South Country
HEALTH ALLIANCE

Communication
Collaboration
Stewardship
Excellence

Code of Conduct

Living Our Values

Dear Coworkers and Business Partners:

Every day at South Country Health Alliance, the work we do has an impact on the members, counties, providers, and communities we serve. How we do that work matters just as much as what we accomplish.

Our mission and values guide us, but they only have meaning when we put them into practice. That means doing the right thing, treating people with respect, using good judgment, and conducting our work honestly and with integrity.

Our Code of Conduct helps us do that. It provides a common foundation for the ethical and legal standards that guide our decisions and our work on behalf of South Country. Our Joint Powers Board and leadership team are committed to these principles, and each of us shares responsibility for upholding them.

I encourage you to take the time to read the Code and think about how it applies to your role. No document can address every situation we may face. When something isn't clear, ask questions, speak up, and use our mission and values to help guide your decisions.

I am proud of the way we work together to serve our members and communities. Maintaining the trust placed in South Country depends on each of us continuing to act with honesty, accountability, and integrity.

Thank you for the work you do and for your commitment to South Country and the people we serve.

Sincerely,

Leota B. Lind

Leota B. Lind
Chief Executive Officer

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Introduction

The South Country Health Alliance Code of Conduct applies to all full-time, part-time, temporary employees, Joint Powers Board of Directors (JPB) members, and all first tier, downstream, and related entities (FDRs) doing business on behalf of South Country Health Alliance (South Country).

We demonstrate our commitment by taking the time to ask, 'Is what I'm doing consistent with South Country's Mission and Values?'

South Country's Commitment

South Country is committed to fulfilling its mission and living out its diamond values with the utmost integrity and ethical behavior. By adopting this Code of Conduct, South Country's JPB affirms South Country's commitment to comply with laws, regulations, ethical business practices, and the basic standards expected in the workplace.

It is designed to ensure that all employees, JPB members and FDRs understand their responsibility for keeping South Country in full compliance with all applicable laws and regulations and how they can participate in the South Country Compliance Program.

Adhering to the principles in this Code of Conduct helps ensure our company's success in a manner consistent with South Country's mission and values. All employees are expected to conduct themselves with this commitment in mind whether in the workplace, working from home, or at any time while conducting South Country business.

Mission, Vision, and Values

South Country's Mission

South Country's mission is to empower and engage our members to be as healthy as they can be, build connections with local agencies and providers who deliver quality services, and be an accountable partner to the counties we serve.

South Country's Vision

South Country will continue to be a fierce advocate for the health and wellbeing of people living in rural Minnesota.

South Country's Values

South Country's Diamond Values help guide our business and how we conduct ourselves in our relationships with others.

Collaboration

We value the contributions of many individuals, partners, and agencies in helping meet the needs of our members.

Stewardship

We responsibly manage our resources, using them in the best way possible for our members.

Communication

We communicate openly, honestly, and frequently, responsibly sharing information and ideas in all areas of our business.

Excellence

We provide quality through our programs and services that make a difference in people's lives.

Living the Values

Please read this Code of Conduct carefully. This Code of Conduct doesn't describe all of South Country's policies and procedures, but it should be read in conjunction with and followed alongside all company policies and the employee handbook. While it may not cover every situation that arises, you are encouraged to exercise good judgment and keep South Country's mission, values and commitment in mind to guide your daily decisions.

All of us have a responsibility to ensure adherence to this Code of Conduct and South Country's policies and procedures. If anyone, in good faith, knows of or suspects a real or potential violation of this Code of Conduct or any applicable laws, regulations or policies, they must report it to his or her manager or director, the Compliance Officer, or to South Country's Report it hotline.

Adherence to this Code of Conduct is a condition of your employment. Violations of the Code or failure to report potential violations may result in disciplinary action up to and including termination of employment.

South Country's Policy of No Retaliation

South Country has a strict policy against retaliation against any individual who makes a good faith report of any concern of suspected or potential violations of this Code of Conduct.

