Novant Health UVA Health System
Prince William Medical Center
Haymarket Medical Center
Volunteer Handbook

The administration, staff and volunteers of NHUVA PWMC and HAMC welcome you to the hospital. We invite you to participate with a special group of people who have chosen to give their time and talents to our hospital.

You are an important member of our team. Your support assists us in providing excellent care and delighting our patients, families and visitors. You are a valued resource and we hope your time here is rewarding.

This handbook is for your information and reference. As a member of our hospital’s volunteer team, it is important that you have an understanding of Novant Health UVA Health System’s policies and procedures. The handbook is not inclusive and its material is subject to change.

Thank you for choosing to volunteer and making this a better world!
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How to Contact
Novant Health UVA Health System
 Volunteer Services
 Volunteer Services Office

Phone: 703-369-8173
Email: VolunteerNVA@novanthealth.org
In 1997, Presbyterian Healthcare, based in Charlotte, and Carolina Medi-Corp, based in Winston-Salem, merged to form Novant Health. Today, Novant Health is comprised of 14 hospitals (soon to be 15 with one currently under construction in Mint Hill, NC and scheduled to open in 2018), 350 physician clinics in NC, SC, VA and GA, and over 26,000 employees. In 2016 Novant Health Partnered with the University of Virginia to create the Joint Operating Company known as Novant Health UVA Health System, which is made up of 3 hospitals.

The following principles guide us as an organization:

**Our Mission Statement**
Novant Health UVA Health System exists to improve the health of communities, one person at a time.

**Our Vision**
We, the employees of Novant Health UVA Health System, and our physician partners, will deliver the most remarkable patient experience, in every dimension, every time.

**Our Values**

**COMPASSION**
We treat customers as family members, with kindness, patience, empathy, and respect.

**PERSONAL EXCELLENCE**
We strive to grow personally and professionally. Honesty and personal integrity guide all that we do.

**TEAMWORK**
We support one another and collaborate in our efforts to better serve our customers.

**DIVERSITY and INCLUSION**
We recognize that every person is different, each shaped by unique life experiences; this enables us to better understand one another and our customers.

**COURAGE**
We act boldly in making the changes necessary to achieve our mission, vision and promise of delivering remarkable healthcare.
History of the Novant Health Auxiliary

In 1961, during construction of Prince William Hospital, the Health Committee of the Woman’s Club of Manassas undertook the challenging project of organizing a hospital Auxiliary. Led by Angela Gregory, chair, committee members were Nancy Haydon, Sylvia Hefflin, Elmira Robbins, Virginia Smith and June Wilkins. Their organizational work included diligent research, consultations and visits to several hospital auxiliaries. A $50 contribution from the Woman’s Club defrayed initial expenses.

It was necessary for the Auxiliary to be approved by the hospital’s governing board and accepted as a part of the hospital family before an initial Auxiliary group meeting could be called. On November 7, 1962, the first official meeting of the Auxiliary was held at the Lake Jackson Restaurant, where forty-three people were in attendance. The purpose, goals, needs and plans for forming an Auxiliary were discussed by Angela Gregory, acting chair; R.O. Maxwell, hospital administrator; Caton Merchant, President of the hospital Board of Trustees; and Louise Lewis, the 1962 President of the Virginia Association of Hospital Auxiliaries. The local women who attended the meeting became charter members of the new Auxiliary.

A second group meeting was held in January 1963, where additional attendees participated. The Bylaws were adopted, officers were elected, committee chairpersons were appointed, and the purpose of the Auxiliary was more clearly defined. In time, the policies that govern the Auxiliary’s programs, service projects and membership were established.

Auxilians served as hostesses at the hospital’s dedication on June 7, 1964. Thanks to the Auxilians’ help, the Red Cross was able to establish a sufficient blood bank for the hospital’s opening; they also assisted the Red Cross in this program on several other occasions. After the hospital officially opened for patients on June 22, 1964 the Auxiliary was granted membership in the Virginia Association of Hospital Auxiliaries (VAHA).

In spring 1965, the Auxiliary initiated and sponsored a volunteer program for teenage girls between the ages of fourteen and eighteen. At the time, they were referred to as Candy Stripers. In 1973, the program was opened to boys and the name was changed to Teen Volunteers. Through the years, many teen volunteers have pursued careers in medicine and healthcare.

In February 1969, a Memorial Fund was established to honor Auxilians and their family members who have passed away. The Memorial Fund recently donated more than $209,000 to The Cancer Center at Lake Manassas, a joint venture between Prince William Hospital and Fauquier Hospital.
Over the years, the Auxilians have continued to raise funds for the hospital. On November 21, 1971, the hospital dedicated a new wing and second floor, which increased the number of beds from 60 to 170.

In the mid-1980’s the Auxiliary initiated the inclusion of men, and the name Pink Ladies was dropped. The members are now referred to as Auxilians.

From the time the hospital opened its doors until January 2015, the volunteers have donated more than 1.6 million hours of service. Recognition of the volunteers is provided through an established awards program of certificates and pins.

During the same period, the Auxiliary has raised more than $5.7 million, with $500,000 going to the Hylton Family Birthing Center, which opened in 2003. In 2009 the Auxiliary funded a new fleet of Staxi Chairs for Prince William Medical Center. The Plaza at Haymarket Medical Center was supported by the Auxiliary with a gift of $300,000.

Presently, the Auxiliary has pledged $150,000 to the Novant Health UVA Health System Mammography Coach. These funds were the result of profits from the Gift Shops, Mom365, the Aubergine Thrift Shop, and special fundraising projects such as jewelry sales, uniform sales, the annual Holiday Bazaar and Circle of Lights.

The Auxiliary contributes many hours of service, raises funds for healthcare purposes and provides positive public relations in the community. Its success is attributed to the enthusiastic, untiring efforts of its membership, its Board of Directors, and the encouragement and cooperation of the staff and administration of Novant Health Northern Virginia Market, which includes Prince William Medical Center and Haymarket Medical Center.

**Auxiliary Mission**

To assist the Novant Health UVA Health System in providing the most remarkable patient experience in every dimension, every time.

**Our volunteer mission is to provide:**
1. Needed Services to staff and patients
2. Goodwill between the community and the hospital
3. Financial support of the Health System through fundraising efforts
Auxiliary Pledge

Believing that Novant Health UVA Health System has real need of my services as a volunteer, I will:

- Be punctual and conscientious in the fulfillment of my duties and accept supervision graciously.
- Obtain my own substitute if I am unable to be present at my assigned time and duty.
- Conduct myself with dignity, courtesy and consideration.
- Consider as confidential all information that I may hear directly or indirectly concerning a patient, doctor or any member of the personnel, and will not seek information in regard to a patient.
- Take any problems, criticisms or suggestions to Volunteer Services.
- Endeavor to make my work of the highest quality.
- Uphold the traditions and standards of Novant Health UVA Health System and interpret them to the community at large.

Auxiliary Prayer

Almighty God and Heavenly Father of Mankind, bless we pray Thee, our endeavors in healthcare in which we strive to bring comfort and hope to all who are in distress of mind and body.

Guide us so that we may use the privilege given us to help the aged, the ill and the very young – with generosity, with discretion and with gentleness.

Give us the strength to labor diligently, the courage to think and to speak with clarity and conviction, but without prejudice or pride.

Grant us, we beseech Thee, both wisdom and humility, in directing our united efforts to do for others only as Thou would have us do.

Amen.

Volunteering for NHUVA

All Auxiliary services rendered to Novant Health UVA Health System are governed by Bylaws and Organizational Policies and Procedures of the Novant Health Auxiliary, Prince William Medical Center, Haymarket Medical Center, under the direction of the Director of Volunteer Services, the Board of Directors and the Service Chairs.

