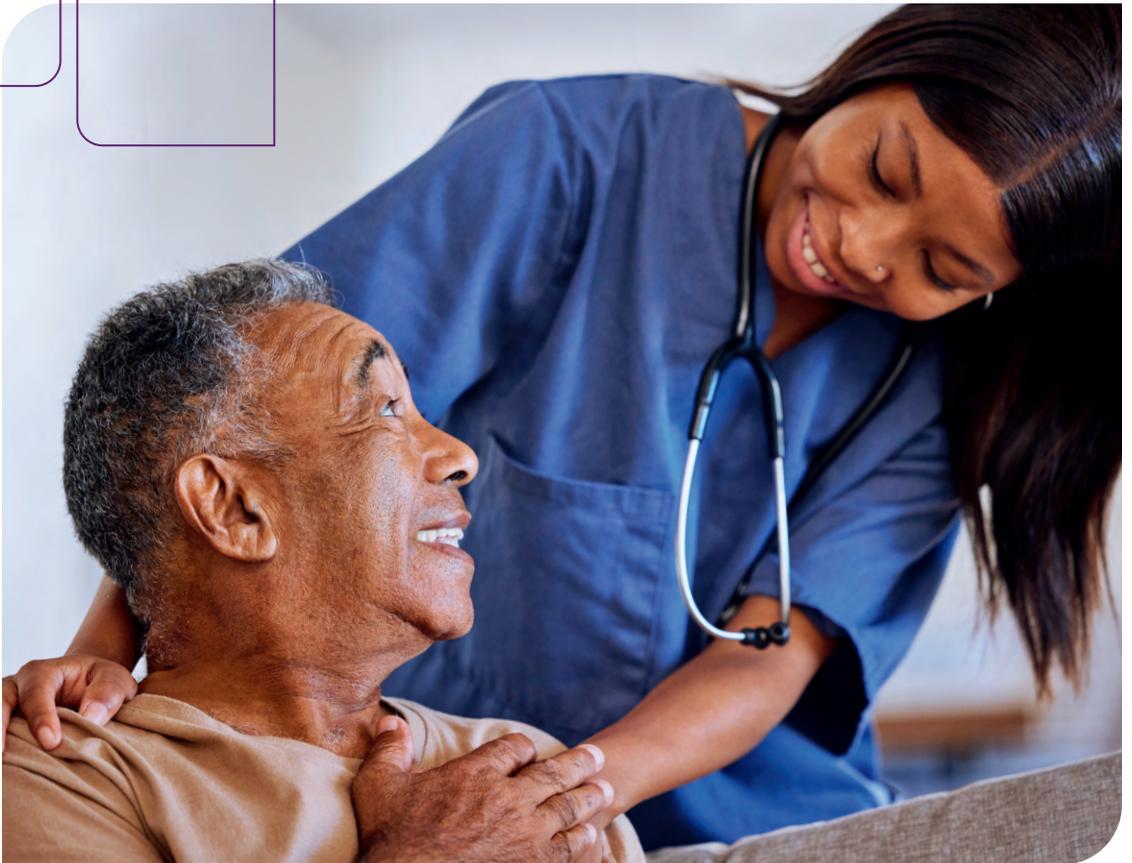
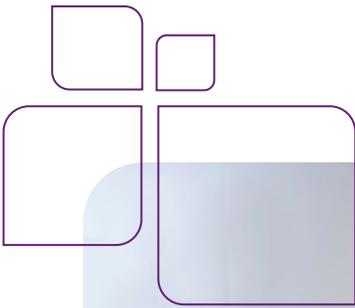


Code of Ethics and Business Conduct

Fifth edition | 2023



Your health. Your life. Our purpose.

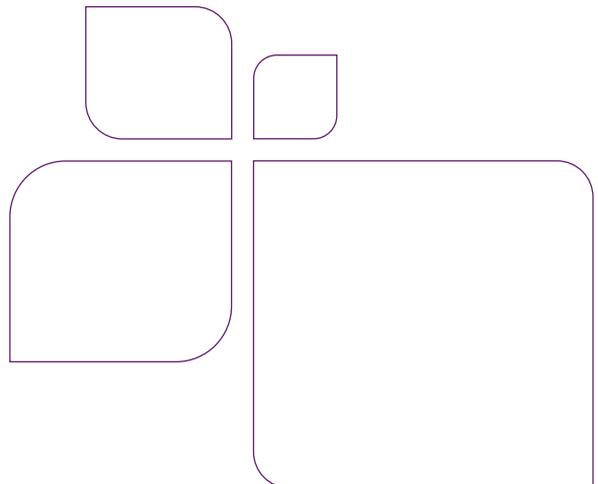




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Message from our President and CEO

We are charged with a large mission: to extend the healing ministry of Jesus Christ. It's one that often feels overwhelming but is always rewarding. I am proud to work alongside each of you as I believe you take this responsibility as seriously as I do. In order to best execute on our mission, we must work together and we must have a shared understanding of our values and approach. The pages that follow outline our Code of Ethics. Please use these to help guide your decisions each and every day.



Our Code is grounded in our belief that behaving ethically is everyone's duty, from Associates to vendors. I expect each of you to familiarize yourself with these pages so that you, in turn, can make the right choices as you face decisions throughout your day. Doing so ultimately allows us to do our best by our patients, working efficiently and effectively alongside one another, and delivering the highest standards of care.

In addition to our focus on caring for the communities we serve, we are also committed to following applicable laws and regulations. I ask you to familiarize yourself with those applicable to your role, as well as relevant policies, so you can act accordingly.

If you're a leader, you have an even larger responsibility to not only lead by example, but ensure your team has a deep understanding of this Code, applicable laws, regulations, and policies. Remind them and as I remind you now – this Code is not exhaustive. If you come across a situation about which you're unsure, please ask others for assistance. Your compliance team is always ready to help.

CHRISTUS' ministry spans 150 years and it's my hope that it will continue far beyond another 150 years in the future. We've grown exponentially since my work here began and I'm confident that there is more growth in our future. We can't sustain such growth and longevity, though, without being good stewards of our resources and achieving consistency in our approach to policies, structures and behaviors. Thank you for taking the time today, and every day, to make CHRISTUS Health's mission your own. Our ministry is better because of the talents you bring to it. And together, as One CHRISTUS, with our code of ethics driving our decisions, we'll continue to build on our strong foundation and reach even more lives with Jesus' healing ministry.

With gratitude,

A handwritten signature in black ink, appearing to read "Ernie Sadau". The signature is fluid and cursive, written over a light-colored rectangular background.

