

# Code of Conduct

Compliance Department

**HENRY  
FORD  
HEALTH**<sup>SM</sup>



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# Henry Ford Health is:

- Henry Ford Hospitals and Health Networks
- Henry Ford Hospital
- Henry Ford Medical Group
- Henry Ford Behavioral Services
- Henry Ford Wyandotte Hospital
- Henry Ford Macomb Hospitals
- Henry Ford West Bloomfield Hospital
- Henry Ford Jackson Hospital
- Community Care Services
- Corporate Services
- Health Alliance Plan

# True North

We will be the trusted partner in health, leading the nation in superior care and value... one person at a time.



# Our Priorities



- High Reliability Organization-Quality
- Customer Experience
- System Redesign & Transformation



- HAP Growth
- HFPN/JHN
- Covered Life Performance
- Primary Care



- Cancer
- Orthopedics
- Heart & Vascular
- Neurosciences
- Physician Partnerships



- Integrated Market Plan
- Tertiary/Quaternary Market Capabilities
- Ambulatory Services
- Community Health



- Academic
- Provider
- Payer
- Commercial
- International



- Employee Experience
- Diverse & Inclusive Workforce
- Cultural Transformation
- Operating Model Alignment
- Safe Place to Work

# Strategic vision

## True North

We will be the trusted partner in health, leading the nation in superior care and value-one person at a time.



# Strategic themes

## Our Path North



Differentiated Care & Experience Every Time



Highest Performing Networks



World-Class Service Lines



Local Market Leadership



Transformative Partnerships



Inspired People / Extraordinary Place to Work



Dear Team Henry Ford,

For over 100 years Henry Ford Health has had the honor and privilege of serving southeast Michigan and more recently, the Jackson/Central Market of our state. Throughout that time, we have earned a strong reputation as leaders in this community by living out our values of compassion, innovation, respect and results.

That would mean nothing, however, if our reputation wasn't also built on an unbreakable foundation of honesty and integrity. This, our Code of Conduct, provides instruction on how we conduct business at Henry Ford Health, and outlines the behaviors expected of each and every one of us, including our vendors, board members, and volunteers.

This document, along with our Compliance Program, will assist you in understanding and following the laws, regulations, professional standards and ethical commitments that apply to our work. It is a resource for you when you have questions or need further assistance. More importantly, it also details your duty to report, without fear of retaliation, any activities you believe may be a violation of our Code of Conduct.

We have built a sacred trust with the communities we serve, a trust that must never be broken. To maintain it requires all of us to be committed to holding each other accountable to the highest standards.

After over 40 years of working throughout this system, I am confident that we will continue to hold true to the standards we have set, and I look forward to working with you as we continue to build on our vision of being a trusted partner in health. Thank you for your dedication and commitment.

Sincerely,

**Bob Riney**

*President and Chief Executive Officer, Henry Ford Health System*

**As Henry Ford Health workforce members, we must support and practice the HFH vision, “We will be the trusted partner in health, leading the nation in superior care and value - one person at a time.”**

**Each patient is an individual with unique health care needs. We must provide the best possible care focused on these needs and recognize that effective quality and safe medical care requires a cooperative effort with the patient (or designated representative). This principle is carried out by:**

- Providing the quality of care and comfort we want for our families and ourselves.
- Treating patients, families, guests and each other with respect and dignity.
- Courteously and sincerely smiling and greeting everyone, using their name when known.
- Using appropriate vocabulary when communicating with others, directly, by telephone or in writing.
- Satisfying each patient’s needs, providing genuine care and comfort, concentrating, in turn, on each patient’s welfare, and fulfilling even unexpressed wishes and needs.
- Providing personal service, identifying patient preferences and tailoring service to those preferences.
- Contributing to a proper atmosphere for patients and visitors through careful attention to personal appearance and the appearance of our facilities.
- Working together with coworkers, physicians, patients, family members, outside agencies, etc. as a team to collectively satisfy all patient needs.
- Receiving complaints and concerns non-defensively and communicating them to the appropriate person, ensuring the patient or family member receives a timely response.
- Providing all patients a level of care based on their diagnosis, treatment needs, care planning and other aspects of patient care.
- Examining and stabilizing patients who request emergency service without regard to ability to pay and only transferring the patient when the medical advantages outweigh the risks as determined by the physician or upon patient request.
- Basing all admissions on patient need, our ability to provide care at the admitting facility, and our contractual obligations to the patient’s health plan.
- Encouraging patients to participate in their own care, inquire about their medical care plan and provide advanced directives. We will provide appropriate information to patients so they can consent to treatment on an informed basis and we will honor their decisions.
- Planning discharges in the best interest of the patient and developing these in collaboration with the patient/ family/ caregiver and the multidisciplinary health care team.



