Northwest Hospital & Medical Center (NWHMC) has adopted a Compliance Program to ensure compliance with applicable laws. An important component of the program is the Standards of Conduct (Standard) that sets out basic principles which all personnel of NWHMC, as well as its owned clinics and affiliated entities must follow.

**Standards of Conduct:**

1. All personnel shall act in compliance with the requirements of applicable law, UW Medicine policies and this Standard in a sound ethical manner when conducting business and operations. All Personnel shall maintain the confidentiality of UW Medicine and NWHMC’s business information, including patient information. Personnel shall not use any such confidential or proprietary information except as is appropriate for business operations.

2. Each supervisor and manager is responsible for ensuring that the personnel within their supervision are acting ethically and in compliance with applicable laws, UW Medicine policies and this Standard. All personnel are responsible for recognizing potential compliance issues applicable to their duties and for appropriately seeking advice regarding such issues.

3. This Standard will be distributed to all personnel and sets forth general guidelines applicable to business and operations. UW Medicine policies and NWHMC policies and procedures are available at the NWHMC intranet site: [http://nwh/SitePages/Home.aspx](http://nwh/SitePages/Home.aspx)

4. Personnel shall not offer or accept any payment, item, gift or thing of value to any person or entity with whom NWHMC has or is seeking any business or regulatory relationship, except for gifts of nominal value which are legal and given in the ordinary course of business, consistent with the NWHMC and UW Medicine policies. Personnel must promptly report the offering or receipt of gifts above a nominal value to their supervisor.

5. Personnel shall be completely honest in all dealings with government agencies and representatives; no misrepresentations shall be made, and no false records or requests for payment for a false claim shall be submitted to government agencies or representatives. Refer to the UW Medicine Compliance Fraud, Waste and Abuse Prevention - COMP.201 policy.

6. NWHMC business transactions shall be carried out in accordance with management’s general or specific directives. Books and records shall be kept in accordance with generally accepted accounting standards.

7. All personnel shall follow safe work practices and comply with applicable safety standards and health regulations.

8. All personnel are responsible for ensuring that the work environment is free of unlawful discrimination or harassment due to age, gender, race, religion, national origin, disability, sexual orientation or covered veteran status. Any form of harassment, including the creation of a hostile working environment is completely prohibited.

9. Any director, officer or personnel who believes or becomes aware of any violation of applicable law, UW Medicine policies, this Standard or any illegal activity by any of NWHMC personnel shall promptly report such activity in person, by phone, e-mail or in writing to one of the following:
   a. Personnel’s Department Supervisor, or
   b. UW Medicine Compliance

   **Compliance Anonymous Hotline:** 206.616.5248 (local) or 866.964.7744 (toll free)
   **Main telephone line:** 206.543.3098 (local) or 855.211.6193 (toll free)
   **Fax:** 206.221.5172
   **Email:** comply@uw.edu
   **Address:** 850 Republican Street, Building C, Box 358049, Seattle, WA 98195-8049
Personnel may report illegal acts or violations anonymously. NWHMC will take reasonable precautions to the extent permitted by law, to maintain the confidentiality of those individuals reporting illegal acts or violations or of those involved in the alleged improper activity.

It will be a violation of this Standard not to report any suspected or known violations or illegal activity. If you have a question about whether particular acts or conduct may be illegal or in violation of UW Medicine policies, NWHMC policies or this Standard, contact any of the persons mentioned above.

10. It is NWHMC’s policy to promptly and thoroughly investigate reports of potential illegal activity or violations of applicable law, UW Medicine policies and this Standard. Personnel must cooperate with these investigations.

11. No reprisals or disciplinary action will be taken or permitted against personnel for good faith reporting of, or cooperating in the investigation of illegal acts or violation of this Standard.

12. Personnel who violate applicable law, UW Medicine policies and this Standard or commit illegal acts are subject to disciplinary actions up to and including dismissal. Personnel who report their own illegal acts or improper conduct, however, will have such self-reporting taken into account in determining appropriate disciplinary action.

13. NWHMC and its personnel shall cooperate fully and promptly with appropriate government investigations into possible civil and criminal violations of the law. Any government inquiries or request for information, documents, or interviews should be promptly referred to appropriate staff in accordance with NWHMC Search Warrant Response Guidelines.

Effective: 11/06
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Operational Responsibility/Approval: Executive Director, President
Compliance/Privacy Officer