Ernie Sadau



Introduction

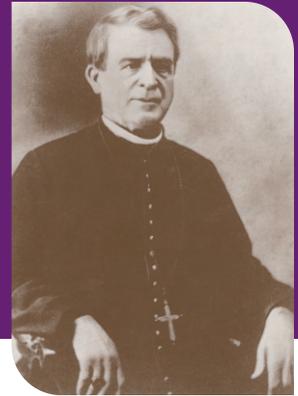
**Your Health. Your Life.
Our Purpose.**

Introduction



The CHRISTUS Health Code of Ethics and Business Conduct (Code) outlines the principles on which we rely to guide our operational practices and professional decisions. Additionally, it provides examples of expected behaviors for CHRISTUS Associates and health care partners who support our ministry. As representatives of our organization and our ministries, we must all strive to fulfill CHRISTUS' mission to extend the healing ministry of Jesus Christ and serve in alignment with CHRISTUS' core values. CHRISTUS is committed to maintaining an ethical and equitable culture as well as to complying with all applicable laws and regulations in the countries and states in which we serve. Each of us is responsible for understanding and adhering to this Code and holding each other accountable for the same. Not complying with our Code can impact our mission, organization, Associates, patients, communities, business partners and Congregational Sponsors. This Code does not articulate how to act in every situation, but it does outline the core values and principles that should guide us in our daily work.

Our Heritage



CHRISTUS Health is sponsored by three Catholic congregations: the Sisters of Charity of the Incarnate Word of Houston, the Sisters of Charity of the Incarnate Word of San Antonio, and the Sisters of the Holy Family of Nazareth. In 1866, three Sisters from Lyon, France arrived in Galveston, Texas and founded the first private, Catholic hospital in Texas. Skilled in nursing, the Sisters came in response to Bishop Claude Marie Dubuis' call, "Our Lord Jesus Christ, suffering in the persons of a multitude of sick and infirm of every kind, seeks relief at your hands," and established the Congregation of the Sisters of Charity of the Incarnate Word (later named Sisters of Charity of the Incarnate Word of Houston). The health care ministry flourished and, in 1869, the frontier community of San Antonio invited three Sisters to found a hospital and establish the Congregation of the Sisters of Charity of the Incarnate Word of San Antonio.

In 1875, in Rome, a new congregation of the Sisters of the Holy Family of Nazareth was founded by Blessed Mary of Jesus the Good Shepherd (Frances Siedliska). Responding to an invitation by Archbishop Feehan of Chicago, Illinois, the Sisters expanded their ministry to the U.S., in 1885. In 1937, the Sisters were called to Tyler, Texas to found the community's first hospital, which continues to operate as part of CHRISTUS today.

Our Sponsors came from diverse places, cultures and backgrounds, but always in response to a common call to devote their lives to caring for and serving the needs of the sick, the poor and the vulnerable. That same spirit of unity amidst diversity continues within CHRISTUS Health, where our Associates, care partners and volunteers serve in alignment with our mission, vision and **core values**, to bring care to all in need of healing.

Mission: To extend the healing ministry of Jesus Christ

CHRISTUS Health is a Catholic health care ministry with the mission to extend the healing ministry of Jesus Christ. We seek to improve the health of the communities we serve and to ensure that all may experience God's healing presence and love. We strive for health equity for all, without exception. Our mission should be obvious to all who come to us for care by our daily demonstration of our **core values**: dignity, integrity, compassion, excellence and stewardship.

CHRISTUS has a formal and essential relationship with the Catholic Church in each community we serve. As a Catholic health care provider, CHRISTUS Health is committed to adhering to the relevant requirements of the Code of Canon Law as well as Catholic moral teaching related to health care. In the United States, this teaching is expressed in the **Ethical and Religious Directives for Catholic Health Care Services (ERDs)** as promulgated by the United States Conference of Catholic Bishops. Consistent with Catholic moral teaching, CHRISTUS attends to the physical, spiritual, psychological and social dimensions of all persons as it fulfills its ministry.



A ministry of the Catholic Church

As a Catholic health care ministry, we operate consistent with the social teachings of the Catholic Church, as expressed in the following Core Commitments.

Serve as a ministry of the Church: The call to live our identity in concrete ways and connect to the broader Church is essential to maintaining our identity.

Promote and defend human dignity: A critical element of Catholic identity is the commitment to cherish, promote and defend human dignity. Made in the image and likeness of God, each person is a treasure and each life a sacred gift.

Promote the common good: We believe in the Holy Trinity of God the Father, Jesus His Son and the Holy Spirit. We also believe that we were made in God's image, which tells us we were also made to have meaningful relationships. Protecting and promoting the common good for our patients, residents and the communities we serve involves staying active in local partnerships that seek to monitor and improve the social determinants of health.

Attend to the whole person: Catholic health care affirms every person is a unity of body, mind and spirit. When we attend to the whole person, we strive for the best care possible to meet their physical needs without neglecting their spiritual needs.

Care for poor and vulnerable persons: Jesus clearly demonstrated his love for people who are poor and vulnerable and so, too, we pay attention to our neighbors who are poor, underserved and vulnerable.

Act on behalf of justice: We work together to bring alive the Gospel vision of justice and peace interpersonally within our organizations for our patients and for our communities.

Steward resources: Our mission stands as an enduring sign of health care rooted in faith in Jesus Christ. We steward more than buildings and bottom lines. We steward the legacies of those who have gone before us in this ministry.

Our responsibilities

Each of us is responsible for ensuring that CHRISTUS is an ethical organization and for helping to foster an ethical culture within our ministries. We are all representatives of CHRISTUS, who share a responsibility to serve as stewards of our resources and organizational reputation. CHRISTUS Health cannot be an ethical and compliant organization unless our Associates and health care partners actively participate in making it so. Accordingly, participation in the CHRISTUS Compliance Program is a condition of employment, Board appointment and maintaining a business relationship with CHRISTUS. As a representative of CHRISTUS, you are expected to:

- Identify, review, understand and comply with laws/regulations applicable to health care organizations and/or your job duties and policies/procedures designed to facilitate legal/regulatory compliance;
- Complete general and, as appropriate, role-based trainings designed to promote compliance with applicable laws, regulations, and policies in your day-to-day activities;
- Know, understand and meet your obligation to report actual and potential non-compliance as well as ethical concerns, and do so promptly through one of the several available reporting mechanisms, sharing any knowledge or suspicion of existing or potential legal, regulatory, or compliance-related policy violations, including violations of this Code;
- Review compliance-related communications, particularly as they relate to your job duties;
- Promptly respond to requests for information or assistance in connection with Compliance Program activities, including investigations, monitoring and auditing;
- Know, understand and meet your obligation to report actual and potential non-compliance as well as ethical concerns;
- When asked, actively participate in CHRISTUS' efforts to investigate any instances of non-compliance; and
- Uphold the mission and core values of CHRISTUS, including the moral and social teachings of the Catholic Church as they relate to health care.

