

Code of Conduct

JANUARY 2026



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Dear Colleague,

Every Brown University Health employee, manager and member of the professional staff (collectively referred to as a “team member”) plays a role in supporting Brown University Health’s commitment to conduct its business activities in an ethical manner. As such, knowledge of and continued adherence to the Brown University Health Corporate Compliance Program is of the utmost importance.

“Brown University Health” encompasses the Brown University Health hospitals which include Emma Pendleton Bradley Hospital, Newport Hospital, Rhode Island Hospital, The Miriam Hospital, Morton Hospital, and Saint Anne’s Hospital; Gateway Healthcare; and Brown Health Medical Group.



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The Brown University Health Corporate Compliance Program is a system-wide initiative consisting of a code of conduct, general compliance policies, internal monitoring, employee training and an employee response line. Designed to minimize Brown University Health's risk of violating federal and state regulations, the Corporate Compliance Program addresses issues, from billing and claims, to patient confidentiality, to employees' rights. These policies and standards are not a new philosophy of complying with the law, but rather a daily reminder of Brown University Health's commitment to being a responsible corporate citizen.

It is your responsibility to comply with the program, to use sound and ethical judgment and to report any suspected violation of law or ethical principle.

Suspected violations can be confidentially reported without fear of retaliation by:

- Talking with the manager of your department
- Calling the confidential employee response line at **1-888-678-5111**
- Calling the corporate compliance officer at **1-401-444-4728**
- Completing a confidential employee response form via the Brown University Health intranet at <https://intranet.brownhealth.org>.
“Report a Compliance Concern” is listed as a link at the bottom of the page.

This brochure was developed to help you understand the code of conduct, policy CCPM 01 “Code of Conduct,” and the general compliance policies that support the code and the Corporate Compliance Program. If you would like additional information, please visit the Corporate Compliance Program website at <https://intranet.brownhealth.org/compliance>.

Your ongoing commitment and support of the Corporate Compliance Program will enable Brown University Health to continue to be a healthcare leader.

Kind regards,
John Fernandez
President and Chief Executive Officer

A handwritten signature in black ink, appearing to read "John Fernandez".

About Brown University Health's Corporate Compliance Program

The Corporate Compliance Program began in the late 1990s in response to the changing healthcare environment. The Corporate Compliance Program directly aligns with Brown University Health's shared values (Compassion, Accountability, Respect, Excellence). It establishes compliance standards and procedures for detecting, preventing and reporting violations of laws and professional regulations.



The mission of the Brown Health Corporate Compliance Program is as follows:

MISSION: The Corporate Compliance Program's mission is to create a culture of system-wide compliance with all applicable laws, regulations and Brown Health policies, as well as an appreciation for privacy awareness. The compliance function is a resource to all Brown Health team members, using a collaborative approach to navigate compliance concerns.

To accomplish this mission, the program sets forth, in policy, reasonable methods for the Brown Health community to follow to achieve continued compliance, and it aims to resolve detected violations in a fair, ethical and consistent manner. For example, it requires all team members to report suspected violations or improper business practices to Brown Health leadership or the Brown Health Corporate Compliance office.

VISION: The Office of Corporate Compliance and Internal Audit is an accountable and supportive team that is innovative, approachable and a confidential resource to connect team members to achieve patient-centric solutions.

Components of Brown University Health's Corporate Compliance Program

Brown University Health's Corporate Compliance Program includes a code of conduct and numerous supporting policies to ensure compliance with all government rules and regulations.

The code of conduct defines the standards of conduct that all team members are expected to follow. It requires that they:

- Commit to Brown Health **CARE** values
 - ~ **Compassion:** Delivering care and comfort with empathy and kindness.
 - ~ **Accountability:** Taking ownership of actions and their consequences.
 - ~ **Respect:** Placing the highest value on every individual's well-being regardless of personal and professional differences.
 - ~ **Excellence:** Always providing safe, high quality, innovative care and service.
- Comply with all applicable federal and state laws and regulations and professional standards governing Brown Health's operations and delivery of healthcare services, regardless of whether such laws, regulations, or standards are specifically mentioned in Brown Health's corporate compliance policies or other Brown Health policy.
- Maintain knowledge of such laws, regulations and professional standards relating to their specific responsibilities by attending educational and training programs offered by either Brown Health or other parties.
- Conduct themselves in accordance with the code of conduct and supporting corporate compliance policies. Failure to do so is not authorized by Brown Health, is inconsistent with Brown Health standards for team members, and may result in progressive disciplinary actions up to loss of employment or curtailment of privileges.
- Periodically review Brown Health's Corporate Compliance policies, located on the Brown University Health Intranet at <https://intranet.brownhealth.org/compliance>, to become familiar with those policies. Additionally, team members who are Brown Health employees, as part of the annual performance evaluation process, must acknowledge their understanding of and adherence to the Brown Health Corporate Compliance Program; and active medical staff, during the credentialing process, must attest to their knowledge of and adherence to the Corporate Compliance Program and its policies.