# As the Henry Ford Health workforce, we must refrain from outside work activities or personal interests that result in or appear to be in a conflict of interest with Henry Ford Health and we must maintain the highest standards of business ethics.

## Conflict of interest

We must refrain from participating in outside activities or having financial interests that influence or appear to influence our ability to make objective decisions for patient care and HFH. We must never use our official position or influence to gain an improper advantage, economic or non-economic, for ourselves or our family members, vendors, patients, customers or associates. (Note: unless otherwise stated, “family members” include parents, spouses, children, siblings, and domestic partners.)

Whenever we are involved in any situation that is or might appear to be a conflict of interest, we must disclose it to HFH management. This includes disclosures in response to routine annual disclosure requests, as occurs annually for trustees and selected employees, and in addition, disclosure of any new situation that is or might appear to be a conflict of interest. If a conflict exists, HFH will work with the workforce member to resolve it. If the conflict cannot be resolved, HFH will take appropriate action such as ending a vendor relationship or terminating employment, depending on the circumstances and nature of the conflict. Advice on handling potential conflicts of interest may be obtained by contacting the Compliance department.

## Guidelines for specific types of business conduct and conflict of interest:

**Gifts:** All gifts, entertainment and business meals provided or received must be reasonable and small enough that they do not influence our decisions. We never accept anything of value in exchange for referrals or other business. A gift is any item of value (including marketing items, gift cards or food items, if the recipient is not expected to pay for the item.

Gifts received from patients are not permitted. We may not accept or solicit gifts from patients in any form. Additionally, free health care items or services of any

value purchased for or provided to patients or physicians unless specifically permitted by a Henry Ford Health policy - including waiving charges for professional services as “professional courtesy”.

We recognize that certain items are appropriate and do not present a risk of influencing our decisions. We must communicate to vendors, physicians, patients and others that our values restrict what we can give and receive because we want our services and business relationships to stand on their own. When on-site, our vendor relations policy prohibits us from accepting any gift. Off-site, on occasion, we may accept gifts of nominal value (\$100 or less), if acceptance will not influence the decisions we make regarding that vendor. Acceptance of such gifts must be disclosed on our annual COI disclosure statement and may not be brought on-site.

**Business Entertainment:** We may accept occasional invitations from vendors to off-site social activities provided that we are accompanied by the vendor and it is clear to all concerned that acceptance facilitates the business purposes of the relationship and in no way influences our decision-making on behalf of HFH.

## A representative from a supplier we frequently do business with wants to bring lunch for our department. What should we do?

In general, gifts or take-out food delivered to HFH locations from vendors is prohibited. (See HFH Supplier Code of Conduct). Any off-site meal provided must be infrequent, connected to a legitimate business purpose, such as education or product demonstration, and must take place in an appropriate business setting with the supplier host present. Likewise, meals may only be provided for staff attending the education or product demonstration and the cost of any meals provided must be modest.

**Support is available:** The best ‘thank you’ any vendor can give is to provide excellent service at a reasonable price.

**Donations:** Donations, gifts or bequests to HFH are encouraged. They must be freely given, intended to further the mission of the System, not intended to personally benefit an individual employee and not linked to a contractual obligation or other HFH business activity. All donations should be coordinated through the Philanthropy Department.

**Expert Testimony:** We are prohibited from serving as an expert witness if our testimony conflicts or could appear to conflict with the best interest of HFH, or if payment for such services could in any way appear to influence our decision-making on behalf of HFH. Expert testimony must be performed outside of work hours, not use any HFH resources, and should be approved by your manager or department chair.