Compliance with Laws and Regulations

South Country is committed to complying with all federal, state, and local laws and regulations that governs its business. We are each responsible for ensuring our own compliance with laws, rules, regulations and contractual obligations applicable to South Country, so understanding the laws and regulations that apply to our particular roles at South Country is a part of our job responsibilities.

At South Country, we all take responsibility for understanding and complying with the laws and regulations that apply to our particular roles.

South Country's commitment to complying with laws and regulations applies to applicable common business laws and the laws and regulations that govern the State and Federal health care programs that South Country administers.

Your Duties

- Bring any questions or concerns regarding specific laws, regulations or any legal issue promptly to the Compliance Department.
- Individuals executing contracts are responsible for ensuring that they are consistent with South Country policies and in the best interest of South Country.
- Never jeopardize your job, your co-workers' jobs or the company's future by taking part in a potentially illegal or unethical activity.
- If you know of or suspect any illegal activity, you are obligated to report it immediately.

Conflict of Interest

LIVING THE VALUES: We demonstrate good stewardship by avoiding situations where our own personal interests may conflict, or appear to conflict, with the interests of South Country.

South Country maintains a policy that protects itself from any conflict of interest that could result in situations where a personal financial interest may affect the ability to make fair and objective decisions on behalf of South Country.

We all have an obligation to be free of actual, perceived, or potential conflicts of interest when conducting business on behalf of South Country.

A potential conflict of interest may arise in a number of ways, including but not limited to, when we or a family member:

- Are employed by, or owners of, a competitor, customer, provider, or supplier of South Country;
- Use information that comes to us as representatives of South Country for personal investment or gain; or
- Take advantage of any situation for personal gain that may disadvantage South Country.

Outside Employment is not prohibited, but a conflict of interest may exist if that employment or other related activities interferes with our work on behalf of South Country or could conflict with South Country's interests.

Conflicts of Interest

Employees must promptly disclose actual, potential, or perceived conflicts of interest to their supervisor or the Compliance Department.

For more information refer to policy 'AD 22 Conflict of Interest.'

Political Activity

South Country encourages us all to participate fully in the political process. However, South Country resources may not be used in connection with any lobbying or political activity unless directly relating to South Country's business activity and in compliance with applicable law.

If personally participating in any political activity, we must use our own funds and not do so in our capacity as an employee or representative of South Country.

Any attempt to influence the decision-making process of elected officials by improper means is strictly prohibited. If at any time an elected official makes a request or demand for any such improper benefit, you must immediately report this to the Compliance Department or your supervisor.

Gifts and Kickbacks

Acceptance of Gifts

We are all prohibited from accepting gifts or gratuities of any value that may result in undue influence on our decision-making and vendor selection. Acceptance of modest entertainment such as meals is permissible if consistent with common business practice and of reasonable value. Employees should consult the Gifts and Gratuities policy for more information.

Gifts to Government Employees

Federal and State laws generally prohibit gifts and gratuities to government officials. Consequently, as a general rule, no payment of money, gifts, services, entertainment or anything else of value may be offered—regardless of

the amount—to any state or federal government official or employee. In some cases, the laws may allow for gifts of nominal value, such as greeting cards, advertising trinkets and modest meals and refreshments. You must consult with the Compliance Department before offering these types of items.

Other Improper Payments

Only payments or offerings included in the South Country standard marketing policies may be offered to customers or prospective customers.

Anti-Kickback Laws

All employees are prohibited from engaging in any conduct that violates the federal Anti-Kickback Statute. The federal Anti-Kickback Statute makes it illegal to knowingly or willfully offer, pay, solicit or receive anything of value in return for the referral of business reimbursed by Medicare, Medicaid or any other federal health care program. A violation of the Anti-Kickback Statute provides for severe criminal, civil and monetary penalties not only for individuals who offer kickbacks, but also for South Country and involved employees.