Each of us must adhere to this Code and model CHRISTUS' core values in our behavior. Every Associate and health care partner is accountable for his or her actions and is required to act professionally, ethically and consistent with this Code and other CHRISTUS policies. CHRISTUS management team members are expected to lead by example, promoting knowledge of and compliance with this Code as well as with applicable laws, regulations, and policies, with their Associates and health care partners.

Our responsibility for reporting

General

As a representative of CHRISTUS, you are required to report actual, potential, and suspected violations of laws, regulations, compliance-related policies, or this Code. Retaliation of any kind against **good faith** reporters is absolutely forbidden at CHRISTUS.

CHRISTUS has an open-door policy, which provides many avenues for you to fulfill your obligation to report without fear of retaliation, harassment, discrimination, or other inappropriate behavior. You may report through the **Integrity Line** or to your immediate supervisor, Human Resources, leadership/management, Ministry/Regional Compliance Officer or the CHRISTUS Health Corporate Compliance Department. You may contact the CHRISTUS Health Corporate Compliance Department at **469.282.2263**. Your ministry compliance committee or mission leader are also available to help address your concerns.

Speak up if you think something is not right, even if you are not sure whether misconduct occurred or even if you do not believe that you have all of the necessary information. If your issue has not been addressed or if you do not believe that the issue has been sufficiently addressed, you are expected to bring it to the attention of another one of the aforementioned resources.

Reporting through the **Integrity Line**

Compliance concerns may be reported 24 hours a day to the CHRISTUS Health **Integrity Line**. Although you may report anonymously through this **Integrity Line**, please be advised anonymous reporting may make investigations more difficult when additional information is needed for the investigation. If you report anonymously, please check in on your case routinely, as you may have questions from the investigator waiting for you. Contact information for ministry compliance lines are below:

- United States: 888.728.8383
- Chile: +56.223.548.256
- Colombia: +01.800.5.1.84500
- Mexico: +001.844.268.9569
- Online at **CHRISTUSintegritylink.org**

Integrity Line complaints are received by professionals employed by an outside vendor who are trained to document your concerns. All reported issues will be directed to the appropriate individual(s) at CHRISTUS, and investigated and addressed, as appropriate.

Compliance investigations

CHRISTUS maintains confidentiality to the fullest extent possible during reviews and investigations. Sometimes, the nature of an investigation or certain laws and regulations may require CHRISTUS to make a disclosure.

If you are involved in a compliance investigation, you are expected to keep the details confidential. Preserving confidentiality honors the dignity of the individuals participating in the process and protects the integrity of the investigation.

We do not tolerate retaliation

As CHRISTUS Associates, we must demonstrate the CHRISTUS **core values** in the performance of our duties. CHRISTUS has policies and procedures in place to promote transparency and foster a safe and ethical environment. We expect all Associates, contractors, physicians and other partners/vendors to speak up when they have concerns and to not be fearful of retaliation. As mentioned above, retaliation against anyone who raises a concern or reports misconduct in **good faith** is strictly prohibited. Of course, non-retaliation policies and laws do not protect you from civil, criminal, or disciplinary action regarding your own performance or behavior, if you have been involved in misconduct.



Respect for the worth of every person, recognition, and commitment to the value of diverse individuals and perspectives, and special concern for the poor and underserved

We serve our communities

We are called to be involved in the areas we serve, recognizing that our ministries do not exist in isolation but rather as part of their communities. We have a responsibility to contribute to the common good by helping to improve economic and social conditions in our communities, by defending the dignity of all people and promoting their full development as human beings. Strengthening the overall health of our communities requires a special focus on service to persons whose social and economic conditions place them at the margins of society.*

Community benefit

As part of contributing to the common good, we promote and track our work in community benefit through standard budgeting and reporting practices, engaging in outreach initiatives that emphasize social action and participating in advocacy programs that promote human dignity. We also direct resources via the CHRISTUS Fund to improve community health. To further this work, CHRISTUS routinely conducts community health needs assessments and sets priorities with community health improvement plans to evaluate how we improve health and quality of life in our communities. We also provide financial assistance at our health care facilities to facilitate equitable access to care for the poor and vulnerable.

Advocacy

In order to effectively promote the common good, CHRISTUS advocates and partners with national and state legislatures and with local government, to help ensure equitable access to health care for all persons.**

We promote diversity, equity and inclusion

At CHRISTUS we strive to promote human dignity in every encounter. We value diversity among our Associates and health care partners and understand how this organizational philosophy enhances the consumer experience. We are committed to carrying out our mission without regard to race, ethnicity, color, creed, religion, gender, sexual orientation, disability, age or national origin. We foster a nurturing and inclusive work environment that respects diverse thoughts and backgrounds. The diversity of our teams and communities makes us a stronger organization. Therefore, we offer equal opportunity employment and Associate development programs designed to continuously encourage personal and professional growth.

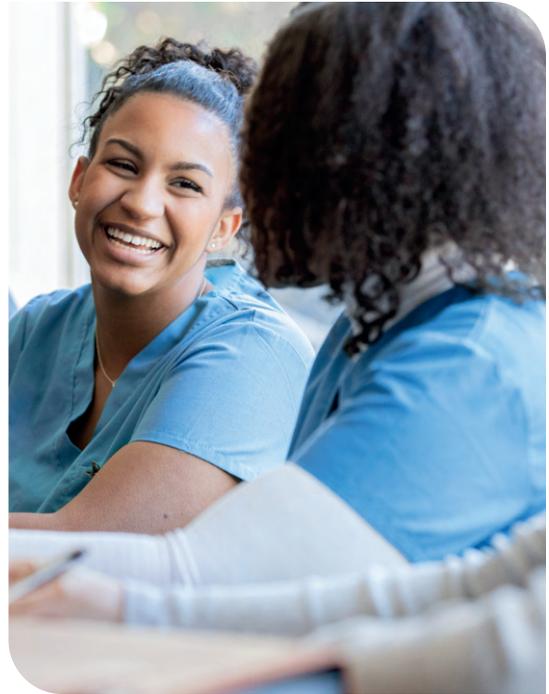
* ERDs Part One, The Social Responsibility of Catholic Health Care Services

** ERDs Part One, Directive 3

We foster positive relationships among Associates

We treat others with respect

CHRISTUS is committed to honoring the dignity of each Associate and health care partner and is committed to treating them with respect. Our Associates and health care partners are our most important resources, as they help us to deliver high-quality, compassionate care. CHRISTUS endeavors to create a collaborative environment in which relationships are built on trust and individual contributions are appreciated.



