Corewell Health Code of Excellence

Our Commitment to Ethics and Integrity

What we do matters. As a health system, we can ***improve health, instill humanity and inspire hope***. How we go about fulfilling our mission also matters.

Our Code of Excellence sets clear expectations for how we act and make decisions every day. The core principle of our Code is: ***We do the right thing.***

Doing the right thing means we speak and act in accordance with our values. When we're unsure of what's right, we ask for help. When there are different ways to achieve the right outcome, we seek to make the best decision possible, guided by our values and knowledge. We do the right thing even if no one notices or is watching, and even if it's not the easy thing to do.

By embracing and living this Code, each of us contributes to a culture of trust and transparency, innovation and continuous improvement, compassion and generosity. Each of us helps establish our system as one that welcomes all, encourages everyone to contribute, and is dedicated to solving the tough issues our patients and health plan members encounter.

I am grateful for your commitment to doing what's right for everyone, everywhere, every day. And I am proud and honored to reimagine the future of health with you.

Tina Freese Decker
President & CEO, Corewell Health



Mission
Improve health, instill humanity and inspire hope.

Vision
A future where health is simple, affordable, equitable and exceptional.

Values
Compassion. Collaboration. Clarity. Curiosity. Courage.

Corewell Health Code of Excellence

This Code of Excellence (Code) applies system-wide to all employed and non-employed team members (collectively referred to as team members) including providers, contractors, consultants, agents, students, volunteers and suppliers.

1. **We follow the highest standards of ethics and integrity.** This includes conducting ourselves in accordance with our values, adhering to all professional standards for responsible and ethical business practices and complying with all laws and regulations governing our business.
2. **We make sure everyone has a voice.** We raise concerns and evaluate them in a fair and just manner. We do not allow retaliation against anyone seeking help or raising a concern in good faith. When human error happens, we support our team members through a non-punitive response.
3. **We treat everyone with compassion, dignity and respect.** We serve everyone in our communities, without regard to race, color, sex, national origin, disability, age, HIV status, marital status, sexual orientation, gender identity, gender expression, religious beliefs, sources of payment for care or other protected status or category. We work to create environments free of harassment, violence and intolerance.
4. **We prioritize team member wellbeing and foster belonging.** We promote a positive, supportive environment where each team member feels valued and included. We act in safe and healthy ways and perform our duties with clarity and focus.
5. **We are good stewards of our resources.** These resources include our people, facilities, funding, information, technology, equipment, and supplies. We use them responsibly, and ensure that others do, too. We share them or allow others access to them only for legitimate business purposes and with proper authorization.
6. **We code and bill our services appropriately.** We strive to ensure and maintain complete and accurate documentation of medical services provided. We expect accurate coding from our provider partners. We report and return overpayments from a government health care program, commercial payer or patient.
7. **We are transparent with quality and pricing.** We give clear and accurate information as it relates to charges for the items and services we provide. We proactively share information about the quality of our care, the outcomes of our services, and the experiences of our patients and health plan members. We attempt to answer questions and resolve disputes related to our services to the patient's, health plan member's and payer's satisfaction.
8. **We protect the privacy of our patients and health plan members.** We collect information about a patient's and health plan member's medical condition, history, medication and family illnesses to provide the best possible care and health plan services. We protect individuals' health information while allowing the flow of information needed to provide and promote high quality health care.
9. **We are honest, accurate and fair in our business relationships.** We provide true and accurate information to the public, regulatory agencies, news media, and others who have an interest in our activities. We engage in social media in a way that is truthful and respectful of others. We follow our policies and principles of good business ethics pertaining to the exchange of gifts and business courtesies with suppliers. We address potential conflicts of interest before they arise, and when they do arise, we manage them through disclosure and removing the individual(s) with the conflict from decision-making related to the interest or matter.

How Can I Report a Concern?

You can report a concern in several ways. Our help lines are available 24 hours a day, seven days a week. An outside company receives calls and online submissions. The Compliance Department receives the report and reviews for follow-up or investigation. All contacts are confidential, to the limit allowed by law. If you prefer, you can make an anonymous report. Providing as much information as possible will help us review the validity of the report and investigate any potential misconduct.

Corewell Health Integrity Help Line
877.319.0266



secure.ethicspoint.com/domain/media/en/gui/73947/index.html

Priority Health Integrity Help Line
800.560.7013

*for providers, vendors, agents and members

You can always contact one of our Compliance Officers:

Cindy Rollenhagen
Chief Compliance & Privacy Officer
cindy.rollenhagen@corewellhealth.org

Michele McDonald
VP, Compliance & Privacy Officer
Corewell Health in Southeast Michigan
michele.mcdonald@corewellhealth.org

Heather DeHaan
VP, Compliance & Privacy Officer
Priority Health
heather.dehaan@priorityhealth.com

Carrie Miedema
VP, Compliance & Privacy Officer
Corewell Health in Southwest Michigan
Corewell Health in West Michigan
carrie.miedema@corewellhealth.org

Corewell Health Code of Excellence Acknowledgment

I understand and agree that:

- It is my responsibility to review, be familiar with, and comply with the Code of Excellence ("Code") and all related Corewell Health policies and procedures.
- Corewell Health and Priority Health provide an Integrity Help Line (877) 319-0266, managed by an outside, independent vendor for reporting (anonymously, if desired) any potential violation of the Code, Corewell Health policies or procedures, or any applicable laws, regulations or professional standards of conduct.
- I will not retaliate against another person for raising a concern or reporting a suspected violation of the Code, Corewell Health policies or procedures, applicable laws, regulations or professional standards of conduct.
- It is my responsibility to prevent, detect and report concerns and suspected violations of the Code or possible fraud, waste, and abuse, to a member of leadership, human resources, compliance, or the Integrity Help Line.
- I will inform my leader of potential conflicts of interest that I may encounter so that they may be properly addressed.
- If I violate the Code or other policies or procedures applicable to me as a Corewell Health team member, I may be subject to performance correction up to and including separation from employment or other relationship with Corewell Health and any of its affiliates, including Priority Health.

I certify that I am not currently excluded from participation in Medicare, Medicaid or any other federal or state health care program. I understand and agree that it is my responsibility to immediately disclose to the Corewell Health Compliance Department any current or future federal or state program exclusion or another event that makes me ineligible to perform work related directly to federal or state health care programs.

Electronic Signature: _____

Date: _____