III. Code of Conduct

It is the policy of UMC that all of the business of UMC be conducted according to high ethical standards, including compliance with applicable laws, rules, and regulations, and the requirements of third party payers. In support of this stated policy, a Code of Conduct is essential for UMC to prosper and receive the desired trust and respect of its patients, physicians and other health care providers, third party payers, employees, and agents. Set forth in this Code of Conduct is a set of standards to evaluate situations in a consistent manner and arrive at uniform decisions. The underlying principles of these standards are based on common sense, courtesy, ethical and legal conduct that are essential to govern the business of UMC. It is important that all UMC employees understand these standards and abide by them daily.

In furtherance of these principles, UMC subscribes to the following Code of Conduct:

**PRINCIPLE 1 - Legal Compliance:**
We will strive to ensure all activity by or on behalf of the organization is in compliance with applicable laws.

The following Standards are intended to provide guidance to employees and subcontractors to assist them in their obligation to comply with applicable laws. Knowledge (first or second hand) or suspicion of any violation of any law, regulation or rule must be reported to the Compliance Hotline ((601) 953-1761).

- We shall not solicit, receive or offer to give anything of value to anyone in exchange for referral of patients. Bribes or kickbacks of any kind intended to induce referrals are prohibited.
- We shall not make false statements or representatives to any person or entity in order to gain or retain participation in a program or to obtain payment for any service.
- We shall submit claims for reimbursement accurately and only for services rendered.
- We shall not enter into any agreements with competitors to share or fix prices.
- We shall maintain complete and accurate medical records to support all medical decisions and the necessity for diagnostic testing.
- We shall collect all applicable copayments and deductibles in accordance with policy.
- We shall strive to ensure that our contracts conform with all applicable laws by having them reviewed and approved as required by UMC policies.
- We shall store, dispense and transport all drugs and biologicals in accordance with accepted guidelines.
- We shall adhere to sound environmental and safety practices, including the proper handling of medical or hazardous waste.
We shall respect our obligations as individuals and as health care providers, and neither express nor imply a promise of performance which we cannot reasonably expect to fulfill;

We shall assure that all practices of write-offs, discounts, or forgiveness of debt are based solely on justifiable business practices and conform to federal and state statutes.

**PRINCIPLE 2 - Quality of Care:**
We are committed to providing the highest quality of care and delivering services in an ethical, professional manner.

- We shall treat all patients with dignity, respect, and compassion at all times.
- We shall provide high quality care to all patients without regard to race, creed, age, gender, religion, national origin, or disability.
- We will honor the patients right to give informed consent. We understand that informed consent is a continuing process and not just a form.
- We shall honor the right of patients, or their legal designees, to participate in decision making regarding their care, including refusing treatment to the extent permitted by law and being informed of the consequences of such action.

**PRINCIPLE 3 - Confidentiality:**
We shall strive to maintain the confidentiality of patient and other confidential information in accordance with applicable legal and ethical standards.

- We shall protect the confidentiality of patient information in accordance with all applicable laws and regulations. We shall refrain from revealing any personal or confidential information concerning patients or members unless supported by legitimate business or patient care purposes.
- Information and ideas of UMC are important to organizational success. Information pertaining to our competitive position or business strategies, payment and reimbursement information, and information relating to negotiations with employees or third parties should be protected and shared only with employees having a need to know such information in order to perform their job responsibilities.
- We shall hold all investigatory information, data, and reports collected and/or made in connection with compliance issues in the highest confidence and not disclose such information outside of the confines of the activities of the UMC Compliance Committee, except as is otherwise required by applicable law.
- We will ensure that information received in confidence is not used for personal gain and divulge no such information with the intent of giving or receiving an unfair advantage in a personal business transaction.
**PRINCIPLE 4 - Valuing Employees:**
We value our employees and are committed to their protection and professional success.

- We shall afford all people equal employment and advancement opportunities without regard to age, gender, race, creed, national origin, religion, or disability. No form of harassment or discrimination will be permitted.

- We shall treat each other with respect, dignity, and fairness. Sexual harassment, sexual advances, request for sexual favors or other verbal or physical conduct of a sexual nature that would create a hostile working environment are absolutely prohibited.

