

Our Code of Conduct

The Right Thing to Do





Our Mission, Vision & Values



Mission

We are committed to the mission of *“healing all people with compassion, faith and excellence.”*



Vision

To provide convenient, high-value, clinically integrated care to all.



Values

Human Dignity
Integrity
Compassion
Stewardship
Service

Table of Contents

Living the Mission: Culture + Compliance = Doing the Right Thing.....	4
Our Culture & Why Compliance Matters.....	6
Committed to the Mission.....	8
<i>Do the Right Thing: Decision-Making Guide.....</i>	<i>9</i>
Be Empowered.....	10
<i>Following the Law.....</i>	<i>10</i>
<i>Conflicts of Interests &d Gifts.....</i>	<i>10</i>
<i>Fair Business & Anti-Corruption.....</i>	<i>11</i>
<i>HIPAA & Privacy.....</i>	<i>12</i>
<i>Financial Honesty & Record Keeping.....</i>	<i>12</i>
<i>Responding to Government Inquires or Investigations.....</i>	<i>12</i>
<i>Preventing Fraud, Waste &d Abuse.....</i>	<i>13</i>
<i>Social Media Use.....</i>	<i>14</i>
<i>Speaking with the Media.....</i>	<i>14</i>
<i>Acting with Integrity.....</i>	<i>15</i>
Be Agile.....	16
<i>Policies & Procedures.....</i>	<i>16</i>
<i>Partnering with Third Parties</i>	<i>16</i>
<i>Acceptable Use of RSFH Resources.....</i>	<i>16</i>
<i>Respect the Work Environment.....</i>	<i>17</i>
Be Unified.....	18
<i>Patient Safety.....</i>	<i>18</i>
<i>Substance Use & Fitness for Duty.....</i>	<i>18</i>
<i>Supporting the Code of Conduct.....</i>	<i>19</i>
Code of Conduct Resources.....	20

Living the Mission: *Culture + Compliance = Doing the Right Thing*

Roper St. Francis Healthcare exists to care for our community — body, mind and spirit. For more than 170 years, we have provided compassionate, expert care to the Lowcountry, guided by our mission of healing all people with compassion, faith and excellence — regardless of their circumstances. From the opening of our first hospital in the 1850s to today's award-winning health system, we are proud of our enduring legacy and our deep roots in Charleston and the surrounding region.

As we look ahead, we are committed to caring for more patients and modernizing technology to better serve future generations. Our vision helps guide every decision we make and underscores the importance of a strong culture of compliance. Our promise to deliver safe, high-quality care must be matched with an equally strong commitment to ethical behavior, transparency and integrity.

This code of conduct is designed to help you understand how we bring our values to life through compliance. It outlines the policies, laws, regulations and standards of conduct that teammates, medical staff, volunteers and others affiliated with Roper St. Francis Healthcare are expected to follow. Together, these principles link our core conduct expectations with the laws and regulations that safeguard our patients, our team and our mission.

The Code of Conduct isn't meant to address every situation you may face, but it provides practical guidelines to help you make sound decisions and uphold Roper St. Francis Healthcare's long-standing commitment to moral, ethical and legal integrity.

Our success relies on the good judgment and personal integrity of every member of the Roper St. Francis Healthcare family. By following the Code of Conduct, you help us live out our mission, vision and values each day. We ask that you join us in protecting and strengthening our reputation for doing what's right and in keeping our promises to one another and to the patients we serve.

If you ever have a question, concern or need clarification about anything in this document, please reach out to the Corporate Compliance & Privacy Department.



Joseph DeLeon
President & CEO



Sallie Bissette
*Chief Compliance &
Privacy Officer*

Our Culture & Why Compliance Matters

Every Roper St. Francis Healthcare (“RSFH”) teammate plays a vital role in supporting our mission and upholding this Code of Conduct by honoring the dignity of everyone, acting with integrity, showing compassion, practicing good stewardship and serving others with purpose. This code applies to everyone connected to RSFH, including but not limited to teammates, leaders, board members and volunteers.

Because of its importance, the Code of Conduct is reviewed and approved by the RSFH Executive Leadership Team and Board of Directors. All RSFH policies should align with the expectations outlined in this document. For more specific procedures or guidance on compliance areas, please refer to the appropriate RSFH policies.

