

MissionPoint

HEALTH PARTNERS

STANDARDS OF CONDUCT

A mission based on being authentic.

CEO MESSAGE

MissionPoint's ability to carry out its mission lies in its culture as an authentic organization. An authentic organization is one that is true to itself; one that is real and is carried out in a culture of respect, awareness, and accountability.

The MissionPoint ministry is represented through the symbol of sea glass. The making of sea glass is a transformative process. Glass (which has found its way into the ocean) encounters the waves, sand, and other elements. Over time the rough and sharp edges of the glass are made smooth and a new shape is given to the glass as well as accents of its color and make-up. The ocean brings out hidden aspects and beauty of the glass, bringing about a new sense of its purpose and meaning.

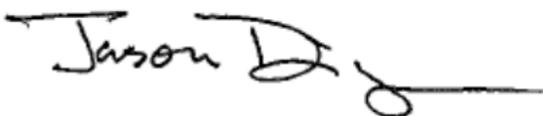
The ministry of MissionPoint is very much the same. We encounter those we serve who have entered into the waters of a health crisis and a health journey. Our members can experience this journey as frightening, overwhelming, and confusing like the churning of the waves and currents. We join them as their guides and companions, helping them to navigate these waters so that the rough and sharp edges of their journey are made more rounded. Through our care and presence, they too find their lives transformed in directions that are more hopeful, promising, and meaningful. Like the ocean, we help others discover hidden beauty, wholeness, and life within their journeys toward health.

At the same time we, as a healing community, are also like this process. Our strength comes from our diversity of backgrounds, personalities, talents, and perspectives. Like any community, our differences can be encountered like rough and sharp edges. We must learn to "do" and "be" in community together. And, as we focus upon our ministry, we seek to embody the wholeness that we offer to others. We live out our Core Values in our relationships with one another - which helps to transform us individually and collectively. Through our shared experiences of community and service we discover the sacredness, meaning, and beauty within each other and our work.

Our Simple Guiding Principles, along with our Standards of Conduct (collectively referred to as our Standards of Conduct), provide scaffolding that supports making decisions for the right reasons, acts as a common language within disparate and remote parts of our organization, help manage the complex and unanticipated. They are ever present in our effort to Be Authentic. The Standards of Conduct describe the behavior and conduct expected of associates; Board and Board Committee members; and contractors. They are intended to help us respond to questions and situations we may encounter in our daily work. Please read this document carefully and consider what it says.

No Standards of Conduct can anticipate every question or substitute for each individual's sense of honesty and integrity. If you have questions about the Standards of Conduct or come across any situation which you believe violates the Standards, you should consult your Supervisor, the Corporate Responsibility Officer or the Ascension Values Line at 1 (800) 707-2198 or www.AscensionHealthValuesLine.org. There will be no retaliation for asking questions or reporting concerns in good faith.

Our commitment to Corporate Responsibility begins and ends with each of you. Thank you for joining us in our shared commitment to Be Authentic.



Jason Dinger
President and Chief Executive Officer, MissionPoint Health Partners

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Standard of Conduct Definitions

The following words and phrases have the following meanings as used in the Standards of Conduct:

Contractors

Third party individuals or organizations with which we do business, such as vendors that provide supplies and services.

Retaliation

A harmful action against an associate in response to the associate asking questions or reporting a concern.

Values Line

A confidential phone and internet web service for associates to report ethical and legal issues without providing their name.

INTRODUCTION

This document details the Mission, Vision and Values of MissionPoint; explains the Simple Guiding Principles and Standards of Conduct we are responsible for practicing; and describes ways for associates to find help and report ethical and legal issues.