- Report any apparent or threatened violations of any Brown Health policy or any applicable law, regulation, or standard of conduct to their supervisor, senior management or the corporate compliance office. Brown Health will not take adverse action against any person or party who reports in good faith any violation, or apparent or threatened violation. Disciplinary action may be taken against a team member if it is discovered that the team member knew or clearly should have known that a potential violation existed, but failed to report it.
- Know that violation of one or more of the various laws cited in the corporate compliance policies may result in personal, criminal and civil sanctions and penalties. These laws include the False Claims Act, Civil Monetary Penalties Law, the Stark Law, the Anti-Kickback Statute, and the Rhode Island False Claims Act.
- Exercise good faith cooperation in making the Corporate Compliance Program effective.

Summary of Brown University Health's Compliance Policies

The following is a brief overview of the various compliance policies, grouped into categories. For more information on a specific policy, go to PolicyStat on the Brown Health Intranet or review the Corporate Compliance Program website at <https://intranet.brownhealth.org>. Scroll down to Corporate Compliance or Privacy (located at the bottom of the page).



Legal Compliance

Brown Health is committed to conducting its actions in conformance with all applicable laws and regulations. Our legal compliance policies cover topics including but not limited to anti-kickback laws, antitrust laws, patient referrals, patient transfers, physician recruitment, non-hiring of sanctioned individuals, and certification of need and licensure.

For example, CCPM-03, "Patient Referrals and Compliance with the Stark Law," generally prohibits a physician from referring a patient to an entity in which the physician has a financial interest. In addition, CCPM-22, "Compliance with Antitrust Laws," focuses on a commitment to preserving the free enterprise system by not unreasonably restraining competition.

Billing and Claims

Our policy CCPM 08, “Health Care Billing and Claims Submission,” states that Brown Health will adhere to all federal and state billing, coding, and claims regulations. The documenting of services, billing, coding, processing of claims, and obtaining reimbursement from Medicare and Medicaid programs is highly regulated and complex. As such, utmost attention to and diligence in these matters are required.

Many Brown Health team members are responsible for assigning and entering charges, procedure codes, and diagnostic codes; such team members are expected to comply with applicable billing rules to ensure accurate claims are prepared and submitted. False billing is a serious offense and is prohibited.

Examples of false claims include intentionally and knowingly:

- claiming reimbursement for services not rendered or not medically necessary;
- filing duplicate claims; and
- characterizing the service differently than the service actually rendered

Additional billing policies relate to professional courtesy at CCPM-34, “Professional Courtesy,” and waiver of co-payments at CCPM-35, “Waiver of Co-Payments”.

Conflicts of Interest

Brown Health is committed to achieving its mission by conducting its affairs in accordance with the highest professional and ethical standards. CCPM-09, “Conflict of Interest,” dictates Brown Health’s requirements for implementing a system of disclosure and resolution of conflicts of interest.

Q - *I received a gift card from my patient as a “thank you” for providing excellent patient care. I don’t want to hurt their feelings, can I accept it?*



A - Brown Health’s policy CCPM-30 “Gift Acceptance” prohibits acceptance of gifts, whether in cash or gift card from patients. Please thank the patient sincerely and refer the patient to the development office of your hospital affiliate for them to make a donation in your name.

Other similar policies in this category include interaction with vendors from the pharmaceutical, medical device and medical supply industries; gifts and entertainment; excess benefits; and private inurement/private benefits. For example, CCPM-46, “Vendor Interactions,” prohibits our team members, including our employed physicians, from participating in speaker bureau activities.

Confidential Information

Brown Health takes very seriously its responsibility to maintain confidential information. The confidentiality policies relate to patient information, contact with the media and law enforcement, documentation retention, software copyright compliance, the issuance of tax-exempt bonds, and insider information.

For example, CCPM-11, “Confidentiality of Patient Information,” requires that all team members comply with our patients’ rights to privacy and confidentiality of medical records, and it includes prohibitions on accessing the medical records of family members, friends and colleagues outside of work-related duties. Additionally, all employees must be mindful of protecting confidential medical information working both in the medical and/or office environment and remotely. This policy is supported by additional HIPAA privacy policies, which can also be accessed via the Corporate Compliance Program website. In addition, CCPM-10, “Software Copyright Compliance,” dictates that personal computer software may not be installed, copied or used on any computer owned by Brown Health or its affiliates except as permitted by the software licensing agreement.

