Code of Conduct

The path to ethical decisions in the workplace

January 2021
A message from
CEO Jim Przybilla

Dear Fellow Employee:

Ethics and accountability are essential to the core values and mission of PrimeWest Health. Our commitment to serving our members and communities with the highest level of ethical behavior is vital. That commitment has helped build a positive reputation with our members, providers, regulators, and other key stakeholders.

While PrimeWest Health possesses a solid reputation as a health plan, employer, and corporate citizen, reputations are fragile and fickle things. It’s important to remember each one of us has the opportunity every day to solidify our reputation and credibility by promoting an ethical culture, serving our members with integrity, respecting coworkers, bringing forward concerns without fear of retaliation, and using our Code of Conduct to guide us in making good ethical decisions.

All of us possess a solid work ethic and set of professional values, yet some of our professional decisions still may be difficult. That is why resources such as our compliance training are available to us. Every employee and governing member of PrimeWest Health, including our Joint Powers Board of Directors (JPB) and leadership team, participate in this training. You can be assured that the JPB and I fully support our Compliance Program and are personally committed to our Code of Conduct and core values.

PrimeWest Health is well positioned for continued success, and the realization of that success begins with our daily commitment to maintaining high ethical standards. You can join in that commitment by becoming familiar with the Code of Conduct and applying it to your work here at PrimeWest Health. Thank you.

Sincerely,

Jim Przybilla, CEO
PrimeWest Health
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Mission, Vision, and Guiding Principles

The Mission of PrimeWest Health
The mission of PrimeWest Health is to cost-effectively improve our members’ health and health care experience through local county-based integration and coordination of health care and human services payment and service delivery.

The Vision of PrimeWest Health
Our vision is to inspire each other to provide high quality health care choices to our participating members.

The Guiding Principles of PrimeWest Health
We believe the interests of our members are of primary importance to PrimeWest Health. Our members are the reason for our existence and the rationale for the resources with which we operate.

We believe that, as representatives of our members, we are obligated to provide and demonstrate leadership qualities in the health care field. Leadership carries with it the responsibility to act with honesty and integrity in all dealings and communications.

We believe that PrimeWest Health employees are our most valuable asset and that the long-term success of our organization is directly dependent upon these individuals. We act as a cohesive team and depend on and support one another in all aspects of our business. We define success so we can acknowledge and celebrate our accomplishments. We recognize others for good work because one person’s achievements benefit us all.

We believe these guiding principles express PrimeWest Health’s philosophy and form the foundation for a positive work environment and a successful business.

“Our vision is to inspire each other to provide high quality health care choices to our participating members”
Core Values

Integrity
Integrity is the driving force behind our obligation to provide quality health care services and our commitment to honest, forthright, and respectful communications with all.

Responsibility
Responsibility makes us accountable for and willing to accept the consequences of our actions and behavior. We perform our job duties honestly and efficiently while striving for excellence in everything we do. We are responsible for adhering to the highest legal and ethical standards for our business.

Mutual Respect
Mutual respect fosters a work environment based on teamwork, encouragement, and trust, along with honest and open communication among all employees.

Corporate Citizenship
Corporate citizenship mandates that we operate our business in a manner that obeys and respects all applicable laws, rules, and regulations governing our business and that we take a proactive approach to improving the quality of life for our members across the 13 counties we serve.

Purpose of Our Code of Conduct

The PrimeWest Health Joint Powers Board of Directors (JPB) has adopted this Code of Conduct (the “Code”) to provide guidance and assistance in carrying out the daily business of PrimeWest Health consistent with appropriate ethical and legal standards. The Code applies to every employee and representative of PrimeWest Health: full-time and part-time staff, JPB members, temporary workers, consultants, volunteers, providers, contractors, subcontractors, and other people performing services on behalf of PrimeWest Health.

The Code is intended to accomplish the following key objectives:
• Communicate facts about how PrimeWest Health works for the benefit of our members
• Clearly demonstrate that PrimeWest Health is responsive to suspected concerns brought forth by any party and takes action when appropriate
• Provide a platform that demonstrates PrimeWest Health’s commitment to the highest levels of ethical decisions and accountability
Ethical Responsibilities

For all of us, compliance with the Code and PrimeWest Health’s Compliance Program (the “Compliance Program”) is a condition of our employment with PrimeWest Health. We all must conduct business in accordance with all applicable laws, regulations, and contractual obligations. We all must behave ethically, respectfully, and with integrity, and always follow the principles of the Compliance Program when making business decisions.

