

IT'S YOUR RESPONSIBILITY



A Guide to
Ethical Standards
at Partners HealthCare



Partners calls upon every member of our organization to engage wholeheartedly in the challenge of maintaining the highest ethical and legal standards in all that we do.

Introduction

This booklet describes the basic principles that must be followed by all Partners employees, board members, officers and anyone acting on behalf of our organization. Not every situation covered here will apply to you. There are also many specific integrity issues covered elsewhere in Partners policies or procedures. The information in this booklet is intended to provide general standards of conduct that should guide you in considering how best to behave in situations where there may not be a specific rule, policy or procedure.

If you have any questions about these principles or how to apply them to a particular situation, please contact your supervisor or the Compliance & Business Integrity Department, 617-724-1177.



Nothing is more important to us than to continue to be worthy of the trust of our patients and communities.

James J. Mongan, M.D.
President



Every day thousands of patients and their families rely on Partners HealthCare to provide outstanding clinical care, pioneering research, and exceptional physician education. Our patients and our community have come to expect the best from us. In order for us to achieve our mission as a leader among integrated health care systems we must guard the confidence of our patients and our larger community.

We do our work in a complex and rapidly changing regulatory environment. We also work in an era in which organizational ethics are under increasing public scrutiny. Partners calls upon every member of our organization to engage wholeheartedly in the challenge of maintaining the highest ethical and legal standards in all that we do.

Please read this booklet carefully. Whether you are an employee, a provider, a researcher, or a volunteer leader, you will find standards here that apply to your efforts. You will also find a description of the efforts Partners is making to ensure that all of us know and understand the legal and ethical requirements that impact us in our work.

Nothing is more important to us than to continue to be worthy of the trust of our patients and communities.

Table of Contents

Ethical Responsibilities 2

Statement of Values 3

Addressing Integrity Concerns:

Partners Resources Available to Address
Integrity Concerns 4

You Ask/We Answer 5

Using the Compliance HelpLine

Integrity Standards:

Working with Integrity at Partners

- Our Work Community 6
- Qualifications of Partners Employees 6
- Equal Employment Opportunity 6
- Safety and the Environment 7
- Harassment/Sexual Harassment 7

Financial Records and Transactions

- Creating Accurate Records 8
- Billing and Coding 8
- Preserving Records 9

Protecting and Handling Information

- Proprietary Information 10
- Confidential Patient Information 10
- Marketing 10
- Communicating with the Media 10
- Government Inquiries 11

Managing Multiple Roles

- Conflicts of Interest 12
- Conflicts of Commitment 12
- Gifts, Gratuities and Kickbacks 12
- Political Activities and Contributions 13

Achieving Quality Requires Integrity 14

Ethical Responsibilities

The standards and expectations included in this booklet apply to all Directors and to all employees, providers, and volunteers within Partners HealthCare starting from the very top of our organization.

Partners depends on each individual to make our shared commitment to high legal and ethical standards come to life. The trust and respect enjoyed by Partners in our community is the result of repeated acts of integrity by individuals within Partners and its member institutions over many years. Regardless of your role, you are responsible to protect and add to this long and proud tradition.

Each person working for or representing Partners is expected to notice and report any internal problem that violates Partners standards so that it can be corrected. You cannot remain silent if you see or know about a problem. You must report it to the right people to help solve it. Partners prohibits any retribution for bringing forward a good faith concern. Any person who violates this non-retaliation standard is subject to corrective action up to and including termination.

Each of us is responsible for understanding the integrity standards, policies and procedures related to our work. Adherence to these standards is a condition of employment at PHS. Partners considers your actions under these standards to be a significant reflection of your judgment and competence. For this reason, your knowledge of and compliance with these standards will constitute an important element of your annual evaluation.

If you are a supervisor, you have special responsibilities to create a work environment that helps those individuals reporting to you understand the legal and ethical standards that apply to their work. To do this well, you must listen carefully and act on the integrity concerns raised by those who report to you. You are also responsible to set a personal example of high ethical standards in the performance of your job.



Statement of Values

- Partners HealthCare is committed to conducting its affairs in accordance with the highest ethical and legal standards. In order to maintain these standards, all those associated with Partners will perform their duties with integrity and honesty.
- The affairs of Partners HealthCare must be conducted in compliance with both the letter and the spirit of all applicable law.
- Partners HealthCare has achieved a reputation as an institution of the highest integrity. This reputation is a priceless asset that must be maintained. All individuals employed by or associated with Partners must conduct the business of Partners in such a way that Partners maintains and continues to build its position of respect and prestige in the community.



