“A healing work environment empowers people to aspire to be their very best (top performers) and inspires commitment to the Mission, Vision and Values.”

— George Mikitarian, President/CEO
Parrish Medical Center | Parrish Healthcare

Mission Healing Experiences For Everyone All The Time®
Vision Healing Families—Healing Communities®
Values Safety | Loyalty | Integrity | Compassion
Excellence | Stewardship

Our commitment to ethical conduct and compliance depends on Parrish Medical Center care partners. If you find yourself in an ethical dilemma or suspect inappropriate or illegal conduct, use the reporting process identified in our Code of Business Ethics and Business Conduct (Code), including calling the Compliance hotline at 888-447-8653 or reporting online at parrishmed.ethicspoint.com. Reporting may be done anonymously.
# TABLE OF CONTENTS

<table>
<thead>
<tr>
<th>Topic</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>Culture of Choice®</td>
<td>2</td>
</tr>
<tr>
<td>Care Partners Letter</td>
<td>4</td>
</tr>
<tr>
<td>Compliance and Business Ethics</td>
<td>6</td>
</tr>
<tr>
<td>Code of Business Ethics and Business Conduct</td>
<td>7</td>
</tr>
<tr>
<td>Dealing with Vendors and Referring Providers</td>
<td>8</td>
</tr>
<tr>
<td>Conflicts of Interest</td>
<td>8</td>
</tr>
<tr>
<td>Responding to Government Inquiries</td>
<td>10</td>
</tr>
<tr>
<td>False Claims Act</td>
<td>10</td>
</tr>
<tr>
<td>Confidentiality</td>
<td>11</td>
</tr>
<tr>
<td>Care Partner Identity Theft</td>
<td>11</td>
</tr>
<tr>
<td>Hotline Reporting</td>
<td>12</td>
</tr>
<tr>
<td>Frequently Asked Questions</td>
<td>14</td>
</tr>
</tbody>
</table>
Thanks to the continued efforts of Parrish Medical Center care partners (employees, physicians and volunteers), we have provided service to our community since 1958, and we look forward to many more years. Caring is at the core of who we are and what we do. As caregivers to the most frail in our community, Parrish Medical Center’s focus is on quality care, a healing environment, effective use of resources, and compliance with applicable laws and ethical standards.

Parrish Medical Center’s reputation for integrity, quality service and fair dealings come down to one thing—you. Parrish Medical Center isn’t ethical unless you are. We need the commitment of everyone—from every individual and department.

It is important that you read and live by our Code of Business Ethics and Business Conduct (Code). Be curious and ask questions or raise concerns about areas you don’t understand. Engage in conversations about any ethical situations you encounter. I encourage you to have candid dialog about ethics and integrity.

If you are concerned about something you have observed, raise your concern with your manager, Corporate Compliance, Human Resources, or any director or senior executive.

To continue to be successful in the ever-changing and increasingly complex health care environment, we must manage our health system responsibly and in compliance with all applicable laws. Furthermore, we must hold ourselves to high standards of integrity in all that we do. Our community expects no less.

Our Code, mission, vision, values, and policies and procedures work together to provide guidance on how we should approach our work and operate with integrity. Our Code is not a prescription, but rather a framework for operating with integrity.

Of course, no compliance program is perfect. In organizations as complex as ours, some care partners may run afoul of the rules, often unintentionally. Our objective is to have a compliance system and culture that prevents such issues from arising. Big problems usually start small, but we can avert them if we identify and address them promptly when they do occur.

Our commitment to compliance means that we all understand our obligation to prevent issues of noncompliance. All of us have a duty to seek guidance when we are unsure about the right course of action, and to speak up when someone is not acting in compliance with our Code, policies or government regulations. Our Code applies equally to each of us, regardless of position. We should take pride in our conduct and never compromise our integrity.
Herman Cole Jr.
Chairman of the Board

George Mikitarian
President/CEO

Anual Jackson Sr.
Inspector General
Chief Compliance Officer
Chief Privacy Officer
COMPLIANCE AND BUSINESS ETHICS

Parrish Medical Center established The Compliance and Ethics Program (Compliance Program) to reinforce our commitment to conduct business with integrity. People with integrity are honest, sincere, ethical, and act within legal boundaries at all times.

