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Dear Colleagues

Westchester Medical Center (WMC) is committed to providing high-quality care to our patients and to conducting our business with integrity. To this end, we have an extensive Corporate Compliance Program in place to prevent fraud, waste and abuse and establish a standard for conducting business at the highest ethical, professional and legal standards. Given your affiliation with WMC, you are required to read this Code of Conduct. It is based on principles outlined in our mission and values statement, and it serves as the foundation of our Corporate Compliance Program. This code should help you carry out your daily activities within appropriate moral, ethical and legal standards. It is not intended to cover every situation, but is intended to help you make the right decisions or ask the right questions. The policies set forth in this Code of Conduct apply equally to everyone, are mandatory and must be adhered to. If you have any questions, the Corporate Compliance Officer is available to assist you. If you know of actual or suspected violations of the Code of Conduct or any WMC policy, you have a duty to report it to your supervisor or the Corporate Compliance Office at 914-493-5998 or the Corporate Compliance Helpline: 1-844-332-2477. Thank you.

Sincerely,

Michael D. Israel  Patricia Ariel
President and CEO  Senior Vice President and Chief Compliance Officer
Mission and Organizational Values

Mission Statement

New York State’s Delivery System Reform Incentive Payment (DSRIP) program provides unprecedented opportunities to observe, study, validate and replicate a systemic process for transformation of the health care delivery system across the State. As a result of DSRIP funding and implementation, The Center for Regional Healthcare Innovation (CRHI) was established in September of 2013 to be the central organizing entity for receipt of DSRIP funding for WMC Health and to be the Program Management Office for the WMC Health PPS.

Organizational Values

CRHI values reflect it’s mission to improve and ensure the provision of the highest quality health care to all residents of the Hudson Valley regardless of insurance, status, race, ethnicity, culture or sexual orientation. The organization values the treatment of all it’s employees, partners and stakeholders with the highest level of respect, dignity and personal and professional integrity.
The Corporate Compliance Program is WMC PPS’s commitment to the prevention of fraud, waste and abuse. An effective program establishes a standard for conducting business at the highest ethical, professional and legal standards. WMC PPS regards corporate and Representative integrity as critical to its operations. At the request of the Board of Directors and Chief Executive Officer, the Compliance Office continues to serve as a resource to guide the WMC PPS Representatives and Partners to “do the right thing.”

This Code is the heart of the Program and will assist Representatives in carrying out their daily activities within appropriate moral, ethical and legal standards. This Code is not intended to cover every situation but is intended to help Representatives make the right decisions or ask the right questions. This Code and associated policies also apply to WMC PPS relationships with all contractors, vendors, consultants and virtually everyone Representatives come into contact with. This Code can also be accessed via the Corporate Compliance area of the Center for Regional Healthcare Innovation (CRHI) website.

Duty to Report

The Compliance Office is here to assist you to understand what compliance and ethical conduct means to WMC PPS. If you know of actual or suspected violations of a law, this Code or a WMC PPS policy, you have a duty to report. You may report to your supervisor, manager, the Compliance Officer, or the Compliance Helpline.

Continues...
WMC PPS’s Corporate Compliance Program

/ continued...

How to Report

Representatives may contact the WMC PPS Corporate Compliance Office at 914-493-5998. WMC PPS also has a confidential Compliance Helpline (1-844-332-2477) where any Representative may confidentially or anonymously report any suspected or actual violation. Representatives who choose to remain anonymous will have their identities protected to the extent permitted by law.

Any supervisor or manager receiving a report of a suspected violation shall confer with the Corporate Compliance Office. Anonymous callers are given case numbers so they may call back at a designated date to receive follow-up information. To clarify any compliance-related issues, Representatives may call the Office of Corporate Compliance at 914-493-5998.

There will be no reprisals or retaliation against Representatives for good faith reporting of compliance concerns to their supervisor, manager, Human Resources, General Counsel, the Corporate Compliance Office or the Compliance Helpline.

Internal Investigations and Corrective Action

WMC PPS, through its Corporate Compliance Office, is committed to investigating all reported violations promptly and confidentially as required by law. Investigations may be conducted in conjunction with the Office of General Counsel. The Compliance Officer will coordinate any findings and corrective actions with affected departments and/or Partners. The Department of Human Resources will continue to coordinate investigations involving allegations of harassment (sexual or otherwise), grievances, suspected violations of ADA, FMLA, FLSA, or EEOC and discrimination. The Department of Human Resources shall keep the Office of Corporate Compliance apprised of the outcome of such investigations. All Representatives are expected to cooperate with all investigations.