**Loans:** We may not accept loans from vendors of either a personal or business nature unless the vendor is a commercial lender and the loan is based on prevailing market terms.

**Nepotism:** It is against HFH policy for an employee to be placed under the direct supervision or being supervised by a relative, domestic partner or significant other.

**Outside Employment and Consulting:** We and our family members are prohibited from employment and consulting relationships (including speeches, presentations, written articles etc.) with a vendor if this could appear to influence our decision-making on behalf of HFH. If we wish to participate in an employment or consulting relationship that does not influence our decision-making on behalf of HFH, this: (1) Should be approved by your manager or department chair; (2) must be conducted outside of work hours and not conflict with our HFH job responsibilities or the best interests of HFH; (3) must not use HFH resources or be conducted on HFH property; and (4) must not utilize the services of any subordinate. (Note: Compensation for participation in marketing activities on behalf of Industry is prohibited; this includes what is most commonly referred to as industry-sponsored "Speaker's Bureaus.")

**Physician Relationships:** We must structure all business arrangements with physicians to ensure compliance with legal requirements. Such arrangements must be in writing, at market value, and approved by the HFH Legal Department. Verbal arrangements are prohibited.

**Prizes or Awards:** If we receive a prize or award from a vendor, we must disclose this by requesting and submitting a completed conflict of interest disclosure form and abide by any decisions made as to the ultimate disposition of the prize or award.

**Discounts from Vendors:** Discounted purchases of goods or services from a vendor for personal use are not permitted unless part of an HFH sponsored program.

**Referrals:** We must never compensate anyone in any way for patient referrals nor can we accept compensation for referrals we make.

**Serving on Boards:** If we sit on the board of directors or advisory board of an organization, we must abstain from decisions that impact or appear to impact the relationship between the organization and HFH. If attendance at outside board activities is during HFH time, compensation should not be offered or accepted. Any involvement on the board of an organization must be disclosed to HFH.

**Sponsorships:** Vendor sponsorship of a function that benefits HFH is allowed as long as it does not appear to create a conflict, is freely given, and is not linked to any contractual obligation of HFH. Such sponsorships must be referred to the Office of Philanthropy or Corporate Accounting for specific guidelines and procedures. Vendor sponsorship of an outside function which personally benefits any employee or family member is prohibited.

**Vendor Funded Travel:** All vendor sponsored travel must be disclosed and fulfill a bona fide education or consultative purpose and directly benefit HFH.

**Vendor Relationships:** The value of goods and services supplied by vendors must be judged by their utility, quality and pricing, not on the ability of the vendor to influence us in any other way. At HFH, we:

- Restrict and monitor vendor access to our facilities, particularly to patient care areas.
- Educate vendor representatives as to the conduct expected of them while on our premises and certify them as qualified to visit these facilities.
- Communicate the strict guidelines as to what "donations" may be accepted from a vendor and by what process.
- We must not conduct business on behalf of HFH with a family member, other relative, or with a company of which we are an officer, director, principal, employee or agent without first advising the Compliance Department so that appropriate advance approval can be sought and management plans put into place.

**Vendor Funded Travel:** All vendor sponsored travel must be disclosed and fulfill a bona fide education or consultative purpose and directly benefit HFH.

**Waiving of Charges:** To comply with private insurance and government regulations, we, as health care professionals, may not waive charges for services as a "professional courtesy."

# As HFH workforce members, we must know, understand and comply with all laws, regulations and professional organization requirements that apply to our jobs.

## The False Claims Act

As a recipient of federal health care program funds, including Medicare and Medicaid, HFH is required by law to include in its policies and provide to all workforce members, students, agents and contractors, detailed information regarding the federal False Claims Act and applicable state, civil and criminal laws intended to prevent and detect fraud, waste and abuse in federal health care programs.