Q - *I want to use Chat GPT to summarize clinical information for me. Everybody is using Artificial Intelligence. Why can't I?*

A - Brown Health has recently adopted an AI Governance and Usage Policy. Please refer to that policy which states “in all cases, public, consumer grade AI services (e.g. public chatbots like ChatGPT or cloud AI not under Brown’s control) should not be used with any Brown Health confidential or patient PHI data.”

Q – *I am so worried about my family member that I want to look at the documentation in their medical record that I can find in Epic (EPIC) or other authorized electronic health record. Is that ok?*

A – No. Epic and other authorized electronic health records contain confidential patient information. Those systems allow you to access your patient's information for Brown Health business-related purposes only. Accessing Epic or other authorized electronic health records for you, your family members, or your friends is prohibited, and will result in discipline or termination of your employment.

However, you can access your personal medical records and the records of your family members for whom you serve as the proxy through the EPIC patient portal and the other authorized electronic health records patient portal. Patient Portals are the only permitted ways to view personal health information and access personal medical records. To secure access please reach out to the Health Information Services department at the hospital or medical group.

Social Media

Brown Health team members who publish or post content on user-generated media or the Internet (including, without limitation, social media sites, blogs, chatrooms and message boards) should exercise good judgment, respect for patient privacy, respect for self and others, and discretion, and should ensure compliance with both Brown Health's MC-1, "Brown University Health Corporation and Affiliate Employee and Professional Staff Members Social Media Policy," and CCPM-74, "Unauthorized Photography and Video Recording of Patients, Professional Staff and Workforce Members by Patients and Visitors."

Q – *I want to take a selfie with my favorite patient in their hospital bed and live stream the excellent care I am providing to my patient. The patient said it was ok with them. I want people to see what a good hospital I work at, so I would like to post this on Facebook, Instagram and other social media sites.*

A – Brown Health policy CCPM-74, "Unauthorized Photography and Video Recording of Patients, Professional Staff and Workforce Members by Patients and Visitors," states that photography of a patient is not permitted if it is conducted during patient care or treatment unless there is a signed

written authorization by the patient on file in the Marketing office for the specific photo. Posting any work-related information (pictures or verbiage) on social media is not allowed.

Q - *What if my favorite patient takes a picture of another patient?*

A - If you see a patient taking a picture or a video of another patient, please alert a member of your clinical leadership and Risk Management as soon as possible. They will contact Corporate Compliance to assist in the next steps. Patients should not take pictures of other patients.

Positive Work Environment

Providing a positive work environment for all team members is vital to Brown Health's corporate values. The compliance policies include but are not limited to policies on sanctioned individuals, equal employment opportunity, sexual harassment, substance abuse, and occupational safety and health.

For example, Human Resources Employee Relations 5.8, "Nondiscrimination/Anti-Harassment and Complaint Procedure," states that Brown Health will not tolerate sexual harassment of team members, and that swift disciplinary action will occur to eliminate inappropriate conduct. Human Resources 4.4, "Substance Abuse/Drug Free Workplace" dictates that all Brown Health team members will perform their duties at an acceptable performance level—without being impaired by drugs or alcohol.

Political Activities

Brown Health recognizes our team members participate in civic and political activities; however, when doing so they must ensure their actions comply with Brown Health's policy CCPM-42, "Compliance with Federal and State Legislative and Executive Branch Lobbying Laws and Regulations." Brown Health team members may not use Brown Health letterhead for written correspondence to legislative or executive officials and cannot use or display their Brown Health credentials, including their identification badge, when commenting regarding pending legislation or policy making decisions. Moreover, Brown Health's direct political activities are limited by both state and federal laws, which mandate that corporations cannot make contributions to elected officials and candidates for political office. In addition, federal statutes govern the reporting of Brown Health's purchases for events that honor members of Congress. Finally, Brown Health has created policies governing contracts with major state and municipal decision makers and compliance with lobbying laws and regulations.

Protecting the Environment

Healthcare settings produce a variety of environmental wastes that are subject to regulatory and accreditation standards. Brown Health and its affiliates practice safe and responsible techniques for handling and disposing of these wastes in compliance with applicable regulations.

Q - *What if I find paper on the ground or prescription bottles that have patient protected healthcare information or patient address information?*

A - Pick up the paper or prescription bottle and contact the Office of Corporate Compliance. A team member will work with you on the next steps.



Use of Brown University Health Email and Secure Chat

All Brown Health employees and contracted clinicians should be responsive to requests for feedback on Brown Health email. Additionally, all employees and contracted clinicians should abide by the secure chat policy.

Q - *I have been contacted by a clinician via secure chat since I am on the care team of their family member. Should I respond?*

A - Brown Health's policy CCPM-87, "Clinical Communications and Use of Secure Chat," outlines the guidelines for secure chat and the secure message function in other authorized electronic health records and specifically states secure chat and secure messaging should only be used by members of the patient's care team or for healthcare operations.

