

Code of Conduct

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I. OUR COMMITMENT AND OUR EXPECTATION

Integrity. This core value of Inova is central to all that we do as we seek to achieve our vision of being one of the leading health systems in the nation. We are committed to consistently upholding the highest moral and ethical standards and to honoring our commitments as we provide world class healthcare - every time, every touch - to each person in every community we have the privilege to serve.

To help each team member, officer, trustee, physician, and business partner understand the bounds of this commitment, we have prepared this Code of Conduct to describe the responsibility of each of us to ensure that the Inova Health System always acts with the highest ethical standards and in compliance with applicable laws, rules, and regulations. We are relying on you to follow these guidelines and to act each day on behalf of Inova in a manner that reflects these values and standards.

Your Responsibilities

As (i) an Inova team member, officer, or trustee, (ii) physician practicing at Inova, or (iii) business partner (including students, volunteers, and agency/temporary staff), it is your responsibility to comply with the provisions of this Code of Conduct when acting on behalf of the organization or at an Inova facility. Ultimately, we expect you to act with honesty, integrity and consistent with the highest ethical standards.

As a component of your orientation and Inova's annual Compliance and Ethics training, you will be required to certify in writing that you have received, understand, and will abide by this Code of Conduct. This is required at the time of hire or within your first 90 days with Inova and annually thereafter. You understand that this Code is not a contract and that Inova may alter, amend or modify this Code at any time. You may always find the latest version of this Code on InovaNet (inovanet.net.inova.org) or request a current copy of it from Inova's Compliance Department.

This Code is intended to be read in conjunction with existing Inova policies and procedures. If there is an existing policy that is more specific than the Code, the Code is intended to complement the existing policy. In the event that the Code conflicts with an existing Inova policy, please notify management or the Chief Compliance Officer immediately and Inova will take action, if appropriate, to reconcile any inconsistency.

Violations of Inova's Compliance Program or Code of Conduct could result in disciplinary action up to and including termination of your employment, your contract, or your Medical Staff membership or privileges. See HR Progressive Discipline Policy #3024.

The term "Inova" in this Code refers to the collection of entities and affiliated entities that, together, constitute the Inova Health System.

Questions / Reporting Concerns or Violations

In carrying out your responsibilities, the right course of action may not always be clear. When faced with business decisions that may affect Inova's reputation for honesty and integrity, apply your common sense. If you question any situation or action, ask yourself the following:

- Is it legal?
- Is it consistent with this Code of Conduct and Inova's policies and procedures?
- Does it feel like the right thing to do?
- How would you feel if the situation continued?
- How would it look to family, friends, patients, and the community?

If, after asking yourself these questions, you have any concerns about the appropriateness of a particular situation or action, then it is your duty to report this concern to management, the Chief Compliance Officer, or the Compliance and Ethics Hotline. Similarly, if you observe or suspect a violation of this Code, Inova's Compliance Program, applicable law, or Inova policy, you must promptly report it to management. **It is your duty to question actions inconsistent with our values.** No concern is too small to bring to the attention of management. You may contact Inova's Chief Compliance Officer directly (**703-205-2337**) or Inova's Compliance and Ethics Hotline (**1-888-800-4030**) if you are not comfortable reporting something directly to management, or if you feel that attempts to do so have not been effective.

Non-Retaliation Policy / Confidentiality

We need everyone's help in detecting and preventing potential improper conduct at Inova and we take all reports seriously. Our policies prohibit any sort of retaliation against any individual who reports a potential or suspected violation of this Code, Inova's Compliance Program, applicable law, or Inova policy. If you feel that you have been intimidated or retaliated against for reporting a concern in good faith, you should report the suspected intimidation or retaliation immediately by contacting Inova's Chief Compliance Officer directly (**703-205-2337**) or Inova's Compliance and Ethics Hotline (**1-888-800-4030**). We will do our best to keep your identity confidential if you report a violation, raise a concern, or are involved in a complaint or investigation.

II. OUR COMMITMENT TO THE ORGANIZATION

Conflicts of Interest

In your role, you are expected to always act in the best interest of Inova. A conflict of interest occurs when any personal interest exists that might affect, or might reasonably appear to affect, your objective or impartial judgment or conduct on behalf of Inova. Conflicts, or the appearance of a conflict, can be very damaging to Inova's reputation and to the trust between Inova and its stakeholders. You should avoid any potential or actual conflict of interest with respect to Inova. If a conflict or perceived conflict is nonetheless created, you should promptly report it to management or to Inova's Chief Compliance Officer to determine the best course of action.