Inspired by our mission, vision and values, we are committed to fostering a culture grounded in our core behaviors. At RSFH, we strive to be an empowered, unified and agile team of professionals who are passionate about delivering high-quality, compassionate care. We expect all teammates to demonstrate these core culture behaviors each day:

Be Empowered – We lead with integrity, transparency and accountability. Every teammate has a voice and a responsibility to speak up and do the right thing.

Be Unified – We are one team, working together with mutual respect, inclusiveness and collaboration.

Be Agile – We adapt and respond with urgency, innovation and smart decision-making in a constantly evolving healthcare landscape.

Be Committed – We are deeply committed to our mission, our patients, our communities and the legacy of compassionate care that defines RSFH.



Leader Responsibility – As leaders, excellence means modeling integrity – speaking up when something isn’t right, fostering accountability, encouraging continuous improvement and creating a culture where learning and transparency strengthen our organization.

Employee Responsibility – Every team member is responsible for upholding our standards by staying informed, protecting privacy and acting with integrity – on and off the clock. Your actions, decisions and voice reflect Roper St. Francis Healthcare and help maintain the trust of those we serve.

Committed to the Mission

At the heart of Roper St. Francies Healthcare is our unwavering mission of healing all people with compassion, faith and excellence. Our compliance program supports this mission by ensuring we meet regulatory requirements and ethical standards that protect our patients and our organization. Compliance helps us prevent harm, uphold trust and deliver safe, high-quality care.

Understand and follow our Code of Conduct and policies. This means knowing where to find the information you need, understanding your responsibilities and asking questions when something isn't clear. While this code and our policies provide guidance for many situations you may encounter, they cannot address every circumstance or decision you may face.

Every member of the RSFH team is expected to act with integrity and do the right thing, even when no one is watching. Our mission of healing all people with compassion, faith and excellence depends on the sound judgment, professionalism and ethical behavior of every teammate. When faced with a difficult decision, use the Do the Right Thing: Decision-Making Guide below to help evaluate your options and determine the best course of action. If you're still unsure, seek guidance from your leader, Human Resources, Compliance, Privacy, Legal or another appropriate resource before moving forward.

Upholding our mission isn't just about following rules. It's about making choices that reflect our values, earn the trust of those we serve and support a culture of integrity across RSFH.

Do the Right Thing: Decision-Making Guide

Questions to ask yourself when making decisions:

Would I feel uneasy, embarrassed or regretful if others knew what I did?

Would this choice raise questions about my integrity or professionalism?

Is it legal? Does it follow our Code of Conduct or policy? Is it the right thing to do?

Could this hurt RSFH, our patients, or our teammates if everyone did it?

If you are **UNSURE** to any of these questions:

Reach out to your supervisor, Compliance, HR or Legal before continuing.

If you answered **NO** to any of these questions:

The decision to take this action appears reasonable and in line with our standards.

If you answered **YES** to any of these questions:

STOP! Ask a clarifying question or for a cross-check. Moving forward could place patients, teammates or RSFH at risk.



Be Empowered

Following The Law: At Roper St. Francis Healthcare, we follow all laws, rules and policies that apply to our work. That includes laws about patient care, billing, safety, privacy and honesty. We are each responsible for knowing what's expected and asking questions if something feels unclear. We tell the truth in our work, in our records and in what we share with others. When government agencies or auditors ask for information, we cooperate fully and answer honestly. We never destroy or hide records that may be needed for a review or investigation. Doing what's right keeps our patients, our team and our organization safe.

Conflicts of Interest & Gifts: Our choices should always be made for the good of our patients and our organization, not for personal gain. A conflict of interest happens when personal relationships, activities or money matters could affect your work decisions. If you ever suspect a conflict, tell your supervisor or report it to the Compliance office right away.

To keep things fair and honest:

- Don't accept cash or gifts from vendors, patients or anyone who does business with RSFH.
- Small thank-you items like snacks or pens are OK if they're shared with your team.
- Never offer or accept anything that could look like a bribe or a favor in return for business.

[Conflict of Interest Policy](#)

[Gifts Policy](#)



Fair Business & Anti-Corruption: We compete fairly and follow all laws that keep business honest.

That means:

- No secret deals or price-fixing with other organizations.
- No sharing of private or competitive information.
- No gifts, bribes or favors to influence decisions.

