

Code of Conduct Policy Addendum

Applies To: All Hospital Employees

Managed By: Corporate Compliance

Effective Date: 4/26/2006

Last Review Date: 7/2/2014

Purpose:

To insure that all BTNRH staff, contractors and consultants comply with the BTNRH Code of Conduct Policy. Training on this policy is to be completed at the time of employment and thereafter annually. This policy is an addendum to the FFBH Code of Ethics and Professional Conduct #13275.

Policy:

Boys Town National Research Hospital (BTNRH), an operating unit of Father Flanagan's Boys Home, has adopted a Corporate Compliance Program to ensure that its hospitals and clinics operate in full compliance with applicable laws. An important component of the program is the Code of Conduct (referred to as the "Code"), which sets out basic principles which all its subsidiaries, directors, officers, professional staff, and other employees (referred to as "personnel") must follow. This Code applies to all business operations and personnel. Non-personnel representatives of BTNRH, such as sales agents or external advisors, consultants, and contractors are to be directed to conduct themselves in a manner consistent with the Code when they are acting on behalf of BTNRH. If there are any questions about the Code or its applicability to a particular situation, please contact your supervisor or BTNRH Compliance Officer.

The Corporate Compliance Program and this Code are not intended to and shall not be deemed or construed to provide any rights, contractual or otherwise, to any personnel or to any third parties.

Procedure:

Standards of Conduct

1. One of BTNRH's strongest assets is a reputation for integrity and honesty. A fundamental principle on which BTNRH will operate is to conduct its business in full compliance with applicable laws and sound ethical standards. Achieving business results by illegal acts or unethical conduct is not acceptable.
2. Each supervisor and manager is responsible for ensuring that personnel within their supervision are acting ethically and in compliance with applicable law and the Code. All personnel are responsible for acquiring sufficient knowledge to recognize potential compliance issues applicable to their duties and for appropriately seeking advice regarding such issues.
3. This Code has been distributed to all personnel and sets forth general standards applicable to all business and operations and is available for review on the BTNRH website. In addition, there are a number of more detailed and specific policies covering particular business units or subject matters. BTNRH will communicate those specific policies to personnel who are particularly affected by and who must comply with them in the course of BTNRH's business. A current set of such policies is available at the BTNRH website. If you have any questions, please contact your supervisor or BTNRH's Compliance Officer.
4. Personnel shall not offer, make, or accept any bribe(s), payment(s), gift(s), or item(s) of value to any person or entity with whom BTNRH has or is seeking any business or regulatory relationship except for gifts of a nominal value which are legal and given in the ordinary course of business. Gifts of nominal value have a fair market value of less than \$100. To accept or give a gift with a fair market value of greater than \$100, the personnel must first receive permission from the Executive Vice President of Health Care.
5. Personnel staff shall not directly or indirectly authorize, pay, promise, deliver, or solicit any payment, gratuity, or favor for the purpose of influencing any political official or government employee in the discharge of that person's responsibilities.
6. Personnel shall be completely honest in all dealings with government agencies and representatives. No misrepresentations shall be made, and no false bills or requests for payment or other documents shall be submitted to government agencies or representatives. Personnel certifying the correctness of records submitted to government agencies, including bills or requests for payment, shall have knowledge that the information is accurate and complete before giving such certification.

7. All political activities relating to BTNRH shall be conducted in full compliance with applicable law. No BTNRH funds or property shall be used for any political contribution. Personnel may make direct contributions of their own money to political candidates and activities. These contributions will not be reimbursed.
8. Other than compensation from BTNRH, and as consistent with the conflict of interest policies, personnel shall not have a financial or other personal interest in a transaction between BTNRH and any of its business units and a vendor, supplier, provider, or customer.
9. Personnel shall not engage in any financial, business, or other activity, which competes with BTNRH's business which may interfere or appear to interfere with the performance of their duties or that involve the use of BTNRH property, facilities, or resources.
10. All of BTNRH's business transactions shall be carried out in accordance with management's general or specific directives. All financial or accounting records shall be kept in accordance with generally accepted accounting principles or other applicable standards. All transactions, payments, receipts, accounts, and assets shall be completely and accurately recorded in BTNRH's records on a consistent basis. No payment shall be approved or made with the intention or understanding that it will be used for any purpose other than that described in the supporting documentation for the payment. All information recorded and submitted to other persons must not be used to mislead those who receive the information or to conceal anything that is improper.
11. Books and records shall be created, maintained, retained, or destroyed in accordance with FFBH or BTNRH's records retention policy.
12. Personnel shall comply with applicable antitrust laws. There shall be no discussions or agreements with competitors regarding price or other terms for product sales, prices paid to suppliers or providers, dividing up customers or geographic markers, or joint action to boycott or coerce certain customers, suppliers, or providers.
13. BTNRH and its personnel shall not engage in unfair competition or deceptive trade practices, including misrepresentation of BTNRH's products or operations. Personnel shall not make false or disparaging statements about competitors or their products or attempt to coerce suppliers or providers into purchasing products or services.
14. All personnel shall maintain the confidentiality of BTNRH's business information and information relating to BTNRH's vendors, suppliers, providers, customers, and persons covered by any of BTNRH's products. Personnel shall not use any such confidential or proprietary information for their own personal use.

15. All personnel shall follow safe work practices and comply with all applicable safety standards and health regulations.
16. All personnel are responsible for ensuring that the work environment is free of illegal discrimination or harassment.

Reporting of Violations

1. Illegal acts or improper conduct may subject BTNRH to severe civil and criminal penalties, including fines and being barred from certain types of business. It is, therefore, very important that any suspected illegal activity or violation of the Code be promptly brought to the BTNRH Compliance Officer's attention. In many cases, if BTNRH discovers and reports illegal acts to the appropriate governmental authorities, BTNRH may be subject to lesser penalties.
2. Any director, officer, or employee who believes or becomes aware of any potential violation of this Code or any illegal activity by a director, officer, employee or another person acting on BTNRH's behalf shall promptly report the violation or illegal activity in person, by phone, or in writing, to one of the following persons:
 - a. The appropriate business unit or department head or any other senior manager.
 - b. The Hospital Compliance Officer
 - c. Or via Ethics Point at 1.888.264.0754 or www.boystownethics.com
3. Personnel are in direct violation of this Code if they do not report a suspected violation of the Code or illegal activity. If you have a question about whether particular acts or conduct may be illegal or violate the Code, you should contact one of the individuals listed above. It is a violation of this Code for personnel to whom a potential illegal act or violation of the Code is reported to not ensure that the suspected illegal act or violation of the Code comes to the attention of those responsible for investigation of such reports.
4. It is BTNRH's policy to promptly investigate reports of suspected illegal activity or violations of this Code. Personnel must cooperate with these investigations. Actions may not be taken to prevent, hinder or delay discovery an investigation of illegal acts or violations of this Code. It is a violation of this Code for personnel to prevent, hinder, or delay discovery and full investigation of suspected illegal acts or potential violations of this Code.
5. Personnel may report illegal acts or a violation of this Code anonymously. To the extent permitted by law, BTNRH will take reasonable precautions to maintain confidentiality of those individuals who report suspected illegal activity or potential violations of the Code and

of those individuals involved in the alleged improper activity, whether or not investigation shows that improper acts occurred, except as required by law.

6. No reprisals will be taken against personnel for good faith reporting of, or cooperating in the investigation of suspected illegal acts or potential violations of this Code.
7. Personnel who violate this Code or commit illegal acts are subject to discipline up to and including dismissal. Personnel who report their own illegal acts or improper conduct, however, will have such self-reporting taken into account in determining any appropriate disciplinary action.