



Maimonides Health

Code of Conduct



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A Message from the CEO



At Maimonides Health, we treat everyone like a neighbor. Our staff strive to provide the best care possible - with dignity and respect - to people hailing from the most diverse communities across Brooklyn and beyond. This has been at the heart of our mission since we opened our doors more than 110 years ago. Our recent experiences with public health emergencies like COVID-19 reinforce the importance of delivering high quality care to the communities we serve.

We have developed a set of shared standards consistent with our values, which are reflected in this Code of Conduct (“Code”), to help us define who we are and what we aspire to be as a healthcare system. The Code serves as the blueprint for how we achieve those standards; it spells out what is expected of each of us to practice the highest standards of business ethics, create a workplace that is safe, welcoming, and open, comply with the law, minimize risks, and support each other as we carry out our mission.

Every member of the Maimonides team – regardless of role – is expected to read the Code and comply with it, because each of us plays a critical role in making sure we live up to our values.

If you observe instances in which the Code is not being followed, contact a supervisor, a senior management member, or the Office of Corporate Compliance at 718-283-6608. You can also make a confidential report online or to the Compliance Hotline 24/7, 365 days a year by calling 800-585-7970. Our Code prohibits retaliation against anyone who submits a complaint in good faith.

Thank you for taking the time to familiarize yourself with the Code and for all that you do for our patients and community.

Sincerely,



Kenneth D. Gibbs

President and Chief Executive Officer, Maimonides Medical Center

Who We Are & Our Core Values

Maimonides Health is a healthcare system focused on improving Brooklynites' health and well-being. We are proud to carry on a legacy of more than 110 years of service to the richly diverse communities that make up our borough. We are comprised of Maimonides Medical Center, one of the largest independent teaching hospitals in the country, Brooklyn's only Children's Hospital and pediatric trauma center, Brooklyn's first full-service cancer center, and over 80 community-based practices and outpatient centers. Each year, our team of over 7,000 employees and 1,800 physicians serves over 320,000 patients. We are also affiliated with Northwell Health, the co-operator of New York Community Hospital of Brooklyn dba Maimonides Midwood Community Hospital and a major clinical training site for the SUNY Downstate College of Medicine.

We are home to innovative population health programs and centers of excellence in numerous specialties. Many of our clinical programs rank among the best in the country for patient outcomes.

We work every day to deliver on the promise of helping Brooklynites lead healthier lives. We are grateful to the hundreds of thousands of people who trust us with their care, and to our many partners, community leaders and neighbors for their continued collaboration and support.



At Maimonides, our core values drive everything that we do. We uphold and maintain the values of Honesty, Empathy, Accountability, Respect, and Teamwork (H.E.A.R.T.) to empower our talented team, engage our respective communities, and provide patient-centered care.

- **Honesty** - Establishing trustworthy and dependable relationships through the continuous provision of open, transparent, and sincere communication.
- **Empathy** - Being sensitive and taking the time to understand what someone is experiencing and showing them compassion.
- **Accountability** - Taking responsibility for one's actions, performance, and outcomes of care, which ultimately benefits our wellbeing.
- **Respect** - Demonstrating commitment to fostering an environment where diversity is valued through non-judgmental acceptance whereby we treat each other with dignity, kindness, and compassion.
- **Teamwork** - Collaborating effectively with each other by empowering and supporting the utilization of individual strengths to achieve common goals.

Our Commitment to Compliance

The Code of Conduct

The Code embodies our core values and outlines the type of behaviors that are expected from us in the workplace. It reflects our commitment to dealing fairly and honestly with one another, adhering to the highest ethical and business standards, and complying with applicable laws, regulations, and policies. The Code also provides ways for us to appropriately report ethical and legal concerns should they arise. The Code is intended to be a guide and resource to help each of us make decisions that are in the best interest of Maimonides and our patients as we perform our duties.

The Code applies to anyone employed by or, as set forth below, associated with Maimonides Medical Center, Brooklyn Communities Collaborative, Inc., Community Care of Brooklyn IPA, Inc., and M2 Medical Community Practice, P.C., including medical and professional staff, affiliated physicians, residents, fellows, trainees, volunteers, trustees, consultants, suppliers, and vendors.