It is up to each Associate and health care partner to help make CHRISTUS a safe, positive and inclusive workplace. We expect Associates to treat fellow Associates, health care partners, patients and their guests with dignity and respect. Our One CHRISTUS culture calls Associates and health care partners to be compassionate with one another, respecting others' personal beliefs, choices and lifestyles.

We do not tolerate acts of violence or acts associated with violence, including bullying, battery, intimidation, threatening, hostile behaviors, stalking, abuse, vandalism, possession or use of weapons, comments regarding intended violence, or any other conduct that management deems as violent or as a violation of the dignity of others.

We also do not tolerate harassment in any form and will take all appropriate preventive measures to protect our Associates and health care partners. When necessary, we are committed to taking action(s) against harassers.

Fundraising efforts

No one is compelled to participate in fundraising efforts undertaken by CHRISTUS, other Associates, or health care partners. When CHRISTUS opts to support specific charitable organizations Associates are free to choose whether to donate or participate without fear of any workplace consequences.

We respect human life

The Catholic Church respects the dignity and sanctity of human life, from conception to natural death. It believes all persons have inherent worth and are made in God's image, irrespective of talents, abilities and shortcomings. As such, the Church respects and protects dignity, particularly when persons feel the most undignified, often due to illness.

In alignment with Catholic moral teaching and our value of dignity, CHRISTUS ministries do not perform, promote, or condone abortions, physician-assisted suicide, euthanasia or sterilization. Abortion is defined as the directly intended termination of pregnancy before viability or the directly intended destruction of a viable fetus. However, there may be instances due to the pathological condition in a pregnant woman when procedures cannot be safely postponed until viability, even if it might indirectly result in the death of an unborn child.

The foundation of the Church's respect for life and dignity calls us to provide patients with appropriate opportunities to prepare for natural death. Patients should be offered the appropriate medical information that would make it possible to understand the choices available to them

According to the Catholic Church, a person has the moral obligation to use ordinary or proportionate means of preserving their life. It is important to note that disproportionate means to preserve life, like life-sustaining treatment, must be distinguished from euthanasia. Within the Church and its sponsored health care organizations, the first is an appropriate acceptance of human mortality and the limits of medical science, while the second is a direct rejection of the gift of human life. Disproportionate means are treatments or procedures that, in the patient's judgment, either offer no reasonable hope of benefit or entail an excessive burden or expense on the family or community.

Another element of honoring the dignity of the person within the Church is recognizing the right and duty of each person to protect and preserve bodily and functional integrity. To this end, CHRISTUS does not permit direct sterilization of men or women in their ministries.

For a more detailed explanation of the moral teachings of the church regarding respect for life, please reference [The Ethical and Religious Directives for Catholic Health Care Services, Part Three, Directives #29,32,33, Part Four, Directive #53, Part Five, Directives #55-59.](#)





Honesty, justice and consistency in all relationships

We comply with laws and regulations

At CHRISTUS, we do the right thing not only because it's the right thing, but also because patients' lives and the communities we serve depend on us. We strive to act with integrity in everything we do. Our core values help guide us in making the right decisions ethically, thoughtfully, and responsibly so that our business can appropriately meet patient and societal needs.

Ethical decisions promote trust as well as accountability for doing the right thing, both internally and externally.

Our commitment to integrity begins with our devotion to compliance with all applicable laws and regulations, wherever we do business. CHRISTUS is strongly committed to conducting our business honestly and compliantly and to fostering a culture of compliance. Associates and health care partners are expected to understand and follow our organization's policies and the laws and regulations that apply to our specific roles and responsibilities. If you do not understand a policy, law or regulation, then you are expected to seek guidance from a relevant expert such as the policy owner or a CHRISTUS Compliance or Legal Department Associate. As a CHRISTUS Associate, you are expected to help prevent violations of policies, laws and regulations and for speaking up when you become aware of any such possible violation.

Excluded persons

CHRISTUS strives to never appoint, employ, credential, contract or do business with individuals or entities that have been excluded, debarred, suspended or have otherwise become ineligible to participate in government-funded health care programs. Associates and health care partners are required to disclose when they are under investigation for criminal or civil offenses for which they may become excluded, debarred or suspended.

Credentialing

CHRISTUS requires that, as applicable, credentials, licenses and certifications be maintained by Associates and other health care providers who treat our patients. Individuals with lapsed or revoked credentials, licenses and certifications are prohibited from providing patient care at CHRISTUS facilities.

Laws specific to the health plans

In addition to laws that apply to CHRISTUS as a health care provider, CHRISTUS Health Plan also complies with laws specific to managed care and other applicable payers. Persons or entities conducting business for the Health Plan will also receive copies of this Code and be expected to comply with these standards.

Working with physicians and other referral sources

CHRISTUS values its relationships with physicians and other health care providers and is committed to strengthening those relationships while maintaining compliance with laws and regulations. Accordingly, our policies and procedures articulate the following commitments:

- Agreements between CHRISTUS and physicians must comply with applicable laws and regulations governing relationships between hospitals and physicians and be approved by CHRISTUS Legal;
- We accept patient referrals and admissions based only on the patient's needs and our ability to provide the services needed. CHRISTUS does not pay or provide anything of value to anyone for the referral of patients or Health Plan members;
- No CHRISTUS Associate or health care partner is permitted to solicit or receive anything of value, directly or indirectly, in exchange for the referral of patients or Health Plan members; and
- CHRISTUS does not consider the volume or value of referrals that another health care provider has, or may make, to CHRISTUS when we make referrals to another party or when we consider entering into legally permissible relationships in which financial remuneration is provided to physicians.

CHRISTUS recognizes that the relationship between providers and patients requires mutual respect, trust, honesty and appropriate confidentiality.





We make values-based decisions

The Values-Based Decision-Making Process (VBDMP) is a tool to help leaders make important decisions in alignment with our mission and core values. The VBDMP should be used when board members, leadership or teams encounter an issue or situation in which a number of important values are at stake that require deeper reflection.