Volunteers must be members of Novant Health Auxiliary to work in any of its authorized services. Each new volunteer will be furnished with service guidelines by his/her service chairperson. The service chairperson will be an experienced volunteer or Health System employee.
### Auxiliary Presidents

<table>
<thead>
<tr>
<th>Name</th>
<th>Years</th>
</tr>
</thead>
<tbody>
<tr>
<td>Angela Gregory (Charter President)</td>
<td>1962-1966</td>
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<tr>
<td>Marion L. Payne</td>
<td>1966-1968</td>
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<tr>
<td>Auvergne J. Barbee</td>
<td>1968-1970</td>
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<tr>
<td>Oneida H. Lawrence</td>
<td>1970-1972</td>
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<tr>
<td>Lois F. Smith</td>
<td>1972-1974</td>
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<tr>
<td>Ann W. Harrover</td>
<td>1974-1976</td>
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<tr>
<td>Beverly A. Keenan</td>
<td>1976-1978</td>
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<tr>
<td>Jane M. Heliinger</td>
<td>1978-1980</td>
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<tr>
<td>Maria L. McLaughlin</td>
<td>1980-1984</td>
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<tr>
<td>Maxine L. Coleman</td>
<td>1984-1986</td>
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<tr>
<td>Carolyn C. Mosseller</td>
<td>1986-1990</td>
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<tr>
<td>Hazel B. Boyer</td>
<td>1990-1992</td>
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<tr>
<td>Joan E. McNoldy</td>
<td>1992-1994</td>
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<tr>
<td>Mabel A. Phillips</td>
<td>1994-1996</td>
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<tr>
<td>Carl F. Smith</td>
<td>1996-1998</td>
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<tr>
<td>Paulette O’Connor</td>
<td>1998-2000</td>
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<tr>
<td>Lou Balboni</td>
<td>2000-2002</td>
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<tr>
<td>Hazel B. Boyer</td>
<td>2002-2006</td>
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<tr>
<td>Patricia L. Cusey</td>
<td>2006-2008</td>
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<tr>
<td>Ruth Simione</td>
<td>2008-2010</td>
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<tr>
<td>Helen Poli</td>
<td>2010-2012</td>
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<tr>
<td>Sandy Carrott</td>
<td>2013-2013</td>
</tr>
<tr>
<td>Margaret Gorzka</td>
<td>2014-2016</td>
</tr>
<tr>
<td>Bruce Clough</td>
<td>2017-</td>
</tr>
</tbody>
</table>

### Charter Members

| Mrs. Florence Bobcock       | Mrs. Virginia Carper |
| Mrs. Margie Ann Connor     | Mrs. C. Ferguson     |
| Mrs. Nancy Friant          | Mrs. Jeannette Garber|
| Mrs. Jean Goving           | Mrs. Angele Gregory |
| Mrs. Magdalene Hahn        | Mrs. Nancy P. Haydon |
| Mrs. Sylvia Heflin         | Mrs. Thelma Jamison |
| Mrs. Henrietta Jussaume    | Mrs. Harriet B. Keenan|
| Mrs. Beverly A. Keenan     | Mrs. Edna Earl Kincheloe|
| Mrs. Lucie K. Latimer      | Mrs. Martha Leitch  |
| Mrs. Linda A. McLain       | Mrs. Mildred Magnusson|
| Mrs. Loretta Manderfeld    | Mrs. Maddie A. Martin|
| Mrs. Mary Margaret Matthews| Mrs. Carrell J. Maxwell|
| Mrs. Mae Merchant          | Mrs. M. L. Nafzinger |
| Mrs. Mattie C. Parrish     | Mrs. Marion L. Payne |
| Mrs. B. F. Phillips        | Mrs. Lelea D. Ringler|
| Mrs. Elmina Robbins        | Mrs. Dottie Robinson |
| Mrs. Mary Scheele          | Mrs. Ann B. Sinclair |
| Mrs. Lois F. Smith         | Mrs. Virginia B. Smith|
| Mrs. F. Stephens           | Mrs. Barbara Tucci   |
| Mrs. Gabriele Von Oettingen| Mrs. Anne M. Wall    |
| Mrs. Alice Whitmer         | Mrs. June P. Wilkins |
| Mrs. Irene Wood            |                      |
Remarkable Patient Experience

There are six vision elements that describe our current approach to providing remarkable care. The following are the definitions of each of the current elements:

Safety
Our patients are safe and free from harm when they are in our care. Our work environment is one of open communication and timely feedback about the patient’s safety and care experience which is guided by the expectation: “First, do no harm.”

Quality
Patients receive integrated healthcare services which deliver superior outcomes as against national, state and regional benchmarks, peer data bases, internal standards and the patient and family experience. It includes prevention, early detection, treatment and ongoing health across all venues of care.

Affordability
We deliver a system of care that provides value, as judged by our patients and their payers. Novant Health UVA Health System will compare favorably to a similar group of top performing health systems. Our sustained financial strength will allow us to grow strategically and invest to meet the needs of the patients and communities we serve.

Easy for Me
We deliver a convenient and seamless patient and family experience which is accessible and welcoming. Patients understand they are part of a system of care and can describe what is going to happen during their journey and why. Resources and information are readily available and waits are filled in ways that add value to the patients and their families.

Voice & Choice
Patients receive all the necessary information to make knowledgeable and confident choices about their health conditions, treatment options and overall well-being. We embrace patients as true partners by valuing their perspectives and engaging them in genuine dialogue.

Authentic Personalized Relationships
We know our patients and see healthcare from their perspective. Our patients receive personalized care during and beyond care encounters, and always from a place of compassion. They truly feel like family and choose us because of the authentic and meaningful relationships we have built with them.
Volunteer Responsibilities

VOLUNTEER ATTIRE
Personal appearance plays an important role in the public’s perception of volunteers as professionals and Novant Health as an organization. Volunteers are expected to wear the designated volunteer uniform. Uniforms are available for purchase in the Volunteer Office. Financial assistance and/or used uniforms are available.

Dress code for volunteers:
- Aubergine jacket, smock, apron, vest or polo shirt
- Men’s attire consists of an Aubergine jacket or vest, comfortable dark closed-toe walking shoes with socks (no sandals) and plain grey or black slacks. Information Desk Auxilians will wear long or short sleeved crisp white shirts. Other service Auxilians will wear white long or short sleeved open collared shirts, turtleneck shirts or collared polo buttoned shirts.
- Women’s attire consists of an Aubergine Auxiliary jacket or vest with long or short sleeved white blouse or turtleneck shirt (not sleeveless), comfortable white or black walking shoes with hose or socks (no sandals or open-toed shoes) with white or black slacks or skirt.
- Shoes must be closed-toe. Tennis shoes/ or sneakers or comfortable walking shoes are recommended. Shoes should be clean and in good repair.
- Head coverings are not to be worn by volunteers except for religious or cultural reasons.
- Auxilians working within the Pet Therapy service area will dress in a preapproved manner.
- Auxilians working at the Aubergine Thrift Shop will wear the approved Auxiliary uniform, but may elect to substitute jeans for pants and polo shirt for vest & white shirt.
- Clothes should be clean and neatly pressed.
- Photo ID badge must be worn above the waist with picture visible when volunteering.

Additional information:
- Shorts, capris or blue denim may not be worn when volunteering.
- No extremes in makeup, hairstyles, and hair color (blue, pink, etc.).
- Jewelry should be limited when volunteering.
- Tattoos and body piercings other than ears should be avoided. Offensive and vulgar tattoos are not permitted to be visible at any time.
- Artificial or acrylic nails may not be worn if in direct patient care areas.
- Strong perfumes, lotion, colognes and aftershaves are not permitted.
ATTENDANCE

Although you do not receive a paycheck for volunteering, we ask that you treat your position like a job. You should be reliable and consistent in your attendance. Be punctual in your arrival time and stay for the period that is assigned. Volunteer dependability is essential to effective performance.

Most volunteer shifts are scheduled for one 3-hour shift a week. Volunteers may work more than one shift per day or more than one day per week.

- **Absences:** In case of illness or emergencies, notify your assigned work area and Volunteer Services.
- **Vacations:** Please provide as much notice as possible of planned vacations. This will give Volunteer Services the opportunity to seek out a substitute.
- **Substitutes:** To cover for volunteer absences, substitutes are utilized. Please notify the Volunteer Services office if you are willing to serve as a substitute in your service area. You may designate certain days and times that you area available.
- **Inclement Weather:** In case of inclement weather, volunteers should NOT come to the hospital if it is not safe to do so. If volunteers decide to not report for duty they should call the Volunteer Services office.

MINIMUM TIME OF SERVICE

We ask for a commitment of at least one year or 100 hours of service.

IDENTIFICATION BADGE

All on-duty volunteers are required to wear their ID badge. The badge is to be visible at all times and worn in the neck/chest area. No person may borrow or loan an identification badge; if lost, please notify us immediately. Your ID badge must be returned to Volunteer Services when you are no longer volunteering.

SIGN-IN PROCEDURES

Volunteers must sign in and out each day in the Volunteer Office or otherwise designated area.

ANNUAL MANDATORY EDUCATION

All volunteers will complete a re-education packet each year they remain as a volunteer similar to the Orientation they completed when they began volunteering. Each volunteer is required to complete Annual Mandatory Education in order to remain as a volunteer. Each volunteer will also re-sign a new Confidentiality Agreement each year.

ANNUAL MEDICAL REQUIREMENTS

All volunteers are required to fill out a TB questionnaire and receive a flu shot during flu season (October – April) each year they remain as a volunteer. Exemptions to the flu shot are available for health or religious reasons with proper documentation – see a member of the office team for more information.
TOBACCO PRODUCTS
All Novant Health UVA Health System facilities are 100% tobacco-free. This includes anywhere on the property, including the parking lots.