Responsibilities of Associates, Leaders, Board and Board Committee Members and Contractors

The Standards of Conduct apply to all associates, Board and Board Committee members, and contractors. You are expected to:

- Review and follow the Standards of Conduct, paying particular attention to those Standards of Conduct that apply to your everyday work responsibilities
- Ask questions when you are uncertain what to do, see page 14 on where to find help

Responsibilities of Leaders

Leaders have a role in receiving and responding to questions and concerns raised by associates and others you lead. How you respond to these questions and concerns is key to others having the trust and confidence to bring important matters to your attention. You are expected to:

- Serve as a role model for our Mission, Vision and Values by carrying out your responsibilities with the highest degree of personal integrity
- Clearly communicate to others your expectations for the highest standards of ethical behavior
- Promote a culture of trust, open communication and respect
- Hold those you lead accountable for behavior consistent with the Standards of Conduct
- Encourage others to raise issues and concerns so they can be addressed
- Respond timely and appropriately to issues and concerns brought to your attention and forward concerns expressed by your staff to the Corporate Responsibility Officer, Human Resources or other appropriate leaders
- Support our policy of non-retaliation for anyone who raises issues and concerns in good faith
- Learn and follow applicable laws and regulations that affect your work
- Ask for assistance when you are unsure how to respond to an issue or concern

INTRODUCTION

Responsibilities of the Board and Board Committees

Members of the Board and Board Committees have a responsibility to be informed and exercise appropriate judgment to:

- Ensure that legal and ethical business practices expressed in the Standards of Conduct guide the decisions you make on behalf of MissionPoint
- Disclose any potential Conflict of Interest and take appropriate actions to address any situations that may appear to interfere with independent judgment or the duty to serve in the best interest of MissionPoint
- Hold senior leadership accountable for effective policies, procedures and internal control systems that address compliance with laws and regulations and promotion of ethical business practices
- Respond timely and appropriately to issues and concerns brought to your attention

The following Standards of Conduct are a foundation for the behaviors that are expected from associates, Board and Board Committee Members and Contractors.

MISSION, VISION & VALUES

Our Mission, Vision, and Values provide a strong foundation and guidance for the work we do in transforming healthcare in the United States. They serve as a framework that expresses our priorities in responding to the care of those most in need.

Mission

Rooted in the loving ministry of Jesus as healer, we commit ourselves to serving all persons with special attention to those who are poor and vulnerable. Our Catholic health ministry is dedicated to spiritually centered, holistic care, which sustains and improves the health of individuals and communities. We are advocates for a compassionate and just society through our actions and our words.

Vision

We envision a strong, vibrant Catholic health ministry in the United States which will lead to the transformation of healthcare. We will ensure service that is committed to health and well-being for our communities and that responds to the needs of individuals throughout the life cycle. We will expand the role of laity, in both leadership and sponsorship, to ensure a Catholic health ministry of the future.

Values

We have a common vision and are called to act upon the following ideas and beliefs:

- Service of the Poor – Generosity of spirit, especially for persons most in need
- Reverence – Respect and compassion for the dignity and diversity of life
- Integrity – Inspiring trust through personal leadership
- Wisdom – Integrating excellence and stewardship
- Creativity – Courageous innovation
- Dedication – Affirming the hope and joy of our ministry

GUIDING PRINCIPLES & BEHAVIORS

Culture of Respect

Keep the Faith: We are committed to the Forgotten, inspired by those in our heritage of faith, and seek to renew our own faith in what is possible.

- Supports the personal spirituality of oneself and others
- Respectfully supports the dignity of all we serve
- Trusts in and anticipates the good intentions of others
- Perseveres with dignity through difficult circumstances
- Is flexible and adaptable; can integrate new ideas, methods or approaches in one's work

Listen: We seek to understand the need of our clients, members and partners we serve.

- Actively seeks to determine the needs of those we serve
- Questions to clarify and understand
- Correctly interprets the words and actions of others
- Responds with respect, courtesy and professionalism
- Successfully creates and delivers personalized client strategies
- Tailors tone, style and format for the audience

Say Thank You: We are servants and we are better for it.