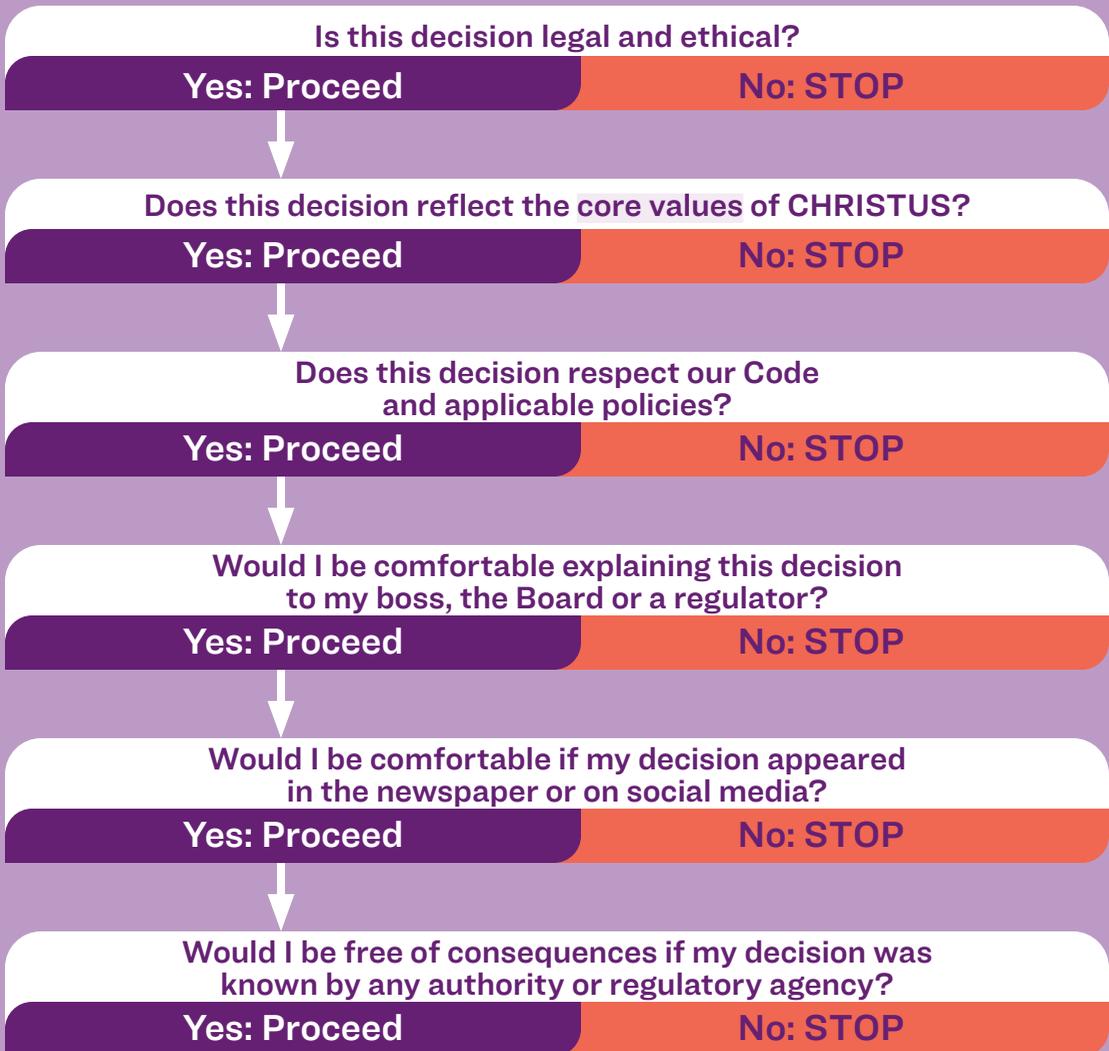
Criteria for the use of the VBDMP include, but are not limited to:

- There is a recognized difference of opinion;
- There is uncertainty about the circumstances or the possible resolution; or
- It involves a major transaction or important decision.

Leaders are expected to use the VBDMP when making significant decisions for CHRISTUS. The ministry mission leader is available to provide more information about this process or to identify a facilitator to help guide stakeholders through the process.

We make the right decision

Reaching the right decision in any particular situation may feel subjective but can be reached with a bit of additional thought and consideration. When we are faced with a difficult ethical decision, we should ask ourselves the following questions, which will help to facilitate our decision-making process:



Any negative response should lead us to reconsider the decision and consequent action.

You should be able to answer all of these questions with a clear "yes." If you cannot, you should speak with your manager, your human resources representative or Compliance, before moving forward with the action.

Do the right thing. Ask for help if it's not clear.

We maintain proper vendor relationships

We strive to select consulting, subcontractor, supplier and Vendor partners in a fair and equitable manner, free from conflicts of interest and consistent with all applicable laws, regulations, policies, and ethical business practices. CHRISTUS buyers are required to select Vendors on the basis of objective criteria including quality, price, delivery, adherence to schedules, service, maintenance of adequate sources of supply, and past performance.

Gifts from Vendors

Gifts or entertainment provided to CHRISTUS Associates or **health care partners** should not be considered in Vendor selection or the decision to continue with or terminate Vendor relationships. CHRISTUS Associates must conduct ourselves in a manner that leaves little doubt as to our integrity, impartiality or loyalty to the best interests of CHRISTUS. Any decision to accept or give business-related gifts and entertainment should be based on prudent judgment, good stewardship, and the potential impact on the public image of CHRISTUS as well as made in accordance with CHRISTUS policies. No items of value may ever be given or accepted as a condition of conducting business with a Vendor, in exchange for providing or receiving preferential treatment for/from a Vendor, or in exchange for supplying or receiving confidential information to/from a Vendor.

*Please refer to [Compliance Policy 38.0 – Gifts and Entertainment in Business Relationships](#).**

Non-retaliation

A Vendor will not be retaliated against for **good faith** participation in the CHRISTUS Compliance Program, including reporting potential issues, investigating issues, conducting self-evaluations or audits, and reporting to appropriate officials.

We avoid conflicts of interest

We are all responsible for avoiding situations that create actual or perceived conflicts between our personal interests and those of CHRISTUS. Conflicts of interest occur when personal or outside interests affect (or appear to affect) one's ability to prioritize CHRISTUS' or patient interests while fulfilling one's responsibilities to CHRISTUS or one's patients. Actions taken while one has an unmanaged conflict (or even the appearance of an unmanaged conflict) call into question the legitimacy of business decisions and, in some instances, are against the law.

*Also, please refer to [Compliance Policy 35.0 – Conflicts of Interest Reporting and Management](#).**

* To ensure efficient access to our policies and before clicking on any policy hyperlinks, please first open the Policy Medical app found on your desktop.