We each have a responsibility to be familiar with the Code and to adhere to it and all PrimeWest Health policies and procedures. This includes reporting all violations of the Code and/or PrimeWest Health policies and procedures. Claims of ignorance, good intentions, or use of poor judgment are not accepted as excuses for noncompliance. Violations of the Code, law, or PrimeWest Health policies and procedures—or failure to report such violations—will result in disciplinary action, up to and including termination. Maintaining ethical standards is in everyone’s interest. If any of us knows of or suspects a problem, we must report it to our manager, director, Corporate Compliance/HIPAA Privacy Officer, or the Chief Executive Officer (CEO), or call the PrimeWest Health Compliance Hotline at 1-866-763-2952 (toll free).

It is the responsibility of each person within PrimeWest Health to be truthful and cooperate fully with any regulatory or business-related investigation or audit. We must furnish all related materials and facts concerning suspected violations. We must also ensure that the information we furnish is accurate, complete, and not misleading.

All suspected violations of the Code and/or PrimeWest Health policies and procedures are taken seriously and investigated. The PrimeWest Health Compliance department may enlist other departments within the organization to review the information supplied or conduct their own investigations.

Directors have a special responsibility to create and sustain a work environment in which employees know that ethical and legal behavior is expected of them. Directors are held accountable for making sure that their employees understand and apply the ethical standards set out in the Code. To do so, directors must listen to their employees and act on their concerns. Leadership requires setting a personal example of high ethical standards in the performance of one’s job.

“We must all behave ethically, respectfully, and with integrity...”
Addressing Integrity Concerns

PrimeWest Health’s business is governed by complex, demanding, and ever-changing laws, rules, and regulations. We recognize that the application of these laws, rules, and regulations can create uncertainty for employees and other PrimeWest Health representatives in some situations. PrimeWest Health is committed to providing each person with the resources and training needed to make ethical and legal decisions while performing his/her job.

Questions and concerns about the proper way to handle different situations may, and often do, arise. Open discussion of issues and concerns by all employees without any fear of retaliation is essential to the success of the Compliance Program and PrimeWest Health. The Compliance Program provides the tools to help resolve concerns or questions we may have about business ethics and integrity. We are expected to ask questions and raise concerns when we have doubts about whether an action or situation is proper.

We all have the responsibility to engage in appropriate business conduct. In addition, we must report any activity that we, in good faith, believe may be a violation of any applicable laws, regulations, policies, and/or the Code. PrimeWest Health Policy and Procedure C04: Non-Retaliation/Non-Retribution forbids retaliation against any employee who brings forward a good faith concern. Any person who violates this policy is subject to disciplinary action up to and including termination. PrimeWest Health offers multiple communication channels and resources for discussing concerns. The following outlines the general steps to be taken when we are faced with a question or concern:

**Step 1**
When in doubt, ask yourself the following questions:
- Is there a law or regulation being violated?
- Is the situation consistent with PrimeWest Health values, policies, and the Code?
- Could the situation harm PrimeWest Health’s reputation?
- How would the situation be described in a newspaper headline?

**Step 2**
After reflecting on the issue or concern, speak to your manager. Give your manager a chance to participate in the problem-solving process. If you still have concerns after talking with your manager or you are not comfortable discussing the issue with your manager, go to the next step.

**Step 3**
Discuss your issue or concern with your director. Give your director a chance to participate in the problem-solving process. If you still have concerns after talking with your director or you are not comfortable discussing the issue with your director, go to the next step.

**Step 4**
Discuss the issue with the Corporate Compliance/HIPAA Privacy Officer or CEO. If you are not comfortable taking this step, go to the next step.

**Step 5**
Call the PrimeWest Health Compliance Hotline at **1-866-763-2952** (toll free). Your call can be anonymous; you are not required to provide your name. Issues may also be reported via email to **compliance@primewest.org**. Reporting by email is not considered anonymous.
Compliance Hotline

PrimeWest Health is committed to Policy and Procedure C01: Reporting of Suspected Integrity Variances or FWA, which states that all employees and other PrimeWest Health representatives have a reporting obligation. If we are aware of an actual or potential ethical or compliance violation, we must report it right away. PrimeWest Health offers a Compliance Hotline that allows us to seek guidance or report a matter of concern. The number is 1-866-763-2952 (toll free).