The following examples identify certain potential conflicts of interest and how they should be handled, but this is not intended to be a complete list. If you believe other activities or situations might create a conflict of interest for you, notify management -- even if you are not sure. If management is unsure whether the situation constitutes a conflict, they will ask the Chief Compliance Officer and/or Inova's Legal Department for guidance.

Relationships with Suppliers, Competitors, and Family Members

- If you deal with contractors, suppliers, vendors or competitors, you must not take advantage of your position at Inova for any sort of personal gain.
- You may not take personal advantage of any business opportunity that is (or appears to be) of interest to Inova.
- If you have any interest in a company — for example, a company that is owned by your family or in which you have an employment or other compensation relationship — you may not do business with that company on behalf of Inova.
- You may not do business with a relative on behalf of Inova.

Gifts and Entertainment

- You may not accept gifts or entertainment from persons or companies that do, or seek to do, business with Inova, except as expressly permitted in Inova's Regulatory Compliance – Business Courtesies Policy and Supply Chain Supplier Management Policy and Procedure.
- You may not accept gifts or favors from Inova patients, except as expressly permitted in our Regulatory Compliance — Business Courtesies Policy.
- Any individual or organization that wants to make a gift should be referred to the Inova Foundation.
- You may occasionally accept a meal with a business partner or potential business partner for the purpose of discussing Inova business and developing professional business relationships. However, use good common sense and make sure that the meal is not excessive and does not influence how you conduct yourself on behalf of Inova.
- You may accept perishable or consumable items that are given by a patient as long as these items are infrequent, are of reasonable value, consumed or enjoyed by the staff at work, and will not cause a conflict or the appearance of a conflict of interest (for example, food during the holiday season, flowers from a patient, or pizza provided for the staff by a patient's family).
- You may not accept an invitation to a vendor-sponsored conference, meeting, training or other event that includes meals, travel or lodging except as expressly permitted in Inova's Regulatory Compliance – Business Courtesies Policy and Supply Chain Supplier Management Policy and Procedure.
- Vendors are prohibited from providing food at any Inova location and /or to members of Inova's workforce. This covers all workforce members at any Inova location or at offsite locations, during and after business hours. The only exceptions to this policy are as follows:

- When a vendor is asked to assist with an Inova sponsored CME educational activity or an Inova sponsored fundraising event. In these instances, the vendor will be contacted by the Inova CME office or the Inova Foundation.
- When a vendor provides official continuing education hours (e.g., contact hours). These educational hours may be provided by a vendor on site at an Inova facility during work hours, or offsite when an Inova workforce member may attend on his or her own time.
- During these events Inova workforce members may accept food provided by a vendor who provides or sponsors the training.

For more information see the Supply Chain Supplier Management Policy and Procedure.

Employment of Relatives

- The hiring or promotion of a team member or contractor is prohibited if that individual will be supervising, or be supervised by, a member of his or her own family.

Outside Employment and Other Activities

- You must not engage in activities during scheduled working hours that are not related to Inova's business.
- You must not use Inova's equipment, supplies or information, including but not limited to client lists, financial reports, business or strategic plans, vendor lists, fee schedules or reimbursement rates, or marketing information, in connection with any non-Inova activities.
- You may work at another job (self-employment or employment by others) outside of your work for Inova as long as it does not adversely affect your job performance for Inova or create a conflict of interest. If an outside job might create a conflict, you must receive approval from management.

It is your duty to be fair and unbiased and not driven by personal agenda. For further guidance on potential conflict of interest scenarios, please see [Conflict of Interest Frequently Asked Questions found on the Regulatory Compliance page on InovaNet](#).

Confidential Business Information

In the course of your duties, you may learn trade secrets, proprietary information, commercially sensitive information and other confidential information about Inova. Do not disclose any such confidential information to people who are not supposed to have it, including anyone outside Inova or anyone within Inova who is not authorized to have access to this information. Do not use confidential business information in any way that is not directly related to authorized Inova business activities — either during or after your relationship by Inova.