We prevent corruption

The Foreign Corrupt Practices Act (FCPA) regulates U.S. companies doing business abroad. The FCPA makes it illegal for employees of U.S. companies, its subsidiaries, or agents to, either directly or indirectly, give bribes or anything of value to a foreign government official, candidate for public office, political party or party official in order to gain a business advantage.

No Associate, or anyone acting on behalf of CHRISTUS, shall offer, authorize, promise, or make a payment (including payment of non-monetary benefits) that is intended to improperly influence, or even appears to improperly influence, a foreign official to gain unfair business advantages. Employees of state-owned businesses are considered foreign officials for FCPA purposes. There is no monetary threshold—even the smallest bribe is prohibited. Associates should also remember that acts of giving and receiving bribes violate not only this Code, but also the FCPA and, in many cases, local criminal laws as well.

*Also, please refer to [Compliance Policy 31.0, Foreign Corrupt Practices Act](#).**

We respond to government investigations

CHRISTUS cooperates with government inquiries and investigations as appropriate and legally permissible. If you are contacted by a government representative, please immediately contact your CHRISTUS Regional/Ministry Compliance Officer, the Vice President of Compliance, or the Legal Department. They will work with you, as appropriate, on how to best respond.

*Please also refer to [Compliance Policy 14.0, CHRISTUS Health Response to Government Inquiries or Investigations](#).**

* To ensure efficient access to our policies and before clicking on any policy hyperlinks, please first open the Policy Medical app found on your desktop.

Our ethics programs

Each acute care facility has an ethics program, whether local or regional. Ethics programs have two resources – committees and consultants. Both assist with value-based dilemmas within the ministry.

Ethics committees

Associates and **health care partners** from a location or region may be asked to serve on an ethics committee. An ethics committee's function is to:

- Review and approve ethics-related policies;
- Organize ethics education for Associates and **health care partners**;
- Improve processes by integrating ethics concepts into daily workflows;
- Provide ethics consultation on clinical and organizational issues; and
- Interact with the community on ethics-related topics.

Ethics consult teams

Associates and **health care partners** who undergo specialized training to respond to ethics consults comprise the local ethics consult team. Consultants are also ethics committee members, but anyone may ask for an ethics consult with a consultant at any time outside of committees' regular meeting times. To learn how to schedule an ethics consult, contact your local mission leader or a member of the Ethics Committee.



We safeguard protected health information

CHRISTUS entities collect information about a patient such as medical condition, history, medication and family illnesses in order to provide the highest quality care. We understand the sensitive nature of both protected health information (PHI) and other personally identifiable information and are committed to maintaining the privacy, security and confidentiality of this information.

In accordance with the Health Insurance Portability and Accountability Act (HIPAA), CHRISTUS does not use, disclose or discuss patient-specific information, including patient financial information, with others, unless it is necessary for treatment, payment, operations, or compliance with an applicable law/regulation/court order. Patient information will be released only to persons authorized by law or by the patient's written authorization.

As a CHRISTUS Associate or health care partner, we have a responsibility to:

- only access PHI when required to fulfill our job responsibilities;
- keep all log-in information and passwords confidential and secure;
- properly secure and store PHI to which we have access;
- not transmit it to anyone outside CHRISTUS, except for contracted business associates, health care partners, the patient (or their authorized representative) or government agency; and
- transmit information securely and consistent with applicable information security and/or privacy protocols, when transmission outside of CHRISTUS is appropriate.

Using social media, recording and photography

Patient confidentiality

In alignment with our values of dignity and integrity, CHRISTUS Health requires the responsible management of all patient data. When participating in social media, regardless of whether you are on or off the clock, an Associate is prohibited from engaging in conduct or communication that would compromise the privacy or security of confidential patient health information, identifiable health information, or CHRISTUS' confidential and proprietary business information. Any Associate violating this rule is subject to corrective action, up to and including termination. In addition, CHRISTUS and its Associates may also be subject to legal proceedings and/or criminal charges as a result of compromising patient health information.

Social media on behalf of CHRISTUS Health

We follow our **core values** in the online social media community. The same commitment is required of you, our Associates, when participating in social media as part of performing their work duties.

Social media can play an important role in our personal and professional lives. As a representative of CHRISTUS, you are encouraged and expected to use discretion and care when sharing content, opinions and experiences on social media and other internet forums. We ask that you write in the first person and make it clear you are speaking for yourself and not on behalf of CHRISTUS. Below, please find additional guidelines to keep in mind when engaging in social media activities.

- Be truthful, accurate, professional, and respectful;
- Follow copyright laws;
- Do not disclose proprietary information about CHRISTUS;
- Refer all media inquiries and opportunities to the System Communications team;
- Do not post any patient information, including any information that might enable reader/viewer to identify a patient, including but not limited to audio, video, or photographs.

There may be specific requirements for CHRISTUS-sponsored electronic and social media materials. Associates should obtain approval from the System Communications team before posting content related to CHRISTUS products and services. We recognize and respect Associates' rights to freely communicate with one another about benefits and terms and conditions of employment, including on social media platforms.

*Please refer to our [Social Media Policy](#), for additional information.**

* To ensure efficient access to our policies and before clicking on any policy hyperlinks, please first open the Policy Medical app found on your desktop.



Compassion

Service in a spirit of empathy, love and concern

We protect patients' rights

Recognition and respect of patients' rights provides an important aspect of care that encourages patients to become more informed and empowered, ask questions, build better relationships with their caregivers and be active participants in their treatment planning. The acknowledgement of patient rights and responsibilities also helps patients feel supported by the facility and those people directly involved in their care. In a climate of respect and trust, communication is enhanced, and issues that could lead to safety or quality risks can be prevented or addressed.

*Please also refer to [Policy 7.001, CHRISTUS Health Clinical Guideline – Patients' Rights and Responsibilities](#).**

We handle patient grievances appropriately

CHRISTUS is dedicated to meeting patient needs, keeping them safe and making their stay with us as comfortable as possible. If patients are dissatisfied with their care, CHRISTUS has formal structures to inform patients of their rights with regard to filing complaints and grievances regarding care and services. This process complies with standards from CMS and The Joint Commission. Our goal is to ensure patients and other stakeholders are informed of available resources for complaint and grievance resolution. When a complaint is received, our Associates and leaders will do our best to help resolve the issue and address the concern. If the issue resolution of the complaint is not satisfactory, then the patient and family can file a grievance. Patients and families are given information about how to file a grievance with state, federal and accreditation agencies. Voicing a complaint, grievance, or other improvement opportunity will not subject the patient to any repercussions or retribution. The processes related to complaints and grievances helps CHRISTUS know about patient concerns and helps us to resolve them right away.