All calls to our Compliance Hotline can be made anonymously and, in accordance with PrimeWest Health Policy and Procedure C04: Non-Retaliation/Non-Retribution, without fear of retaliation. Calls to the Compliance Hotline are not traced, and the information conveyed is treated in a confidential manner, subject to the limits imposed by law. To protect all individuals who report concerns in good faith from retaliation, retribution, intimidation, and/or harassment, careful efforts are made to ensure that investigations are handled confidentially. PrimeWest Health Policy and Procedure C04: Non-Retaliation/Non-Retribution forbids retaliation against any employee or other individual who makes a good faith call to the Compliance Hotline, cooperates or helps with a compliance investigation, or gives information about a breach of a law, regulation, or policy. The term “other individual” refers to consultants, agents, temporary employees, customers, providers, vendors and producers, and other entities with which PrimeWest Health does business. Any person who violates this non-retaliation policy is subject to disciplinary action up to and including termination.

The Compliance Hotline is intended to supplement existing internal communication channels. It is not intended to replace our leadership team or other resources. The Compliance Hotline is available when we believe we have exhausted normal PrimeWest Health channels, wish to remain anonymous, or feel uncomfortable about bringing an issue to a manager, director, the Corporate Compliance/HIPAA Privacy Officer, or the CEO.

The Compliance Hotline is available 7 days a week, 24 hours a day. Calls received during business hours (Monday – Friday, 8 a.m. – 4:30 p.m.) are handled by Compliance staff. Callers who call outside of business hours or on holidays are prompted to leave a message for Compliance staff. Callers may report their concerns by leaving a detailed, descriptive message. Alternatively, callers may call again during business hours if they wish to speak directly to a Compliance staff member.
Compliance with Laws/Regulations
PrimeWest Health is committed to complying with all Federal, State, and local laws and regulations that apply to its business. PrimeWest Health provides its employees and other applicable PrimeWest Health representatives with the compliance information and education resources they need for this purpose. We are each responsible for ensuring our own compliance with the laws, regulations, and contractual obligations that apply to PrimeWest Health. Questions or concerns regarding specific laws, regulations, or any legal issue should be promptly brought to the attention of the Corporate Compliance/HIPAA Privacy Officer, CEO and/or PrimeWest Health’s Legal staff.

Lobbying and Political Activity

Employee political activities
PrimeWest Health supports all employees’ right to participate in and contribute to political activities as citizens of their country, state, county, city, and neighborhood. This includes voting in elections and educating yourself on issues that may affect your community. However, your political involvement must be separate from your duties as a PrimeWest Health employee. There should never be an appearance that PrimeWest Health is connected to or endorses your political activities.

Employees and other applicable PrimeWest Health representatives must not use PrimeWest Health property, facilities, or time for any political activity prohibited by law. Examples of prohibited political activity include, but are not limited to, any of the following:
- Using PrimeWest Health administrative support to send invitations for political fundraising events
- Using PrimeWest Health telephones to make politically motivated requests
- Allowing any candidate to use PrimeWest Health facilities or meeting rooms for campaign purposes
- Loaning PrimeWest Health property to anyone for use in connection with a campaign

Federal and State elections
Federal laws restrict the use of PrimeWest Health corporate funds in connection with Federal and State elections.

Lobbying
Lobbying involves the advocacy of an interest that is affected, actually or potentially, by the decisions of government leaders. PrimeWest Health officers, JPB members, department directors, employees, and, where appropriate, contractors and other agents, must not engage in any lobbying or political activity that is not compliant with applicable law.

PrimeWest Health often has contact and conducts business with governmental bodies and officials. All such contacts and transactions must be conducted in an honest and ethical manner. Any attempt to influence the decision-making process of governmental bodies or officials by the improper offer of benefits is absolutely prohibited. Likewise, any requests or demands by any government representative for any improper benefit are not tolerated and should be reported to your manager or director.