CELL PHONE POLICY
Volunteers may carry their cell phone in their pocket FOR EMERGENCY USE ONLY AND IT MUST BE ON VIBRATE OR SILENT. If absolutely necessary to take a call or text, use your phone in a private area. Please do not use your phone in any public area, including hallways. If someone walks by you at your volunteer assignment they should not see your cell phone out.

VOLUNTEER ACCIDENTS/INJURIES
Volunteers are covered under Novant Health UVA Health System’s accident policy. In case of an accident while on duty, the volunteer should notify the Volunteer Services office as soon as possible to be given necessary medical care and help complete an accident report.

HARASSMENT AND BULLYING
Novant Health UVA Health System is committed to providing an environment in which you are treated with dignity and respect and which is free from all forms of unlawful harassment. Therefore, all actions that could be construed as harassment or bullying are prohibited.

GRIEVANCES
If you have a complaint or problem, report it immediately to Volunteer Services. Comments regarding direct patient care should be directed to the nurse or nurse manager in the specific department.

RULES OF CONDUCT
The progressive discipline policy is the same for volunteers as it is for employees. The intent of the progressive discipline policy is to improve poor performance and correct behavioral problems while maintaining an atmosphere in which volunteers can learn from past mistakes. When coaching and counseling from a leader have failed to achieve the desired results, the following corrective action may be taken. The process includes:

1. Documented oral warning: In a private conversation, the Volunteer Program Coordinator explains the violation and what is necessary to correct it. The leader will complete the performance and behavior documentation form and allow the volunteer to read the documentation and offer any comments he or she wishes. This document will be kept in the volunteer’s secure file in the Volunteer Services office.

2. Written warning/probation: A written warning is a formal notification of serious misconduct or failure to improve conduct after a documented oral warning.

3. Discharge: A volunteer may be discharged if sufficient improvement has not been made in the progressive discipline procedure or immediately upon violation of a zero tolerance group 1 rule of conduct.
Volunteer Privileges

COMPLIMENTARY COFFEE
A complimentary cup of coffee is offered in the cafeteria at PWMC and HAMC on your day of service, before or after your shift.

PARKING
Parking is free for all active volunteers. Volunteers may park in any of the visitor parking areas.

SERVICE AWARDS
Volunteer Services keeps a record of hours worked by each volunteer and pins are awarded at the completion of 100 hours of service, 250 hours, 500 hours, and thereafter in increments of 500 hours.

VOLUNTEER ANNIVERSARY RECOGNITION
Each year on your volunteer anniversary you will receive a card to wear with your Volunteer ID badge that signifies the number of years of volunteer service you have provided Novant Health UVA Health System.

ANNUAL APPRECIATION LUNCHEON
During National Volunteer Week in April, all active and associate volunteers are recognized at an appreciation luncheon.

FLU SHOTS
As an organization committed to the health and safety of its patients, Novant Health requires all employees, contracted personnel, volunteers, students, vendors and medical staff to receive an annual flu vaccination. Vaccinations will be provided at no cost during annual flu clinics to adult volunteers. Volunteers who choose not to receive the shot will be placed on leave of absence until the flu season regulation has been lifted, which is usually at the end of March each year. If a valid medical or religious exemption is granted, masks must be worn for the duration of the flu season.
The Joint Commission (TJC)

The Joint Commission is an independent, not-for-profit organization and it accredits and certifies more than 20,500 healthcare organizations and programs in the United States. TJC accreditation and certification is recognized nationwide as a symbol of quality that reflects an organization’s commitment to meeting certain performance standards. It is important to be accredited and recognized by an organization whose mission and vision are similar to Novant Health UVA Health System.

Importance of accreditation:
- Fulfills hospital licensure requirements
- Required by most insurance payers including Medicare and Medicaid
- Important public statement of accountability
- Bond ratings and financial options enhanced
- Recruitment of high-quality staff

Joint Commission standards apply to staff, contract employees, and volunteers. A surveyor may ask you about your role in the hospital. Be prepared for questions on the following:
- Our mission, vision and values
- Your role as a volunteer
- Hospital and department policies and procedures
- Emergency codes and safety procedures
- Infection Control procedures for volunteers
- Your volunteer orientation and training

Risk Management

The role of Risk Management is to identify, reduce, and eliminate actual or potential risks to the quality of patient care or visitor safety. Volunteers are to learn and observe all safety policies and procedures. If something happens to a visitor, notify Public Safety.
Corporate Compliance

Our corporate compliance program supports compliance with the False Claims Act. The Federal False Claims Act prohibits any person from submitting a false or fraudulent claim for payment to the US government. Our corporate compliance program ensures that all laws, regulations, and ethical standards are being followed and provides a way to prevent, detect, and report “wrong-doing.” The Code of Ethics defines appropriate behavior for workers and provides consequences for acting outside of the policy. It includes information related to conflict of interest, confidentiality, business conduct, fraud, and patient issues.

If you have any concerns about wrong-doing at the hospital, contact Volunteer Services. You may also make an anonymous report by calling the Alert Line at (800) 350-0094 or https://novanthealth.alertline.com.

Patient Confidentiality

HIPAA: Health Insurance Portability and Accountability Act -
This is a Federal law that protects the confidentiality of a patient’s medical information. Without patient consent, medical information can only be released for purposes of treatment, scheduling, or payment.

What is considered confidential?
- Patient name, address, phone number, age
- Information about illness, diagnosis, or treatment
- Conversation between patient and healthcare provider
- Patient insurance and financial information

Access to and Requests for Confidential Information:
Access to confidential information (medical record, on-line laboratory, x-ray, financial, addresses, phone numbers, etc.) is limited to staff who need the information in order to perform their job duties. A HIPAA violation can lead to disciplinary action and/or termination.

Protect patient confidentiality the following ways:
- Follow proper procedures for access and handling of information
- Protect all records (including computer screens) from public view
- Never talk about patients in public
- Use care with phones and fax machines
- Use proper procedures for destroying patient information (never put in trash)
- ID badges and computer passwords may not be used by anyone else
- No photos or videos permitted without written consent
Public Safety

Novant Health UVA Health System strives to provide a safe and secure environment for its visitors and staff. You are expected to take an active role in the security program to insure its success.

Weapons:
Never bring a weapon onto our campus or any Novant Health UVA Health System facility. This includes guns, knives, pepper spray, explosives, and tasers.

Tips for staying safe:
- Be aware of your surroundings
- Recognize potentially dangerous situations
- Lock your vehicle and keep valuables out of sight
- Leave valuables at home or locked up in your car

Security is everyone’s responsibility:
- Wear your ID in the neck/chest area with picture showing
- Do not prop open exterior doors
- Report the following to Public Safety (non-emergencies, dial x8128):
  - Suspicious persons
  - Thefts or incidents
  - Lost or stolen keys and ID badges
  - Visitor problems

No violent act will be tolerated.

Weapons of any type are prohibited from Novant Health UVA Health System properties.

To report an EMERGENCY:
Dial 7000 from internal phones.
# Emergency Codes

## Non-clinical plain language overhead pages

Overhead pages will be understood by all that have a role or are affected.

<table>
<thead>
<tr>
<th>Event type</th>
<th>Plain language overhead page</th>
</tr>
</thead>
<tbody>
<tr>
<td>Active Shooter</td>
<td>Security Alert, Active Shooter, [LOCATION LAST SEEN], Escape immediate danger or shelter in place. Please follow team member instructions</td>
</tr>
<tr>
<td>Bomb Threat</td>
<td>Security Alert, Suspicious Package, Team Members search their areas</td>
</tr>
<tr>
<td>Evacuation</td>
<td>Facility Alert, The facility evacuation plan is now in effect. Please follow our team members’ instructions.</td>
</tr>
<tr>
<td>Facility Lockdown</td>
<td>Security Alert, Facility lockdown activated or lockdown activated, [LOCATION], Please follow the instructions of our team members</td>
</tr>
<tr>
<td>Fire Alarm</td>
<td>Facility Alert, Fire Alarm Activation, [LOCATION]</td>
</tr>
<tr>
<td>Hazardous Spill</td>
<td>Facility Alert, Hazardous Spill, [LOCATION], avoid the area</td>
</tr>
<tr>
<td>Hostage Situation</td>
<td>Security Alert, Hostage Situation, [LOCATION], Please avoid the area</td>
</tr>
<tr>
<td>Infant Abduction</td>
<td>Security Alert, Infant Security Alarm, [LOCATION]</td>
</tr>
<tr>
<td>Multiple Casualty</td>
<td>Facility Alert, Multiple Casualty Situation in the Community, ETA [TIME], [RESPONSE LEVEL #]</td>
</tr>
<tr>
<td>Missing Adult</td>
<td>Security Alert, Missing [Age], Adult, [PHYSICAL DESCRIPTION], [LOCATION LAST SEEN]</td>
</tr>
<tr>
<td>Missing Infant/Minor &lt;18yrs</td>
<td>Security Alert, Missing [Age], [Infant &lt;1yrs], [Child &gt;1yrs], [Teen &gt;12yrs], [PHYSICAL DESCRIPTION], [LOCATION LAST SEEN]</td>
</tr>
<tr>
<td>Regulatory Visit</td>
<td>Facility Alert, Outlook Message Check</td>
</tr>
<tr>
<td>Severe Weather</td>
<td>Facility Alert, [TYPE OF WARNING], Please follow our Team Members’ instructions</td>
</tr>
<tr>
<td>Utility Disruption</td>
<td>Facility Alert, Loss of [SYSTEM] downtime plan is in effect.</td>
</tr>
<tr>
<td>Violent Individual</td>
<td>Security Alert, Public Safety Respond, [LOCATION]</td>
</tr>
</tbody>
</table>