Duty to Report & Reporting Resources

We are all required to act in a manner consistent with the Code, which includes reporting any concerns or actual or suspected violations of the Code, Maimonides policies and procedures, or applicable laws and regulations. Failure to do so can have serious consequences not only for Maimonides, but also for the person who fails to report a potential violation, including, in the case of an employee, disciplinary action up to termination of employment.

You can report any concerns or actual or suspected violations by:

- Contacting your supervisor or a senior manager;
- Contacting the Office of Corporate Compliance at 718-283-6608;
- Contacting the Compliance Hotline at 800-585-7970 or submitting a report online. You can choose to make an anonymous report; providing as much information as possible, including your identity, however, will allow us to investigate your complaint more fully; or
- Contacting the Chief Human Resources Officer, Vice President of Human Resources, or Assistant Vice President of Employee and Labor Relations either in person or by email.

We investigate all reports as promptly and confidentially as possible. If an investigation substantiates a reported violation, we will take the steps necessary to address the reported concerns.

If you find yourself in a situation where you are unsure of whether a particular action might violate the Code, Maimonides policies and procedures, or applicable laws and regulations, ask yourself the following questions:

- Am I uncomfortable with a particular action?
- Would I be embarrassed to discuss my action with my family and friends?
- Could someone's life, health or safety be endangered by my action?
- Could my action appear improper to others?
- Have I witnessed an action that I believe violates the law or an ethical standard?

Non-Retaliation Policy

Maimonides prohibits retaliation against anyone who makes a good faith report of a possible violation. Reporting in good faith means you are coming forward honestly with information you believe to be true. Any person who is found to have retaliated or intimidated someone who has made such a report will be subject to immediate disciplinary action reflective of the nature of the offense. If you believe that someone has retaliated against you for reporting a compliance violation, or are otherwise aware of an incident of retaliation, contact Human Resources, the Office of Corporate Compliance, or the Compliance Hotline by calling 800-585-7970 or submitting a report [online](#).

Q: My supervisor threatened to give me a negative evaluation if I told the Compliance Officer about suspicious activity in my department. What can I do?

A: Report any activities that you have reason to believe violate the Code, Maimonides policies, or the law. Your supervisor may not retaliate against you by giving you a negative evaluation, or in any other way, as long as your report is made in good faith.

Our Compliance Program

The Code is an integral component of Maimonides' Compliance Program, which the Office of Corporate Compliance oversees. The Office of Corporate Compliance supports our commitment to comply with federal and state laws and regulations and Maimonides' policies and procedures at all levels of the enterprise. The Chief Compliance Officer reports to the Boards of Trustees of Maimonides. For more information about the Compliance Program at Maimonides, visit the [Intranet](#) or Office of Corporate Compliance's [webpage](#).

Our Commitments/Standards of Conduct

Our Patients

High Quality Care

Maimonides' number one priority is the delivery of high-quality care. As members of the Maimonides team, we endeavor to do so in a way that promotes the well-being, comfort, and dignity of our patients. We make no distinction in the availability of services or the care we provide based on actual or perceived race, creed, religion, national origin, sex, gender and/or gender identity or expression, sexual orientation, disability, pregnancy, citizenship, marital status, veteran or military status, source of payment or any other protected category. We accommodate the needs of our patients with disabilities.

- We treat all of our patients equally with compassion, integrity, respect and dignity;
- We provide care that is medically necessary, appropriate, and in compliance with professionally recognized standards of care;
- We make clinical care decisions based on the medical needs and wishes of our patients and not on financial criteria; and
- We involve patients in decisions regarding their care.



We ensure that all patients receive important information about their rights, including but not limited to the Patient Bill of Rights and Notice of Privacy Practices. In addition, when we become aware of an adverse patient care incident or are concerned we may not be meeting our standards of care, we report it to a supervisor or manager or the Risk Management Department. To the extent required, Maimonides will inform the appropriate regulatory agency within the appropriate time frame.