Continued on next page
Government Contracting and Grants

PrimeWest Health is committed to complying with the laws and regulations that govern State and Federal health care programs. We must all act in a respectful manner in the presence of all government and regulatory officials. We must cooperate fully with all reasonable requests from government and regulatory agencies for information to which they are entitled. All information provided must be truthful and accurate. During a government inspection, you must never conceal, destroy, or alter any documents or lie or make misleading statements to the government representative. You should not attempt to cause another employee to fail to provide accurate information or obstruct, mislead, or delay the communication of information or records relating to a possible violation of law.

All government contracts and grants must be administered in an honest and ethical manner in accordance with applicable Federal and State laws and PrimeWest Health’s commitment to follow contract requirements and specifications.

All contracts entered into on behalf of PrimeWest Health must be executed in accordance with PrimeWest Health Policy and Procedure FM05: Delegation of Purchasing Authority.

“All government contracts and grants must be administered in an honest and ethical manner.”
PrimeWest Health employees and other applicable representatives must avoid situations where their personal interests could conflict, or reasonably appear to conflict, with the interests of PrimeWest Health or an individual’s ability to do his/her job. A conflict of interest occurs whenever a person permits the prospect of direct or indirect personal gain to influence his/her judgment or actions in making decisions regarding PrimeWest Health business. In general, the following applies:

- We must be free of actual, apparent, or potential conflicts of interest when dealing with people or business entities on behalf of PrimeWest Health. We must award business solely on merit, getting the best value for PrimeWest Health and, wherever practical, on a competitive basis.
- We must not use information that comes to us in the course of employment for personal investment or gain. We also must not provide this type of information to family members or others.
- We must avoid direct or indirect responsibility for the hiring or supervision of a family member. Even the appearance of favoritism can have a degrading effect on employee morale and the perception of PrimeWest Health’s fairness to all employees. Employment of family members is permitted so long as one family member does not report directly or indirectly to another family member.
- We must avoid romantic and other close personal relationships with another employee where one individual manages, directly or indirectly, the other’s performance, salary, schedule, or other working conditions.

Immediate Family Member Working in the Industry

We may all find ourselves in a situation where an immediate family member works for a competitor, vendor, provider, or customer. In such cases, we must be especially sensitive to security, confidentiality, and conflicts of interest. Any person facing such an issue should review his/her specific situation with his/her manager or director to assess the nature and the extent of any potential conflict of interest and how it can be resolved.

“Immediate family member” means: spouse, domestic partner, parent, child, sibling, grandparent, grandchild, housemate (any person living in the same household, regardless of whether related by marriage or blood), and the spouse of any such immediate family member.

Outside Employment and Other Activities

A conflict of interest may also exist if the demands of any outside activity hinder or distract us from the performance of our jobs or even appear to influence our judgment or performance for PrimeWest Health. We must not engage in any outside activity that has a negative impact on our job performance. Generally, any outside employment with a competitor, provider, or entity that does or seeks to do business with PrimeWest Health is not permitted. Any questions or doubts regarding an outside job or activity should be discussed with your director or the Corporate Compliance/HIPAA Privacy Officer.

Other Conflicts of Interest

It is not possible for the Code to list every type of potential conflict of interest. When in doubt, employees and other PrimeWest Health representatives should share the facts of the situation with the appropriate director or the Corporate Compliance/HIPAA Privacy Officer and follow Policy and Procedure ADM01: Conflict of Interest when disclosing potential conflicts of interest.
Gifts, Gratuities, and Kickbacks

PrimeWest Health must maintain the highest standards of integrity and objectivity in dealing with vendors and service providers. Generally, PrimeWest Health does not allow employees to accept gifts, entertainment, or other items from vendors or other interested parties. However, in limited circumstances, PrimeWest Health may allow employees and departments to occasionally accept gifts, entertainment, or items from vendors or other interested parties, provided that such gifts, entertainment, or items are of nominal value and are shared among employees or departments, to the extent possible. These limited circumstances should be discussed with the CEO and Corporate Compliance/HIPAA Privacy Officer to determine if the gift, entertainment, or item falls into the category of “limited circumstances.” Examples may include holiday gift baskets or flowers to celebrate a company achievement. We must never offer or accept gifts of cash or cash equivalents (checks, honoraria, money orders, stocks, gift cards, and saving bonds) to or from any current, former, or potential vendor, customer, or provider that is intended to influence a decision to purchase or recommend products or services.