Once a compliance investigation has been completed, the reporting person may be given a brief summary of whether the allegations were substantiated and whether or not corrective action was taken.
Internal Monitoring and Auditing

The Corporate Compliance Office and the Office of Internal Audit are responsible for overseeing various monitoring and auditing activities. Representatives may be asked to participate in audits in their respective organizations, as well as routine monitoring of high risk areas identified in the Compliance Office Annual Work Plan.

Disciplinary Action

Representatives recognize that we shall act in accordance with this Code of Conduct, WMC PPS policies and procedures governing our conduct and behavior, and federal and state laws, rules, and regulations. Failure to do so may result in serious consequences for Representatives, as well as for WMC PPS. Disciplinary actions up to and including termination of employment or contract (as appropriate) may occur for:

• Violating the Code of Conduct
• Failing to report a violation of the Code of Conduct or failing to cooperate in an investigation
• Retaliation against an individual for reporting a violation or possible violation of the Code of Conduct
• Deliberately making a false report of, or not reporting in good faith, a violation of any law, WMC PPS policy or this Code

Compliance Program Structure

The Corporate Compliance Officer reports directly to the Senior Vice President and Chief Compliance Officer. A Corporate Compliance Committee, comprised of members of WMC PPS, is charged...
with the responsibility of operating and monitoring the compliance program. The Corporate Compliance Program follows closely the guidance issued by the United States Federal Sentencing Commission, Department of Health and Human Services Office of the Inspector General, and the New York State Office of the Medicaid Inspector General that calls for the implementation of eight specific elements for achieving a successful compliance program. These eight elements include the designation of a Compliance Officer and Compliance Committee, development of written policies and procedures; which include disciplinary policies, as well as a policy of non-intimidation and non-retaliation for good faith participation in the compliance program, continuous education and training programs, effective lines of communication, responding to allegations of improper or illegal behavior, auditing and monitoring, and a process to address systematic problems and the prevention of hiring sanctioned individuals.

**Government Transactions**

All Representatives involved in government business activities must adhere to the ethical standards contained in this Code of Conduct as well as to governmental rules and regulations. If your responsibility involves business with any government entity, you must know the rules and regulations applicable to them as it relates to that governmental agency. If you are unsure, discuss the matter with your supervisor or the appropriate WMC PPS Representative or contact the Corporate Compliance Officer. If you are contacted by a regulatory or government agency, you should be professional and immediately notify the Corporate Compliance Officer, Office of General Counsel or Executive Director. WMC PPS shall not make any verbal or written false statements to a government agency or payor. We strive to ensure that all reports or other information required for any federal, state or local government agency are provided in a timely, accurate manner and in compliance with all applicable laws and regulations. We comply with federal, state or local requirements regarding government contracts and programs in which WMC PPS participates.
Patient Confidentiality

During the course of their work, Representatives may become aware of Protected Health Information (PHI) about patients and their medical conditions. All patient information is confidential. WMC PPS is committed to maintaining confidentiality of patient and other information in strict accordance with legal and ethical standards and shall actively protect and safeguard such information. Breaches of PHI are not tolerated by WMC PPS. If you know of actual or suspected violations of the Health Insurance Portability and Accountability Act (HIPAA) Privacy Rule, you have a duty to report to your supervisor or the Compliance Officer at (914) 493-5998.

All Representatives have a duty to protect the confidentiality of patient information at all times in the course of their work or responsibilities. Information concerning patients or their treatment plan of care should not be discussed in public areas where others may overhear the conversation.

Any Representative of WMC PPS who engages in unauthorized disclosure of PHI in violation of HIPAA, WMC PPS policies, and other applicable rules and regulations may be subject to disciplinary action up to and including termination as well as civil and/or criminal sanctions.
Conflict of Interest

General Statement

Representatives have a duty, when conducting WMC PPS business, to place the interest of the PPS ahead of their own personal interests. Representatives shall not use their positions or confidential information gained during the course of their duties to their personal advantage. A conflict of interest may occur if your outside activities or personal interests influence, or appear to influence, your ability to make objective decisions associated with your workplace responsibilities. All Representatives shall also abide by the WMC PPS Conflict of Interest policy, if applicable.