Partners Resources Available to Address Integrity Concerns

Compliance & Business Integrity Department

Each individual associated with Partners is expected to contribute to maintaining an environment of integrity. Partners has established a Compliance & Business Integrity Department and has appointed a Compliance Officer charged with implementing and monitoring the Integrity Program. The staff of the Compliance & Business Integrity Department is available to assist all levels of the organization with understanding their ethical, legal, and regulatory responsibilities and finding ways to meet those responsibilities.

Raising Integrity Concerns With Confidence

Because raising ethical and legal concerns is such an important part of your responsibilities, Partners offers consultation, education and policy guidance to assist you. As you make decisions in your work, ask yourself:

- Does this action comply with the laws, regulations, policies and procedures that apply to us?
- Is it consistent with Partners policies?
- Does it protect and serve the best interests of our patients?
- How would you feel about it? Could you explain your decision to family, patients, and our larger community?

If you are unsure, ask for assistance from your supervisor, the Compliance and Business Integrity Department, or another resource such as the Office of General Counsel, or Human Resources (HR).

We also understand that sometimes people are reluctant to voice their concerns due to a fear of retaliation. Whether obvious or subtle, such actions taken against another employee are not tolerated at Partners. Not only is it against Partners' policy to retaliate against those who report concerns, it is also illegal under both state and federal law.

If you believe someone is seeking to intimidate you or to retaliate against you because you raised an ethical or compliance concern, contact the Compliance and Business Integrity Department or your HR Generalist for assistance right away. Partners is committed to fostering a supportive environment that honors individuals for noticing and reporting problems so they can be addressed.

You Ask/We Answer

Using the Compliance HelpLine

617-724-1177

Direct Partners Compliance AnswerLine

1-800-856-1983

Anonymous Partners Compliance HelpLine

You have both the right and the obligation to report problems or concerns about ethical or compliance issues. If you have a legal or ethical question or believe that another member of the Partners community has violated a legal or ethical responsibility, you should quickly raise the issue with your supervisor. You or your supervisor may consult with Partners Compliance & Business Integrity staff directly by calling the Partners Compliance AnswerLine at 617-724-1177.

In some situations, you might be uncomfortable about raising a concern with your supervisor. Although it is forbidden, you might worry that someone will retaliate against you for reporting a problem. Or, you might be concerned that your supervisor will not resolve the concern. It is very important that you report ethical and compliance problems. For this reason, Partners has set up an anonymous Compliance HelpLine. This toll-free telephone service (1-800-856-1983) is confidential and answered by professionals who do not work at Partners. You can call any time, 24 hours a day, 7 days a week from any location. The person you talk to will report your concern to the Compliance Officer. If you wish, you can make this report without leaving your name. The person answering your call will arrange a time for you to call back so you can provide further information that might be needed for the investigation. When you call back, you will be told whether the Compliance and Business Integrity Department will be handling your concern or referring it to someone who may be better able to address the issue. All concerns reported to the HelpLine are investigated.

Partners has a firm policy prohibiting retaliation of any kind. Any person who violates this policy will be subject to corrective action.

Working with Integrity at Partners

Our Work Community

Our work environment impacts the way we perform our jobs. When we work in an atmosphere of honesty and respect, we can focus our attention and effort on achieving excellence and accomplishing our common goals. Partners is committed to providing a workplace that is safe and promotes employee growth.

Qualifications of Partners Employees

It is Partners' policy to make reasonable inquiry into the background of all individuals being considered for employment. Partners screens both permanent and temporary employees to determine whether they have been convicted of a criminal offense or have been excluded or debarred by a federal agency or declared ineligible to participate in a federal healthcare program. All Partners employees are screened against government sanction lists annually.

Equal Employment Opportunity

Partners supports equal opportunity and provides equitable opportunities for advancement. Our workplace must be free from discrimination based on race, sex, sexual orientation, age, color, religion, disability, national origin, veteran status, membership in any lawful organization and other factors not related to Partners' business interest.



Safety and the Environment

Partners HealthCare is committed to promoting sound practices that will prevent damage to the environment. We are equally committed to promoting a safe working environment.