Q: A limited English proficient (LEP) patient approached me with a question, but I had a difficult time understanding what they specifically needed. Can I ask them to ask their question in English?

A: No. Federal, state and local laws require that we provide language assistance services to LEP patients, including patients with visual and hearing impairments, in their preferred language. Maimonides provides language assistance services, including interpretation and translation services, through the Patient Relations Department. The provision of these services facilitates the delivery of high-quality care.

Protecting Patient Information

We demonstrate our respect for our patients, including patients who are employees of Maimonides, by protecting the confidentiality and privacy of all personal information they share with us for the purpose of receiving medical care. This information, known as “Protected Health Information” or “PHI” may include patients’ names, addresses, phone numbers, social security numbers, medical diagnoses, family illnesses, financial information, and/or other personal information. Federal and state laws, including the Health Insurance Portability and Accountability Act (“HIPAA”), require us to safeguard this information and maintain its confidentiality. We do not access, use, disclose, or discuss patient specific information except as necessary for patient care, as required by law for treatment, payment, or healthcare operations, or with the authorization of a patient or their personal representative. We understand that our responsibility to protect Maimonides patient information continues, even if we no longer work at Maimonides.

Anyone subject to the Code who engages in the unauthorized access, use, or disclosure of patient information may be subject to criminal and civil penalties. Employees who engage in such behavior will also be subject to disciplinary action, up to and including termination of employment. Maimonides may terminate its engagement with consultants, suppliers, and vendors who engage in such behavior.

Q: My friend asked me to look up the medical record of her neighbor, who is a patient at Maimonides. Am I allowed to do this?

A: No. You are prohibited from accessing the medical record of any patient unless you are required to do so to fulfill your job responsibilities. Furthermore, you may not disclose any patient information unless the individual has authorized the disclosure or the disclosure is otherwise permitted by law.

If you become aware of unauthorized access, use, or disclosure of patient information, or if you receive patient information that you are not authorized to have, report it immediately to the Office of Corporate Compliance.

Our Employees & Colleagues

Equal Employment Opportunity, Non-Discrimination & Anti-Harassment

Maimonides promotes workforce diversity at all levels of our organization. We are committed to providing a work environment where everyone is treated with respect, courtesy, and dignity. We have policies in place that prohibit discrimination, harassment, bullying, retaliation, or any other inappropriate or abusive conduct by or against employees, interns, residents, fellows, volunteers, medical staff, contractors, applicants, or anyone directly conducting business with Maimonides.

We are an equal opportunity employer and do not discriminate on the basis of race, color, creed, religion, gender, national origin, actual or perceived sexual orientation, veteran status, age, or disability. We comply with all laws, regulations, and policies relating to equal employment opportunity in hiring, reductions in force, transfers, terminations, evaluations, recruiting, compensation, promotions, and discipline. We provide reasonable accommodations to persons with disabilities in accordance with law.

If you believe anyone at Maimonides has discriminated against you on the basis of any protected category or characteristic, you can file a report with the Discrimination Grievance Coordinator at 718-283-3933.

Each of us has the right to work in an environment that is free from harassment. Our Anti-Harassment and Anti-Sexual Harassment Policy HR-039, prohibits harassment by any employee, co-worker, supervisor, manager, volunteer, student, intern, or third party based on any classification protected by applicable federal, state or city law (e.g., actual or perceived color, religion, creed, age, sex, national origin, alienage, citizenship status, marital status, partnership status, familial status, caregiver status, parental status, domestic violence victim status,

military status, veteran status, genetic information, including predisposing genetic characteristics, sexual orientation, gender, gender identity, gender expression, gender non-conformance or transgender status, sexual and reproductive health decisions, physical or mental disability, height, weight, unemployment status or consumer credit history). Employees who engage in sexual harassment, including, but not limited to, unwelcome sexual advances or requests for sexual favors, will be subject to disciplinary action up to termination of employment.

If you observe or experience any form of discrimination or harassment, including sexual harassment, report it immediately to the Chief Human Resources Officer, or the Vice President of Human Resources, or Assistant Vice President of Employee and Labor Relations, either in person or by email.