**Code CERT**
Non-patient medical emergency
Code team responds. Do not go to that area.
Fire Emergencies

R.A.C.E.—Fire Alarm Activation
If you suspect a fire, follow the RACE rule:
- Rescue or remove anyone from immediate danger to nearest safe area
- Activate the alarm by pulling alarm box
- Contain the fire by closing doors
- Extinguish the fire if you can do so safely or evacuate

P.A.S.S.—Using the Extinguisher
Fire extinguishers used in our facilities are rated ABC which means they can be used in all types of fires. To properly use the fire extinguisher, use the PASS method:

- Pull the pin
- Aim at base of fire
- Squeeze the trigger
- Sweep from side to side

Fire Prevention & Response

Know...
- The location of fire pull stations, fire extinguishers, and emergency exits
- How to report smoke or fire
- The emergency number to call in case of fire
- How to respond to a fire alarm

Common fire hazards include:
- Smoking
- Flammable substances (i.e., hand sanitizers, acetone, alcohol)
- Combustibles (i.e., paper, cardboard, trash, wood, linen, rags)
- Oxygen and other compressed gases
- Faulty electrical equipment or wiring
- Improper use of extension cords
- Unattended cooking (microwave, hot plate, coffee pot, Sterno)

General Fire Prevention Practices:
- Help enforce the Tobacco Free Environment policy
- Keep combustibles and flammables away from heat and other ignition sources
- Never block, prop, or obstruct fire/smoke doors
- Keep all “in use” items in the hallways on the same side of the hall
- Inspect your work area for hazards regularly
- Report any problems you observe involving electrical equipment
Infection Prevention Basics

When volunteering in the hospital, there are special procedures you need to keep in mind to protect our patients health and safety as well as your own. Do not volunteer if you are sick. Any illness you have could easily be spread to patients. A minor illness such as a sore throat or fever may seem like a small thing, but it can prove to be quite serious for a weakened patient. Call Volunteer Services to let us know if you will not be coming in to volunteer.

Hand Hygiene

The single most important way to prevent the spread of infection is to wash your hands effectively!!!

WHEN TO WASH YOUR HANDS

• After all visits to restroom
• After blowing your nose or covering a sneeze or cough
• Before and after meals, breaks
• Anytime they are visibly soiled

HOW TO WASH YOUR HANDS

• Turn on water to comfortable temperature
• Have paper towel available
• Wet hands and apply soap
• Use friction rubbing all surfaces for at least 15 seconds
• Rinse hands well under running water
• Dry hands thoroughly with paper towel
• Use paper towel to turn off faucet

When running water is not available, use a waterless hand washing product. Rub the sanitizer on your hands until it is dry.
Precautions

Standard Precautions are used for the care of ALL patients, regardless of a known infection. Clinical staff wear gloves and other protective equipment when coming in contact with all body substances. Volunteers have no “hands-on” contact with patients.

Transmission-Based Precautions are used in addition to Standard Precautions for patients who have contagious infections or patients with weak immune systems. Do not enter any patient’s room when there is a precautions sign on the door. (NOTE: A yellow bag for protective equipment will also be on the door.)
Infection Control Guidelines for Volunteers

- You may transport a patient in a wheelchair, following wheelchair safety training. Extra training, with approval from the Volunteer Services, is required to assist with patient discharges.

- **DO NOT** transport a patient in a wheelchair with an IV attachment or oxygen tank.

- **DO NOT** assist patients with bathing, dressing or toileting.

- **DO NOT** handle needles, syringes or other sharp instruments.

- **DO NOT** volunteer while you are ill.

- **DO NOT** wipe up any spills — notify a staff member instead.

- **DO NOT** offer any medical advice based on your past experience.

- Notify your supervisor and Employee Health if you are exposed to any blood or body fluids. Wash the exposed area for 1 minute.
Hazardous Materials

The Hazard Communication Law requires each facility to identify and list all hazardous chemicals used in the workplace. Each department has Material Safety Data Sheet (MSDS) posted for each chemical used in that department. The MSDS includes information on a chemical's safe handling and use, its physical and health hazards, emergency first aid procedures, and safe clean-up methods.

Ergonomics

PROPER LIFTING TECHNIQUES
- Plan the move, get help when needed
- Keep weight close
- Use a wide base of support
- Maintain curve in low back
- Bend knees and lift with legs
- Avoid twisting or jerking
- Do not lift heavy objects

AVOID SUSTAINED POSTURES
- Vary position and activities frequently
- Take stretch/movement breaks every 30-60 minutes
- Avoid long reach or elevated shoulder for prolonged periods
- Use a low stool if standing for long periods

Protect your body - always use good body mechanics!
Patient Bill of Rights and Responsibilities

Patients receive a copy of the Patient's Bill of Rights and Responsibilities when they are admitted or sign consent for treatment. Copies are posted throughout the hospital.

Patient rights include:
- Impartial access to care
- Considerate and respectful treatment
- Participation in their care and ethical decisions
- Knowing about diagnosis, prognosis and treatment options including their risks and benefits
- Personal privacy and confidentiality of information
- Access to protective services
- A truthful and compassionate disclosure of an unexpected medical outcome
- Having complaints or grievances resolved

Ask Me 3™

Ask Me 3™ is a patient education program of the National Patient Safety Foundation®. The program is being implemented throughout NHUVA and is designed to promote communication between health care providers and patients in order to improve health outcomes. The program encourages patients to understand the answers to three questions:

1. What is my main problem?
2. What do I need to do about it?
3. Why is it important for me to do this?

Patients should be encouraged to ask their providers these three simple but essential questions in every health care interaction. Likewise, providers should always encourage their patients to understand the answers to these three questions.

Studies show that people who understand health instructions make fewer mistakes when they take their medicine or prepare for a medical procedure. They may also get well sooner or be able to better manage a chronic health condition.
Service Standards

Know me

I will be fully present and attentive when I am with you
- Getting Familiar
- Always Listening
- Anticipating my needs

Respect me

I will honor you as an individual
- Being open with me
- Valuing my time
- Protecting my dignity

Care about me

I will be there for you in the way that you need
- Comforting me
- Acknowledging my uniqueness
- Meeting me where I am

Delight me

I will think ahead and go the extra mile for you
- Creating warm hand-offs
- Own my issues and concerns
- Exceeding my expectations
Thank you for your interest in joining the Novant Health UVA Health System Volunteer Team!

*We love our Volunteers!*
Dear team member,

At Novant Health, we have a reputation for integrity and honesty when fulfilling our mission to our patients, our credo to each other, and when dealing with vendors, regulating agencies, and the public. We are proud of this reputation; it is our heritage and our future.

Just as our values help us fulfill our mission, so does our Code of Ethics. Following a code of ethics is important for all businesses—especially for businesses like ours, as we care for our patients and communities, often in some of the most difficult of times.

Following a code of ethics is about acting honorably. It’s about following rules and guidelines. It’s about accepting responsibility for our actions. At Novant Health, we are committed to doing the right thing across all parts of our business operations.

The Novant Health Code of Ethics establishes our commitment to the highest ethical standards by putting in writing the ethical principles we follow when conducting our business. It is a clear statement of policy to team members, medical staff members, our Board of Trustees, independent contractors, students, volunteers, and anyone representing Novant Health. It outlines the rules and guidelines we should all follow while working to fulfill our mission.

Please read our Code of Ethics carefully. If you ever have any questions about our Code or concerns about the Code not being followed, you can always ask your leader or any member of management. You can also contact the Compliance team directly, or anonymously via The Alert Line. Remember that Novant Health policy prohibits retaliation against someone for making a compliance report in good faith.

Doing the right thing supports our commitment to our patients, our communities, and our team.

Thank you for your commitment to doing the right thing.

Sincerely,

Carl S. Armato
President and Chief Executive Officer
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Resolution of the Board of Directors of Novant Health, Inc.