### What is the False Claims Act?

The False Claims Act is a federal law that makes it a crime for any person or organization to knowingly make a false record or file a false claim regarding any federal health care program, which includes any plan or program that provides health benefits, whether directly, through insurance, or otherwise, which is funded directly, in whole or in part, by the United States Government or any State health care program. "Knowingly" includes having actual knowledge that a claim is false or acting with "reckless disregard" as to whether a claim is false. Examples of potential false claims include knowingly billing Medicare for services that were not provided, submitting inaccurate or misleading claims for actual services provided, or making false statements to obtain payment for services.

The False Claims Act contains provisions that allow individuals with original information concerning fraud involving government health care programs to file a lawsuit on behalf of the government and, if the lawsuit is successful, to receive a portion of recoveries received by the government.

### State Laws

In most states it is a crime to obtain something (i.e., such as a Medicaid payment or benefit) based on false information. In addition to the federal law, Michigan has adopted similar laws allowing individuals to file a lawsuit in state court for false claims that were filed with the state for payment, such as the Medicaid program.

## Penalties for Violating the False Claims Act

There are significant penalties for violating the federal False Claims Act. Financial penalties to an organization that submits a false claim can total as much as three times the amount of the claim, plus fines of \$5,500 - \$11,000 per claim. In addition to fines and penalties, the courts can impose criminal penalties against individuals and organizations for willful violations of the False Claims Act. The false claims law adopted in Michigan also carries significant fines and penalties of \$5,000 - \$10,000 per claim.

## Protections Under the False Claims Act

The federal False Claims Act protects anyone who files a lawsuit under the Act from being fired, demoted, threatened or harassed by his or her employer as a result of filing a False Claims Act lawsuit. Similar protections are also provided to individuals under the state False Claims Act laws adopted in Michigan.

## What is fraud and abuse?

### Fraud and Abuse laws generally prohibit the following:

- Submitting inaccurate or misleading claims for services provided.
- Submitting claims for services not provided.
- Submitting claims that don't meet payer requirements (e.g. coverage for services).
- Making false statements or representations to obtain payment for services or to gain participation in a program.
- The offer or payment of money, goods or anything of value in return for the referral of patients to a health care provider.
- Offering or giving something of value to patients to encourage them to use or purchase health care services.

## Antitrust matters

Antitrust laws forbid companies from doing business in a way that gives them too much control in the marketplace. The purpose of these laws is to preserve competition. These laws could affect your dealings with patients, doctors, payers, suppliers and competitors of Henry Ford Health. The antitrust laws are violated if competitors agree to:

- Fix prices or pricing methods
- Allocate patients, payer contracts or regions
- Boycott or refuse to do business with a payer, physician, provider or other party

## Billing for services

We take great care to ensure that all billings are for services that are medically necessary and supported in the medical record. Bills must accurately reflect the services provided and comply with all applicable federal and state laws and regulations. We must provide an explanation of charges with the bill and provide a means of answering patient questions and resolving differences.

## Research

Our research programs are conducted in compliance with all state, federal, sponsor and institutional regulations and policies. We must not:

- Use research funds in a manner inconsistent with the funding agency's guidelines.
- Inappropriately reveal private patient information in the conduct of research.
- Fail to disclose a conflict of interest and research misconduct as required by federal and institutional regulations.

## Copyright and patent

We comply with all copyright and patent laws. We must not:

- Share software with more people than are allowed under the licensing agreement.
- Duplicate copyrighted materials without proper permission.

## Political contributions and lobbying

We do not engage in activity that may jeopardize the tax-exempt status of Henry Ford Health, including a variety of lobbying and political activities. If we, as individuals, support a candidate for political office, a political party, an organization, or political action committee, support must be conducted on our own behalf, time and expense. HFH may not contribute money, property, or services to any political candidate, party, organization, committee or individual. All HFH contacts with government bodies and officials must be conducted in an honest and ethical manner, without an attempt to influence by the offer of any improper benefit. Requests or demands by a governmental representative for any improper benefit should be immediately reported to the Legal Department.

## Marketing

Our marketing materials must reflect only the services available and the level of licensure and accreditation held.

