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## Confidentiality

We are committed to maintaining the confidentiality of patient and other facility information in strict accordance with legal and ethical standards. We will not tolerate breaches of confidentiality.

- We will respect the privacy of our patients and fellow employees.
- We will actively protect and safeguard patient information.
- We will not reveal information unless it is supported by a legitimate clinical or business purpose, in compliance with facility policies and procedures, the Medical Staff Bylaws, and applicable laws, rules and regulations.
- We will not discuss patient information in any public area, including hallways or dining areas.
- We will disclose business information only as required in the performance of our job or as expressly authorized to do so by the facility.
- We will exercise care to ensure that confidential and proprietary information is carefully maintained and managed to protect its value.
- We will not disclose information regarding the facility's financial performance without appropriate approval.
- We will treat salary, benefits, payroll, personal files, and information on disciplinary matters as confidential information.
- We will maintain computer passwords and access codes in a confidential and responsible manner.



519 Pleasant Street  
Miles City, MT 59301  
Phone (406) 234-1420  
Fax (406) 234-1423



*Corporate Compliance  
Hotline*

*1-877-650-8048*

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# CORPORATE COMPLIANCE

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## Business Ethics and Compliance with Laws and Regulations

**We will follow the letter and spirit of applicable laws and regulations, conduct our business ethically and honestly, and act in a manner that enhances the facility's standing in the community and is sensitive to those we serve.**

**We, the employees, medical staff and others who comprise, or have a relationship with GLENDIVE MEDICAL CENTER, will act with integrity when working with patients, physicians, colleagues and members of our local communities. We will provide quality care to our patients while observing the highest standards of legal and ethical conduct. We will comply with all applicable laws, rules and regulations. This Code of Conduct, serves as the foundation for our Corporate Compliance Program. It applies equally to everyone.**

In order to have an effective compliance program, we must all cooperate willingly and participate actively. We have a responsibility to report concerns or issues regarding noncompliance. We may report our concerns to any of the following individuals or departments: Our manager/supervisor, Human Resources or Corporate Compliance Officer. We can report issues or problems without fear of retaliation from anyone connected with the facility.

If questions or concerns persist about a compliance issue, you should contact our Office of Corporate Compliance (406) 345-2603 or the confidential Hotline at Montana Health Network 1-877-650-8048.

We recognize that we must act in accordance with the Code and conform to its standards and supporting guidance, policies and procedures. We are aware that failure to do so can result in serious consequences for the individual employee, or medical staff member, as well as for the facility.

While the Code is designed to provide overall guidance, it does not address every situation. More specific guidance is provided in Corporate and Medical Staff Bylaws and Facility Policies and Procedures.

- We will make every effort to demonstrate honesty, integrity and fairness in the performance of our duties.
  - We will report any practice or condition that may violate any law, rule, regulation, safety standard, facility policy, or Code of Conduct to appropriate levels of management.
  - We are strictly prohibited from giving or receiving any form of payment, kickback or bribe to induce the referral or the purchase of any healthcare service.
  - We will not offer any improper inducement or favor to patients, physicians or others to encourage the referral of patients to our facilities.
  - We will not accept any improper inducements or favors from vendors to influence our patients or others connected with the facility to use a particular product or service.
  - We will avoid agreements or other actions that may unfairly restrain trade or reduce competition.
  - We will be aware of situations that may present potential antitrust issues and avoid inappropriate discussions with competitors regarding business issues. This includes prices for goods and services, salaries and benefits, payment rates and business plans.
  - We will market and advertise accurately and in compliance with laws and regulations.
  - We will provide contract payments or other benefits to clinicians and referral sources for the services and at the rates called for in the contract with them. Payments must also be supported by proper documentation that the services contracted for were in fact provided.
  - We will procure, maintain, dispense, and transport drugs or other controlled substances used in the treatment of patients according to applicable laws and regulations.
  - We will not make any verbal or written false statements to the government agency or other payer.
  - We will not pursue any business opportunity that requires unethical or illegal activity.
  - We will strive to ensure that all reports or other information required to be provided to any federal, state or local government agency are provided to on time, accurately, and accordingly to applicable laws and regulations.
  - We will comply with federal regulations regarding government contracts and programs in which we participate.
  - We will provide managers and employees who work in relevant areas with knowledge of the governing rules and regulations.
  - We will not subordinate our professional standards, judgment or objectivity to any individual. Significant differences of opinion in professional judgment will be referred to appropriate management for resolution.
  - We will not enter into any joint venture, partnership or other risk-sharing arrangement with any entity that is a potential or actual referral source unless the arrangement has been reviewed and approved by legal counsel.
  - We will not use facility resources, facilities or supplies for the purpose of supporting any candidate for public office.
  - We will not engage in lobbying activities on behalf of the facility that are or may be inconsistent with our tax-exempt status.
  - We will conduct fundraising in accordance with all applicable laws and regulations and facility policies and procedures.
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