- Displays genuine humility
- Communicates an attitude of gratitude
- Serves without the motivation of recognition
- Recognizes and appreciates others publically

Infantem Non Turpis Voco Alicuius (Don't Call Somebody's Baby Ugly): We help people try differently.

- Values other's ideas and expertise
- Humbly learns from others
- Meets other where they are
- Shows respect for and understanding of diverse points of view
- Works collaboratively with others within and across departments
- Demonstrates openness in sharing information and keeping others informed
- Strategically, creatively, and proactively finds solutions
- Mentors others
- Speaks truth with kindness

GUIDING PRINCIPLES & BEHAVIORS

Culture of Awareness

Fail Quickly and Often & Let 1000 Flowers Bloom: We are willing to risk, try, fail, learn, and try again.

- Seeks out new ideas
- Is not bound by current or traditional approaches
- Offers new solutions while respecting the history of other's experiences
- Learns from mistakes and risks again
- Encourage and celebrates the efforts of others, especially when failure is to be overcome

Surprise and Delight: We bring our full selves in every way, every day.

- Trusts in the good intent of others
- Allows natural consequences to occur
- Recognizes that mistakes lead to learnings

Believe it is Possible: We are trying to do what no one has done before.

- Embraces ambiguity
- Adapts to change well
- Takes initiative; displays a bias towards action
- Exudes confidence and hope
- Inspires people and gains their support
- Creates the future with bold strategies and plans
- Applies knowledge and skills to achieve greater results
- Stays current in the area of technical expertise and seeks to expand knowledge
- Creatively finds solutions to challenges and goes the extra mile to make a difference
- Surprises others in a positive way
- Brings joy and encouragement to others
- Is a bearer and harbinger of hope
- Empowers others

GUIDING PRINCIPLES & BEHAVIORS

Culture of Accountability

Don't Ask Anyone to Do What You Wouldn't Do: We don't consider it an option.

- Leads from the front
- Takes ownership of actions and results
- Understands and acknowledges one's own strengths and limitations
- Builds the capabilities of others whenever possible
- Does not hesitate to roll up sleeves and get the work accomplished
- Treats others in a respectful, courteous & professional manner
- Values the ideas and expertise of others
- Takes personal responsibility to build collaborate relationships
- Addresses areas of conflict humbly, directly, and quickly without unnecessarily involving others

Believe in Grace: We all make mistakes.

- Acknowledges one's own limitations and failings; is self-aware
- Demonstrates the ability to see things as they are
- Empathizes with the situations of others
- Is forgiving, and accepts forgiveness

RELATIONSHIPS WITH OTHERS

We will interact with others in a sincere and authentic manner. We will develop relationships with others based on honesty, fairness and mutual trust. We will act with dignity and mutual respect and will not discriminate against individuals on the basis of race, color, religion, gender, sexual orientation, national origin, age, disability, genetic information, marital status, amnesty, any other legally protected status or status as a covered veteran in accordance with applicable federal, state and local laws.

What is Expected of Me?

- Treat others fairly, honestly and with dignity
- Treat others respectfully, without discrimination
- Communicate with others openly, honestly and respectfully

Q & A

Q: I heard a co-worker making racially offensive jokes with other co-workers. It made me really uncomfortable. What should I do?

A: Immediately report the incident to your Supervisor, the Human Resources Department, your Corporate Responsibility Officer or the Values Line.

COMPLIANCE WITH LAWS & REGULATIONS

We will operate in accordance with all laws and regulations applicable to MissionPoint.

What is Expected of Me?

Follow all laws and regulations that apply to your work and ask for assistance if you have questions about how they affect you. Examples of laws that apply to MissionPoint are as follows:

- Maintain privacy and security of protected health information in keeping with the Health Insurance Portability and Accountability Act (HIPAA). Do not access, use, disclose or discuss protected health information with others unless permitted to do so or required by law.
- Ensure compliance with Medicare Shared Savings Program requirements.
- Ensure that reports or other information required to be provided to any federal, state or local government agency are filed accurately and timely to comply with applicable laws and regulations.
- Avoid discussions and collaborations with competitors about pricing, terms and other market information in compliance with Antitrust Laws.