We never use RSFH money, time or resources to support political campaigns. We also follow all laws that prevent bribery, money laundering or financial crimes. Our reputation is built on honesty, fairness and respect, for our patients, our partners and each other.

Be Empowered

HIPAA & Privacy: Protecting patient and employee information is everyone's job. Never share or look at protected health or personal information unless you need it to do your job. This includes names, addresses, diagnoses, billing information and anything else that identifies a patient. Follow all HIPAA rules and [RSFH Privacy Policies](#).

- **Only use or share information for treatment, payment or healthcare operations.**
- **Do not discuss patient details in public areas or on social media.**
- **Lock your screen and secure documents before stepping away.**
- **Report any privacy concern or data breach right away to the Corporate Compliance & Privacy Department.**

We protect privacy because it protects us.

Financial Honesty & Record Keeping: All records such as patient charts, billing, reports and time sheets must be true, complete and on time. We protect private and business information and never share it with anyone who shouldn't see it. We only destroy records according to RSFH policy and law. Never delete or throw away documents that might be a part of an investigation. Good records help us serve patients better and protect the trust our community places in us.

Responding to Government Inquiries or Investigations: RSFH cooperates fully with all government requests and investigations. If you receive a request for documents, records or information from a government agency or attorney:

- **Do not respond on your own. Immediately notify the Legal Department.**
- **Never destroy, change or hide records related to an investigation or subpoena.**
- **Preserve all documents and data until you are told otherwise by Legal.**

If you learn that RSFH is being investigated, inform Compliance, Legal or your leader right away.

We take all inquiries seriously and handle them with honesty, care and professionalism. For more information, please read the [Response to Government Requests Policy](#).

Preventing Fraud, Waste & Abuse:

We must always be honest in how we bill, code and record information. Submitting false, incomplete or misleading claims is against the law. Fraud, waste and abuse can include:

- **Billing for care that wasn't provided.**
- **Recording the wrong procedure or code.**
- **Charging for unnecessary services.**
- **Billing the same service twice.**

If you see something that looks wrong, speak up. You can report it to your supervisor, Compliance at compliance@rsfh.com or the RSFH Compliance HelpLine, **(800) 597-3386**. For more information regarding fraud, waste, and abuse, see the [RSFH policy here](#).



Be Empowered

Social Media Use: Social media is public, even when you think it's private.

What you post can affect how others see you and RSFH.

- **When using social media at work or on your own time, remember:**
- **Never share patient information or anything that could identify a patient.**
- **Do not post photos, stories or comments about patients, teammates or work areas.**
- **Avoid using RSFH logos, names or images unless approved by Marketing and Communications.**
- **Be respectful when talking about RSFH, your fellow teammates or the healthcare industry.**
- **Personal opinions are yours. Make that clear and avoid speaking on behalf of RSFH.**

If you're unsure whether something is okay to post, don't post it.

Protecting privacy and professionalism online protects our patients, our team and our reputation.

Speaking with the Media: To keep our message clear and accurate, only authorized RSFH representatives may speak with the media.

If a reporter, blogger or anyone from the press contacts you for information about a patient, our organization or any RSFH matter – do not comment. Politely refer them to the RSFH Marketing and Communications Department.

Even a friendly or casual comment can be taken out of context or violate privacy laws. It's always best to let our communications team handle media questions quickly and correctly.



Acting with Integrity: Integrity means doing what's right, even when no one is watching. We are all responsible for following our Code of Conduct and holding ourselves to high standards. Leaders are expected to set the example by making ethical choices, teaching others and creating a safe space for people to speak up. If you have a question, ask! If you see a problem, report it! We do not tolerate retaliation against anyone who raises a concern honestly. Doing the right thing helps protect our patients, our teammates and our mission.

Be Agile

Policies & Procedures: Policies and procedures explain how we can carry out our work safely, legally and ethically. You're expected to:

- **Know the policies that apply to your role.**
- **Follow procedures carefully and consistently.**
- **Ask for clarification when you're unsure.**
- **Report any policy violations to your leader or Compliance.**

Policies aren't red tape. They help protect patients, staff and the organization.

Partnering with Third Parties: Only share RSFH information, systems or access with third parties when it is approved and necessary for their work. Make sure appropriate agreements are in place and that the patient, business and confidential information is always protected.