Integrity

We maintain the highest levels of integrity when dealing with current or prospective vendors by not accepting gifts which may result in the loss of objectivity when selecting, or continuing to do business with, the vendor.

For more information refer to policy 'AD 30 Gifts and Gratuities.'

South Country Assets

South Country assets may only be used for the legitimate business purposes of South Country and only by authorized employees. Employees are responsible for following the same processes and procedures whether in the workplace, working from home, or at any time when conducting South Country business. We all share a duty to ensure that the assets are used and maintained with the greatest care and guard against misuse, loss and theft.

Incidental personal use of telephones, computers, meeting rooms, e-mail, the Internet and other similar services is permitted as long as it neither distracts nor disrupts an employee's job performance, South Country operations, or our compliance with relevant laws, ethical standards, policies and procedures. Personal use is not allowed if it interferes with the security of any system. In addition, personal use of South Country assets is not entitled to any expectation of privacy.

Unauthorized software is not allowed. Individuals are prohibited from making unauthorized copies of computer software programs or using personal software on South Country computers. Such unauthorized use could also be a violation of federal copyright laws and could result in civil and/or criminal liability.

South Country systems may never be used to store, access, or distribute anything that is: false or fraudulent; offensive, threatening or malicious; criminal or promoting criminal activity; or sexually explicit.

South Country Assets include, but are not limited to:

- Equipment
- Inventory
- Facilities
- Systems
- Corporate Funds
- Office supplies
- New product designs
- Business strategies and concepts
- Marketing plans
- Trademarks and copyrights
- Detailed financial or pricing information
- Computer programs and databases

Stewardship Protecting and caring for our assets.

Confidential Information

Member Information

South Country takes the obligation to maintain the confidentiality of our member's personal information very seriously. It is our obligation to do all we can to provide the necessary protections to ensure that a member's protected health information and nonpublic personal information is not used or disclosed in a manner not allowed by state or federal law. Employees are responsible for the protection and privacy of any South Country member information whether in the workplace or working from home and must follow all South Country's Policies and Procedures to ensure that confidential information about our members is protected. In addition, we will only access the member's information on a need to know basis as a part of our responsibilities at South Country.

DOING THE RIGHT THING.

We protect our members' information as if it was our own.

Confidential Information *(continued)*

Proprietary Information

Any unauthorized access, use or disclosure of confidential information is prohibited. Confidential Information includes anything that is generally not known or shared with the public or outside South Country.

Examples of Confidential Information are:

- Sensitive information that South Country obtains through its business or employment relationships;
- Proprietary information, including trade secrets, vendors and/or competitors; and
- Information about South Country customers, employees, consultants, volunteers, contractors or participating providers that is not public knowledge.

We also may not acquire or use confidential or proprietary information (including technology) from other companies through improper means.

Any suspected privacy incident, security incident, or unauthorized disclosure of confidential information must be reported immediately to the Compliance Department.

For more information refer to policy 'AD 04 Confidentiality Plan and Policy.'

Fraud, Waste, and Abuse

South Country is committed to identifying, preventing, correcting and reporting fraud, waste and abuse. The Compliance Department will investigate all allegations of fraud, waste, and abuse involving employees, providers, members or other entities.

FRAUD

is an intentional act of deception, misrepresentation or concealment in order to gain something of value.

ABUSE

is excessive or improper use of services or actions that are inconsistent with acceptable business or medical practice.

WASTE

is the over utilization of services, or other practices that, directly or indirectly, result in unnecessary costs to the health care program.

Your Duties

- Learn to recognize fraud, waste and abuse, which can include offering false or fictitious information, reports or claims made to another person.
- Follow all South Country policies and stay true to the Code of Conduct.
- Cooperate fully and truthfully with government agencies, auditors or others conducting investigations.

If you see or suspect a potential act of theft or fraud, report it immediately to the Compliance Department or by calling Report it at 1-877-778-5463. We will promptly investigate the incident and take appropriate action.