Adoption of a Corporate Compliance Plan

WHEREAS, Novant Health, Inc. ("Novant Health") is an integrated health care delivery system that includes, among other health services, hospitals, physician clinics, clinical laboratory services, and other healthcare services;

WHEREAS, Novant Health has authorized the creation of a comprehensive Corporate Compliance Plan and a stringent Code of Ethics that will apply to operations of the entire Novant Health integrated delivery system;

WHEREAS, the Board has reviewed the Compliance Plan with the cooperation of officers and directors of Novant Health and other Novant Health employees; and,

WHEREAS, the proposed Compliance Plan is intended to satisfy the requirements set forth in the Federal sentencing Guidelines for Organizations;

NOW, THEREFORE, BE IT RESOLVED, that the Board hereby approves the adoption of the Corporate Compliance Plan with the expectation that all Novant Health employees and other agents shall be instructed in their respective duties under the Plan and shall comply fully therewith.

Adopted: Effective as of May 12, 1998
Revised: Effective as of March 6, 2000
Revised: Effective as of July 18, 2006
Revised: Effective as of February 21, 2011
Revised: Effective as of February 20, 2012
Revised: Effective as of February 18, 2013
Revised: Effective as of February 18, 2014
Revised: Effective as of February 17, 2015
Revised: Effective as of February 16, 2016
Revised: Effective as of February 21, 2017
Revised: Effective as of February 20, 2018
Revised: Effective as of February 19, 2019
Novant Health’s Mission, Vision and Values

**Mission:** Novant Health exists to improve the health of communities, one person at a time.

**Vision:** We, the Novant Health team, will deliver the most remarkable patient experience, in every dimension, every time.

**Values:**

**Compassion:** We treat our customers and their families, staff and other healthcare providers as family members by showing them kindness, patience, empathy and respect.

**Diversity and Inclusion:** We recognize that every person is different, each shaped by unique life experiences. This enables us to better understand one another and our customers. By engaging the strengths and talents of each team member, we ensure a strong organization capable of providing remarkable healthcare to our patients, families and communities.

**Personal Excellence:** We strive to grow personally and professionally, and we approach each service opportunity with a positive, flexible attitude. Honesty and personal integrity guide all that we do.

**Teamwork:** The needs and expectations of any one customer are greater than that which one person’s service efforts can satisfy. We support each other so that together as a team, we can be successful in the eye of the customer as a quality service provider.

**Courage:** We act boldly in making the changes necessary to achieve our mission, vision and promise of delivering remarkable healthcare.

**Our people:** We are an inclusive team of purpose-driven people inspired and united by our passion to care for each other, our patients and our communities.

**Our promise to patients:** We are making your healthcare experience remarkable. We will bring you world-class clinicians, care and technology – when and where you need them. We are reinventing the healthcare experience to be simpler, more convenient and more affordable, so that you can focus on getting better and staying healthy.
Novant Health's Commitment to Legal and Regulatory Compliance

Novant Health is committed to the highest levels of ethics across all segments of its business operations and to an effective Compliance Program that helps maintain a culture promoting the prevention, detection and resolution of potential violations of law or Novant Health policies. Novant Health's Compliance Program recognizes that compliance is the responsibility of all employees, governing board members, administrators, physicians, students, volunteers, as well as those with whom we do business.

Novant Health provides varied healthcare services pursuant to applicable federal, state, and local laws. Novant Health expects and demands compliance by all of its employees with the statutes and regulations that govern Novant Health's business.

The Corporate Compliance Plan is designed to establish general standards of conduct that promote compliance with applicable law. These standards of conduct are complemented by more detailed policies and procedures that promote conformance with the standards.

However, it is impractical to develop policies and procedures that encompass the full body of applicable law and regulation. All applicable laws and regulations, whether or not covered in organization policies and procedures, must be followed. There is a range of expertise within Novant Health, including counsel and numerous other experts who may be consulted for advice. It is anticipated that this Plan will be amended from time to time as necessary to articulate standards of conduct that are necessary to promote regulatory compliance.
Purpose of this Compliance Plan

An effective program to prevent and detect violations of law means a program that is reasonably designed, implemented, and enforced so that it generally will be effective in preventing and detecting improper conduct. Failure to prevent or detect any offense, by itself, does not mean that the program is not effective. The hallmark of an effective program to prevent and detect violations of law is that the organization exercise due diligence in seeking to prevent and detect improper conduct by its employees and other agents. Due diligence requires at a minimum that the organization must be taking the following steps:

Compliance Standards and Procedures

Novant Health has a wide array of policies and procedures to assure compliance with laws and regulations. These policies and procedures are widely disseminated and are reviewed and revised to assure the most appropriate and relevant content. These policies and procedures are part of a system of internal controls maintained by management that provides reasonable assurance of reducing the likelihood of violations of law or regulation. The compliance program includes policies and procedures that fall into three broad categories:

1. Code of ethics
2. Policies relating to the operation of the compliance program
3. Policies addressing the organization's principal legal and compliance risks

Oversight Responsibilities

Novant Health's leadership is knowledgeable of the content and operation of the program. Novant Health assigns high-level staff the overall responsibility to oversee compliance. Their responsibility is to ensure implementation and effectiveness of the program. These individuals are given adequate resources and authority to carry out this responsibility and report to the Novant Health Board of Trustees. Novant Health's Board of Trustees has created an audit and compliance committee of independent trustees to provide oversight to the auditing and compliance functions. This committee is knowledgeable about the context and operation of the compliance program to prevent and detect violations of law and exercises reasonable oversight with respect to the implementation and effectiveness of the program. This committee charters both the audit and compliance functions.

The Novant Health Chief Executive Officer shall appoint a corporate officer to serve as the Corporate Compliance Officer (CCO). The Audit and Compliance Committee of the governing board shall concur in the appointment. The CCO shall report administratively to the Novant Health Chief Legal Officer and functionally to the Audit and Compliance Committee of the governing board. Regular compliance reporting from the Vice President/Corporate Compliance Officer has been established to assist the Board in meeting its governance and oversight responsibilities. The CCO shall have the authority to report on matters of concern directly to the Novant Health Chief Executive Officer or to the Chairperson of the Audit and Compliance Committee at any time the CCO determines this to be necessary.
**Duties of Corporate Compliance Officer**

The Audit and Compliance Committee authorizes the CCO to implement and oversee the operation of Novant Health's corporate compliance program in accordance with the charter for the corporate compliance function established by the committee.

**Duties of Compliance Staff**

Compliance staff shall operate under the supervision and direction of the Corporate Compliance Officer. The staff will investigate possible compliance issues and recommend necessary compliance initiatives. They may also serve as the delegate of the Corporate Compliance Officer.

Novant Health values the support and engagement of all organizational leaders in their roles to support compliance. The compliance staff works closely with human resources, legal counsel, information technology, risk management and many other areas.

**Compliance Committees**

Compliance Committees are established to advise the Corporate Compliance Officer and compliance staff and assist in the ongoing growth of Novant Health's compliance program. Novant Health Senior Management is actively involved in routine ongoing meetings with the Corporate Compliance Officer and/or the compliance staff. These meetings serve as an effective means to assure communication regarding the program and compliance issues while maintaining and enhancing management's commitment and support of the corporate compliance program. In addition, committees may be at the business unit, departmental, facility or regional level and may be serving in an advisory capacity, an operational capacity, or in a functional capacity as needed to respond to dynamic environments. The Committees may consist of individuals with varying responsibilities within the organization.

These committees' functions may include:

- Analyzing specific risk areas;
- Assessing existing and developing new policies and procedures that promote compliance;
- Recommending and monitoring the development of internal systems and controls to carry out the organization's standards, policies and procedures daily operations;
- Receiving and processing information about government rules and regulations and corporate compliance audits;
- Understanding systems implications and coordinating common resources;
- Managing regulatory changes, including education;
- Planning and reporting on the implementation of required changes;
• Implementing changes at the work area level within each facility/department;
• Participating in monitoring and quality assurance;
• Assisting Corporate Compliance with internal investigations.

Delegation of Authority

Novant Health will use reasonable efforts and due diligence to assure that those who are given authority have not been convicted of violations of law, criminal or non-criminal. Novant Health does not employ, contract with, or bill for services initiated and/or rendered by an individual or entity that is excluded or is ineligible, suspended or debarred from participation in Federal healthcare programs, Federal government contracts, or has been convicted of a criminal offense related to the provision of healthcare items or services and has not been reinstated in a Federal healthcare program. Novant Health searches the Department of Health and Human Services’ Office of Inspector General List of Excluded Individuals and Entities, the General Services Administration’s System for Award Management, and applicable Medicaid lists of such excluded and ineligible persons.

Employees, vendors, and privileged practitioners at Novant Health facilities are required to report to Novant Health if they have become excluded, debarred, or ineligible to participate in Federal healthcare programs, or have been convicted of a criminal offense related to the provision of healthcare items or services.