Examples of confidential business information include:

- Inova's strategic plans
- Planned expansions or reductions in Inova's business
- Merger or acquisition activity involving Inova
- Inova earnings estimates
- Borrowings by Inova
- Lawsuits involving Inova
- Senior management team developments within Inova
- Major purchases or sales by Inova
- Client or vendor lists

- Fee schedules
- Reimbursement rates or methods
- Personal information of any Inova team member or patient (including Social Security Numbers and other personal identifying information)

Books and Records

Inova maintains a wide range of books and records including, but not limited to, patient charts, medical records, clinical logs, clinical reports, financial reports, accounting records, research reports, expense reports, time records, and any other documents that might reflect Inova's business. Our record keeping must always be accurate, legal, and proper. To ensure this, you are required to:

- Record all entries in Inova's books and records accurately and in a timely manner.
- Not record any false or misleading information in any Inova books or records.
- Any entries that are recorded late should be noted as such and include the date and time the entry is made. Any late entries must be recorded in such a way as not to mislead potential readers regarding when and how the entry was made.
- Make sure that all Inova reports, records and documents accurately reflect performance and disclose the results of operations.
- Where applicable, make sure that records and reports comply with Generally Accepted Accounting Principles or relevant regulations of the federal Centers for Medicare and Medicaid Services (CMS) (Medicare and Medicaid), the Department of Medical Assistance Services (DMAS) (Medicaid), The Joint Commission, or any other applicable authority.
- Comply with all of Inova's internal audit procedures.
- Not engage in any "off the books" transactions that are not accurately reflected in Inova's books and records.

Information Technology

All information created, sent or received on Inova applications and electronic systems remains the property of Inova and must be used and handled per HIPAA guidelines and all other applicable regulations. Inova has a legal and ethical obligation to protect not only patient information but also team member and confidential corporate data. Consequently, you should follow the following protocols:

- Passwords and user IDs should be protected and never shared with others.
- Be aware of the risk of falling prey to phishing scams and never open emails or links to unknown sources.
- Electronic devices used for the storage or transmission of Protected Health Information (PHI) or confidential corporate information should be protected by encryption and physical safeguards.
- The Inova internet connection is for work related use. Personal use that is not approved by Inova Information Technology (IT) support staff should be limited to occasional or incidental use.
- Online actions should not violate any local, state, federal or international laws or infringe on copyrights or intellectual property rights.
- Online actions should be consistent with Inova mission, vision and values.

For more information, refer to Inova Information Technology Policies.

Intellectual Property

- You may only use material copyrighted by Inova, or Inova's trademarks, patents and other "intellectual property" for authorized Inova business.
- You may not use Inova computers, Internet access or other software or equipment to download music, software, movies or anything else that might violate copyright or trademark laws.
- Be alert to possible violations of Inova's copyrighted materials, trademarks or other intellectual property rights and immediately report suspected violations to management or Inova's Legal Department.
- When you use someone else's copyrighted materials, trademarks or other intellectual property rights, make sure that you are doing so legally.

If you have a question about intellectual property laws, please refer it to Inova's Legal Department for guidance.

Inova's Tax-Exempt Status

The resources of Inova's tax-exempt entities should be used only to further Inova's charitable purpose and in a manner that furthers the public good rather than the private or personal interests of any individual or company. Consequently, you should do the following:

- Ensure that all Inova business transactions are in the best interest of Inova and negotiated at "fair market" value.
- Do not use Inova resources to engage in any transaction in excess of fair market value.
- Do not use Inova resources or property for your own personal use or benefit, or to benefit a third party.
- All transactions with non-employed physicians must be on fair market value terms.

If you are unsure how tax-exempt requirements would apply to a particular situation, or if you suspect a violation of these requirements, immediately report the situation to management or Inova's Legal Department.

III. OUR COMMITMENT TO EACH OTHER

Expectations for the Workplace

We strive for a workplace that is inclusive and safe for our team members, physicians, and business partners. Our policies and programs are designed to promote fairness and respect for all individuals and to foster a workplace where diversity and inclusion are valued. We treat one another with respect and collaborate to achieve results. We do not tolerate discrimination, harassment or retaliation. Behaviors that put our patients, team members, physicians, or business partners at risk are not allowed.