**PRINCIPLE 5 - Conflicts of Interest:**
We shall avoid conflicts or the appearance of conflicts of interest between our private interest and the fulfillment of our duties.

- No employee may represent UMC in any transaction in which he or she or a member of their immediate family has a personal interest.

- We shall not disclose or use confidential, special or inside information of or about UMC for personal profit or advantage.

- Employees shall disclose all potentially conflicting activities in the annual Conflict of Interest disclosure statement.

- We shall avoid any real or potential conflicts of interest and disclose to UMC to the fullest extent possible, any significant proprietary or financial interest in any organization with which UMC does business, as defined in, but not limited to, the Mississippi Code of 1972, sections 25-4-101 through 25-4-119, and the UMC Faculty and Staff Handbook and Personnel Procedures.

**PRINCIPLE 6 - Business Relationships:**
Business transactions with vendors, contractors and other third parties shall be transacted free from offers or solicitation of gifts and favors or other improper inducements in exchange for influence or assistance in a transaction.

- **Gifts.** We will not solicit tips, personal gratuities or gifts from patients or vendors. We will not accept gifts, favors, services, entertainment or other things of value to the extent that decision-making of UMC might be influenced. Similarly, the offer or giving of money, services or other things of value with the expectation of influencing the decision making process of any purchaser, supplier, customer, government official or other person by UMC is absolutely prohibited. Employees may retain gifts from vendors that will not influence decision making which have a nominal value of less than $50 per gift and $300 per year in the aggregate. If there is any concern whether a gift should be accepted, the Compliance Office should be consulted.

- We shall recognize that character is the greatest personal asset in business and give it major consideration in the selection of individuals and companies with whom we do business.
We shall take no action which would otherwise be suspect merely because it appears to be customary in a particular location or particular area of business activity.

**PRINCIPLE 7 - Protection of Assets/Research:**
All employees will strive to preserve and protect the organization’s assets by making prudent and effective use of UMC resources and properly and accurately reporting its financial condition.

- UMC 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. All employees of UMC share the responsibility for maintaining and complying with required internal controls.

- All financial reports, accounting records, research reports, expense accounts, time sheets and other documents must accurately and clearly represent the relevant facts or the true nature of a transaction.

- All employees are expected to refrain from converting assets of the organization to personal use. All property and business of the organization shall be conducted in the manner designed to further UMC’s interest rather than the personal interest of an individual. Employees are prohibited from the unauthorized use or taking of UMC's equipment, supplies, materials or services.

- We shall collect and report scientific research validly and accurately.

UMC requires that all employees of UMC abide by the principles set forth in this Code of Conduct. Failure to abide by the principles set forth in this Code of Conduct and the guidelines for behavior which this Code of Conduct represents may lead to disciplinary action.

Any suspected violation of this Code of Conduct must be reported to a member of the UMC Compliance Committee, the Office of Integrity and Compliance, the Compliance Hotline, or in accordance with any other authorized and posted reporting mechanism. The Compliance Hotline is intended to identify and address improper conduct as quickly as possible. All UMC employees may make reports to a member of the UMC Compliance Committee, the Office of Integrity and Compliance, the Compliance Hotline, or in accordance with any other authorized and posted reporting mechanism, without fear of retaliation. Reports of suspected violations may be made anonymously.

It is important that this Code of Conduct be understood and practiced daily by all UMC employees. All UMC employees must understand that UMC will take action to uphold and enforce these standards. This Code of Conduct is adopted in conjunction with the adoption of the UMC Compliance Plan and implemented as part of the UMC Compliance Program. This Code of Conduct will be distributed to all current UMC employees to read and acknowledge, with the acknowledgment kept on file with UMC. At the beginning of each fiscal year, each employee will repeat the procedure and sign an acknowledgment to be retained by UMC. Furthermore, within four weeks of initiating employment with UMC, or during orientation, new employees will read the Code of Conduct and sign the acknowledgment. Within such a four-week period, the new employee's
supervisor or other UMC official will discuss the content and requirements of the Code of Conduct with the new employee.

The following will be considered violations of UMC's Code of Conduct:

· Violations, or attempts to commit any violations, of the Compliance Program;

· Dishonest acts, or attempts to commit any dishonest acts; and

· All improper or dishonest acts and matters which have significance with respect to the integrity of books, records, or management of UMC.