

Code of Conduct



Mission, Vision and Values

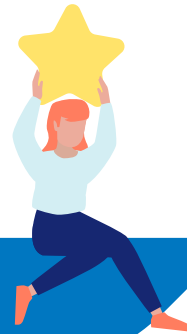
Endeavor Health is committed to providing outstanding patient care and conducting our business with integrity. We do so by adhering to professional ethics and personal responsibility, and consistently demonstrating our mission, vision and values.



Mission

The reason we come to work each day; inspires action

Help everyone in our communities be their best.



Vision

What happens when we fulfill our mission

*Safe, seamless and personal.
Every person, every time.*

Values

Beliefs and behaviors that guide us on the journey

Act with Kindness

Meet people where they are and show empathy through listening

Earn Trust

Act with integrity and accountability to earn and maintain trust

Respect Everyone

Champion diversity, equity and inclusion for all through mutual respect

Build Relationships

Develop meaningful connections that have a positive impact on everyone who crosses our path

Pursue Excellence

Seek out ways to keep learning and growing so we can deliver the best care to all, every time



Executive Summary and Contents

Welcome

Endeavor Health is committed to healthcare that is safe, seamless and personal. Every person. Every time. This commitment applies to both the expert and compassionate care we provide and the inclusive and trusted work environment we create together.

Grounded in our values, this Code of Conduct is a formal statement of Endeavor Health's standards of integrity, honesty and ethical behavior. Adhering to these standards in our words, actions and decision-making, earns us the trust placed in us.

It is important that each of us understands and complies with these standards. We encourage you to talk with your leader if you have questions and familiarize yourself with this Code and the compliance resources Endeavor Health provides for our team members.

Thank you for being a member of the Endeavor Health team and helping everyone in our communities be their best.

JP Gallagher
Chief Executive Officer

Laura Morgan
Chief Compliance Officer

[Introduction to the Endeavor Health Compliance Program and Your Role in It](#)

In this section we explain your participation in creating an effective compliance program at Endeavor Health.

[Safeguarding Information](#)

Here we help you learn your role in helping Endeavor Health protect the integrity and availability of its information system network and the confidentiality of information—our patients' and our organizations'.

[Business Conduct and Use of Endeavor Health Assets](#)

Here we help you understand our expectations for how you interact with our business partners.

[Workforce Support](#)

Here we orient you to our focus on maintaining a safe, healthy, and secure environment for our patients, our families, and our colleagues.

[Social Responsibility](#)

Learn more in this section about our efforts to positively impact the communities we serve beyond the walls of our facilities.

[Embracing Differences](#)

In this section, learn how you can help us celebrate the diversity of our patients and team members.

[Responsible Business Practices](#)

Here we explain our expectations surrounding our accounting and billing practices.

[Here to Help—the Compliance Office](#)

For assistance with matters and questions requiring a more in-depth response, use these resources.

Introduction to the Endeavor Health Compliance Program and Your Role in It

This Code of Conduct serves as a north star for Endeavor Health. It provides the standards of conduct we follow and ways for our team members to seek guidance and openly report ethical and legal issues.

Introduction to the Endeavor Health Compliance Program and Your Role in It

Your Responsibilities

Endeavor Health relies on all team members to understand and abide by the Code of Conduct (“Code”). The Code applies to all employees, non-employed staff,¹ Board and Board Committee members. You are expected to:

- Review and follow the Code, paying particular attention to relevant topics for your everyday work responsibilities.
- Report, in good faith, any known or suspected violation of Endeavor Health policy, law or regulation. If a matter has been reported and if the reporting individual doubts that the issue has been given sufficient or appropriate attention, the individual should report the matter following the **Chain of Command**² until they are satisfied that the matter has been appropriately recognized.
- Escalate issues and ask questions when you are uncertain what to do.