Partners and its member institutions value our relationship to our neighbors and have achieved a reputation of responsiveness to the interests of our community. State and national agencies have developed standards and rules of practice to protect our air, soil and water. Because of the nature of our business, we face particular challenges. Laboratories and research areas work with materials and substances that may present problems if handled or disposed of incorrectly. Medical and diagnostic practices utilize substances that, while vital to the successful care of patients, can compromise the environment if improperly disposed of or not monitored while in use.

Each Partners employee shares in the responsibility to protect our environment and to keep our workplace safe. Employees are provided with information on working with hazardous materials and their proper handling. Partners also provides employees with needed protective equipment and training in its use. It is vital that employees use equipment properly and follow the appropriate procedures to ensure that everything possible is done to avoid compromising the safety of co-workers and the quality of the world around us.

Harassment/Sexual Harassment

Sexual harassment, comments or other conduct that creates an intimidating or offensive environment will not be tolerated. Partners has adopted specific policies with respect to sexual harassment and discrimination that provide a way for you to bring such improper conduct to the attention of management.

LEARN MORE

- Visit Partners Policies & Procedures (PPP) online to read Partners Non-Retaliation Policy and Partners Fraud & Abuse Reporting Policy. These policies cover both Partners standards and laws protecting and supporting your right to report problems.
- For further information on these topics contact your Human Resources Generalist.

Financial Records and Transactions

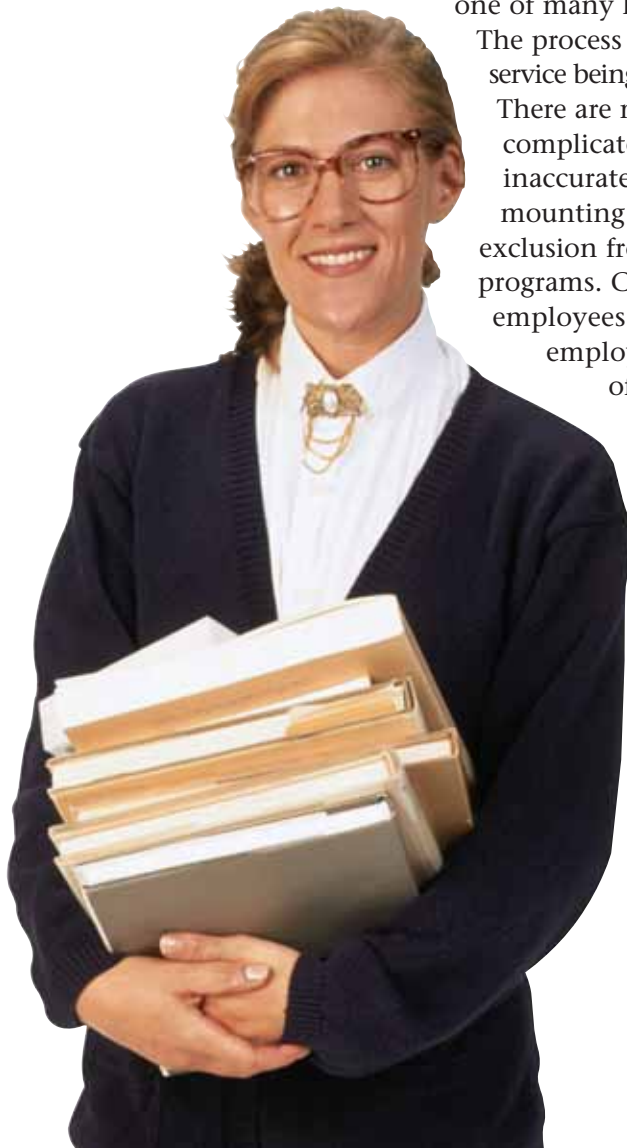
Creating Accurate Records

Partners is committed to creating accurate, true and complete business records. All financial information, expense accounts, vouchers, invoices, time reports, payroll records, reports to government agencies, measurement and performance records, and other records pertaining to Partners business must be prepared with care, honesty and accuracy. You must never improperly alter or make false entries, or intentionally make incorrect entries on any Partners record or document.

Billing and Coding

Partners is committed to full compliance with all federal health care program requirements, including the requirement to prepare and submit accurate claims. One of the most complex and important functions in our organization is accurate and appropriate billing. Billing is an end product of many steps in health services. The process begins with a clinician ordering a specific service for a patient from one of many locations and providers.

