent and qualified individuals will provide appropriate and necessary care, while considering the safety and wellbeing of the patients.

3. Protect Non-Public Information, including Confidential Information

Bassett is committed to maintaining the confidentiality of patient, personnel, business, and proprietary information in accordance with all state and federal privacy laws. As it relates to patient information, this includes but is not limited to the Health Insurance Portability and Accountability Act (HIPAA), the New York State Hospital Cybersecurity Regulation, and ethical standards. The NYS Hospital Cybersecurity Regulation also requires the protection of non-public information from unauthorized access, use, disclosure, alteration, or destruction.

Every Covered Person must sign a Confidentiality Agreement when first coming to Bassett and annually thereafter. All confidential information should only be accessed and used as needed to perform job responsibilities. Any impermissible access, use, or disclosure of confidential information or failure to comply with the Confidentiality Agreement must be reported and may result in disciplinary action, up to, and including, termination, and may even result in personal civil and criminal legal liability.

4. Manage Conflict in Leadership

Bassett strives to offer an environment in which communication is open and frequent. However, conflict is sometimes an inevitable part of human interaction. For Bassett leadership groups, conflict may occur due to the dynamic nature of healthcare, scarcity of resources, and the diversity of opinion which we seek. It is critical that we maintain the utmost respect and collegiality in our communications with our colleagues.

5. Hold Covered Persons Accountable

There are certain behaviors and actions that Bassett will not tolerate. Unacceptable behaviors will result in immediate disciplinary action which may include termination or sanctions as applicable to their arrangement. Respecting staff is very important at Bassett, so emphasis is on educating colleagues about appropriate conduct and behavior, while having a system that provides feedback to improve if needed. In all cases, it is the responsibility of the Covered Person to meet the conduct and performance expectation at Bassett in conjunction with living the Mission, Vision, and Values.

6. Prohibit Disruptive Conduct

All persons within its facilities shall be treated with courtesy, respect, and dignity. To that end, all Covered Persons shall conduct themselves in a professional and cooperative manner. Covered Persons who engage in unacceptable disruptive conduct shall be subject to disciplinary action, or sanctions as appropriate to their arrangement, in accordance with Bassett's policies.

7. Adhere to Anti-Referral and Healthcare Fraud and Abuse Legislation

Covered Persons are required to comply with laws which prohibit healthcare fraud, waste and abuse. Prohibited activities include, but are not limited to:

- Intentionally or knowingly documenting false or fraudulent information;
- Intentionally or knowingly submitting or causing to submit false or fraudulent claims for payment or approval;
- Offering or receiving remuneration (such as kickback, bribe, or rebate) to influence someone to make a referral for the furnishing (or arranging for the furnishing) of any item or service;
- Submitting false information for the purpose of gaining or retaining the right to participate in a plan or obtain reimbursement for services; and,
- Referrals by a physician of Medicare or Medicaid patients to any entity for "designated health services" when the physician or an immediate family member has a financial relationship with the entity (unless the arrangement complies with applicable legal exceptions).

8. Not Accept Inappropriate Gifts or Gratuities

The following standards apply to the giving or receiving of gifts and gratuities.

Receiving Gifts from Patients and Vendors: Covered Persons are prohibited from accepting gifts or entertainment from persons or vendors that do or are seeking to do business with Bassett with a value more than $100, and/or that might be considered by an objective observer to have the potential for influencing his or her conduct of business on behalf of Bassett. Gifts of money are never allowed. This is not intended to prohibit the exchange of social amenities or business courtesies of a nominal value, consistent with good taste and mature judgment.

Gifts from pharmaceutical and medical device manufacturers to members of the Medical Staff are prohibited. In circumstances where vendors or patients wish to provide a gift in support of the mission, they should be directed to the Friends of Bassett by visiting friendsofbassett.org or calling 607-547-3298.

Giving Gifts to Patients and Vendors: The federal Anti-Kickback Statute prohibits the knowing and willful solicitation or receipt, offer or payment, overtly or covertly, directly or indirectly, of any remuneration (anything of value) in return for patient, product, or service referrals, or to encourage such referrals. This prohibition extends to arranging for, recommending, or approving any purchase, lease, or order of any goods and services that could potentially be reimbursed by Medicare or any state healthcare program.

A Covered Person who is in doubt about whether a situation involving the giving or receiving of something of value is acceptable should ask the Compliance Officer.