Maintain a Workplace Free from Disruptive Behavior or Intimidation

- Inova is committed to providing an environment where all members of its workforce treat each other with respect, courtesy and dignity and conduct themselves in a professional and cooperative manner.
- All members of Inova's workforce, including members of the Medical Staff, advanced practice providers, nursing and clinical personnel, team members, contractors, and volunteers, must act in accordance with Inova's mission, vision and values, and are expected to refrain from disruptive behavior or intimidation.
- Disruptive behavior includes acts of degradation, intimidation, harassment or the threat of harm to patients, others, or workforce members that:
 - Disrupt orderly operation of facilities
 - Interfere with and/or impair the ability of others to accomplish their work safely and competently
- Examples of disruptive behavior include, but are not limited to:
 - Threats, attacks, verbal or other abuse, in whatever form, that are personal, or outside the bounds of fair professional conduct and personal civility
 - Disrespectful or inappropriate verbal communication or written documentation in medical records, or other official documents that, by fact or design, compromise the effectiveness of that person.
 - Non-constructive criticism, addressed in a manner to intimidate, undermine confidence, demean, or belittle other persons
 - Harassment of any kind
 - Use of profanity or similarly offensive language, written or verbal, gestures or actions that are perceived to intimidate, degrade, embarrass or humiliate other person(s).
- Individuals who observe or are subjected to disruptive behavior or intimidation should bring such activity to the attention of management through the facilities' Human Resources Departments or applicable Medical Staff Office. According to Inova's Progressive Discipline Policy (#3024), disciplinary action may be necessary when team members violate Inova's policies, procedures, or Code of Conduct.

Maintain a Working Environment at Inova Free from Harassment, Illegal Drugs, Alcohol, Tobacco and Unlawful Discrimination and Retaliation

- Inova is committed to providing an efficient and productive work environment.
- Perform your duties safely, competently, efficiently and in a way that protects Inova's interests, your interests and those of Inova patients.
- You are expected to conduct yourself in a way that reflects personal honesty and integrity, reflects positively on Inova, and meets Inova's obligation to provide quality care to patients.
- You must comply with all applicable federal and state employment laws, including those relating to discrimination based on age, race, religion, gender, sexual orientation, disability, or

any other characteristic protected by law, those related to retaliation and those relating to compensation and overtime pay.

- You must comply with federal and state laws that prohibit substance abuse in the workplace and Inova's Drug Free Workplace Policy. It is a violation of law and Inova policy to use illegal drugs or alcohol in the workplace. If you use illegal drugs or alcohol, you may be penalized, including termination of your employment, your contract, or your Medical Staff membership and/or privileges, in accordance with applicable Medical Staff bylaws, rules and regulations and policies. Please see Inova Human Resources Policy— Drug-Free Workplace.
- Inova is an equal opportunity employer: team members will be recruited, hired, promoted, transferred, demoted or terminated on the basis of their skill, experience, behavior and/or performance — without regard to race, color, sexual orientation, gender identity, religion, sex, pregnancy, childbirth, or related conditions (including lactation), marital status, national origin, age, disability, veteran status, genetic information, or any other characteristic protected by applicable federal, state or local law or any protected activity..
- If you are a team member and you think you may have been unlawfully discriminated or retaliated against, promptly report the situation to management, or to the director of Human Resources for your department.
- Sexual harassment includes, but is not limited to, sexual advances, requests for sexual favors, or any sexually offensive verbal, visual or physical conduct, and is not permitted.
- If you think you may have been unlawfully harassed, promptly report the situation to management or to your department's director of Human Resources.
- Please refer to the Inova Human Resources Policy — Anti-Harassment/Anti-Sexual Harassment about what is considered acceptable behavior.

Maintain a Safe and Healthy Working Environment

- Comply at all times with Inova's environmental and occupational safety and health policies to help Inova maintain a workplace free from health and safety hazards.
- Help to minimize potential health and safety hazards and notify your manager of any actual or potentially unsafe working conditions.
- You must be particularly careful if you are involved with the storage or disposal of medical and/or chemical waste.
- If you operate incinerators, sterilizers, underground storage tanks (containing fuel for emergency generators), or any other type of potentially hazardous equipment, you must follow all permits, applicable laws, regulations and procedures.
- If you suspect a violation of an environmental or occupational safety and health law, immediately report the situation to management or to your director of Safety and Security, who will report to Inova Risk Management or Inova's Legal Department, if necessary.
- If you have a question about environmental or occupational safety and health policies or laws, ask management, who will consult with Inova's Legal Department, if necessary.
- If you are involved in or see an accident that (1) injures (or may have injured) a patient, team member or visitor, or (2) damages property, you must report it to a supervisor and/or report it through the designated reporting procedure (e.g. Safety Always application).