If a third party's actions raise concerns or do not align with RSFH standards, report it to your leader or Compliance and Privacy right away.

Acceptable Use of RSFH Resources: RSFH provides technology, systems, equipment and information to support patient care and business operations. These resources must be used responsibly, professionally and in line with RSFH policies.

RSFH resources including computers, email, phones, networks and data should not be used for personal gain, inappropriate activities or anything that could harm patient privacy, system security or RSFH's reputation. You should not expect privacy when using RSFH systems.

If you are unsure whether a use is appropriate, stop and ask a clarifying question to your leader, IT, Compliance and Privacy, before proceeding.

Respect the Work Environment: We treat everyone with dignity and respect – always. Harassment, bullying, discrimination and violence have no place here. We build a healthy workplace by:

- **Speaking and acting respectfully.**
- **Valuing diversity and inclusion.**
- **Maintaining a drug- and alcohol-free workplace.**
- **Keeping our environment safe, clean and professional.**
- **Your words and actions shape the culture we share.**



Be Unified

Patient Safety: Every patient deserves to receive high-quality care while being safe, respected and free from humiliation. We are responsible for keeping our patients safe by:

- **Reporting errors or unsafe situations immediately.**
- **Following clinical and safety policies every time.**
- **Using equipment and medications correctly.**
- **Speaking up if something doesn't look or feel right.**
- **Safe care starts with awareness and ends with accountability.**

Substance Use & Fitness for Duty: RSFH is committed to providing a safe, healthy and professional environment for our patients, visitors and teammates.

Coming to work under the influence of alcohol, illegal drugs or misused prescription medication is not allowed. These substances can affect judgment, reaction time and patient safety.

If you are taking medication that may impact your ability to work safely, talk with your supervisor or Teammate Health before your shift. Report any unsafe or impaired behavior right away to your leader, HR or Compliance.

We encourage anyone struggling with substance use to seek help. Support and resources are available through Teammate Health or our employee assistance program (Spring Health).

Our goal is to protect everyone's safety and to offer help when it's needed.



Supporting the Code of Conduct: The code of conduct helps guide our daily choices. Read it, understand it, and use it as your reference when something feels uncertain.

If you have a question or concern:

- **Talk with your supervisor or Compliance.**
- **Use the Compliance HelpLine to report anonymously, if needed.**
- **Ask before you act. Use the decision-making matrix found in the Code of Conduct.**

There is zero tolerance for retaliation against anyone who reports a concern in good faith. Following the Code of Conduct means protecting each other, our patients and RSFH's mission. For more information on retaliation, please refer to our [Reporting Compliance Concerns/Non-Retaliation policy here.](#)

Code of Conduct Resources

Speak Up. We're here to help.

Sometimes you know something isn't right. Sometimes you just have a question. Either way, reaching out is the right thing to do.

When you contact Compliance, Privacy or Human Resources, your concern will be reviewed by the appropriate team. We will listen, ask questions to better understand the situation and work to address concerns fairly, respectfully and confidentially. You do not need to be certain a violation occurred before reaching out. If something doesn't seem right, ask.

Reports made in good faith are protected from retaliation. Information is shared only with those who need it to review and address the concern. Our goal is to protect our patients, support our teammates, strengthen our organization and help us continue our mission of healing all people with compassion, faith and excellence.

Not Sure Who to Contact?

Compliance & Privacy – Questions about ethics, privacy, billing, documentation, regulatory requirements, conflicts of interest or concerns about misconduct.

The Compliance HelpLine is available 24 hours a day and may be used to report concerns anonymously.

Human Resources – Questions about workplace conduct, employment concerns, benefits, performance, teammate relations or workplace conflicts.

When in doubt, speak up. We'd rather answer a question today than address a bigger problem tomorrow.



Ways to Contacts

Need guidance? Start with any resource below. If you're not sure who can help, we'll connect you with the right team.

Compliance HelpLine: (800) 597-3386

Compliance & Privacy:

ComplianceDepartment@rsfh.com | Privacy@rsfh.com

Online Reporting: rsf.complianceprohealth.com/report/choose

Human Resources: Submit a request at HRServiceNow.RSFH.com or call **(888) 691-5729** for questions about workplace concerns and teammate relations.

For System Policies, please refer to [Document Manager](#).