The Board of Directors supports our Code—Parrish Medical Center’s formal statement of standards and rules of ethics and conduct. The Compliance Program gives Parrish Medical Center a way to communicate standards of ethical conduct to its care partners, vendors and the community it serves.

Parrish Medical Center’s Compliance Program

The Inspector General | Chief Compliance Officer | Chief Privacy Officer administers Parrish Medical Center’s Compliance Program. Corporate Compliance teams with department leaders and appropriate committees to ensure compliance with complex regulatory requirements.

Corporate Compliance is available to receive all reports of suspected violations of Parrish Medical Center’s policies, applicable laws and regulations. Suspected violations reported to Corporate Compliance, either directly or through the compliance hotline, are thoroughly investigated.

Application of Our Ethical Standards

The number of guidelines Parrish Medical Center must follow is staggering. The fact that there are so many guidelines to follow, however, does not lessen our commitment to follow them according to our ethical standards.

Care Partners Take Responsibility

As a care partner (employee, physician, volunteer), you have a responsibility to yourself, your coworkers and Parrish Medical Center to conduct business legally and ethically. Make sure you read our Code and understand the rules that apply to you.

Integrity: “Doing the right thing when nobody is watching.”

— C.S. Lewis
Leaders Have Greater Responsibility

Leaders set the tone for our ethical workplace and are expected to be in every respect a role model. Parrish Medical Center looks to our leadership to set a good example and be familiar with our Code, the laws and policies that apply to your team. Leaders must ensure that ethical, compliant behavior is never sacrificed during the pursuit of business objectives.

As leaders, you have a responsibility to listen to your care partners, and promote an open dialogue about ethical and compliance issues. When ethical issues are brought to your attention, we rely on each leader to report concerns through the appropriate channel. You must never respond in a retaliatory manner. Each leader is expected to create an environment where all care partners are encouraged to raise concerns and propose ideas.

CODE OF BUSINESS ETHICS AND BUSINESS CONDUCT

Our Code is designed to provide you with a clear understanding of what is expected in the workplace. Our Code does not cover every situation. Instead, our Code provides broad guidelines that are detailed in policies and procedures.

Parrish Medical Center is committed to providing high-quality patient care in the communities we serve. Parrish Medical Center advocates a responsive management style and a patient-first philosophy based on integrity and competence. We treat our patients with respect and dignity. We provide quality, compassionate care in a clean, safe environment.

As part of Parrish Medical Center’s systemwide Compliance Program, our Code sets forth the principles under which we operate, and helps us put policy into practice on the job every day. Our Code sets forth guidelines needed to support compliance with federal and state health care program requirements as we provide high-quality patient care.

Parrish Medical Center’s compliance policies are in place to prevent unethical and unlawful behavior; to correct such behavior as soon as possible after it is discovered; and to discipline care partners who do not conform to the laws, regulations, policies or standards.

Parrish Medical Center’s policy is to obey the law. Health care is a heavily regulated business, and it is important to get the details right by following our policies and procedures. Our Code does not discuss every law or policy that applies to your work, but Parrish Medical Center wants you to have all the information you need to do your work fairly, honestly and ethically. If you have questions or need advice about a specific situation, talk to your supervisor, management or the Compliance office.

The Compliance Program and the Code apply to us all.

Compliance to regulations and policies is everyone’s responsibility. No person’s job or position at Parrish Medical Center is more important than preserving Parrish Medical Center’s reputation for integrity.

Care partners are “the eyes and ears” of our Compliance Program. You are in the offices and on the floors; you see and hear what is going on. Care partners are held accountable to know enough about compliance to recognize an issue when it arises and report it.

Charitable Contributions and Gifts

Parrish Medical Center is a public organization governed by the Florida Code of Ethics for Public Officers and Employees. Parrish Medical Center care partners are prohibited from soliciting or accepting anything of value that might influence the care partners’ business judgment for any activity involving Parrish Medical Center.