A kickback means to willfully offer, receive, request, or pay anything of value—even nominal value—in order to induce or reward referrals of business, including goods or services. Under no circumstances do we accept or give kickbacks when obtaining or awarding contracts, services, referrals, goods, or business.

Commissions, rebates, discounts, and allowances are customary and acceptable inducements, as long as they are approved by the CEO and they do not constitute illegal or unethical payments. These payments must be reasonable in value, competitively justified, properly documented, and made to the business entity to which the original agreement or invoice was made or issued. These payments should not be made to individual employees or agents of business entities.

Gifts, entertainment, and meals of nominal value may be provided to PrimeWest Health customers, suppliers, or current or prospective business partners, provided that the expense is reasonable and consistent with applicable laws, regulations, and rules and when activities have a legitimate business purpose and the relevant employee or PrimeWest Health representative is present at the event.

Although PrimeWest Health does not set a dollar limit on gift-giving among employees, it is important to always use reason and good judgment when giving or accepting a gift. Gifts of nominal value are always best and contributing to a gift should always be voluntary. A gift should never be given to another employee to influence, gain favor, or show favoritism. Generally, raffles and prizes that are part of an outside business activity are not considered gifts.

PrimeWest Health’s business involves dealing with Federal and State government officials and employees who are bound by specific laws and regulations governing gifts and gratuities. PrimeWest Health is committed to ensuring compliance with these laws and regulations. Therefore, as a general rule, PrimeWest Health employees and representatives must not offer any gift or gratuity to any government official or employee. Because even a modest item such as a greeting card or refreshment may be prohibited, the appropriate director or the Corporate Compliance/HIPAA Privacy Officer should be consulted before offering anything to a government official or employee. If a government official or employee demands a gift or gratuity, this must be reported to the appropriate manager or director, the Corporate Compliance/HIPAA Privacy Officer or CEO, or the Compliance Hotline right away.
Honoraria

Employees are encouraged to speak at and participate in educational programs and professional activities related to their work at PrimeWest Health. For example, an employee may be asked to serve on a committee or speak at a local/national conference. The employee may be offered a fee (known as honoraria) for his/her participation. However, unless the employee took time off to attend the program or activity for which the honoraria is given, any honoraria in excess of $250 must be turned over to PrimeWest Health.

Confidentiality of Information

PrimeWest Health employees and representatives must protect the confidentiality of the information handled by PrimeWest Health concerning our members, providers, vendors, business partners, employees, and the PrimeWest Health organization itself. We must take precautions to avoid improper, inappropriate, or inadvertent disclosures of sensitive, confidential, or privileged information, records, or documents. We must comply with PrimeWest Health’s privacy and security policies, as well as the Federal, State, and local privacy and security laws that apply to PrimeWest Health. Within PrimeWest Health, we share information only with those employees who have a legitimate business need to know the information. We must all maintain and protect this information even after termination of employment or other relationship with PrimeWest Health.

Employees are responsible for the protection and privacy of any PrimeWest Health member information and any confidential and proprietary information under their control. Failure to do so may result in disciplinary action, up to and including termination.

Member Information

PrimeWest Health follows the Health Insurance Portability and Accountability Act (HIPAA), the Minnesota Health Records Act, and the Minnesota Government Data Practices Act when handling or disclosing any member protected health information (PHI) and nonpublic personal information. We use and disclose this information within PrimeWest Health only on a need-to-know basis for the purpose of conducting PrimeWest Health business. These requirements continue to apply even after an employee or other representative leaves PrimeWest Health employment or terminates his/her relationship with PrimeWest Health.

Employee Information

As with all confidential information, PrimeWest Health has an obligation to protect the confidential information of employees. Information about employees, such as salary, Social Security number, age, status, type of leave, banking, or other financial information must not be shared with third parties unless required for PrimeWest Health operations or by Federal or State laws. It may only be shared with other employees on a need-to-know basis.
Proprietary Information
No person may disclose information about PrimeWest Health’s intellectual property, trade secrets, business interests, providers, or suppliers to unauthorized third parties or to employees except as may be required for those third parties and employees to perform their job duties. Confidentiality of proprietary information is an essential element in complying with antitrust, trade, and other similar business laws that regulate competition, and such information must be kept in confidence. If questions arise regarding obligations to maintain the confidentiality of information or the appropriateness of releasing information, employees and other PrimeWest Health representatives should seek guidance from their director, the Corporate Compliance/HIPAA Privacy Officer, or the CEO.