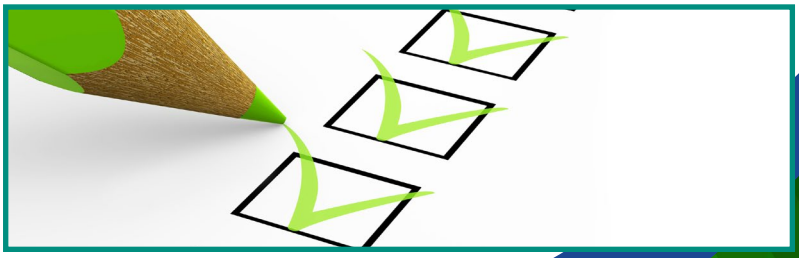
Accounting and Accurate Record Keeping

South Country's reports and records made in the course of business must always be accurate, true and complete. No one may falsify, misrepresent or suppress any information contained in South Country's records. At all times, South Country will strictly adhere to the generally accepted accounting principles or statutory accounting principles as required. For example:

- All transactions and payments must be promptly and accurately reflected;
- No secret or unrecorded funds or assets may be created or maintained for any purpose;
- All invoices must accurately reflect the items and services being purchased or sold and the price paid; and
- No person may make false entries, inappropriately amend entries, or fail to correct inaccurate entries.

South Country utilizes internal controls, policies, and procedures to ensure these standards are being met, including examinations by both internal and external auditors.

South Country retains all documents for the appropriate period of time in accordance with South Country's documentation retention policies as required by the applicable laws and government program contractual requirements. We must not improperly destroy any records or other official South Country documents.



Accounting and Accurate Record Keeping *(continued)*

If litigation, a government audit or investigation is anticipated or ongoing, South Country documents and records must be retained in their proper form until we are advised by legal counsel that the matter has been concluded.

REPORTING VIOLATIONS:

Any person who becomes aware of a deviance from these standards must report it to his or her supervisor, the Compliance Department, or other appropriate company personnel.

Company Reporting

We will only create and submit true and accurate reports and submissions to the state and federal government. The submission of false or misleading reports regarding our operations, performance or utilization data is strictly prohibited. If we are unsure of the accuracy of any information that is to be submitted, we must take all necessary steps to verify the accuracy or raise our concerns to appropriate management. We all share the responsibility to ensure the careful and accurate document submission.

Your Duties

- Ensure that all South Country records are accurate and complete
- Do not make false or misleading entries
- Promptly report any good faith belief of a violation
- Follow the principles of the Code of Conduct

Work Environment

Discrimination

We strictly prohibit discrimination in regard to employment. We provide equal employment and career development without regard to their position, health status, disability, marital status, age, sex, sexual orientation, national origin, race, color, religion, creed, political beliefs, familial status, membership or activity in a local commission, public assistance status, or veteran status.

LIVING THE VALUES:

At South Country, we value the contributions of each other as we serve our members. This is evidenced in our commitment to maintaining a work environment that is safe and secure and respects the rights of each person in the organization.

Harassment

We strictly prohibit harassment, by or of any employee, customer, member, vendor, contractor, or other individual connected with the business. South Country will not tolerate offensive, obscene or threatening behavior. Sexual advances, or any other inappropriate physical contact, actions, comments, or any other conduct that is intimidating or otherwise creates an offensive or hostile situation is strictly prohibited.

In addition, South Country will not tolerate any form of retaliation against any person for reporting harassment in good faith, or for assisting or participating in any investigation of harassment.

Any employee who believes that he or she has been the subject of harassment or retaliation for reporting harassment,

or who has witnessed such conduct, is required to report it immediately in accordance with South Country policies and guidelines.