Workplace Safety & Environmental Health

Maimonides is committed to providing a workplace that is safe. We prohibit workplace violence of any kind, such as inappropriate physical contact, verbal threats, throwing of objects, or destruction of property. Anyone who observes or is subjected to workplace violence should notify a supervisor, a member of the management team, or the Human Resources Department. In cases of workplace violence posing an immediate threat, call the Security Department at 718-283-7733.

Maimonides strives to maintain physical premises free of safety hazards in compliance with federal and state laws. If you become injured on the job or are aware of any circumstance that might pose a safety hazard to anyone, immediately alert your supervisor or the Vice President of Operations and Patient Relations either in person or by email.

Employee Personal Data

In addition to protecting patient information, we protect the privacy and security of the personal data of applicants and current and former employees in compliance with federal, state, and city laws. This data may include retirement account information, bank account numbers, social security numbers, employee health information, and biometric information.

Our Business Partners

Our relationships with suppliers, vendors, affiliated physicians, and others with whom we do business are vital to our success. We treat them with respect, professionalism, and fairness. Prior to engaging with them, Maimonides conducts appropriate background checks for screening and verification purposes.

Supplier/Vendor Relationships

Maimonides uses objective criteria, including the quality, service, or price of goods and services, delivery capability, and technical excellence, to select our vendors, subcontractors, and consultants. We obtain goods and services only when there is a legitimate business need for them. We will not knowingly contract or do business with a vendor, supplier, subcontractor or consultant that (i) is currently excluded, suspended, debarred or otherwise ineligible to participate in federal health care programs; (ii) has been convicted of a criminal offense related to the provision of health care items or services and has not been reinstated in federal health care programs after a period of exclusion, suspension, debarment, or ineligibility, or (iii) is listed on the Specially Designated Nationals and Blocked Persons list.

Referrals of Patients

We do not pay or offer to pay anyone, including physicians or other healthcare providers, colleagues, or any other person or entity, for referring patients to Maimonides. We do not enter into relationships with healthcare providers on the basis of the volume or value of referrals. We accept patient referrals and admissions based solely on the referring practitioner's independent clinical judgment as to the patient's needs, our ability to render the needed services, and the patient's choice. Similarly, we do not accept payments for the referrals that we make. When we discharge patients and refer them to other providers, our referrals are based on the patient's documented need for the referred service, the ability of the referral provider to meet that need, and the patient's choice. We review all financial relationships with providers with whom Maimonides has a referral relationship to ensure compliance with relevant laws.

Gifts & Interactions with Industry

We do not solicit or accept favors or gifts from individuals or companies with whom Maimonides does business that might influence (or appear to influence) our decision to work with a vendor, subcontractor, or supplier. This prohibition applies to gifts of any value, including cash and cash equivalents (such as gift certificates), awards, prizes, or discounts, with very limited exceptions as set forth in our Gifts & Interactions with Industry Policy COMPL-013.

Q: A patient with a chronic health condition is frequently admitted to Maimonides Medical Center for treatment. Sometimes he sends baskets of fruit to the floor. Other times he offers me cash tips. May I accept these gifts?

A: It depends. You may accept gifts of perishables and consumables provided you share them with your colleagues in the department. However, you may never accept cash gifts from anyone with whom Maimonides has a business relationship, including patients, vendors, and affiliated physicians. Rather, these individuals should be directed to the Development Office.

If you are approached by vendors wishing to make donations, direct them to Maimonides' Development Office.

Free goods, discounts, rebates, allowances, or charitable donations from vendors and suppliers may only be accepted in compliance with the Gifts & Interactions with Industry Policy COMPL-013. Any questions or concerns concerning the receipt of gifts, goods, or discounts should be forwarded to the Office of Corporate Compliance or Office of Legal Affairs.