## Taxes

As a nonprofit tax-exempt entity, HFH has a legal and ethical obligation to act in compliance with applicable laws, engage in activities in furtherance of its charitable purpose, and ensure that its resources are used in a manner which furthers the public good rather than the private or personal interests of any individual. Consequently, HFH and its employees must avoid compensation arrangements in excess of fair market value, accurately report payments to appropriate taxing authorities, and file all tax returns in a manner consistent with applicable laws.



# As Henry Ford Health workforce members, we must comply with all HFH policies and procedures designed to ensure proper and legal employment practice or appropriate standards of workplace environment.

## Employment policy and practice

**Diversity and Equal Opportunity Employment:** HFH respects and values the unique talents of all employees and is committed to creating an environment and culture that maximizes their personal growth and their contribution to serving the health care needs of our diverse communities. HFH does not discriminate in the recruitment, hiring, promotion, termination or any other condition of employment or career development based on race, religion, national origin, sex, age, marital status, sexual orientation, height, weight, disability, citizenship or veteran status. Unlawful discrimination includes harassment of individuals based on any of these factors.

**Sanctioned Individuals:** HFH screens for and does not employ individuals or entities ineligible to participate in federal or state health care programs.

**License and Certification Renewals:** If we are required by law to be licensed, certified or otherwise credentialed to perform our services, we must keep our licenses/certifications current and report all status changes in license/certification as soon as possible following the change.

**Employment of Family Members:** Though employment of our family members is acceptable, relatives must not work together in a supervisor/subordinate relationship. (Note: for employment purposes, family member is defined as first cousin or closer, naturally, by law or by marriage.)

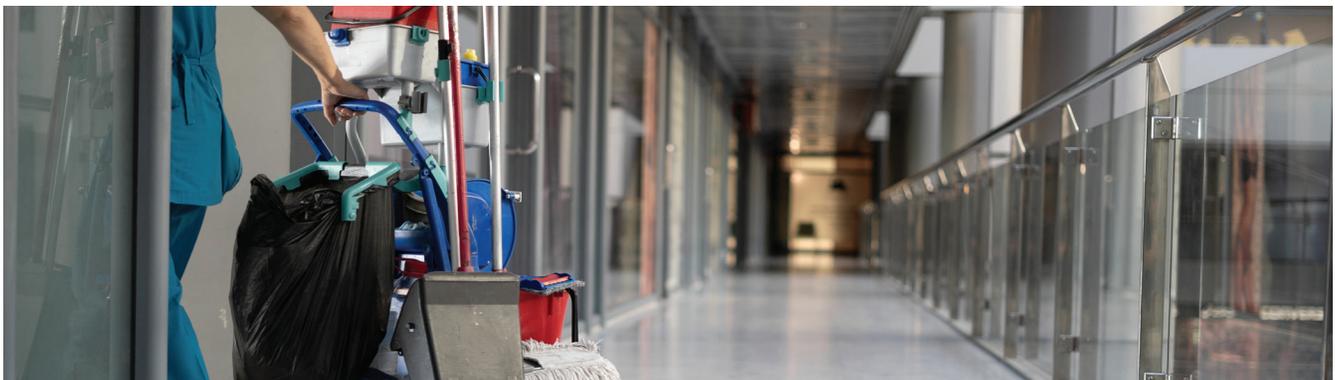
## Workplace environment

**Environmental Health and Safety:** Keeping the workplace clean and safe helps everyone. We must learn the health and safety rules relating to our job and make sure we always follow them.

**Alcohol and Drug Abuse:** When we report to work and while at work or on HFH property, we must remain free from the effects of alcohol and drugs that could adversely affect our ability to perform our job.

**Harassment/Sexual Harassment:** We must avoid behavior that might result in harassment of other employees, patients or visitors. Harassment includes but is not limited to: verbal abuse, suggestive comments, inappropriate gestures and physical contact.

**Workplace Threats and Violence:** HFH intends to provide a safe and non-violent environment for its employees and customers. Threatening, harassing, intimidating, physically or verbally abusing or coercing HFH employees, patients, guests, visitors or supervisory personnel is considered a serious offense. Employee conduct of this nature will be promptly investigated with immediate and appropriate corrective action taken, up to and including termination.



# As Henry Ford Health workforce members, we must preserve and protect institutional assets by making prudent and effective use of resources and accurately reporting their use.