Gifts or Gratuities from Businesses

Care partners must decline any offer that is intended to gain favor with vendors or physicians for any activity involving Parrish Medical Center. Personal gifts of any kind from vendors
conducting business with Parrish Medical Center or wanting to conduct business with Parrish Medical Center are never acceptable under any circumstance, which includes gifts to immediate family members. Parrish Medical Center partners are never to accept gifts of money or money in kind from vendors who conduct business with Parrish Medical Center, or wish to conduct business with Parrish Medical Center. All monies and charitable contributions must be referred to the Jess Parrish Medical Foundation office. Infrequent gifts of a nominal value ($100 annually) so long as such gifts are not solicited may be accepted. Examples of these infrequent gifts are modest meals shared with the department during the holiday season, or a vendor providing a modest onsite working meal when the vendor is providing a necessary business-related educational session. Keep in mind that such business courtesies must be reasonable in value and infrequent. Care partners are not allowed to solicit funding or accept funding to support any parties or similar functions that are not business related. When gifts or gratuities from businesses are unclear, seek clarification from your leadership or Corporate Compliance before accepting the gift or gratuity.

Subsidies from vendors may not be accepted directly or indirectly to pay for the cost of travel, lodging, or other personal expenses. It is acceptable for faculty at conferences or meetings to receive reimbursement for travel, lodging and meal expenses, as long as any reimbursement complies with Parrish Medical Center policy and state laws. Any stipend given by a vendor must be turned in to the Finance department.

Gifts from Patients
Patients who want to make a financial gift to Parrish Medical Center should be referred to the Jess Parrish Medical Foundation office. Patients may insist on making a personal gift to a care partner. Small gifts may be accepted and shared with coworkers (e.g., flowers or a box of candy). It is never proper or allowed to accept money from patients.

Government Personnel
State, local and federal governments have strict rules describing government employees’ accepting gifts. To avoid confusion, Parrish Medical Center care partners will not give or offer to give gifts to government employees.

DEALING WITH VENDORS AND REFERRING PROVIDERS
Dealing with product and service vendors, as well as referring providers, can pose ethical and legal problems. The following guidelines are intended to help care partners make ethical decisions in potentially difficult situations.

Kickbacks and Rebates: Care partners or their families must not receive personal kickbacks (benefits) or rebates as a result of the purchase or sale of goods or services at Parrish Medical Center. If a care partner or family member stands to gain personally from a transaction, that transaction is prohibited. Such practices are unethical and often illegal. This includes, but is not limited to, receiving gifts or money from a referring provider or paying money or giving gifts to a referring provider.

Reciprocity: There are times when Parrish Medical Center purchases goods or services from vendors who also buy goods or services from Parrish Medical Center. This practice is normal and acceptable, but any form of pressure is not. Parrish Medical Center care partners must never ask vendors to buy Parrish Medical Center products or services in order to become a Parrish Medical Center vendor.

CONFLICTS OF INTEREST
As members of the Parrish Medical Center family, we all have a responsibility to make business decisions and take actions that are in Parrish Medical Center’s best interest.

A conflict of interest can happen when you are involved in an activity that affects your loyalty to Parrish Medical Center or your objectivity in making decisions as a Parrish Medical Center care partner. Parrish Medical Center care partners should avoid outside activities that conflict with their obligation...
to Parrish Medical Center or negatively impact Parrish Medical Center’s reputation in the community. Care partners who think they may have an actual or potential conflict of interest due to outside activities should submit a disclosure form to Corporate Compliance. Compliance will assess the disclosure and notify the care partner of the outcome and any actions that need to be taken.

Executive leadership, directors and care partners in designated departments are required to submit a completed disclosure form annually to Corporate Compliance.

All care partners must disclose actual or potential conflicts of interest to Corporate Compliance.

**Common Potential Conflicts of Interest**

A *Second Job*: A conflict of interest can arise if you own, work for or provide services to a business that is a Parrish Medical Center competitor, vendor or customer. A conflict of interest can also arise if you have outside employment that interferes with your ability to perform your job here at Parrish Medical Center. Speak with your management before accepting outside employment.

A *Financial Interest*: Investing in a business that offers, manufactures or sells products or services that compete with or are similar to those of Parrish Medical Center can present a conflict of interest.

*Supervising a Family Member or Partner*: Decisions about hiring and promoting can become difficult if the person you supervise is a close relative or partner. Even if you work to remain objective in your business dealings, the fact that you share a personal relationship can create the appearance of a conflict of interest.

*Public Service*: Volunteering your time and talents to public service is encouraged. You should not use Parrish Medical Center’s name to further activities without appropriate approvals.