Conflicts of Interest

As we conduct business on behalf of Maimonides, we are required to put Maimonides' interests ahead of any outside business, commercial or personal interest. We will disclose any outside

If you are presented with a situation that may involve an actual or potential conflict of interest, ask yourself these questions:

- Could my outside professional activity or relationship compromise, or appear to compromise, my professional judgment?
- Could I, or a friend or family member, benefit from my involvement in this activity?
- Could this activity interfere with my ability to do my job?
- Will this activity cause me to put my own interests ahead of Maimonides' interests?
- Do I need prior notice and/or approval for this outside activity?
- Would I be embarrassed if this matter/activity became public knowledge?
- Could this activity damage Maimonides' reputation?

interests or activities, contracts, and relationships that may be in conflict with the interests of Maimonides. A conflict of interest may exist if your outside activities or personal interests influence or appear to influence your ability to make objective decisions in the course of your job responsibilities or the demands of your outside activities hinder or distract you from performing your job. Maimonides has developed a Conflicts of Interest Policy COMPL-020, which describes the process whereby trustees, directors, officers, and key management members are required to disclose potential conflicts on an annual basis. Per the policy, anyone employed by or otherwise affiliated with Maimonides must promptly disclose potential conflicts as they arise to the appropriate persons. Maimonides promptly investigates all reported conflicts, and, in the event that we determine an actual conflict exists, we take appropriate actions and safeguards to protect Maimonides' interests.

Confidential & Proprietary Business Information

In addition to protecting patient information, we protect the confidential and proprietary information we obtain during the course of our employment or affiliation with Maimonides, including any such information we receive from vendors, suppliers, consultants, contractors, and other third parties. Confidential and proprietary information includes, but is not limited to, information about strategies, processes, marketing and sales information, patient and provider lists, financial data, equipment, copyrights, and any other plans or information that has not been published or disclosed to the public. We only use such information as required in the

performance of our job and are prohibited from disclosing it to anyone outside of Maimonides unless we have express permission to do so from Maimonides and/or the third party to whom the information belongs. We maintain computer passwords and access codes in a confidential and responsible manner and log off computer applications that may contain patient or other confidential information. We do not share login credentials, including passwords, or our electronic accounts with others.

Proper Use of Maimonides' Assets

We only use Maimonides' assets, which include employee work time, materials, supplies, space, property, equipment, and information, for business-related purposes in accordance with Maimonides' policies. We are prohibited from using these assets for personal financial gain, or in a manner that might be wasteful or embarrassing to Maimonides, or in a manner that might violate any underlying contractual arrangements.

Government Regulators

Coding & Billing

Maimonides is committed to maintaining accurate and complete patient records to ensure the continuity of patient care, appropriate and proper billing of federal, state, and third-party payor programs, and compliance with regulatory, tax, and financial reporting requirements. All claims for payment for any service provided by Maimonides must be supported by complete documentation in the medical record, proper coding based on those records, and billing that accurately reflects the coding. We can bill only for those goods and services that are actually provided and medically necessary. We require our clinical providers who treat patients in our facilities to submit complete and accurate information in a timely manner.

When we receive a question from a patient or third-party payer about an invoice or charge, we promptly address the question or refer the matter to the person who is authorized to address it. Except in limited circumstances, as set forth in the Courtesy Discounts Policy FIN-022, we do not routinely waive or discount patients' coinsurances and deductibles. We notify payors of payment errors and process refunds promptly and accurately. With respect to Medicare, we are required to refund all identified overpayments to the government within 60 days of identification. Failure to do so can result in fines and other penalties for Maimonides.

Cost Reports

We submit complete and accurate reports of our costs of operation and other relevant information in compliance with federal and state laws that define what costs are allowable and outline the appropriate methodologies to claim reimbursement for the costs of services provided to program beneficiaries.

Anti-Kickback/Bribes

Maimonides is required to comply with federal and state laws that prohibit any form of kickback, bribe, or rebate to induce the purchase, recommendation to purchase, reduction, or limitation of services or referral of any kind of health care goods and services or items paid for by the Medicare and the Medicaid programs. We do not offer or receive inducements or create situations in which we might appear to do so.

Antitrust

We are required to comply with all state and federal antitrust laws, which prohibit competitors from entering into agreements to fix prices or engage in any unfair practices that might restrict or reduce competition. We may violate these laws if we discuss Maimonides business with a competitor, disclose the terms of supplier relationships, or agree with a competitor to refuse to deal with a vendor. We do not discuss sensitive topics such as prices or engage in practices that might appear to restrict competition with suppliers or competitors, without first discussing the matter with the Office of Legal Affairs.