The process ends with a charge for that service being posted to an individual account. There are multiple rules to follow in a complicated system. Penalties for inaccurate billing can be substantial, mounting to millions of dollars as well as exclusion from the Medicare and Medicaid programs. Careful attention from many employees is required, even from employees who may not always think of themselves as part of the billing process. Wherever you work in Partners, it is likely that some part of your work impacts our ability to bill correctly. It is important to do your part and to raise concerns if you notice a practice that could lead to inaccurate billing.



Preserving Records

Laws and regulations require that Partners keep certain records for specified periods of time. Examples include personnel records, patient medical records, government contracts, billing and other financial records. You must follow these legal requirements and the standards in the Partners Document Retention Program Guidelines. Relevant records may never be destroyed during pending or anticipated litigation, internal investigation, or audit. Destruction of records to avoid disclosing them in a legal proceeding is a criminal offense. If you have any questions about your responsibility in retaining Partners records, contact your supervisor or the Compliance & Business Integrity Department.

If you determine that documents or data you no longer need for your work are permissible to destroy, use good judgment in preserving confidentiality. Never dispose of paper or electronic media containing patient information in the general trash. Use the special locked bins provided for paper and ensure that the data on diskettes, tapes and other electronic media is rendered permanently unreadable before discarding it.

LEARN MORE

- Guidance on proper methods of disposing of confidential information is available from your supervisor or from the Partners Compliance & Business Integrity Department.
- Consult the Document Retention Guidelines posted on Partners Policies & Procedures (PPP) for information on how long paper or electronic records should be kept.



Protecting and Handling Information

In an age of rapid communication it is both more important and more difficult to securely protect the proprietary and confidential information we use in our work.

Proprietary Information

You must not share Partners proprietary information with outside persons, such as competitors, suppliers or outside contractors unless you have been authorized to do so. Proprietary information includes business strategies, pricing information, financial data, research protocols and intellectual property. This requirement continues to apply even after you leave Partners employment or service. You may have similar obligations to prior employers or because of service to other institutions. Partners will honor your responsibility to protect that information as well.

Confidential Patient Information

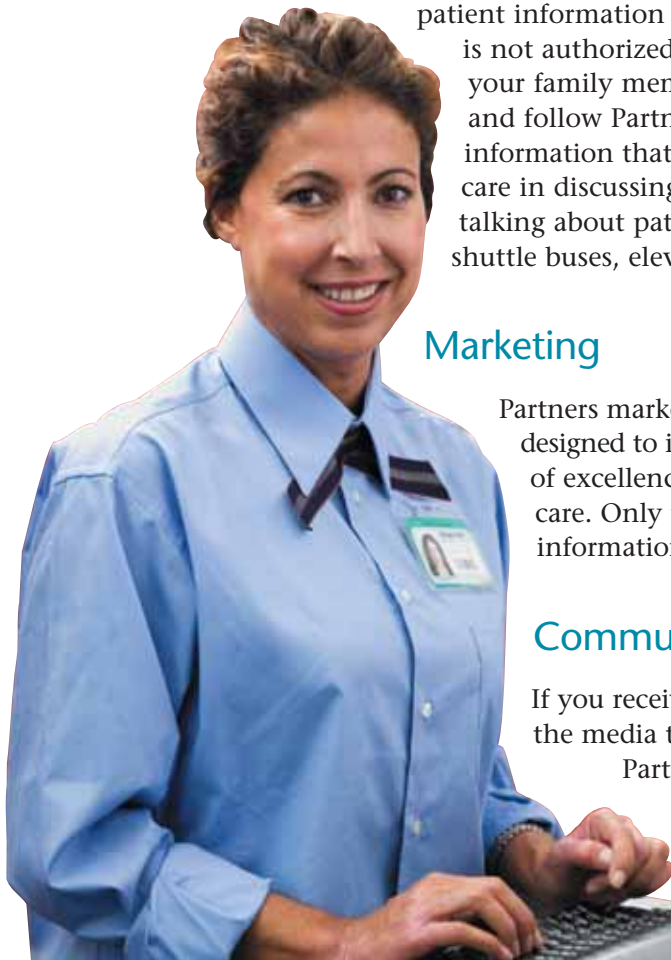
The patients we serve entrust us with personal information for specific limited purposes. We act as responsible stewards of this information and use it only as needed to perform our jobs. Never divulge patient information outside Partners to any individual who is not authorized to receive such information, including your family members or friends. Use good judgment and follow Partners policies when you must fax or mail information that could be used to identify patients. Use care in discussing patient information orally and avoid talking about patient information in public areas such as shuttle buses, elevators, or cafeterias.