Drugs and Alcohol

As a part of our commitment to a safe and secure workplace, South Country prohibits the use, sale, purchase, transfer, or possession of cannabis or illegal drugs on South Country premises. South Country also prohibits the unauthorized use or being under the influence of alcohol, illegal drugs or cannabis while on South Country premises, working from home, or at any time when conducting South Country business.

Social Media

When communicating through social media on a South Country site employees should be mindful of their responsibilities as a South Country employee to protect confidential information and to abide by all of South Country's policies, procedures and values.

In General, Remember:

- Only employees authorized to do so may speak on behalf of South Country.
- Content on a South Country social media site will become the property of South Country with irrevocable rights to use for any purpose and in any manner.
- Make sure that anything you post is consistent with our values.
- Be aware of the perception you might create for our company and yourself on social media.
- Do not post any content that is confidential or proprietary, nor for the use of political lobbying or advertising.

Employees using personal social media accounts must not disclose confidential information, represent themselves as speaking on behalf of South Country unless authorized, or otherwise violate South Country policies.

First Tier, Downstream and Related Entities (FDRs)

South Country relies on our contracted providers to help us meet the needs of our members. These individuals and organizations are considered First Tier, Downstream, and Related Entities (FDRs). FDRs are individuals or entities who provide administrative and/or health care services in connection with South Country programs.

As an FDR, your organization must comply with Medicare Compliance Program requirements including, establishing and sustaining a culture of compliance. FDRs must either establish and distribute comparable Standards of Conduct and policies and procedures or adopt and distribute South Country's Code of Conduct to all employees and contractors within 90 days of hire, upon revision, and annually thereafter.

Excellence

As stated in our Diamond Values, our commitment to Excellence enables us to ensure that "we provide quality through our programs and services that make a difference in people's lives." The commitments we make pursuant to this Code of Conduct are a vitally important component of this value. That's why we expect each and every one of us to follow these guidelines and our company's policies and procedures—with the expectation that together we can achieve this goal.

LIVING THE VALUES:

South Country is committed to health equity by providing the opportunity for all of our members to reach their full health potential regardless of race, creed, income, sexual orientation, gender identity, age or ability.

We value diversity in our workforce and strive to provide equal employment and career development to ensure all employees can achieve their potential. We value the contributions of others and want all employees to feel included, respected and recognized to help us carry out our mission and to serve our members in a unique and impactful way.

Reporting Concerns

It is up to each of us to ensure compliance with this Code of Conduct and South Country policies. That is accomplished by each of us committing to adhere to the guidelines established and to taking responsibility for reporting any real or suspected violations.

The identities of individuals submitting reports will remain confidential to the extent possible by law or to the extent the identity is necessary to investigate and resolve the matter.

If you have any questions, or wish to report a potential violation, you may contact your manager, Human Resources, the Compliance Department, or any other appropriate South Country executive.

Compliance Department:

compliance@mnscha.org

Jeff Marks
Compliance Officer
507-431-6068
jmarks@mnscha.org

Kayla Krenz
Compliance and Government Relations Manager
507-431-6938
kkrenz@mnscha.org

Annie Johnson
Compliance and Program Integrity Analyst
507-431-6060
ajohnson@mnscha.org

Anonymous Options

South Country also provides the following anonymous options for reporting suspected or potential violations of this Code of Conduct:

Using the Internet:

- www.reportit.net
- Username: SCHA
- Password: Owatonna
- Enter the South Country web interface and enter the report information and click SUBMIT.
- Data encryption is used to protect your identity and report. South Country will be alerted that a report has been made.

By Telephone:

- Call the toll-free hotline at 1-877-778-5463
- Username: SCHA
- Password: Owatonna
- A trained operator will guide you through a series of questions
- South Country will be alerted that a report has been made.

South Country's Policy of No Retaliation

South Country has a strict policy against retaliation against any individual who makes a good faith report of any concern of suspected or potential violations of this Code of Conduct.

Focused On

Making a Difference to Members' lives in rural communities throughout our service area.

Communication

Collaboration

Stewardship

Excellence

South Country
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