*Serving on a Board of Directors or Community Board*: Before agreeing to serve as a member on any board of directors or community board, care partners should make sure their commitment won’t interfere with their Parrish Medical Center responsibilities. Don’t accept a board appointment for any corporation that supplies goods or services to Parrish Medical Center or purchases our products unless you obtain advance approval from the Compliance office.
Political Activities: Never make a contribution or payment on behalf of Parrish Medical Center, and don’t express your political views in such a way that others might think you are speaking on Parrish Medical Center’s behalf. Participation in political campaigns must be conducted on your personal time, using your personal resources.

Doing Parrish Medical Center Business with Friends and Family: A potential conflict can arise if a family member, partner, or close personal friend owns or works for a business that is a competitor, vendor or customer of Parrish Medical Center.

RESPONDING TO GOVERNMENT INQUIRIES

Parrish Medical Center’s policy is that care partners cooperate with government personnel who conduct audits and investigations. Government investigators have the right to contact you at work or at home for work-related issues. Immediately contact your supervisor, Corporate Compliance or the administrator on call at the start of any government investigation. Management will immediately contact Corporate Compliance upon any written or in-person government investigations. Care partners are expected to provide truthful and accurate information in a timely manner to a government request. Parrish Medical Center will not tolerate false statements by care partners to government agencies and will take action against care partners for violations.

FALSE CLAIMS ACT

Parrish Medical Center devotes many resources to preventing and correcting billing errors to Medicare, Medicaid and other payers. The federal government and the state of Florida have enacted False Claims Act laws making it illegal to knowingly or recklessly present a false claim to the government for payment of a claim. The government has enacted laws to aggressively pursue billings that are fraudulent, wasteful and abusive. Care partners who suspect that billing errors are occurring have an obligation to report these to management or Corporate Compliance. Care partners who report, in good faith, compliance concerns will be protected from retaliation.
CONFIDENTIALITY
Care partners have access to various forms of sensitive, confidential and proprietary information. Parrish Medical Center collects information about the patient’s medical condition, history, medication, and family illnesses in order to provide quality care. We realize the sensitive nature of this information and are committed to maintaining its confidentiality. Federal laws, Florida laws and Parrish Medical Center policies forbid you to seek, disclose or give unauthorized sensitive information that is not otherwise subject to disclosure under such laws or policies.

HIPAA PRIVACY – HIPAA SECURITY
Parrish Medical Center has a long-standing commitment to the principle and practice of maintaining the confidentiality of protected health information. Maintaining the confidentiality of protected health information is the responsibility of every Parrish Medical Center care partner. Use only the appropriate amount of protected health information minimally necessary to meet the legally intended purpose. If you have questions regarding whether information is protected health information, consult with management or corporate compliance prior to using or releasing such information.

All care partners are required to know and comply with laws and/or policies about HIPAA (Health Information Portability and Accountability Act) privacy and security, and identity theft. Intentional violations of these laws and policies concerning them will not be tolerated and are grounds for disciplinary action, up to and including termination of employment, criminal and professional penalties per federal and state laws and Parrish Medical Center policies.

CARE PARTNER IDENTITY THEFT
Parrish Medical Center has implemented an Identity Theft Program aimed to lessen the exposure of risk to our care partners’ collected and stored information. All care partners should do their part and keep private information private.

In the event that your identity has been compromised, Parrish Medical Center will assist you with any questions on reporting your unauthorized compromised identity. Parrish Medical Center will provide credit company surveillance for one year to monitor your credit.

We take identity theft seriously, and have zero tolerance for care partners violating someone’s personal information. Care partners who are found to have violated the identity of a fellow care partner or patient will be disciplined accordingly, including termination and law enforcement notification.

UNDERSTANDING DISCIPLINARY ACTIONS
Parrish Medical Center approaches all infractions of our organization’s rules with fairness and impartiality. Failure to comply with our Code will result in disciplinary action that may include suspension, termination, reimbursement to Parrish Medical Center for any losses or damages resulting from violation and, where appropriate, referral to a governmental authority. Anyone charged with violation of our Code will be given an opportunity to explain his or her action before disciplinary action is taken. Our Code will be enforced at all levels, fairly and consistently. Disciplinary actions are processed according to Human Resources policies, Hospital Bylaws, and/or Medical Staff Bylaws.