Gifts and Entertainment

Representatives and their immediate family may not accept any gifts or services from vendors, contractors, physicians, visitors, or patients in exchange for referrals or business. WMC PPS prohibits solicitation and the acceptance of cash or cash equivalents. A department or group may accept perishable or consumable gifts. Sometimes a business associate will extend an offer for training and education opportunities that include travel and overnight accommodations, or a vendor may extend an invitation to an event or site visit to receive information about new products or services. Acceptance of these types of events shall be at the cost of WMC PPS with prior approval from appropriate management. The Corporate Compliance Officer should be consulted if there is any doubt about accepting these offers.
Regulations

Licensure and Certifications

WMC PPS does not allow Representatives or independent contractors who are required to be licensed or credentialed to work at WMC PPS without valid, current licensure or credentials. All Representatives are expected to conform to the standards of their profession and exercise appropriate judgment in the performance of their duties. WMC PPS ensures that all prospective employees and PPS Partners, as well as all suppliers, vendors, and contractors are not sanctioned by the relevant regulatory agency and are eligible to perform their designated responsibilities.

Environmental Laws

WMC PPS provides a safe and secure environment for Representatives. Representatives are responsible for being knowledgeable about safe workplace practices and the reporting of any potential hazardous material contamination with which they may come in contact.
Business Information

Integrity of Financial Reporting and Records

WMC PPS has established and maintains a high standard of accuracy and completeness in its financial records. These records serve as the basis for managing our business and are important in meeting our obligations to regulatory authorities. It is WMC PPS’s policy to comply with generally accepted accounting principles. WMC PPS is audited by an independent firm in order to assure financial integrity.

Accuracy, Retention, Storage and Disposal of Records

WMC PPS maintains record retention and destruction schedules to assure that all financial and business records are maintained and destroyed in accordance with legal and business requirements. Representatives may not tamper with records, remove records, or destroy records prior to the date specified on the retention and destruction schedules. In addition, if a Representative has knowledge of an investigation, litigation or subpoena, records may not be destroyed without first consulting with the Office of General Counsel.

Securities

Representatives should expect that in the course of performing their duties they may come to know of information about WMC PPS or other companies with whom we do business. Non-public information, in the context of the Security laws, is defined as any information that would affect securities prices, either positively or negatively, that is not generally available to the investing public. This information is generally referred to as “insider information.” Buying or selling stocks using insider information is referred to as “insider trading” and is an illegal activity punishable by fines and/or imprisonment.
Marketing Practice

WMC PPS shall market and advertise accurately, truthfully and ethically, and in compliance with laws and regulations. Marketing and advertising shall be used for legitimate purposes, including educating the public, reporting to the communities served, increasing awareness of available services and recruiting staff.

Media Inquiries

The WMC PPS shall collaborate with the WMC Marketing and Corporate Communications Department for all contact with the media. Unless you are specifically authorized to represent WMC PPS to the media, please do not respond to inquiries or requests for information. Any questions or concerns shall be directed to the WMC Department of Marketing and Corporate Communications.
Antitrust and Competition

Antitrust laws are designed to create a level playing field in the marketplace and to promote fair competition. It is our policy to fully comply with antitrust laws. Representatives shall be aware of potential situations where it might not be appropriate to participate in discussions, an example of which might be at a trade association meeting.

Supplier, Vendor and Subcontractor Relationships

Suppliers, vendors and contractors shall be selected based upon the quality, price, service, delivery, and supply of goods and services, as well as in accordance with WMC PPS’s procurement policy, laws, rules, and regulations. Representatives will not accept gratuities or contributions to influence the decision process. Suppliers, vendors and contractors shall be expected to adhere to the WMC PPS Code of Conduct.

Intellectual Property

Copyright

WMC PPS Representatives shall not reproduce any copyrighted materials without the express permission of the copyright holder and/or appropriate license from the copyright holder. WMC PPS Representatives shall follow the laws regarding intellectual property, including patents, trademarks, and copyrights.
In general, the laws that apply to printed materials are also applicable to visual and electronic media and include diskettes, CD-ROMS and World Wide Web pages. WMC PPS Representatives may only make copies of copyrighted materials pursuant to WMC PPS’s policies and procedures on such matters and as otherwise permitted by law.

Agreements

All agreements between WMC PPS and its network partners must be in writing and structured to comply with Antikickback, Stark, tax law and other Federal and State rules and regulations.

False Claims Act

WMC PPS complies with the Federal and State False Claims Act. This Act makes it a crime for any person or organization to knowingly make a false record or file a false claim with the government for payment and calls for severe civil and criminal penalties associated with defrauding the Medicare and Medicaid programs. This includes, but is not limited to, billing for services not provided, services not ordered by a physician, billing for services not medically necessary, billing for more complex services than was provided, improper physician financial relationships, inaccurate or misleading cost reports, etc. Representatives who have concerns are required to speak to their supervisor, the Corporate Compliance Officer, or to call the Helpline. WMC PPS refers Representatives to the WMC PPS Policy on Detecting and Preventing, Fraud Waste and Abuse.