9. Avoid Conflicts of Interest

Covered Persons are expected to avoid situations or circumstances that could place them in conflict with the interests of Bassett, its patients, or its vendors. A conflict of interest may exist whenever a person's outside activities, personal financial interests, or relationships interfere, or could appear to interfere, with their judgment or decision-making in their position or role with Bassett. Therefore, Covered Persons must report to the Compliance Office any potential conflict of interest they or their immediate family have in any outside company which does business with Bassett, wants to do business with Bassett, or which competes with Bassett. When addressing conflicts of interest, remember that appearances do count. Discuss any questions you have regarding potential conflicts of interest with the Compliance Office.

10. Follow Antitrust Regulations

A number of activities Bassett engages in are subject to state and federal antitrust laws. Generally, these laws prohibit agreements or actions that may illegally limit trade or reduce competition. Examples of activities that violate these laws include, but are not limited to, agreements between competitors to fix or stabilize prices, inappropriate exclusive dealings, and boycotts of specific suppliers or customers. Sharing information with a competitor, such as how prices are set, labor costs, or terms of supplier contracts may also violate anti-trust laws.

11. Keep Accurate and Complete Records

It is essential that Bassett report accurate information to governmental entities and other third parties. In order to meet this obligation, it is equally essential that every Covered Person accurately and clearly report the relevant facts or the true nature of a transaction. No Covered Person should knowingly or with reckless disregard for the truth make any false or misleading statements All patient records must meet the documentation standards required for quality care and to meet reimbursement rules and regulations. Any individual who contributes to the medical record must document accurately and never alter or destroy anything that is a part of the medical record. Covered Person's travel and business-related expenses must be accurately documented and supported when seeking reimbursement from Bassett. Medical records and other business documents will be retained in accordance with state and federal law and Bassett policy.

12. Conduct Political Activities According to the Law

Bassett does not participate or intervene in (including the publishing or distributing of statements) any political campaign on behalf of or in opposition to any candidate for public office. This prohibition on political campaign activity is not intended to restrict free expression on political matters by Covered Persons or other representatives of Bassett speaking for themselves, as individuals.

Bassett may participate in lobbying activities or advocating the passage or defeat of certain legislation that pertains to issues that affect the healthcare community. Lobbying activities, or advocating the passage or defeat of certain legislation, shall not constitute a substantial part of the activities of Bassett.

13. Protect the Environment

Bassett complies with applicable state and federal laws protecting the environment. Covered Persons shall dispose of all waste and other materials, and store all chemicals and substances, in accordance with applicable laws and regulations. It is important to file all necessary environmental reports accurately and promptly and to cooperate fully with all governmental authorities in the event of any environmental incident.

14. Provide a Safe Workplace

Bassett complies with applicable state and federal laws designed to improve workplace safety. Bassett is committed to training Covered Persons to carry out their work in a manner that is safe for them, their coworkers, and the patients they serve. Bassett does not employ or contract with individuals or entities that are excluded or ineligible to participate in federal or state healthcare programs, suspended or debarred from federal government contracts, or have been convicted of a criminal offense related to the provision of healthcare items or services and have not yet been reinstated in a federal healthcare program, provided we are aware of such criminal offense.

15. Not Tolerate Harassment or Discrimination

Covered Persons shall not discriminate on the basis of race, color, religion, national origin, age, disability, sex, sexual orientation, source of payment, or gender identity and expression in providing services to patients or the public, nor in relation to employment practices. Furthermore, Bassett prohibits harassment of its Covered Persons in any form.

16. Appropriately Use its Assets

Covered Persons are charged with protecting and preserving Bassett's assets and resources by following procedures to prevent their loss, theft, or unauthorized use. No part of the net earnings of Bassett shall inure to the benefit of, or be distributed to, Covered Persons, or other private persons having directly or indirectly any personal or private interest in the activities of Bassett, except to the extent that such payments constitute reasonable compensation for services rendered in the necessary course of Bassett's business.

17. Protect Access to Information Systems

Bassett is committed to protecting all aspects of its information systems. Covered Persons and other associates with access to Bassett's computerized information system shall sign a Confidentiality Agreement and abide by Bassett's information security policies and procedures. Remember: do not share passwords, leave laptops unattended, or download unapproved software to our information systems.