IV. OUR COMMITMENT TO OUR PATIENTS

Patient Rights

At Inova, we work with compassion to ensure that every action we take puts the patient and family first, as reflected in our core value of Patient Always. While caring for our patients, it is our responsibility to advise them of their rights, including but not limited to the following:

- Patients have the right to be informed about their right to make advance directives.
- Patients have the right to know the names of all physicians, nurses and other hospital staff members caring for them.
- Patients must have an opportunity to talk regularly and openly with their attending physicians about their diagnosis, prescribed treatment, the prognosis of their illness or injury, and any follow-up care they may require.
- Patients must be advised if the hospital or its agent proposes to engage in, or perform, human experimentation affecting their care or treatment. They have the right to refuse to participate in any such research project.
- Patients have a right to privacy and confidentiality about their care, diagnosis and medical records.
- Patients have a right to information about a hospital bill, including mailed copies of the bill, upon request.
- Patients have the right to see and receive copies of their medical records and other health records in the form and format they request.
- Patients have the right to impartial access to all hospital services without regard to race, color, creed, national origin, age, gender, sexual orientation, disability or ability to pay.
- Inova shall use all reasonable efforts to ensure that patients are aware of their rights and can exercise their rights effectively.

Inova is Committed to Protecting the Integrity of Clinical Decision Makings

- Clinical decisions must be based on identified patient medical needs.
- Financial incentives must not be used to reduce medically necessary care or add more care than is medically necessary.

For more information, please see Inova's Administrative Policy on Patient Rights and Responsibilities.

Emergency Medical Treatment and Labor Act (EMTALA)

- Any individual who comes to an Inova dedicated emergency department requesting, or for whom a request is made, examination or treatment for a medical condition, will be given an appropriate medical screening. Likewise, any individual who is on Inova hospital property other than in a dedicated emergency department, and who requests, or for whom a request is made, examination or treatment for an emergency medical condition, will be given an appropriate medical screening. All individuals who are found to have an emergency medical condition shall be provided such treatment as required to stabilize the condition, within the staff and facility capabilities and capacity available at the hospital or provider-based, off-campus dedicated emergency department.

For additional information about EMTALA, refer to Inova's Administrative Policy: EMTALA-Compliance with the Emergency Medical Treatment and Active Labor Act.

Patient Information

Inova collects information about a patient's medical condition, history, medication, and family illnesses to provide the best possible care. You are expected to understand the sensitive nature of this information and to uphold Inova's commitment to maintaining the confidentiality of patient information. You must not use or disclose patient-specific information except when it is permitted or required by law, unless the patient has authorized such disclosure. Never use or disclose confidential information in a manner that violates the privacy rights of our patients. You do not have a right to access any patient information other than that necessary to perform your job duties. Every patient can expect that his or her privacy will be protected and that patient-specific information will be released only to persons as permitted by law or by the patient.

Health Insurance Portability and Accountability Act of 1996 (HIPAA) and HITECH Act of 2013

- Patients have the right to privacy and confidentiality about their care, diagnosis and medical information. HIPAA includes rules and regulations about privacy and security of patient information. HIPAA governs how Inova may use and disclose protected health information (PHI). PHI includes all individually identifiable health information such as medical records, patient bills, and electronic records that identify patients. HIPAA privacy rules allow Inova to use and disclose patient information for treatment, payment, healthcare operations, and for other activities required by law. HIPAA security rules govern how Inova must safeguard patients' electronic health information.
- You may access medical records and patient account records for job related purposes only and you may not access the records of family members, co-workers, friends or direct reports unless required by your role at Inova.
- Any complaint received about potential HIPAA privacy violations must be reported to Inova's Chief Privacy Officer or Assistant Privacy Officer, regardless of the perceived validity of the complaint.
- You must adhere to the HIPAA Privacy and Security Rules at all times.

For more information about HIPAA, you may refer to Inova's HIPAA policies and procedures that are posted on InovaNet. If you have any questions about how you may access, use, or disclose patient information you should contact management or the Chief Privacy Officer at 703-205-2337.

V. OUR COMMITMENT TO CONDUCT BUSINESS FAIRLY

Our commitment to act with integrity requires us to conduct ourselves with the highest ethical standards and in accordance with applicable laws and regulations. Shortcuts, unfair dealing, inappropriate business practices, and compromised ethics make it more difficult to achieve our mission and will not be tolerated. Only through acting with integrity and honoring our commitments will Inova reach its vision to be among the leading health systems in the nation.