Employee Training and Education

Compliance training and education have been developed to assure that employees throughout Novant Health are aware of standards pertinent to them. Basic compliance training occurs at the time a worker joins Novant Health and is a part of an annual mandatory education. Upon completion of basic compliance education annually, the worker documents training completion, pledges to adhere to the Code of Ethics and Compliance Plan, and acknowledges that he/she understands that failure to comply may lead to disciplinary actions. Additional compliance training in specific areas may be required of certain individuals depending on their role and function. Leader orientation encompasses education on the Compliance Plan and the Code of Ethics as they pertain to the leadership role.

Auditing and Monitoring of Systems and a Method of Anonymous Reporting

Novant Health maintains auditing and monitoring of its systems to detect violations of the law and to evaluate the effectiveness of the compliance program. These types of reviews permit the Corporate Compliance Department to evaluate compliance with regulations, policies and procedures. Through these reviews, we are continuously assessing the effectiveness of the compliance program and finding ways to improve it. Employees are expected to assist in responding to routine internal and external audits as well as compliance office investigations.
• Reporting Wrongdoing

Novant Health employees are obligated to report any knowledge of suspected wrongdoing. All reports of wrongdoing are taken seriously. Suspected wrongdoing may be reported to:

- The immediate supervisor/manager/director/officer
- The corporate compliance office
- The hotline: The Alert Line 1-800-350-0094 or https://novanthealth.alertline.com
- Human Resources at any time and during exit interview

Novant Health employees may also report any knowledge of suspected wrongdoing to state or federal government with jurisdiction over the area of perceived wrongdoing. Reporting may be done in a manner consistent with the Novant Health policies and procedures addressing reporting options, as amended from time to time.

• Protection of Employees

Employees reporting suspected wrongdoing to Novant Health, or to a state or federal government agency, will receive protection from retaliatory workplace actions, consistent with protections more fully described in the Novant Health policies and procedures addressing reporting options, as amended time to time.

All reports of suspected wrongdoing are investigated promptly and confidentially to the extent possible. Employees are expected to cooperate with investigation efforts.

Response and Prevention

If a reported allegation is substantiated, or if a violation is discovered as a result of auditing, monitoring or other source:

- the corporate compliance officer will be notified;
- the organization will initiate appropriate action, including, if indicated, making prompt restitution of any overpayment amounts;
- the appropriate governmental agency will be notified, if necessary;
- disciplinary action will be implemented, if appropriate; and
- changes will be implemented to prevent or minimize the likelihood of a recurrence.

It shall be Novant Health's policy to cooperate fully in connection with all government audits and investigations and to respond in a timely manner to all requirements imposed by involvement in litigation. Novant Health has developed policy and procedure to guide staff in responding to various government audits, investigations, and requests for information.

In preparation for or during a survey, audit, or investigation, Novant Health employees must never conceal, destroy, or alter any documents or make misleading statements to a government representative.
Employees must never attempt to cause another employee to fail to provide accurate information or obstruct, mislead, or delay the communication of information or records relating to a possible violation of law.

**Enforcement and Discipline**

All violators of the Compliance Plan or the Code of Ethics will be subject to disciplinary action. The precise discipline utilized will depend on the nature, severity, and frequency of the violation and will follow corporate progressive discipline policy. This may result in any of the following disciplinary actions:

- Documented oral warning
- Written warning
- Termination
Novant Health maintains a reputation for integrity and honesty in dealing with patients, employees, vendors, and regulating agencies, and the public. We are proud of this reputation; it is our heritage and our future.

The Novant Health Code of Ethics establishes our commitment to the highest ethical standards. The Code of Ethics puts in writing the ethical principles we follow when conducting our business. It provides a clear statement of policy to Novant Health employees, medical staff members, our Board of Trustees, independent contractors, students, volunteers, and anyone representing Novant Health. Novant Health also maintains separate policies that provide additional guidance on various specific topics. The Code of Ethics and these separate policies are key parts of Novant Health's corporate compliance plan.

All representatives and employees are responsible for reading the Code of Ethics and abiding by its terms. The Code of Ethics is rigorously enforced. Anyone who willfully violates the Code of Ethics is subject to disciplinary action up to and including termination. Individuals should report any violations of the Code, or even situations that give the appearance of a violation. Reports can be made to your supervisor or the Corporate Compliance department. You may also report potential violations anonymously to The Alert Line at 1-800-350-0094 or https://novanthealth.alertline.com. Any person who makes a good faith report of suspected wrongdoing will not be penalized for reporting.

The Code of Ethics is organized into categories that explain related topics in greater detail:
- Patient Care;
- Compliance with Laws and Regulations;
- Proper Use of Funds;
- Avoiding Conflicts of Interest;
- Protecting Company Assets;
- Charitable Organization and Status; and
- Employment

**Patient Care**

a. Patient Rights

We are dedicated to providing quality patient care while respecting individual autonomy and dignity, as reflected in our Patient's Bill of Rights. We encourage patients and their families to participate in decisions regarding patient care, and to be familiar with advance directives in the event the patient is unable to make decisions.

We comply with all laws prohibiting discrimination on the basis of: race, color, religion, sex, age, national origin, disability, veteran status, genetic information, gender identity, or sexual orientation. Patients are admitted to facilities and programs regardless of race, creed, or ethnic origin.
We make decisions related to admission, on-going care, transfer, and discharges based on a patient's assessed needs and our ability to meet those needs. The integrity of the clinical decision-making process will be maintained at all times. Financial incentives will not impact decisions for needed services. Referrals are made based on patient need or diagnosis; any benefit to the facility for such a referral is disclosed to the patient. The appropriateness and safety of care, treatment, and services do not depend on the patient's ability to pay.

b. Emergency Treatment

We provide an emergency medical screening examination and necessary stabilization to all patients that present to our Emergency Departments regardless of that patient's ability to pay, in accordance with the Emergency Medical Treatment and Labor Act (EMTALA).

Patients with emergency medical conditions may be transferred to another facility at the patient's request, or if the patient's medical needs cannot be met at the Novant Health facility (e.g., we do not have the capacity or capability), and appropriate care is knowingly available at another facility. Likewise, we accept patients by transfer who are in need of our specialized services, based on our capacity and capability to treat, without regard to ability to pay or any other discriminatory basis.

c. Research, Investigations, and Clinical Trials

We protect patients and respect their rights during research, investigations, and clinical trials. We provide patients who choose to participate in these programs with a full explanation of expected benefits, potential discomforts and risks, and alternative services that might prove beneficial. We also fully inform these patients of procedures to be followed, especially those experimental in nature. A patient gives informed consent to participate in clinical research or investigations. A patient's choice not to participate in any research or investigation project will not compromise his or her access to services.

We comply with federal and state laws and regulations for all research, investigations, and clinical trials conducted within any of our facilities. Any facility or employee applying for or performing research of any type is responsible for following appropriate research guidelines. Any human subject research is done in conjunction with the Institutional Review Board and should be consistent with our policies regarding human subject research and IRBs.

We submit only true, accurate, and complete costs related to research grants.

d. Accreditation

We deal with accreditation and government survey bodies in a direct, open, and honest manner, whether before, during, or after any survey. We will never mislead accreditors or survey teams, either directly or indirectly.

Compliance with Laws and Regulations

e. Privacy and Security Requirements
We maintain policies and procedures to comply with the Administration Simplification Act of 1996 (HIPAA) and other applicable laws to ensure the appropriate protection of patient privacy and the security and integrity of personal information.

Pursuant to HIPAA, we provide patients with a written notice of our information practices. We also have processes for controlling access to, use, and disclosure of protected health information (PHI). Specifically, we maintain an information security program designed to safeguard PHI. We provide employee education on handling and safeguarding PHI and provide guidance on how complaints about privacy practices may be filed.

f. Bribes and Improper Payments

We cannot enter into any agreement or arrangement that involves a commission, rebate, bribe, kickback, or any other item of value, if it is known or reasonably suspected that the intent or likely result of that item of value is to improperly reward, either directly or indirectly:

- Any employee, official, or representative of the federal or state government or any of their departments or agencies;
- Any Medicare Administrative Contractor under contract with the federal or state government, or any of their departments or agencies for the administration of any health care insurance program in which Novant Health or any of its operating subsidiaries participates;
- Any officer, director, employee, shareholder, or other representative of a customer, supplier, or other institution with which Novant Health or any of its operating subsidiaries has existing or prospective business relations; or
- Any physician, health care provider, or any other person or company that is in a position to refer or encourage the referral of patients to Novant Health for the delivery of health care services by a Novant Health operating subsidiary.