Q & A

Q: My co-worker recently posted a notice on the associate bulletin board asking associates to join her in forming a group to support a candidate for city council. Is this allowed?

A: No. Using MissionPoint's resources to participate or encourage participation in political campaign activities is not allowed and could jeopardize our tax-exempt status.

Q: What should I do if my laptop is stolen on a weekend or after business hours?

A: Contact your Supervisor, Privacy Officer and the Ascension Information Services Help Desk.

Q: An associate overheard that a colleague had been to the emergency room. The associate pulled up the colleague's medical record to see why. Is this appropriate?

A: No, this is a breach of patient information that is reportable to the Privacy Officer.

Q: You have a member that needs to lose weight so you offer her a \$50 gift card to Macy's if she loses 25 pounds. Is this acceptable?

A: No. MissionPoint can provide patient incentive items or services at a free/reduced price that are preventative or that advance clinical goals, such as a blood pressure cuff to a patient with hypertension. No cash/cash equivalent (like gift cards) incentives are permitted.

HUMAN RESOURCES

We strive to cultivate a work environment where associates are highly regarded; where they are treated honestly and respectfully; where their health and safety are protected; where they are motivated to reach their potential; where they are given the opportunity for personal and career learning and advancement; where they are provided with opportunities to participate in decisions that affect their working conditions; where they are provided with the tools necessary to do their jobs well; where there are safe and adequate procedures for resolving conflicts; and where associates are recognized and rewarded for their achievements, without prejudice or discrimination.

What is Expected of Me?

- Be supportive of others and work as a team
- Be committed to ongoing learning, including training or educational opportunities
- Create a workplace that fosters community and honors and cares for the dignity, safety and well-being of all persons

Q & A

Q: I don't get along with one of my co-workers. We share certain responsibilities, but I feel like I do most of the work while he just passes the time. What should I do?

A: When you have a conflict with a co-worker, the best course of action is to discuss it with the person privately. Explain what you have observed and how it affects the work of your department. If you don't see a change in behavior, notify your supervisor. You should alert your supervisor if you think the behavior may violate a law or the Standards of Conduct.

BUSINESS & ETHICAL PRACTICE

We are committed to ethical business conduct and integrity consistent with our Catholic tradition. Associates must represent the organization accurately and honestly and must not do anything that purposely defrauds anyone, including other companies or the government, of money, property, or services. Associates must take all reasonable steps to preserve and protect the organization's assets by making prudent and effective use of its resources, and properly and accurately reporting its financial condition.

What is Expected of Me?

- Adhere to the highest standards of ethical business practices
- Do not disclose confidential information related to MissionPoint to any outside unauthorized person or organization, or use such information for your personal benefit
- Share confidential information about MissionPoint with associates only when they have a legitimate need to know the information in order to perform their job
- Maintain confidential information, including financial data and associate related information, in a confidential and secure manner
- Prepare all documents accurately and timely, including expense reports, time and attendance records, financial statements, and accounting records
- Deal with regulatory agencies honestly and accurately
- Properly use and protect MissionPoint resources including supplies, equipment, associate time and financial assets
- Act only within the scope of the authority granted with your job

Q & A

Q: Before coming to work at MissionPoint, I consulted for a competitor and obtained information that would help us negotiate favorable contracts. Should I share this information with others in the organization?

A: No. Do not disclose confidential information learned through another job. It is unethical and possibly illegal to share confidential information you learn from your association with one employer with another employer should you leave the organization. Further, we will not be able to use this type of information in any business dealings.

CONFLICTS OF INTEREST

Associates are expected to act in a manner that is in the best interest of MissionPoint. Associates may not use their positions to profit personally or to assist others in profiting in any way at the expense of MissionPoint. In any situation where an associate's outside interests conflict with those of MissionPoint, the associate must disclose the conflict in accordance with the Conflicts of Interest Policy.