Fraud and Abuse Risk Areas

We are committed as a high reliability organization to refrain from conduct that may violate the fraud and abuse laws or applicable false claims laws. These laws prohibit: (1) direct, indirect or disguised payments in exchange for the referral of patients; (2) billing for certain services ordered by excluded providers or by physicians whose financial relationship with Inova does not meet a regulatory exception; (3) the submission of false, fraudulent or misleading claims to any government entity or third-party payer, including claims for services not rendered, claims that characterize the service differently than the service actually rendered, or claims that do not otherwise comply with applicable program or contractual requirements; and (4) making false representations to any person or entity in order to gain or retain participation in a program or to obtain payment for any service.

Inova developed its Compliance and Ethics Program and maintains a policy (Regulatory Compliance Policy — Corporate Commitment to Compliance) designed, implemented and enforced so that it will be effective in preventing and detecting acts of non-compliance including violations of the fraud and abuse laws and state and federal false claims laws. Any violation of these laws may subject Inova or the individual to serious civil or criminal penalties.

False Claims Act

It is a violation of the Virginia Fraud Against Taxpayers Act and the Federal False Claims Act to knowingly submit, or cause to be submitted, false or fraudulent claims to the government. It is also a violation to make or use false or misleading records or to make false or misleading statements. Anyone who knows of such a violation, who ignores the truth or falsity of information, or who acts in reckless disregard of the truth or falsity of such information, may violate the Virginia Fraud Against Taxpayers Act and the Federal False Claims Act. It is also a violation to omit important facts about the claims submitted or the information provided. These laws serve to prevent and detect fraud, waste and abuse in government healthcare programs such as Medicare, Medicaid and Tricare.

Any individual or organization that violates the Federal False Claims Act is liable to the government for penalties of not less than \$11,665 and not more than \$23,331 for each false claim, plus three times the amount paid by the government for the claim. Any individual or organization that violates the Virginia Fraud Against Taxpayers Act is liable to the Commonwealth of Virginia for penalties of not less than \$10,957 and not more than \$21,916 for each false claim, plus three times the amount paid by Virginia for the claim.

It is very important to Inova that we make every effort to ensure that Inova's claims are accurate and free from any misstatement that might violate state or federal law. It is up to you and your team members to report to management or the Chief Compliance Officer anything that you believe might violate these laws.

Both the Virginia Fraud Against Taxpayers Act and the Federal False Claims act provide certain protections for individuals who report what they believe is a violation of the state or federal law. Individuals are protected from discrimination, retaliation, or retribution if they report a potential violation to the government. Inova's policies also prohibit any sort of retaliation, retribution, or discrimination against any member of its workforce if they report a potential violation.

Maintain Accurate Records of the Healthcare Services Provided by Inova

We are committed to following all the laws and regulations that relate to coding and billing. Our bills, claims and requests for reimbursement, and all documentation supporting those claims or requests, must be complete and accurate and must reflect reasonable and necessary services ordered by an appropriately licensed medical professional. Likewise, our coding must be accurate, properly reflect the services provided, and be consistent with applicable coding rules and standards. And in the same manner, Inova's cost reports must be accurate, properly reflect the statistics, charges and costs for services rendered, and must comply with federal and state laws, regulations and guidelines.

The following are examples of illegal activities:

- Billing for supplies or services not delivered or billing more than once for the same service
- Misrepresenting services provided
- Falsely certifying that services were medically necessary
- Collecting or attempting to collect amounts that exceed the co-payment and deductible from a Medicare or Medicaid beneficiary who has assigned benefits
- Asking for, offering or receiving a kickback, bribe or rebate or any other form of payment, in exchange for patient referrals
- Offering valuable items or services to Medicare or Medicaid beneficiaries to attract their business
- Providing financial incentives to limit services to Medicare patients

In addition:

- If you discover an inaccurate claim, immediately notify management or the Chief Compliance Officer, even if the bill or claim has already been submitted for reimbursement. Any overpayments that are identified must be repaid/refunded in a timely manner as identified by federal law.
- If your duties include providing a service for which Inova bills a payer or patient, you must be (1) licensed/credentialed to provide the service, or (2) specially trained to provide the service if required by the state law/regulation for your specialty and any national licensure or accreditation requirements¹.
- You may not make false statements or misrepresentations at any time about your Inova duties or about the services provided by Inova; this is particularly important if you are involved with processing claims or any other part of the documentation and reimbursement process. Making false statements or false representations includes making statements that you know are untrue or believe might be untrue; omitting important facts about the information provided; or allowing someone to rely on information provided when you believe that information may not be accurate.