Improper rewards include the giving or receiving of anything of value, not just money. Additionally, employees are prohibited from giving improper rewards (or something of value) to any individuals as an incentive to make decisions or take actions favorable to Novant Health, or to make referrals to a Novant Health operating subsidiary. It is not permissible to take any such action just because it appears to be customary in a certain location or a particular area of business activity.

To the extent possible, Novant Health requires that all business arrangements between it and possible sources of patient referrals conform to the safe harbor regulations under the federal Anti-Kickback Statute. Novant Health also requires that all compensation arrangements with physicians who make referrals to Novant Health conform with applicable exceptions to the federal Physician Self-Referral law, related regulations, and any similar state laws.

g. Interactions with Physicians

Two key principles govern our interactions with physicians:
1. We accept patient referrals and admissions based solely on the patient's medical needs and our ability to meet those needs. We do not pay or offer to pay or accept anything of value from anyone – colleagues, physicians, or other people or entities – for patient referrals.

2. We do not accept payment for patient referrals we make. We are not permitted to solicit or receive anything of value, directly or indirectly, in exchange for patient referrals. Similarly, when making patient referrals to another health care provider, we do not take into account the volume or value of referrals that the provider has or may make to us.

Federal and state laws and regulations govern the relationships between hospitals and physicians who refer patients to those facilities. In addition, the Internal Revenue Service prohibits people, including physicians, from receiving a private benefit as a result of their relationships with a tax-exempt health care organization.

Novant Health representatives who interact with physicians should be aware of the legal, regulatory, and policy requirements that address relationships between physicians and hospitals or health care systems. This is especially so when making payments to physicians for services rendered, leasing space, recruiting physicians to the community, acquiring physician practices, and arranging for physicians to serve in leadership positions.

Any business arrangement with a physician must be developed to ensure compliance with legal requirements, regulatory guidance, and our policies and procedures. All arrangements must be in writing and approved by the Novant Health Legal Department before making any payment to a physician. All contract payments or benefits provided to physicians should be supported with appropriate documentation reflecting the business purpose of the payments or benefits. Additionally, relationships with physicians must be diligently administered as agreed so as to avoid legal violations.

h. Physician Owners and Structuring of Joint Ventures

Health care providers that have physician investors or participants are subject to requirements designed to prevent physicians from benefiting from referrals to companies in which they have a financial or economic interest. The providers and physicians involved must ensure that the overall structure of the relationship complies with the requirements related to ownership interests, investment structure, and reporting.

i. Environmental Compliance

We comply with all environmental laws and regulations as they relate to our organization's operations. This means we:

- Act to preserve our natural resources to the fullest extent reasonably possible;
- Recycle where possible;
- Comply with requirements for the proper handling of hazardous materials;
• Comply with environmental laws and operate our facilities with the necessary permits, approvals, and controls;
• Diligently use proper procedures to prevent pollution and provide a beneficial environment of care;
• Immediately alert supervisors to any situation regarding the discharge of a hazardous substance, improper disposal of hazardous medical waste, or any situation that may be damaging to the environment; and
• Work with authorities to remedy an environmental contamination for which we may be responsible.

Proper Use of Funds

j. Charging, Coding, and Billing for Services

We have policies, procedures, and systems in place to facilitate accurate billing to patients, government payers, and commercial payers, which conform to related federal and state laws and regulations.

We do not knowingly present or cause to be presented claims for payment or approval which are false, fictitious, or fraudulent. Employees who perform billing, coding, or charge entry shall take every reasonable precaution to ensure that their work is accurate, timely, and in compliance with our policies, and federal and state laws and regulations.

Individuals who add to a patient’s medical record must provide accurate information and not destroy any information considered part of the official medical record. Accurate and timely documentation also depends on the diligence and attention of physicians who treat patients across our locations. We expect those physicians to provide us with complete and accurate information in a timely manner, including the documentation of medical necessity.

Any subcontractors engaged to perform billing or coding services are expected to have the necessary skills, quality control processes, and appropriate systems and procedures to ensure that all billings for patients, government programs, and commercial insurance programs are accurate and complete.

Additionally, we implement and maintain a system of controls to ensure an appropriate charge capture process, including the continual updating of fee schedules and charge lists.

Examples of unacceptable billing and coding practices include: presenting, or causing to be presented, a claim for services that were not provided; or submitting bills with improper billing and coding practices, such as “upcoding” and “unbundling.” Upcoding is the process of using a code to increase the reimbursement for a particular medical procedure, even though available evidence suggests another code with a lower reimbursement value is more appropriate. Unbundling is the process of billing various parts of one medical procedure separately in an effort to increase reimbursement.
Our employees are obligated to notify their supervisor or a member of management of any requests to deviate from accepted billing practices, or with any questions they may have in this area.

k. Collection of Medicare Deductible and Coinsurance Amounts

Our policy is to bill patients promptly for the services provided and to take all necessary and appropriate action to collect patient accounts. We are also required to collect deductible and coinsurance amounts from most patients.

l. Cost Reports

We maintain a system of internal controls to ensure compliance with federal and state laws, regulations, and guidelines relating to cost reports, which define what costs are allowable and how to claim reimbursement for the cost of services provided to program beneficiaries.

m. Financial Reporting

We maintain a high standard of accuracy and completeness in documenting, maintaining, and reporting financial information. This information serves as a basis for managing our business and is important to meeting our obligations to patients, colleagues, stakeholders, suppliers, and others. It is also necessary for compliance with tax and financial reporting requirements.

All financial information must reflect actual transactions and conform to generally accepted accounting principles in the United States. We maintain a system of internal controls to provide reasonable assurances that all transactions are executed in accordance with management's authorization and are recorded in a proper manner to maintain accountability of the organization's assets.

n. Quality Initiatives

Novant Health participates in various quality initiatives that rewards providers based on the quality of care delivered to patients. The programs are offered or sometimes mandated by government or non-government payers. Novant Health is mindful and strives to fulfill the duties and responsibilities associated with these programs. We maintain accuracy in reporting and adhere to protocols that govern these programs.

Avoiding Conflicts of Interest

o. Conflicts of Interest

Actual or potential conflicts of interest could detract from our mission as an ethical, effective and efficient healthcare organization. A conflict of interest occurs when an employee, in the course
of his or her job duties, has a financial or personal interest that may compromise or have the appearance of compromising his or her judgment with regard to the best interests of Novant Health or its patients.

Any circumstance that might lead to the appearance of a conflict of interest should be disclosed and reviewed to determine whether an actual conflict of interest exists. All employees must annually disclose actual or potential conflicts of interest. Anytime a potential conflict of interest arises, the annual disclosure should be updated. Our Conflict of Interest policy explains conflicts of interest and the disclosure process in more detail.

p. Gifts and Business Courtesies

Any gifts, favors, or hospitality, whether given or received by any employee, should contribute to our mission, vision, and values with highest regard for patient care. We should neither accept nor keep anything of value that has the potential to materially affect the ability to make decisions in the interests of patients. Additionally, we do not solicit vendors and manufacturer representatives for gifts for any purpose, including door prizes, except as allowed under Novant Health Foundations, or for company approved or endorsed fundraising. Our Gifts and Business Courtesies policy provides additional guidance on relationships with referral sources, vendors, industry groups, professional organizations, trade organizations, vendor sponsored conferences, and patients. Good judgment and decisions appropriate to the situation and reflecting the intent of the policy should be used when specific guidance is not found in the policy.

q. Speaking Engagements

We encourage employees to participate as a faculty member or speaker at educational programs and functions. In some cases, employees who participate in speaking engagements may accept reimbursement from the sponsoring party for expenses related to travel and registration fees that are required as part of the speaking engagement. Any honorarium may be kept by the employee if the employee prepares for and participates in the speaking engagement on his or her own time. Otherwise, the honorarium should be directed to the appropriate Novant Health Foundation.

All speaking engagements should be disclosed in accordance with the Novant Health Conflicts of Interest policy, and if under contract, in compliance with any terms or conditions regarding honoraria.

r. Vendors, Suppliers, and Contractors

Our relationships with contractors, vendors, and suppliers must be managed in a fair and reasonable manner, free from conflicts of interest, and consistent with applicable laws and good business practices.
We promote competitive purchasing to the fullest extent practicable. We use the highest ethical standards in business practices for source selection, negotiation, determination of contract awards, and the administration of all purchasing activities.

Our contractor, vendor, and supplier selections will be made on the basis of objective criteria, including: quality, technical excellence, prices, delivery, adherence to schedules, service, and maintenance of adequate supply sources. Our purchasing decisions will be made on the supplier’s ability to meet our needs, not on personal relationships and friendships.

During the selection process, we may find it beneficial to visit other facilities that purchased the vendor’s products, or to consult with various technical experts. We should pay for the cost of any such trips, not the vendor. Budgeting and purchasing negotiations should accommodate travel and other expenses required to obtain the best products or services.