Passwords
Employees and other applicable PrimeWest Health representatives must protect and maintain the confidentiality and integrity of information used to access PrimeWest Health systems including, but not limited to, passwords and other personal security codes. We must keep passwords and other personal security codes confidential. We must not share passwords or let others use our computers while logged on or off.
Accuracy of Records

PrimeWest Health maintains strict policies and internal controls to promote the creation and retention of accurate, true, and complete records. Accuracy and reliability in the preparation of all business records are mandated by law and are of critical importance to PrimeWest Health’s decision-making processes and to the proper discharge of our financial, legal, and reporting obligations. We must never misrepresent facts or falsify or suppress records. In addition, all records must be stored for the period of time required by applicable laws or contracts or PrimeWest Health policy, whichever is longest.

Record Keeping and Reporting

We must all ensure that PrimeWest Health records, business expense accounts, vouchers, bills, payrolls, service records, and reports, whether electronic or on paper, are reliable, accurate, and complete. Transactions between PrimeWest Health and outside individuals and organizations must be promptly and accurately entered in PrimeWest Health records in accordance with PrimeWest Health policies and procedures. No person may improperly alter or make false entries, or willfully fail to make correct entries, on any PrimeWest Health record or document. False or misleading entries on records are unlawful and could subject PrimeWest Health and, in some cases, individual employees or others, to fines and other civil or even criminal penalties. In addition, no person may facilitate the creation of false or misleading records of any of our vendors or providers.

PrimeWest Health is committed to the creation and submission of only true and accurate reports by its employees and any third parties who create or update PrimeWest Health records. We must not create or submit false or misleading reports of operating statistics or measurements, such as performance data and utilization data. If we are not sure of the accuracy or reliability of information, we must take steps to verify it or immediately contact the appropriate director for advice.

We maintain, support, and follow PrimeWest Health’s internal controls designed to provide reasonable assurance that transactions are authorized and that transactions and other data are recorded and presented in a manner that is accurate, complete, current, and not misleading. We record all PrimeWest Health transactions in accordance with generally accepted accounting principles or statutory accounting principles. We charge all items to the appropriate account, regardless of the financial status of the line of business, contract, or cost center. We do not maintain any secret or unrecorded funds. We follow appropriate PrimeWest Health procedures to ensure that errors are corrected, as they become known, through credits, refunds, or other mutually acceptable means.

We never take any steps that would impede, obstruct, improperly influence the conclusions of, or affect the integrity or availability of, any audit, review, or investigation, regardless of whether that audit, review, or investigation is performed by government or external or internal personnel.

Record Retention

PrimeWest Health preserves and maintains organization records in accordance with Federal and State laws and regulations, as well as PrimeWest Health Policy and Procedure C07: Record Retention. We do not improperly destroy, change, or falsify any corporate accounts, records, or other applicable documents. When litigation, a government audit, or investigation is imminent or pending, our normal document destruction procedures will be suspended until all documents relevant to the litigation, audit, or investigation can be identified and segregated.
PrimeWest Health is committed to maintaining a work environment that is safe and secure and where we treat each other with honesty, dignity, and respect. All employees and visiting personnel have the right to work in—and PrimeWest Health is committed to providing—an environment free from harassment, retaliation, discrimination, violence, threats of violence, illegal drugs, and the influence of alcohol, where privacy and dignity are respected and all are protected from offensive, obscene, or threatening behavior. PrimeWest Health does not tolerate sexual advances, actions, comments, inappropriate physical contact, or any other conduct that is intimidating or otherwise creates an offensive or hostile work environment. PrimeWest Health also prohibits the illegal use, possession, or distribution of drugs and prohibits the unauthorized use or influence of alcoholic beverages in the workplace or while conducting PrimeWest Health business.

All employment decisions and practices are based on qualifications, skills, and performance. The diversity of our employees is a tremendous asset. Valuing all employees as unique individuals leads to a more productive and fulfilling work environment. We value the diverse contributions of all people, regardless of their position, sexual orientation, marital or familial status, status with regard to public assistance, age, race, color, creed, sex, disability, religion, national origin, or political beliefs.