We responsibly conduct research

Research is an important part of modern health care. We promote leading-edge, scientifically-meritorious, ethically-sound and regulatory-compliant research that may benefit our patients, communities and future generations. Our research activities are aligned to our mission and **core values**, while closely adhering to the ERDs. Our researchers and clinical investigators must be qualified, responsible and objective and uphold the highest ethical, scientific and medical standards in research. Our Human Subjects Research Protections Program facilitates a culture of responsible research in which our diverse clinical study participants are treated with dignity and respect, as we protect their rights, autonomy and welfare.

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Clinical research integrity at CHRISTUS is safeguarded by several measures, including:

- Rigorous policies and procedures guiding how we conduct research responsibly.
- Review of all clinical research activities by the Institutional Review Board.
*Learn more about this policy [here](#).**
- Collection of informed consent from participants prior to initiating a clinical trial.
*Learn more about this policy [here](#).**
- Accurate recording and reporting of study analyses and results in a timely manner.
- Adherence to accepted industry practices for authorship and publication of study results.
*Learn more about this policy [here](#).**
- Documentation of any financial conflicts of interests from all research investigators.
*Learn more about this policy [here](#).**
- Zero tolerance for research misconduct.
*Learn more about this policy [here](#).**

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High standards of service and performance

We are a High Reliability Organization

CHRISTUS strives to be a High Reliability Organization (HRO). To avoid errors and manage unexpected situations, HROs create an infrastructure that facilitates mindfulness and proactive response. Such action helps us to avoid events escalating into crises and catastrophes. The six interconnected HRO principles that make up the mindfulness infrastructure are outlined below.

- **Preoccupation with failure:** Failures can snowball into tragedy. It's important to address any level of technical, human or process failure. We are tasked with thinking of ways our work processes might break down.
- **Reluctance to simplify:** HROs are complex and should embrace complex solutions for complex problems. We should be open to challenging long-held beliefs and continuously look at data, benchmarks and performance to prevent inappropriate over-simplification.
- **Sensitivity to operations:** HROs understand that getting a good understanding of the current situation involves working with frontline Associates, because they are closer to the work. We must actively communicate with other Associates, physicians and leaders at all levels by taking their concerns seriously and listening to their feedback.
- **Commitment to resilience:** HROs are resilient because they can anticipate trouble and encourage speaking-up for safety when something unexpected occurs or is identified. This allows us to quickly recover from bad situations. We emphasize the importance of working in teams and focus on removing barriers that inhibit functional collaboration.
- **Deference to expertise:** The expert is the one closest to the work. We must know who in the organization possesses specialized knowledge and we must value expertise over authority and titles. In high-risk conditions, it's important to adapt to circumstances that rapidly change which requires expertise to understand and sufficiently address.
- **Safety champions:** We must reward good safety behaviors of our Associates and clinicians, while coaching and engaging our colleagues on HRO principles. Our safety champions not only carry out these responsibilities, but they identify additional HRO training needs and establish the safety phrase for CHRISTUS, "I want to double check."

We provide quality patient care

CHRISTUS is committed to providing our patients with safe, effective care of the highest quality, in a supportive, respectful, and compassionate environment. We expect Associates and health care partners to:

- participate in the delivery of excellent patient care;
- support our drive to improve quality;
- promote evidence-based practices;
- participate in initiatives to improve patient safety and reduce harm;
- listen to patients;
- practice within your scope of education, skill, and clinical privileges;
- speak up if you have concerns, ideas, or questions related to patient quality; and
- encourage patients to raise their concerns or questions with Patient Relations or hospital administration.



We market properly

We promote our services, physicians and care through marketing activities that adhere to principles of truth, fairness and accuracy in all consumer communications and advertising. As messages are created, we strive to provide information appropriate to the age, understanding, and language of the audience. We do not disparage or damage the reputation of another provider, system or institution. A set of brand guidelines is maintained for the organization that further defines how the CHRISTUS brand is to be represented to all audiences. CHRISTUS is committed to compliance with all marketing requirements set forth by law and regulatory agencies.

We are committed to educational excellence

All members of the CHRISTUS Health medical education community are expected to support and uphold our [core values](#) of dignity, integrity, compassion, excellence and stewardship.

In all of our educational programs, we strive to demonstrate the seven core competencies. These include medical knowledge, excellent patient care, systems-based practice, practice-based learning, interpersonal and communication skills and osteopathic principles and practice (for osteopathic students and physicians), with an emphasis on professionalism. *For more, read the policy [here](#).**

CHRISTUS Health's medical education mission includes an unwavering commitment to educational excellence. We provide guidance and supervision to diverse medical students, residents, and fellows, facilitating their professional and personal development while ensuring the highest quality, safe and evidence-based care for patients. *For more, read the policy [here](#).**

In alignment with our values of dignity and compassion, all of our training programs emphasize equity, diversity and community engagement with a special focus on the poor and underserved population.



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Stewardship

Wise and just use of talents and resources in a collaborative manner

We comply with billing and coding requirements

As CHRISTUS Associates or health care partners, we are required to document clinical activity accurately and completely. To that end, we will:

- create accurate and complete medical records and other reports, adhering to applicable standards in maintaining all records;
- provide patients with information about charges for which they will be responsible in accordance with applicable laws and regulations;
- submit claims for payment or reimbursement only for services that were actually provided and medically necessary;
- cooperate with established auditing and monitoring functions to validate accuracy of claims submission;
- make sure all submitted claims are properly coded and documented, and billed according to applicable laws and regulations;
- respond promptly to concerns and review potential errors, and once quantified, submit timely correction of identified errors and refund any reimbursement, as required;
- engage in respectful and honest dialogue with governmental agencies, commercial payers and patients;
- engage contractors, when needed, who demonstrate appropriate skills, quality control processes, and systems; and,
- file on-time, complete and accurate external reports.

If you notice an error in a claim or report, you should correct it before submission. If you are unsure how to proceed, ask a manager or your Regional/Ministry Compliance Officer for help.

We keep accurate business records

We have formal systems and policies in place to facilitate clear and complete patient medical records, which are reflective of the care received by the patient. Likewise, we treat with care organizational documents such as claims and financial statements. When we sign documents, we are confirming that document is true and correct, to the best of our knowledge. We never sign other people's names or use their passwords.