Marketing

Partners marketing and public affairs programs are designed to inform others about our common mission of excellence in teaching, research, and clinical care. Only truthful, accurate, and non-deceptive information will be presented in these materials.

Communicating with the Media

If you receive a request from a representative of the media to comment on a matter that involves Partners, you should contact the Director of



Communications before responding. The Director of Communications will discuss the request with you and determine the best way to respond. If you anticipate being in circumstances likely to involve spontaneous interactions with the media, perhaps because of your clinical or research activities or expertise, you should contact the Partners Director of Communications ahead of time to get advice and guidance on how best to deal with the media.

Government Inquiries

Partners will cooperate fully with government investigations and other requests for information. If a government investigator contacts you, do not feel pressured to talk to him without first contacting Partners Office of General Counsel. You have the right:

- to speak to the investigator or to refuse;
- to request that the interview take place at a time and place convenient to you;
- to have counsel present when you speak to an investigator;
- to terminate the interview whenever you wish;
- to refuse to answer specific questions.

Partners will provide consultation to any employee who is contacted in connection with a government investigation of Partners. If you do decide to speak with an investigator Partners expects you to be truthful and to avoid speculation in your responses.

If you are presented with a subpoena, warrant, or court order you should immediately notify your supervisor and the Office of General Counsel.

LEARN MORE :

- If you have questions about whether information you use is proprietary or confidential, seek advice from your supervisor, the Compliance & Business Integrity Department, or the Partners Privacy Officer.
- Information on recent HIPAA regulations and Partners policies on Privacy and Security of patient information is available at HIPAA CENTRAL on the Partners Pulse intranet site
- Questions about responding to requests from the media can be answered by the Partners Director of Communications at 617-278-1031.
- The Partners Compliance & Business Integrity Department is available to offer a training session on responding to government inquiries. Further information on responding to a subpoena is available from the Office of General Counsel.

Managing Multiple Roles

Conflicts of Interest

All of us have multiple roles, commitments and interests. When acting in our Partners employee role, it is important to avoid any situations where our personal interests could conflict or reasonably appear to conflict with the best interests of Partners. A conflict of interest may exist whenever you have an opportunity to use your position at Partners for personal gain for yourself, a family member or a friend. A conflict of interest may also exist when an outside interest might inappropriately influence your work decisions. When in doubt, you should discuss the situation with your supervisor right away. You may also contact the Corporate Compliance Officer for clarification and recommendations about how to resolve such a conflict.