Employees and other PrimeWest Health representatives are responsible for adhering to all PrimeWest Health policies and procedures related to workplace safety and security, as well as applicable Federal, State, and local laws and regulations governing workplace safety, employee health, and environmental protection. While on PrimeWest Health premises, employees and visiting representatives must wear a company-issued identification badge at all times.

PrimeWest Health often needs to acquire and retain personal information on individual employees for effective operation. It is the policy of PrimeWest Health to maintain the confidentiality of this information and to limit access to authorized people who need the information for business or legal purposes.
Proper Use of Corporate Assets

PrimeWest Health assets are to be used only for lawful, business-related purposes of PrimeWest Health. PrimeWest Health assets include, but are not limited to, corporate data, business opportunities, strategies and plans, financial data, and other proprietary or confidential information about PrimeWest Health’s business or its employees, equipment, furniture, vehicles, office supplies, credit cards, employee time, and computer supplies and software. We have a responsibility to protect these assets and to ensure that they are used for valid PrimeWest Health purposes.

Employees and all PrimeWest Health representatives must use and maintain PrimeWest Health assets with the utmost care and respect, guarding against misuse, waste, abuse, loss, and theft.

Intellectual Property and Trade Secrets

Intellectual property and trade secrets include all ideas, inventions, discoveries, improvements, and innovations including, but not limited to, the following categories:

- New product design
- Marketing plans
- Detailed financial or pricing information
- Computer programs, models, and databases (including source codes)
- Trademarks
- Copyrights
- Logos

PrimeWest Health owns all intellectual property that we make, create, develop, write, or conceive either on our own or with another person while employed by or contracted with PrimeWest Health, whether developed during working hours or not, that meets the following criteria:

- Relates in any way to actual or anticipated business, research, or development of PrimeWest Health
- Results from work assigned to or performed by us for PrimeWest Health
- Is conceived of or made with the use of PrimeWest Health systems, equipment, materials, computer programs, or confidential or proprietary business information

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Use of the Internet and Other Electronic Media
PrimeWest Health’s communication systems (e.g., phones, voicemail, fax, email, Internet, and intranet) are to be used for legitimate PrimeWest Health business purposes only. See PrimeWest Health Policy and Procedure HR46: Electronic Mail and Internet Access Acceptable Use Policy for acceptable and unacceptable uses.

Occasional personal use is allowed so long as such use does not interfere with the security or effectiveness of any system or interfere with an individual’s job performance.

PrimeWest Health owns these communication systems; therefore, employees and applicable PrimeWest Health representatives should have no expectations of rights to privacy. PrimeWest Health reserves the right to access, monitor, and disclose the contents of any communications made via PrimeWest Health’s communication systems, whether made for business or personal reasons, in accordance with all applicable laws and regulations.

Unauthorized Software
Employees must not make unauthorized copies of computer software programs or use personal software on PrimeWest Health computer equipment. The creating or loading of unauthorized software onto PrimeWest Health-owned PCs, workstations, or other computer systems is strictly prohibited. Such unauthorized actions could cause the destruction of information or computer systems, technical problems (e.g., incompatible drivers or commands, or viruses), or other substantial harm, if not approved by and coordinated with the Director of Information Systems & Technology in advance. In addition, the unauthorized copying or use of unauthorized software may be a violation of Federal copyright laws and could result in civil and/or criminal liability.

Respecting the Property Rights of Others
PrimeWest Health respects the property rights of others and does not engage in the unauthorized use of their intellectual property or trade secrets, including the copying or downloading of trademarks, copyrighted materials, and logos.
Conclusion

This Code of Conduct reflects PrimeWest Health’s commitment to the highest standards of legal and ethical business conduct. The Code does not contain all PrimeWest Health policies or include all details regarding any policy. Rather, the Code sets forth the fundamental legal and ethical principles for conducting all aspects of PrimeWest Health business. Detailed policies and procedures for conducting PrimeWest Health business are contained in Compliance 360.

Nothing contained in the Code constitutes a contract of employment. The Code should not be construed as creating an express or implied contract of employment or continued employment by PrimeWest Health. PrimeWest Health reserves the right to modify the Code at any time as it deems appropriate.