Excellence: “A journey that never ends.”
— Brian Tracy
REPORTING COMPLIANCE – HIPAA PRIVACY – HIPAA SECURITY ISSUES

Any care partner who has knowledge of activities that he or she believes may violate laws, regulations or Parrish standards has an obligation, after learning of such activities, to report the matter via the Reporting System.

1. **Talk to your supervisor**

2. Not comfortable contacting your supervisor or do not feel you received an adequate response or still have questions or concerns
   
   **Talk to another member of the management team**

3. Still have concerns or not comfortable talking to management
   
   **Contact Corporate Compliance**

24 hours a day, 7 days a week. Reporting may be done anonymously.

**Compliance Hotline:** 888-447-8653

**Online:** parrishmed.ethicspoint.com

**Compliance and HIPAA Office:** 321-268-6835

**Corporate Internal Hotline Phone:** 321-268-2217

**Compliance Email:** CorporateCompliance@parrishmed.com

Parrish Medical Center takes violations of laws and policies seriously.

The external hotline and online reporting portals are monitored by an independent ethics and compliance hotline agency. All concerns are forwarded to Corporate Compliance for confidential processing.

Reporting is not intended to replace management or supervisor oversight.

You may always report your concerns directly to your manager. Personnel issues may be reported to Human Resources.

*No retaliation for good faith reporting.*

Retaliation for reporting is not tolerated. Anyone who feels they have been retaliated against should report the specific retaliation immediately to Corporate Compliance or to Human Resources.
MY ACKNOWLEDGEMENT

I understand that I play a critical role in Parrish Medical Center’s mission, vision, and values. I acknowledge that nonadherence to Parrish Medical Center’s principles and standards may result in disciplinary action up to and including termination of my employment, consistent with Parrish Medical Center’s Code of Business Ethics and Business Conduct and with Parrish Medical Center’s Human Resources policies.

As a care partner, I will be an advocate for Parrish Medical Center’s business ethics and business conduct by:

- Complying with applicable federal and state laws, rules and regulations, and Parrish Medical Center’s standards and policies
- Respecting the confidentiality of information acquired in the course of my work, and will not use information belonging to Parrish Medical Center for personal gain
- Acting with honesty and integrity to avoid conflicts of interest in my personal and professional relationships that could have an impact on Parrish Medical Center, and disclosing to Corporate Compliance transactions that may potentially or actually be a conflict of interest
- Proactively promoting ethical behavior among my care partners, patients and vendors
- In good faith, promptly reporting violations or perceived violations of federal and state laws, rules and regulations, and Parrish Medical Center’s standards, policies or procedures
- Protecting the assets of Parrish Medical Center
FREQUENTLY ASKED QUESTIONS

Q: Why do we need a Compliance and Ethics Program?
A: Fraud, waste and abuse in health care can result in criminal prosecution, civil liability and administrative fees. The Compliance and Ethics Program demonstrates Parrish Medical Center’s commitment to ethical behavior, and provides a means to discover mistakes early and correct them. Parrish Medical Center does not interpret honest mistakes as fraud.

Q: Why am I required to complete training on the Compliance and Ethics Program?
A: Compliance education is an important tool to help you become more aware of your personal responsibilities and accountability. The Compliance and Ethics Program defines proper conduct for doing business. The current health care environment is complex, and the Compliance and Ethics Program can help employees understand and comply with legal and ethical policies that will protect them and Parrish Medical Center.

Q: What happens if there is a suspected violation of the Code of Conduct?
A: Corporate Compliance will investigate the suspected violation. Additional resources, such as Corporate Services/Human Resources, the privacy officer or security officer, may assist with the investigation.

Q: I receive my medical care at Parrish Medical Center. Is my medical record kept confidential?
A: Yes. Parrish Medical Center policy and the Code require all employees to respect the confidentiality of every patient and his or her information. Confidentiality standards are the same for all patients, no matter if they are a community member, employed by Parrish Medical Center, a volunteer or a vendor.

Q: I’m concerned about the health of a co-worker and want to do what I can to help. Is it acceptable to look up my co-worker’s medical record?
A: No. You may only access patient information as required for you to complete your work. Accessing patient information for any other reason may be grounds for discipline, up to and including termination.
THANK YOU

for your commitment to work ethically,
leading with honesty and integrity
and for your ongoing dedication to
uphold our values and standards.