Our documents, both medical and business, are retained in accordance with applicable laws/regulations and our record retention policy. No one may remove or destroy records prior to the specified date, without first obtaining permission from the Legal Department.

*Please also refer to [Record Retention and Destruction Policy](#).**

We use our resources

We are committed to being good stewards of our resources, including financial resources, equipment, electronic systems, supplies and information. In order to maximize resources, Associates are asked to:

- Use CHRISTUS resources only for CHRISTUS business purposes, consistent with relevant policies and procedures.
- Correctly use and care for all CHRISTUS property and equipment entrusted to you.
- Maintain inventories and keep all supplies secure, consistent with relevant policies.
- Dispose of surplus or obsolete items according to relevant policies and procedures.
- Use Information Services resources according to relevant policies

All CHRISTUS communications systems, including computers, email, intranet and internet access, telephones, cell phones and voicemail are to be used for business purposes, in accordance with our Information Management policies and procedures. Company issued communication tools are not private, and CHRISTUS reserves the right to monitor and/or access content consistent with our policies.

*Please also refer to [Information Services System Policy](#), [Acceptable Use Policy](#).**

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We protect confidential and proprietary information

CHRISTUS's confidential and proprietary information is another asset that we must safeguard and secure to be a good steward of our resources. Confidential and proprietary information means any information that is not publicly known or is restricted to a limited audience.

Do not disclose CHRISTUS' confidential and proprietary information in casual conversations or in public places. We only share such information as needed with those who have a legitimate and lawful need to know. If you are unsure of whether a request for such information is legitimate, ask your supervisor, your Regional/Ministry Compliance Officer or the Legal Department. If you are working with vendors or other third parties, please contact the Legal Department to put a non-disclosure and/or business associate agreement in place, when appropriate.

*Please also refer to [Privacy Compliance Policy 12.0, Minimum Necessary Standard for Use and Disclosure of Protected Health Information](#); and [Privacy Compliance Policy 35.0, Safeguarding Protected Health Information](#).**

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We respond to the call

Catholic health care is an answer to the call of Jesus to serve the sick, suffering and dying, especially those who are poor or vulnerable. This vocation is founded on a commitment to promote and defend the human dignity of all people we encounter. The Associates and **health care partners** of CHRISTUS continue the legacy of our three Sponsoring Congregations, bringing hope and healing to the communities we serve. Our mission, vision and **core values** provide a strong foundation and guide our ministry. Grounded in this identity and purpose we serve as One CHRISTUS, so that all may experience God's healing presence and love.



Appendix

Glossary

Anything of value: Anything of value includes cash, gifts, gift cards, electronic equipment, clothing, meals, entertainment (e.g. concert, theater, sport, or other similar event invitations without a prevailing business character), travel, lodging, transportation, loans, use of property or equipment, charitable contributions and job offers.

Core values: The principles and priorities that guide an organization's actions. CHRISTUS core values are dignity, integrity, compassion, excellence and stewardship.

Ethical and religious directives (ERDs): Set by the United States Conference of Catholic Bishops, and followed by CHRISTUS Health, to uphold the Church's teachings on human dignity. They also provide moral guidance on issues in Catholic health care and reaffirm the ethical standards of behavior in health care from everyone that contributes to our ministry.

Good faith: Honest belief or purpose, faithful performance of duties, observance of fair dealing standards, or an absence of fraudulent intent.

Government official: Officials or employees of federal, state, provincial, county, municipal, and similar officials of any government or any department or agency thereof; any officers or employees of a company or business owned in whole or in part by a government (i.e. state-owned enterprise); any officers or employees of a public international organization (e.g. the World Bank, United Nations, or the European Union); any foreign political party or official thereof; or any candidate for political office. Government officials include officials at every level of government, regardless of rank or position.

Health care partners: All physicians, residents, fellows, locum tenums, students, other health professionals, volunteers, identified Vendors and those with contractual relationships with CHRISTUS.

High Reliability Organization (HRO): Organizations whose safety, quality and efficiency have been maintained at high levels over an extended period of time.

Health Insurance Portability and Accountability (HIPAA): This 1996 Act is a federal law requiring the creation of national standards to protect sensitive patient health information from being disclosed without the patient's consent or knowledge.

Integrity Line: Also referred to as hotline, is a confidential reporting mechanism that is available for CHRISTUS Associates to report their concerns and allows the Associate to remain anonymous if they choose to.

Patient grievances: Formal or informal written or verbal complaints that are made to the facility by a patient or a patient's representative regarding a patient's care when such complaint is not resolved at the time of the complaint by the staff present. It can involve mistreatment, abuse (mental, physical, or sexual), neglect or facility compliance issues.

Protected Health Information (PHI): Individually identifiable health information including demographic information, medical histories, test and laboratory results, mental health conditions, insurance information and other data that a health care organization collects and or maintains to identify an individual or determine appropriate care.

Attestation

I acknowledge that I have received, read and understand the CHRISTUS Health Code of Ethics and Business Conduct and agree to comply with its requirements, as well as those of the policies, procedures and directives referenced in it, except where applicable laws otherwise apply.

I promise to use it to guide my decision-making process and recognize that making ethical choices in my work and complying with applicable laws contributes to CHRISTUS Health's culture of integrity.

I also recognize that I have a responsibility to report any known or potential violations of the Code, CHRISTUS Health's policies or procedures, or applicable laws/regulations, through the **Integrity Line** or to my immediate supervisor, Human Resources, leadership/management, Ministry Compliance Officer or the CHRISTUS Health Corporate Compliance Department, except where laws or regulations specify otherwise.

CHRISTUS Health does not tolerate retaliation against anyone for making a **good faith** report.

Signature

Printed Name

Date

Our name and symbol



In 1999, the Sisters of Charity of the Incarnate Word of Houston and the Sisters of Charity of the Incarnate Word of San Antonio consolidated their U.S. and International health systems to create CHRISTUS Health. The name CHRISTUS comes from the Latin word for Christ and proclaims publicly the core of our mission, to extend the healing ministry of Jesus Christ. It also exemplifies the heritage and spirituality of our three Sponsoring Congregations, the Sisters of Charity of the Incarnate Word of Houston, the Sisters of Charity of the Incarnate Word of San Antonio and the Sisters of the Holy Family of Nazareth, who recognize Jesus Christ as the Incarnate Word; the love of God made flesh and sent to live among us. Our logo is a cross which combines both the medical and religious meanings for that symbol. Purple is a color of resurrection and the royalty of Christ while the flowing banner reaffirms our hope in new life and our commitment to progress and move forward in our service to our communities.

CHRISTUShealth.org

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