

CODE OF ETHICAL BUSINESS CONDUCT

DRMC is committed to complying with all legal, professional and ethical obligations that apply to our various business practices, and to establishing and maintaining a corporate culture that enables all of us to fulfill all related legal, professional and ethical obligations. DRMC's employees and vendors, contractors and business partners (associates) are expected to know and adhere to all legal and ethical requirements that pertain to their areas of responsibility. This policy is intended to direct the actions and expectations for the conduct of all business affairs. All employees and associates are responsible to ensure that their behavior and activity are consistent with the principles outlined in this policy.

In promoting DRMC's commitment to the highest standards of business ethics and integrity, associates accurately and honestly represent DRMC and will not engage in any activity or scheme intended to defraud anyone of money, property or services.

Financial Reporting, Coding and Claims Processing

- DRMC will not knowingly submit claims for payment or reimbursement of any kind that are false, fraudulent, inaccurate, incomplete or fictitious to any government entity or third party payor.
- All patient records, documents, reports and bills are prepared and maintained as required by state and Federal law. Only appropriate procedure, diagnosis and billing codes are used and appropriately documented before bills or claims are submitted for payment.
- DRMC has established control standards and procedures to ensure the assets are protected and properly used and that financial records and reports are accurate and reliable. All associates share the responsibility for maintaining and complying with required controls.
- All financial reports, accounting records, expense accounts and other related documents accurately and clearly represent the relevant facts and the true nature of a transaction. Improper or fraudulent accounting, documentation or financial reporting is contrary to this policy.
- DRMC requires candor and honesty from individuals in the performance of their responsibilities and in communication with our auditors and outside regulatory or review organizations.

Use of Proprietary Information

- Information pertaining to DRMC's competitive position or business strategies, payment and reimbursement information, and information relating to negotiations should be protected and shared only with those having a need to know such information.
- Copyrighted materials in any form including electronic software will not be duplicated, without written permission of the license holder. Confidential or proprietary information belonging to DRMC, another entity or individual is protected.

Quality Patient Care and Customer Service

- DRMC will respect and support each patient's right to competent, considerate and courteous treatment or service within our capacity.
- Quality patient care with professionalism and integrity is provided, striving to achieve beneficial outcomes for our patients at the lowest possible cost.
- Only personnel with proper credentials, experience and expertise in meeting the needs of our patients are utilized. Vendor representatives are required to have proper credentials, experience and expertise when involved in meeting the needs of our patients.

Confidentiality of Patient Information

DRMC and associates shall maintain the confidentiality of patient's and other confidential information in accordance with applicable legal and ethical standards.

Antitrust

All associates must comply with applicable antitrust and similar laws that regulate competition. Examples of conduct prohibited by the laws are price fixing, bid rigging, boycotts, and unfair trade practices.

Taxes

As a nonprofit, tax exempt entity, DRMC has a legal and ethical obligation to act in compliance with applicable laws, to engage in activities in furtherance of its charitable purpose, and to ensure that its resources are used in a manner which furthers the public good rather than the private or personal interests of any individual.

DRMC expects each of its associates to refrain from engaging in activity that may jeopardize the tax-exempt status of the organization.

Fraud and Abuse

DRMC expects all employees and associates to refrain from conduct that may violate fraud and abuse laws. These laws prohibit activities such as direct, indirect or disguised payments in exchange for the referral of patients; and making false representation to any person or entity in order to gain or retain participation in a program or to obtain payment for any service.

Conflict of Interest

Each board member, officer or employee engaged in management of DRMC is expected in all business matters to place the mission and vision of DRMC above his or her self-interest. Persons holding such positions may not use their position to profit personally or to assist others in profiting in any way at the expense of the organization.

Gifts and Gratuities

DRMC is diligent in preserving and protecting our reputation and avoiding the appearance of impropriety.

- Soliciting tips, personal or monetary gratuities or gifts from patients is prohibited.
- Employees may not accept gifts or services that could influence decisions made on behalf of DRMC.
- Unsolicited gifts of nominal value (up to \$20) from vendors, patients or families are acceptable and, to the extent possible, shared with the co-workers.
- Offering of gifts, meals, expensive entertainment or other goods or services, in excess of nominal value, to individual employees is prohibited.

Business Inducements

DRMC and associates will not seek to gain any advantage through the improper use of payments, business courtesies or other inducements. Offering, giving, soliciting or receiving any form of bribe or other improper payment is prohibited.

Obligation to Report Violations and Misconduct

DRMC is committed to ethical and legal conduct that is compliant with all relevant laws and regulations and to correcting wrongdoing wherever it may occur in the organization. Covered persons shall report any potentially illegal conduct or unethical behavior whether personally observed or upon learning of such conduct. Misconduct may include but not limited to violations of this Code or any accounting or auditing concern.

- Violations are reported the Compliance Department at (814-375-6160)
- Reports may also be made using the Confidential Message Line at 814-375-3361.

Non-Retaliation Policy

DRMC will not tolerate or allow retaliation or harassment of any kind for reports of misconduct made in good faith by any covered person. Associates who attempt or do penalize or harass any individual are subject to action as defined in their agreement with DRMC while physician conduct will be addressed following the Medical Staff Bylaws and Rules and Regulations.

Purchasing

Purchase requisitions with authorized signatures are required for all initial stock and non-stock supplies, minor/capital equipment, etc. being requested and are processed through Materials Management. Authorized signatures are required for payment of invoices.

Contracts, Agreements and Leases

All contracts, agreements, leases,(except maintenance agreements) or other arrangements that financially bind DRMC comply with all Federal, State regulations. All agreements are in writing, validated by Accounting staff for compliance and require authorization and the signature of the President and CEO.

Maintenance agreements require the authorization and signature of the Materials Management Manager.