Information Security is a fundamental aspect of Bassett's operations. Covered Persons have a responsibility to follow applicable Information System policies and procedures in order to maintain a high level of security.

18. Responsible Use of Technology and Artificial Intelligence (AI)

Technology, including AI, can enhance patient care, business operations, and decision-making when used responsibly. Covered Persons are expected to use Bassett technology and AI tools in a manner that protects confidential information, complies with applicable laws and Bassett policies, and supports Bassett's mission and values. These expectations apply to all Bassett technology, personal devices used for business purposes, wearable technology, AI tools and other emerging technologies.

19. Cooperate with Investigations

Bassett is committed to cooperating fully and responding appropriately to all lawful government audits, inquiries, inspections and investigations.

Covered Persons must immediately notify the Compliance Office or the Legal Department if they become aware of any government investigation, subpoena, search warrant, request for records, or other official inquiry involving Bassett. Never, under any circumstances, destroy or alter documents or information, including electronic documents, records, or correspondence requested as part of a government investigation. Never lie or make false statements.

Covered Persons are required to cooperate fully and participate appropriately with all authorized internal and external investigations, audits, reviews, and compliance activities. This includes promptly providing requested information and documents, preserving relevant records, participating in interviews when requested, and responding to questions honestly, completely and accurately.

Nothing in this Code prohibits or restricts Covered Persons from communicating directly with government agencies or regulators or from participating in protected activities under applicable whistleblower or labor laws.

20. Adhere to Intellectual Property Laws

Bassett is committed to adhering to all applicable intellectual property laws. Software used in connection with Bassett's business must be properly licensed and used in accordance with that license. Additionally, Bassett will respect the intellectual property and copyright laws regarding books, trade journals, magazines, and other applicable resources.

21. Violations of our Code

The standards set forth in our Code are mandatory and apply to all Covered Persons. Each Covered Person is expected to use common sense and good judgment in their personal behaviors and work activities consistent with the standards outlined in this Code, applicable laws and regulations, and Bassett policies.

Individuals will be held accountable for behaviors and actions inconsistent with the Code, applicable laws and regulations, and Bassett policies. The precise discipline, corrective action or sanction taken will depend on the nature, severity, and frequency of the violation. The determination of the appropriate discipline, corrective action or sanctions shall be made in accordance with the facts of the case, the Covered Person's relationship with Bassett, and Bassett policy. No Covered Person, regardless of position or title, is exempt from the requirements of this Code of Conduct.

The following are examples of behaviors and conduct that can result in disciplinary actions or sanctions:

- Knowingly authorizing or participating in a violation of law and regulations.
- Withholding information or failing to report violations.
- Leaders, supervisors, or managers failing to provide adequate supervision or displaying a lack of diligence in assuring compliance with law, regulation, policy, or this Code.
- Retaliating against individuals who report issues and concerns in good faith.
- Deliberately filing false or frivolous reports of violations.
- Falsifying documentation in medical records and/or claim forms.
- Acting in a way that is discriminatory or rises to the level of harassment.
- Taking reckless actions or behaviors that jeopardize the privacy and security of personal health information and other confidential business information.

Facility	Compliance Officer/Liaison	Email Address	Phone	Hotline
A.O. Fox Hospital	Amy Rhone	amy.rhone@bassett.org	607-547-6320	844-490-0002
At Home Care	Christina McCoy	cmccoy1@ahcnys.org	607-432-7924	844-490-0002
Bassett Healthcare Network	Amy Rhone	amy.rhone@bassett.org	607-547-6320	844-490-0002
Bassett Medical Center	Amy Rhone	amy.rhone@bassett.org	607-547-6320	844-490-0002
Cobleskill Regional Hospital	Amy Rhone	amy.rhone@bassett.org	607-547-6320	844-490-0002
First Community Care	Jeremy Pain	jpain@ahcnys.org	607-547-2173	844-490-0002
Little Falls Hospital	Amy Rhone	amy.rhone@bassett.org	607-547-6320	844-490-0002
O'Connor Hospital	Amy Rhone	amy.rhone@bassett.org	607-547-6320	844-490-0002
Valley Health Services	Amy Rhone	amy.rhone@bassett.org	607-547-6320	844-490-0002
Valley Residential Services	Amy Rhone	Amy.rhone@bassett.org	607-547-6320	844-490-0002

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