Excluded Individuals

Inova May Not Deal with or Employ any Individual or Organization That Has Been Excluded from Participation in Federal Healthcare Programs

- As part of the implementation of this Code and the Compliance Program, Inova will monitor the list of those individuals and organizations that are designated "excluded providers."
- At the time of hire and/or contract and monthly thereafter, Inova will check the Office of Inspector General (OIG) and System for Award Management (GSA/SAM) databases to confirm the individual or organization has no active exclusions.

¹ This rule does not apply when Inova has written information that the use of unlicensed/uncredentialed personnel is permitted by the payer and applicable laws and regulations.

Anti-Kickback and Physician Self-Referral Laws

Inova prohibits the solicitation, receipt, offer or payment of anything of value in exchange for referring patients, or to encourage the purchase of items or services. Inova expects that its workforce will comply with federal laws including the Anti-Kickback Statute and the Physician Self-Referral Law (the Stark Law) and state physician self-referral prohibitions. If you have a question about any of the laws listed in this section, or any other rules affecting financial relationships with physicians or service providers, contact Inova's Office of General Counsel.

Never Offer, Solicit, Pay or Receive any Money, Gifts or Services or Anything of Value in Return for the Referral of Patients, or to Encourage the Purchase of Items or Services

- Do not offer, pay, solicit or receive any money, gifts, favors or services or anything of value in return for referring (or receiving referrals for) patients.
- Do not offer, pay, seek or receive any money, gifts, favors or services or anything of value to encourage someone to purchase goods or services.
- Remember that it is illegal to give a physician (or other health care provider) special treatment, money, favors, or services in return for patient referrals (or referrals of other business). This does not only mean giving physician money in return for referrals, but also providing a physician with free or discounted services or anything else of value, such as services of free office space or free supplies.
- For example, it is a violation of federal law and Inova policy to:
 - pay a physician for referrals
 - provide free or significantly discounted billing, nursing or other staff services
 - pay more than fair market value for goods or services
 - give physicians money or gifts of more than insignificant value
- Inova's Office of General Counsel must review all arrangements with any referral source (for example, physicians, vendors, suppliers), including contracts for services, leases, recruitment arrangements and loans.

Do Not Enter into any Agreements with or on Behalf of Physicians That Do Not Comply with the Stark Law

- The Stark Law generally prohibits physicians from referring Medicare patients to a facility for certain healthcare services if that physician has a financial relationship with the facility, unless the relationship fits within a regulatory exception.
- Consult with Inova's Office of General Counsel before providing (or agreeing to provide) any direct or indirect compensation to a physician or that physician's immediate family. Indirect compensation can take the form of free or discounted services or supplies, or anything else of value to the physician.

If you suspect or see fraud, dishonesty or criminal conduct, immediately report the situation to your manager, the Legal Department and/or the Chief Compliance Officer. We welcome and encourage your reports, and it is your duty under this Code to do so. If you report a concern to management or the Chief Compliance Officer, your identity will be kept confidential to the extent possible. You may also report your concern anonymously by calling Inova's Compliance and Ethics Hotline (**1-888-800-4030**).

Antitrust and Trade Regulations

Inova is subject to antitrust and trade laws that exist to ensure free and fair competition and to provide consumers with lower prices and higher quality goods and services. To comply with these laws:

- Do not enter into any understanding or agreement (written or oral) that unlawfully reduces or eliminates competition, or that sets prices or divides markets with a competitor.
- Seek advice of Inova's Legal Department before sharing any competitively sensitive information with a competitor.
- When gathering market intelligence, use public forums, publications, or expert consultants. Limit discussions with competitors about general market conditions (past, current and future) to publicly available information.
- If you attend trade association or professional association meetings, or otherwise come into contact with competitors on behalf of Inova, be particularly cautious not to do anything that could be interpreted as collusion or unlawful cooperation between competitors. If in doubt, consult Inova's Legal Department.
- If you question how the antitrust and trade regulation laws might apply to a particular situation, or if you suspect that someone has violated an antitrust or trade regulation law, consult with Inova's Legal Department.

Comply with All Laws and Regulations that Apply to Inova's Operations, Business, and Dealings

- Cooperate with government officials who are responsible for administering and enforcing applicable laws and for monitoring and regulating Inova's activities.
- If an attorney or a representative of any government agency contacts you as part of an investigation of Inova, immediately contact Inova's Legal Department (**703-289-2027**) to make sure that the government agency receives full cooperation. Inova will provide you with guidance on how to respond to investigations and inquiries, if relevant to your work on Inova's behalf.
- If you question whether an action is legal, or if you are confused about what a particular law means, contact management, the Legal Department, or the Chief Compliance Officer.
- If you suspect any violation of this Code, the law or Inova policies or procedures, report it to the Chief Compliance Officer or to management who then will report it to the Chief Compliance Officer.