We do not communicate to any third-party confidential information given to us by our suppliers unless directed to do so in writing by the supplier. We do not disclose contract pricing and information to any outside party. Appropriate commissions, rebates, discounts, or other allowances are permissible if they are compliant with applicable laws and our policies.

We provide all vendors with access to our Code of Ethics and other pertinent policies. Contractors, vendors, and suppliers are expected to comply with this Code and healthcare laws, rules, and regulations.

s. Engagement of Independent Contractors, Agents, and Consultants

At times, we need services offered by contractors or consultants who are not employees of the company. We may enter into independent contractor agreements to acquire services that are necessary for legitimate business purposes at a reasonable cost. All independent contractor arrangements will be covered by a written contract, approved by our legal department. These contracts shall provide us with access to the contractor’s records in accordance with applicable laws.

t. Marketing Practices

- Marketing and Advertising

We may use marketing and advertising to provide information to our communities, educate the public, increase awareness of our services, and recruit employees. We present only truthful, fully informative, and non-deceptive information in these materials.

- Antitrust

Antitrust laws are designed to create a level playing field in the marketplace and to promote fair competition. These laws could be violated by discussing Novant Health business with a
competitor. Examples of this may include: discussing how our prices are set; disclosing terms of supplier relationships; communicating market allocation among competitors; or agreeing with a competitor to refuse to deal with a supplier.

Additional subjects that must not be discussed with competitors include: any aspect of our pricing; our services in any market; key costs, such as labor costs; and our marketing plans. If a competitor raises any of these prohibited subjects, employees must end the conversation immediately and contact the Legal Department.

- Gathering Information about Competitors

It is not unusual to obtain public information about other organizations, including our competitors, through various legal and ethical means. These may include public documents and presentations, journal and magazine articles, or other published or spoken information. However, employees should avoid seeking or receiving information about a competitor through any inappropriate means.

Protecting Assets

u. Record Management

Effective corporate compliance requires a clear and complete documents system. Our record management policy establishes a system for the creation, distribution, retention, and destruction of corporate records.

v. Company Assets

We strive to preserve and protect company assets by making sensible and effective use of resources, and by properly and accurately reporting the company’s financial condition. The company’s assets and our employees’ services are intended to be used only for our business purposes.

Disclosing or using confidential, special, or inside information of or about Novant Health, for personal profit or advantage, or to provide an advantage to any vendor or supplier, is prohibited.

w. Copyrights

Our employees may not copy for their own use documents, computer programs, or other materials in violation of copyright laws or licensing agreements.

Charitable Organization and Status

x. Commitment to Charitable Purpose

Novant Health is a non-profit, tax-exempt organization committed to operating in a manner that furthers its charitable purposes, in compliance with all requirements related to tax-exempt healthcare organizations.
y. Charity Care

We provide patients and their families with information about charity care and various financial assistance programs. Our financial counselors work with patients and their families and sponsors to ensure that patients are appropriately qualified and referred to these programs. All discounts, relief from collection proceedings, and other financial arrangements are made only within the context of established programs.

z. Government Relations and Political Activities

We comply with all federal, state, and local laws governing participation in government relations and political activities. We are nonpartisan with respect to the nomination or election of candidates to public office, and do not support or take positions on political parties or the nomination or election of individual candidates to a political office.

However, we may from time to time take public positions on issues that are important to our welfare, that of our employees, the public, or other stakeholders. We may publically offer recommendations concerning proposed legislation or regulations when our experience might be helpful. We may also analyze and take public positions on issues that have a relationship to our operations when our experience contributes to the understanding of the issues. We will, however, refrain from taking a public position on an issue when doing so could be construed as an implied endorsement of a candidate for political office. However, we may employ and consider for employment elected officials and candidates for office.

We have many contacts and dealings with government bodies and officials, and may invite elected officials and candidates for office to address leadership groups for the purpose of education about government issues and challenges. Electioneering or fundraising activities are prohibited at such events.

Our contacts and transactions with government bodies and officials must be conducted in an honest and ethical manner. Any attempts to influence the decision-making process of a government official by an improper offer of any benefit are absolutely prohibited. Any requests or demands by a government representative for any improper benefit should be immediately reported to the Legal Department.

We may not use corporate funds, properties, or services, whether directly or indirectly, for the purpose of influencing the nomination or election of any candidate to public office. This includes financial and non-financial donations, such as using work time and telephones to solicit for a political cause or candidate, or loaning Novant Health property for use in a political campaign. This prohibition also includes indirect payments, loans, deposits or guarantees, the performance of services, and the furnishing of anything of value by an employee as part of his or her duties for Novant Health or its operating subsidiaries.
We encourage employees to participate in the democratic process of voting and may promote voter registration. We recognize that encouraging individual voter responsibility may include electioneering and personal finance contributions to election campaigns or political organizations on the part of our employees. However, these activities are at the employee’s sole expense and we will not provide reimbursement in any form. Further, no electioneering or political activities by employees shall be conducted on the premises or time of Novant Health, or under any circumstance which may create the appearance that such activity is sponsored by Novant Health.

aa. Workplace Fund-raising and Charitable Activities

We support a variety of charitable activities, including: fundraising, community events, health and wellness promotions, and various social activities intended to support specific community charities.

When the company or a facility decides to support a charitable organization, no employee should be compelled to contribute to the charitable organization. Neither should there be any workplace consequences for non-participation.

Employment

bb. Controlled Substances

Many of our employees have routine access to prescription drugs, controlled substances, and other medical supplies. Many of these substances are governed and monitored by specific regulatory organizations and must be administered by physician order only. To minimize risks to patients and our employees, prescription and controlled medications and supplies must be handled properly and only by authorized individuals.

If anyone becomes aware of inadequate security of drugs or controlled substances, or the diversion of drugs from the company, the incident must be reported immediately.

cc. License and Certification Renewals

Employees, independent contractors, and privileged practitioners in positions requiring professional licenses, certifications, or other credentials, are responsible for maintaining the current status of their credentials. They shall comply at all times with federal and state requirements applicable to their respective disciplines. We do not allow any employee, independent contractor, or privileged physician to work without a valid, current license or credential.

dd. Health and Safety

Our facilities comply with government rules and regulations that promote workplace health and safety. Policies and procedures exist to protect our workers from potential workplace hazards.
Workers must become familiar with and understand how these policies apply to their specific job responsibilities and seek advice from their supervisor whenever they have a question or concern. It is important that any worker immediately notify his or her supervisor of any serious workplace injury or any situation presenting a danger.

**ee. Diversity and Equal Employment Opportunity**

The success of Novant Health depends in large measure on our ability to work together to fulfill our vision and goals. This means we treat employees, patients, and other persons fairly, and without regard to race, color, religion, sex, ethnic origin, age, disability, veteran status, genetic information, gender identity, sexual orientation, or any other classification prohibited by law.

No form of harassment or discrimination on the basis of race, color, religion, sex, ethnic origin, age, disability, veteran status, genetic information, gender identity, or sexual orientation, will be tolerated. Every allegation of harassment or discrimination will be promptly investigated in accordance with applicable human resource policies. For additional information, refer to our policies regarding sexual harassment, discrimination, and Equal Employment Opportunity.

**ff. Harassment and Workplace Violence**

Every employee has the right to work in an environment free of harassment and disruptive behavior. We do not tolerate harassment by anyone based on the diverse characteristics or cultural backgrounds of those who work with us. Degrading or humiliating jokes, slurs, intimidation, or other harassing conduct is not acceptable in our workplace.

Sexual harassment is also prohibited. This prohibition includes unwelcome sexual advances or requests for sexual favors in conjunction with employment decisions. Moreover, verbal or physical conduct of a sexual nature that interferes with an individual's work performance or creates an intimidating, hostile, or offensive work environment has no place at Novant Health.

Harassment also includes incidents of workplace violence. Workplace violence includes robbery and other commercial crimes, stalking, violence directed at an employer, terrorism, and hate crimes committed by current or former employees. Employees who observe or experience any type of harassment or violence should report the incident to their supervisor, a member of management, the Human Resources Department, or the Novant Health Alert Line.

**gg. Substance Abuse and Mental Acuity**

We are committed to an alcohol and drug-free workplace. All workers must be free of the influence of alcohol and illegal drugs when reporting for work. Using, possessing, or selling controlled substances or illegal drugs while on work time or on Novant Health property may result in disciplinary action, up to and including termination.

**hh. Hiring of Former/Current Government Agency or Contractor Employees**
We may hire former or current federal or state employees. However, their recruitment and employment, including independent contractor arrangements, may be impacted by conflict of interest regulations. Hiring employees directly from a government agency or contractor requires certain regulatory notifications. Corporate Human Resources and the Legal Department should be consulted by management prior to entering into any such employment negotiations.