Research Activities

All research performed at Brown Health must comply with federal and state laws regulating research activities. For example, Brown Health's scientific integrity policy CCPM-24, "Brown University Health Policy on Research Misconduct," establishes procedures for resolving and reporting possible misconduct in research-related activities. In addition, the "Brown University Health Research Policy," CCPM-23, affirms Brown Health's intention to obtain grants and contracts from sponsors and to abide by the sponsors' requirements. Furthermore, CCPM-43 "Research Conflict of Interest Policy," describes

established mechanisms to identify, analyze, manage and eliminate conflicts of interest that may be detrimental to our patients' safety and the reputation of Brown Health and our research staff.

Q - *I have been offered a consulting position with a vendor outside of my role at Brown Health, what do I do?*

A - Brown Health's policy CCPM-46, "Vendor Interactions," specifically addresses interactions with vendors. Please contact the Office of Corporate Compliance for guidance on your specific situation.

The Brown University Health Corporate Compliance Program Model

The Brown University Health Corporate Compliance Program is designed to conform with the United States Federal Sentencing Guidelines. Our program works to ensure that compliance is a continuous activity involving all Brown Health team members, including the board of directors, and executive management. The program calls for the development and internal publication of necessary policies, monitors Brown Health activities to anticipate and prevent problems, and ensures that problems, when identified, are appropriately investigated and resolved, including reporting violations to the government when necessary.



The Corporate Compliance Program is fully supported by the office of the president and the board of directors. The board of directors' audit and compliance committee provides guidance to the corporate compliance officer, who reports directly to this committee. The compliance officer also serves as the organization's privacy officer. The system compliance committee, composed of various executive managers from each Brown Health hospital, physician group and corporate services partner and the chief compliance & privacy officer, works to develop, implement and maintain the program.

On an ongoing basis, the corporate compliance & privacy officer and their team review regulatory publications, conduct special investigations, and complete medical record documentation and billing compliance audits. In addition,

the corporate compliance & privacy officer oversees general and specific compliance training programs and works with affiliate privacy officers. In the event that a compliance violation is discovered, Brown Health has the proper mechanisms in place to report the violation to the government.

How to Report a Suspected Violation

Every team member is expected to comply with all the policies and to report any suspected violations. Ignoring a potential violation could jeopardize the high quality of care we provide to the community. For example, if you see the wrong patient documentation in the electronic medical record, please reach out to the health information management staff and corporate compliance to report the concern.

The corporate compliance policies and the code of conduct are meant to guide individuals throughout the system. Brown Health team members must follow all laws, use sound judgment, and consult with their manager or the corporate compliance officer when in doubt.

There are four options for making inquiries about a compliance issue or for reporting a potential compliance violation:

1. Talk to your manager.
2. Call the 24-hour employee response line at **1-888-678-5111**.
3. Complete a confidential employee response form via the Brown Health intranet at <https://intranet.brownhealth.org>. "Report a Compliance Concern" is listed as a link at the bottom of the page.
4. Call the corporate compliance officer directly at **401-444-4728**.

The employee response line established for the Corporate Compliance Program is completely confidential.

Q - *If I report something anonymously through the Confidential Employee Response line, how will I get information on the follow up?*

A - The Compliance & Privacy staff will communicate with you at a minimum, weekly. You will be provided the ability to create a username and password in our Confidential Employee Response line system which will allow you to come back to the system as often as you would like to receive an update.

Once a compliance concern is reported, the corporate compliance office will investigate the circumstances, take the appropriate steps to prevent a similar offense if it is determined there is a problem, and document the resolution and mitigation of the issue as appropriate.

Nonretaliation for Reporting

Brown Health may not retaliate against any team member who reports a concern in good faith. While the team member is accountable for their own wrongdoing, anyone who retaliates against someone who has reported in good faith will be subject to investigation and, if confirmed, disciplinary action.



Team members should report any retaliation or harassment to a supervisor immediately or to the compliance & privacy officer or the Response Line at **1-888-678-5111**. Please refer to Brown Health Policy CCPM-53, “Prohibiting Intimidating or Retaliatory Acts.”

Accessing Additional Information on the Program

Extensive information on the code of conduct and the accompanying supporting policies can be found in the Corporate Compliance Program policy listing and on the Brown Health intranet at <https://intranet.brownhealth.org>. Scroll down to Corporate Compliance or Privacy (located at the bottom of the page).

All team members are urged to review the code of conduct and the various policies via the intranet.

Your commitment to complying with the program is critical to Brown Health's continued success. If you have any questions or concerns, please consult your manager or call the corporate compliance office at **401-444-4728**.



See Something, Report Something



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