## Employment policy and practice

**Work Ethic:** While at work, we must be personally accountable and responsible for the work we do, realizing that compensated time spent non-productively wastes HFH resources.

**Theft and Waste:** We must protect HFH equipment and supplies from theft and waste. We are in violation of System policy if we steal or misuse money, information, equipment, or supplies, or falsify time sheets. We must spend HFH assets as carefully as we would our own. Any employee who steals or misuses HFH property, regardless of value, can be discharged and/or be subject to criminal prosecution.

**Internal Controls:** HFH has established control standards and procedures to ensure that assets are protected and properly used and that financial records and reports are accurate and reliable. We all share responsibility for maintaining and complying with internal controls.

**Financial Reporting:** All financial reports, cost reports, accounting records, research reports, audits, expense accounts, time sheets and other documents must be accurate and clearly represent the relevant facts. Improper or fraudulent accounting, documentation or financial reporting is contrary to the policy of HFH and may be in violation of applicable laws. All transactions conducted in the name of HFH are subject to established authorization and recording procedures.

**Travel and Entertainment:** Travel and entertainment expenses should be consistent with job responsibility and HFH needs and resources. We must comply with all HFH and business unit policies relating to travel and entertainment.

**Advertising:** HFH does not allow the creation of marketing or advertising campaigns including media purchase and placement of advertising by staff outside the HFH Marketing Department. All marketing content, images, audio and video or like material used by HFH are the exclusive property of HFH. Content cannot be used or duplicated without the express written consent of the HFH Marketing Department.

**Corporate Identity:** The HFH trademark is the equity of the System and is what distinguishes the HFH name in the mind of the consumer. The HFH trademark is a corporate asset, registered with the Patent and Trademark Office. The HFH logo must always be presented consistently, and its integrity must always be maintained in accordance with the HFH Corporate Identity Standard Guidelines.

**Actions or behaviors that jeopardize the privacy and security of personal health information or other confidential business information can result in disciplinary action.**

## Question:

I think that my co-worker is violating a provision of the Code of Conduct and HFH's policy, but I don't want to get her in trouble.

## Answer:

Wanting to protect your colleague is understandable, but you have an obligation to report all potential violations of HFH's policy to an appropriate person or resource. If you believe your colleague has violated a policy, this Code of Conduct or any law or regulation, you should contact your manager or the Compliance Department immediately.

# As the Henry Ford Health workforce, we must comply with all policies and procedures designed to ensure proper recording, retention, transmission, confidentiality and security of all clinical and business information.

## Information privacy and security

Protecting patient and other sensitive information is key to maintaining patient and co-worker trust. The Information Privacy & Security Program includes oversight for various sets of data including patient, member, employee, financial and business information. Workforce members are required to access, use and transmit sensitive information in accordance with HFH policies & procedures and support a “culture of confidentiality”.

**Patient Information:** All patient information is confidential and must never be shared with anyone unless there is a legitimate need to know or the disclosure is authorized by the patient or permitted by applicable law.

**Business Information:** All information used daily to conduct HFH business is confidential and should only be shared internally with persons whose job requires it.

**HFH Business Strategies and Operations:** Sensitive information about HFH business strategies and operations is a valuable asset. We all have an obligation to treat information about business operations and projects as confidential and proprietary. We maintain confidentiality and do not share information with third parties or the public. We share confidential and proprietary information internally only with designated individuals who have a need to know the information. If our relationship with HFH ends for any reason, we are still bound to maintain the confidentiality of sensitive information obtained during employment.

## Devices and electronic media

All electronic media, issued by HFH, such as laptops/ computers, tablets, flash drives, telephones, voicemails, Internet access and electronic mail (e-mail) are provided to workforce members solely to facilitate appropriate business communications. In addition, personal devices used for HFH business purposes, should only be used in accordance with policies ensuring the security of electronic media. The content is the property of HFH and HFH maintains the right to monitor and retrieve all such communications.