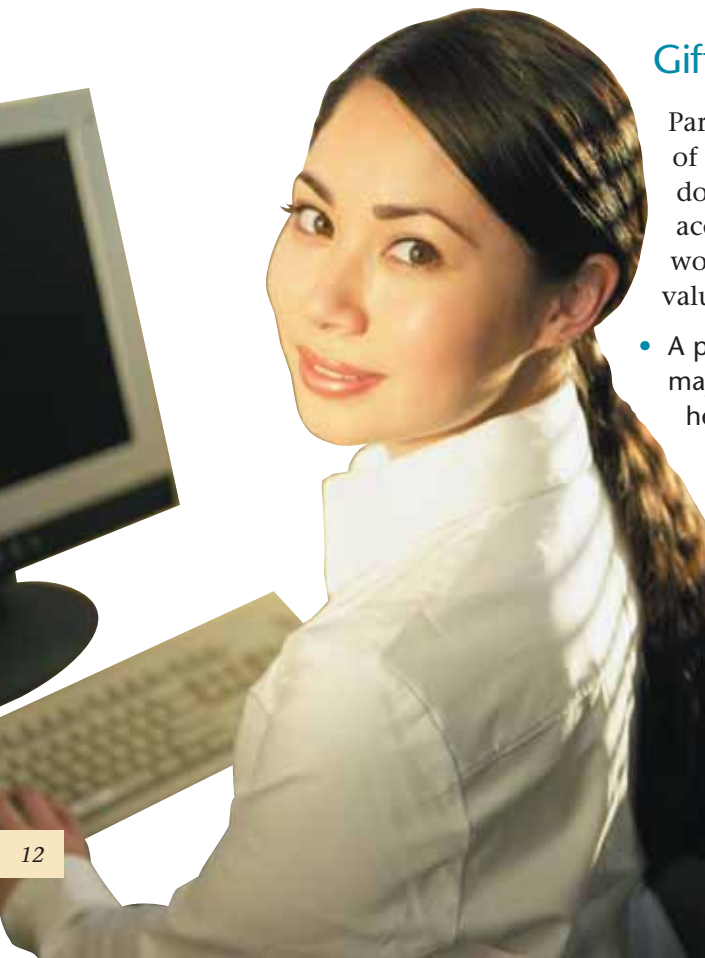
Conflicts of Commitment

Partners recognizes that many individuals who are part of our organization also maintain consulting or other relationships to other organizations. A conflict of commitment exists when these outside ties may keep you from devoting appropriate amounts of time, energy, creativity or other personal resources to your Partners responsibilities. Partners has adopted policies limiting the time and other resources you may devote to outside activities.

Gifts, Gratuities and Kickbacks

Partners strives to maintain the highest standard of objectivity and integrity in dealing with vendors and all providers of service. You must never accept gifts or gratuities in connection with your work except for business courtesies of nominal value that meet one of the following standards:

- A professional staff member or other caregiver may accept modest non-monetary gifts from his or her patients.
- Unless prohibited by his or her supervisor, an individual may accept non-monetary gifts and customary business amenities such as meals and entertainment if the host is present and the purpose of the gift or amenity is only to create or maintain goodwill rather than to influence a business decision. The fair market value of any gift must not exceed \$200 and no more than two gifts per year may be accepted from the same vendor.



You must never accept any personal monetary gift or gratuity, regardless of the amount. You must never accept or give kickbacks in return for obtaining referrals of patients or to induce the purchase of any goods or services. Partners decision to use a particular vendor should never be conditioned on that vendor's donation of money or free products and/or services. If you are offered money or anything else of value that you believe may be intended or could be viewed as a bribe or kickback, please call the Compliance & Business Integrity Department.

Political Activities and Contributions

There are federal and state laws that restrict the use of corporate assets and govern the activities of non-profit organizations such as Partners in connection with elections. Examples of activities that are prohibited include:

- using employee work time for personal political fund-raising activities;
- using a Partners telephone or e-mail system for political solicitations;
- using Partners copying machines to reproduce material for political campaigns.

Senior management and other designated individuals may participate in legally permitted political activities to fulfill their responsibilities as advocates for Partners and our patients, but may not use Partners resources to support any candidate, office holder or political organization.

LEARN MORE :

- Visit Partners Policies & Procedures (PPP) online to read complete policies or search for particular conflict of interest topics. Policies posted include:
 - Partners Code of Conduct
 - Conflict of Interest Policy
 - Policy on Relationships with Pharmaceutical & Medical Device Companies
 - Policy on Consulting and Outside Activities
- If you have questions about what is considered a bribe or a kickback, call the Partners Compliance & Business Integrity Department for clarification.
- For further questions, contact the Partners Compliance & Business Integrity Department or the Office of General Counsel.

Achieving Quality Requires Integrity

Partners HealthCare is known worldwide for quality clinical care, teaching and research. Every member of our organization is responsible to do his or her utmost to continue and advance our leadership in all of these areas. Quality healthcare requires understanding and adhering to our integrity standards. It also requires that we bring a high level of ethical decision making to every action we take on behalf of Partners. To provide quality healthcare we all must ensure that our patients and their families are treated with kindness and respect and without discrimination. Quality requires everyone doing his or her job thoughtfully so patients can have confidence that we will uphold the highest standards of personal and institutional conduct. It is appropriate that the public, courts, and government agencies closely scrutinize us to ensure that we meet all our obligations in this regard. Partners counts on each one of us to participate in efforts to monitor and to continually improve our standards of quality and integrity.



INTEGRITY is Your Responsibility

All Partners employees share responsibility for maintaining high ethical and legal standards in their work.

If you are concerned about the appropriateness of a specific activity, decision or action, call the PHS Compliance & Business Integrity Department at 617-724-1177, or make an anonymous report to the Partners Compliance HelpLine.

CALLS TO THE PARTNERS HELPLINE ARE CONFIDENTIAL AND ANONYMOUS.



Partners Compliance HelpLine

1-800-856-1983

W E ' R E H E R E T O H E L P Y O U !