What is Expected of Me?

- Follow the MissionPoint Conflict of Interest policy. Do not engage in any activity, practice or act that conflicts with the interests of MissionPoint
- Do not make any decision or discussion affecting MissionPoint that might represent a conflict of interest when serving as a member of an outside organization or Board
- Do not accept employment or consulting arrangements outside of MissionPoint, or make personal investments, if they interfere with your job or unduly influence the decisions you are required to make on behalf of MissionPoint

Q & A

Q: My sister-in-law is a health care consultant. Would it be a conflict if I recommended her to work on a project at MissionPoint?

A: No, unless you do something to provide her with an advantage or special consideration or if you receive something of value in return. If you recommend your sister-in-law for the project, you should fully disclose your relationship. You should not participate in the selection decision. Also, you must not share information with your sister-in-law that other prospective vendors or consultants would not have or might give her an unfair competitive advantage over others.

YOUR VOICE: WHERE TO FIND HELP

You may face circumstances that can leave you wondering which path to take, which choice to make and how to make it. This is particularly true when you are confronted with challenges to your ethical and legal standards.

As a responsible associate, it is your right and duty to find help and report situations that you believe may potentially violate laws, the Standards of Conduct or applicable policies. It is not a question of betraying confidence. It's a question of the continued respect and viability of our organization and professional responsibilities. There are several ways in which you can ask a question or share a concern if you do not know whether a particular action would violate laws, the Standards of Conduct or harm MissionPoint.

Your Supervisor or Manager

This is usually the best place to start in getting answers to your questions. Your supervisor or manager may have the information you need or be able to direct you to the right resource.

Higher-Level Manager or Human Resources

If you are not comfortable discussing a situation with your supervisor or manager or do not agree with the answer you receive, consider discussing the issue with a higher-level manager or the Human Resources manager.

Corporate Responsibility Officer

The MissionPoint Corporate Responsibility Officer is responsible for the Corporate Responsibility Program and can assist in addressing your questions and concerns. Contact information: (615) 761.3817 or corpresp@missionpointhealth.org.

VALUES LINE

We encourage you to use one of the resources above to address your questions and concerns. If you are not comfortable contacting any of these associates or if these associates have not fully resolved your concern, you can call the Ascension Values Line at 1 (800) 707-2198 or use the Values Line website at www.ascensionvaluesline.org.

The Values Line is available 24 hours a day, seven days a week. Your call to the Values Line is answered by an outside company. Questions may be asked of you to gather additional information. At the close of the call, you will receive a unique identification number and a specific date to call back to check on the status of your concern. You do not need to provide your name. The calls are not recorded or traced.

The outside company prepares a confidential report based on the information you provide. The report is forwarded to MissionPoint Corporate Responsibility Officer for review, investigation and, when appropriate, corrective action. The results of the investigation will be provided to the outside company so they may be given to you during your follow-up call.

If you use the web site, there are a series of screens that walk you through the process of preparing and submitting a report. After you submit a report, you will be provided a follow-up date, report number and Personal Identification Number.

Q & A

Q: If I report what I think is a violation of the Standards of Conduct, and no violation is found upon investigation, will I get in trouble?

A: There will be no action taken against you for reporting a suspected violation in good faith. You do not need to provide your name when calling the Values Line.

STANDARDS OF CONDUCT ACKNOWLEDGEMENT

Please sign and complete the Standards of Conduct form.

I have received my personal copy of the Standards of Conduct and agree to follow them. I understand that compliance with the Standards of Conduct is a condition of my continued employment or association with MissionPoint Health Partners.

I will uphold the highest standard of ethical and legal business practices. I will not tolerate illegal or questionable activity and promise to identify, report and prevent such activity.

Signature _____

Print Name _____

Name of MissionPoint Location (City) and Department, if applicable

Date _____