## Electronic threats and scams

The Information Technology department works diligently to protect our electronic perimeter but some scams involving electronic mail may make it to your inbox. One consistent trend targets email communications because it can reach the maximum amount of users who may be unaware of the danger. Be aware that authentic-looking emails may attempt to get victims to reveal personal information and use it to distribute viruses or used for identity fraud. If you receive such an email, never provide your User ID or Password, for our Information Technology department will not request your credentials via email. Immediately FORWARD the email to SPAM@hfhs.org for proper containment.

## Code B Alert Program

The Code B Alert stands for Code BREACH Alert and helps to insure a proper response to data breaches as required by HFH policies. All workforce members are alerted when there is a media reportable data breach or other data breach that could pose significant risk to HFH or patients. Code B alerts may include communication to patients, FAQs about the breach, and instructions for forwarding patient inquiries to a toll-free call center. Every Code B Alert requires immediate attention by the entire health system, and should be shared with all workforce members through department meetings or huddles.

**Web Policy:** HFH leaders recognize the value of web technology, but do not allow the creation of websites or services either in or outside the Henry Ford networks, without the review and approval of the Web Services, Marketing and Information Technology Department. Online and electronic content, images, video and other like collateral material used on any of the HFH web properties are the exclusive property of HFH and cannot be used on other properties without the expressed written consent of Web Services, Marketing, or Information Technology Departments.

# As HFH workforce members, we must promptly report any observed conduct that violates this code of conduct, a law, regulation, professional organization requirement or HFH policy or procedure.

## Your role in reporting issues

Compliance to the Code of Conduct is the responsibility of all workforce members. The trust of the entire-community, HFH patients and other customers depends on our honesty and integrity. Any HFH employee who fails to follow the standards of the Code of Conduct or other legal requirements, or engages in unethical business practices, must be reported. Once reported, appropriate investigation, enforcement and remedial action must occur.

**Non-Retaliation:** HFH maintains an open environment, in which employees at every level of the organization understand that their good faith report of possible non-compliance will be taken seriously, that HFH will not tolerate retaliation, and that if an investigation confirms impropriety, it will be appropriately addressed. HFH encourages all employees to promptly notify management of any known or suspected fraud or insurance abuse, other violations of the law, or non-compliance with work-related conduct standards by employees, students, volunteers, contractors or agents. If your immediate supervisor is not available, there are other options, including talking with another member of management, your Human Resources Business Partner, Compliance Site Manager, or Privacy Lead via the web at MyComplianceReport.com (use access ID: HFH).

We are encouraged to voice concerns regarding observed business practices to our immediate supervisor. When this avenue is not appropriate, or if action is not taken in a timely way, there are other options, including talking with another member of management, your Human Resources Business Partner, contacting your Chief Compliance Officer, or Privacy Lead via the web at MyComplianceReport.com (use access ID: HFH).

**Henry Ford Health Compliance Department:** The HFH Compliance Department led by Candyce Foreman, Henry Ford's Chief Compliance Officer, promotes open communication, reporting and resolution of Compliance concerns without retaliation. While you are encouraged to report concerns directly to your manager, the Compliance Hotline is an objective resource that is available 24 hours/day, 365 days/year:

- By phone: 1-888-434-3044
- By email: [Compliance@hfhs.org](mailto:Compliance@hfhs.org)
- Online: [www.mycompliancereport.com](http://www.mycompliancereport.com), use access ID: HFH

## Final points to remember

- Violation of the Code of Conduct and related policies may lead to corrective action, up to and including termination and criminal prosecution.
- Each of us has a sense of what is right and wrong that guides our daily life. If we experience anything that doesn't seem to be included in or prohibited by the Code but is "not right," we must report any suspected violation of this code of conduct.
- Our Henry Ford Health Code of Conduct, like all such sets of standards, cannot cover all possible relevant topics and, from time to time, must be revised. Please contact the Compliance Department with any ideas as to how our Code can be more complete or effective. The most up-to-date version of the Code can always be viewed on the HFH intranet site, directly or through a link from the HAP intranet site.



**Candyce Foreman**  
VP of Business Integrity &  
Chief Integrity Officer

**HENRY  
FORD  
HEALTH®**

[henryford.com](http://henryford.com)