Not-for-Profit Tax-Exempt Status

Most of the entities within the Maimonides system are tax-exempt not-for-profits. Many have charitable missions, which include the provision of community benefits such as health care service delivery, medical training, education, research, and community outreach activities. The tax-exempt status of these entities can only be used for legitimate activities that fall within the scope of each entity's respective mission.

Response to Government Inquiries & Investigations

Maimonides cooperates fully with government inquiries and investigations. We do not prevent persons affiliated with Maimonides from speaking with government officials. However, if requested to speak with government officials, you should contact your supervisor and the Office of Legal Affairs before doing so. When we receive a request for documents or a subpoena, we refer it to the Office of Risk Management, which will work with the Office of Legal Affairs to coordinate our response and ensure that it is appropriate, accurate, timely, and complete. We never destroy or alter Maimonides records requested by or related to a government investigation.

Marketing & Advertising

Maimonides markets and advertises our services in a fair, truthful, and ethical manner that adheres to applicable federal and state regulatory standards. The Department of Marketing & Communications is responsible for reviewing and evaluating all material that is distributed to the community to ensure that the information provided is accurate.

Research

We conduct research in conformance with rigorous ethical standards and in compliance with federal and state laws and regulations. When we ask individuals to participate in research projects, we advise them of all alternative treatments available to them and the risks and benefits of participation in the proposed research project to ensure that they make informed decisions about whether or not to participate.

Record Retention


Accurate and complete records are crucial for the continuation of patient care, appropriate billing, and for compliance with regulatory, tax, and financial reporting requirements. We retain all records as required by federal and state laws or by contract.



Additional Resources

The Code provides general guidance with respect to the standards we are each expected to meet as we perform our duties. In addition to the Code, we are expected to be familiar with Maimonides policies and procedures, entity and department specific policies and procedures, and laws and regulations that are applicable to the scope of our work.

Below are several resources available to help you comply with the Code as well as applicable laws and policies:

Office of Corporate Compliance	
<p>Address: 953 49th Street, 3rd Floor, Brooklyn, New York, 11219 Office hours: 9 am to 5 pm, Monday through Friday Appointments and walk-ins are welcome. During regular office hours, you can reach the Office at 718-283-6608.</p>	
<p>Sandra Maliszewski, VP, Chief Compliance Officer and Privacy Officer 718-283-6002 / smaliszewski@maimo.org</p>	<p>Derek George, Compliance Specialist 718-283-6020 / dgeorge@maimo.org</p>
<p>Billing Compliance: BillingCompliance@maimo.org</p>	
<p>Compliance Hotline: 800-585-7970 http://maimo.ethicspoint.com/</p> <p>Concerns may be reported anonymously 24/7. Scan the QR code to report concerns.</p>	
Development Department	
<p>Bettina Alonso, SVP, Chief Development Officer 718-283-6833 (direct) / 718-283-1627 (office) / balonso@maimo.org</p>	

Discrimination Grievance Coordinator

Paula Ioannides, VP, Risk Management
718-283-3933 / pioannides@maimo.org

Human Resources Department

Hugo Pizarro,
SVP, Chief Human
Resources Officer
718-283-7026
hpizarro@maimo.org

Tonya Richards,
VP, Human Resources and
Organization Development
718-283-8597
trichards@maimo.org

Ashley Smith,
AVP, Performance & Policy
718-283-8510
AshSmith@maimo.org

Information Security

Robert Dalrymple,
Chief Information Security Officer
718-283-1805
rdalrymple@maimo.org

InfoSec@maimo.org
On-Call IT Security: 347- 831-6747

Language Assistance Services

Marina Chilingarova, Language Assistance Coordinator
718-283-8834 / mchilingarova@maimonidesmed.org

Office of Legal Affairs

718-283-7452

Operations/Patient Relations/Safety

Kevin Cottingham, VP, Operations and Patient Relations
718-283-8827 / KCottingham@maimo.org

Security Department

718-283-7733