Engaging in Political Activity

As a nonprofit organization, Inova is prohibited from participating directly or indirectly in political campaign activity on behalf or in opposition to any candidate for public office. Inova may not provide monetary or in-kind support to any political party, candidate for public office, or political action committee.

- You may not use your time while working on behalf of Inova to provide support to any political party or candidate, or for personal lobbying or other personal political activities.
- You may personally participate in and contribute to political organizations and campaigns, but you must do so as an individual, not as a representative of Inova, and you must use your own time and funds.
- You may not use Inova resources, including email, to engage in personal political activities.

Government Contracting

Obey All Laws and Regulations Concerning the Bidding, Pricing, Negotiation and Performance of Government Contracts

- All information you submit to a governmental body or representative on behalf of Inova must be truthful, complete and accurate.
- If you make any statement or claim to the government on behalf of Inova that you know not to be true, you have violated the law and Inova policy — this is true whether the statement or

claim was verbal or written, including bids, proposals, and requests for payment or reimbursement.

- You must strictly obey the terms contained in any government contract, including price terms.
- Do not seek or receive — directly or indirectly — any information that you or Inova are not authorized to have. Examples of information you and Inova are not authorized to have include:
 - confidential governmental information concerning bidding on a particular contract
 - confidential governmental information concerning the selection process for a particular contract
 - confidential information concerning a competitor's bid on a particular contract
- Do not offer, give, seek or receive any form of bribe, kickback, payoff or other improper payment in connection with any government contract.
- If you suspect that there may have been an improper payment to Inova in connection with a government contract, promptly report it to management who will report to the Chief Compliance Officer, if necessary.

Research Activities

Members of Inova's Workforce Engaged in Research Activities Must Comply with Applicable Laws, Regulations, Policies and Guidelines

Inova engages in a variety of biomedical and clinical research activities, some of which are funded by the federal government. If you are involved in federally funded research at Inova, you must obey all laws, regulations, policies and other guidelines applying to:

- Research grants from the U.S. Department of Health and Human Services and other federal and state agencies
- The protection of human subjects
- Provisions of the federal Food, Drug and Cosmetic Act, and other applicable federal and state laws
- The integrity of research data

If you work on other types of research projects with Inova's Office of Research you must also comply with all applicable policies of this department and the policies, procedures and directives of Inova's Institutional Review Boards.

Conclusion

This Code explains how Inova expects you to conduct yourself on the job, while working at Inova facilities, or on behalf of Inova. However, the Code cannot address every ethical or compliance question that you may face. When you need further guidance and cannot find it in this Code, ask someone in management or the Chief Compliance Officer. You should also talk to management or the Chief Compliance Officer if you ever feel that you are being pressured to act inappropriately — whether by a team member, a physician, a supplier, a competitor, or a patient. If management does not resolve your concerns satisfactorily, contact the Chief Compliance Officer directly. In addition, you should contact the Chief Compliance Officer if you have any questions about a law or the legality of a particular action. The Chief Compliance Officer will consult with Inova's Legal Department if appropriate.

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Inova is Northern Virginia's leading nonprofit healthcare provider, recognized in 2019 by U.S. News & World Report, which named Inova Fairfax Hospital the #1 hospital in the Washington, DC region. All five Inova hospitals were awarded 'A' grades for the spring 2020 Leapfrog Hospital Safety Grades, recognizing Inova's achievements in protecting patients from harm and providing safer healthcare. Each of Inova's five hospitals hold 5-star ratings from the Centers for Medicare & Medicaid Services (CMS), distinguishing Inova as the highest rated large health system in the U.S. Our mission is to provide world-class healthcare – every time, every touch – to each person in every community we have the privilege to serve. Inova's 18,000 team members serve more than 2 million individuals annually through an integrated network of hospitals, primary and specialty care practices, emergency and urgent care centers, outpatient services and destination institutes. Inova is home to Northern Virginia's only Level 1 Trauma Center and Level 4 Neonatal Intensive Care Unit. Its hospitals have a total of 1,800 licensed beds. More information and statistics about Inova can be found at inova.org.