The Corporate Compliance Program

Endeavor Health’s Corporate Compliance Program is intended to demonstrate in the clearest possible terms the absolute commitment of the organization to the highest standards of ethics and compliance. Endeavor Health is (1) committed to preventing unethical or unlawful behavior, (2) stopping it upon notice or discovery and (3) ensuring corrective action to prevent a similar occurrence in the future.

The following groups provide oversight and guidance for our Corporate Compliance Program:

- **The Corporate Compliance Office** manages our Compliance Hotline and reports matters through the Incident Management System or directly to a representative of the Corporate Compliance Office.
- **The Corporate Compliance Committee** includes Endeavor Health senior management and sub-committees established specifically for data governance, billing compliance, information security and research.
- **The Audit, Compliance and Enterprise Risk Committee of the Endeavor Health Board of Directors** provides the highest level of organizational compliance oversight.

Resources

Corporate Compliance Hotline

Hotline: 877-275-3642

HR Service Center

847-570-5111

[ServiceNow HR Service Catalog](#)

Contact the Corporate Compliance Office

compliance@EEHealth.org

Additional Resources

[Corporate Compliance Department](#)

Support available to you

You are encouraged to speak up if you see concerning activity or behavior. A culture of openness and trust creates the safest environment for our people and our patients.

You can refer to the Code and other resources, such as health system intranets and policy and procedure documents, to find answers to questions related to team members’ conduct and behavior.

You can also work with your supervisor, work unit or department leader when you have questions. They will help you understand the importance of knowing these standards and complying with them.

Human Resources (HR) partners can also provide information about many of the compliance risk areas described in this Code that pertain to employment and the workplace. The HR team is also responsible for ensuring compliance with various employment laws.

1. Non-employed individuals who provide care, treatment or any other services to Endeavor Health and/or its patients under contract or by other arrangements on Campus including residents, fellows, students, interns, volunteers, vendors, and contract/agency staff.

2. Chain of Command is defined as the organizational direct-reporting structure. An issue may be escalated further up the Chain of Command when an employee believes the issue is not being addressed by a direct supervisor. The Chain of Command process is intended to give those closest to the team member the opportunity to address matters as they arise. The process allows for the advancement of matters to senior management, the Human Resources Department or the Corporate Compliance Department.

Safeguarding Information

One way you can help Endeavor Health build trust is by protecting confidential information. By definition, confidential information is information that is not generally available to the public, including our competitors and only shared on a “need-to-know” basis even internally.

Confidential information includes, but is not limited to:

- Specific information concerning a patient (including Protected Health Information (PHI) and/or Personally Identifiable Information (PII)),
- Research sensitive information
- Proprietary information related to Endeavor Health operations including, but not limited to:
 - employee information (i.e., salary, address, bank account, social security number, etc.)
 - sensitive meeting minutes
 - financial statements and reports

- internal memoranda
- unpublished research data
- contracts and information regarding mergers and acquisitions, business strategies, or other confidential arrangements.

You might come across confidential information in a variety of formats, such as paper, email or other electronic records, telephonic or virtual communications, or through observation. Every team member is responsible for protecting confidential information in accordance with applicable policies, regulation, privilege or other protection that may be applied based on the nature of the confidential information involved in whichever format it is available. This includes refraining from sharing confidential information through social media or other channels you may access and use to communicate with others.

Safeguarding Information

Information Security

Endeavor Health Values

Earn Trust—act with integrity and accountability to earn and maintain trust.

It is everyone's responsibility to help protect our patients, our team members, and ourselves from cybersecurity threats and social engineering. Since confidential information can be accessed and stored on devices like computers, medical equipment, smart phones, tablets, and Jetsons, it is important we work together to help ensure all Endeavor Health information, systems, and networks remain secure.

Remember:

- External attacks and malware can disrupt how we care for our patients.
- Misuse of technology can lead to system outages, data loss, and unauthorized disclosures.

Criminals are getting craftier. Be alert in protecting both patient information and our own data online.

Follow all System and Information Technology policies

Your personal login information for Endeavor Health computers, systems, applications, information, and resources may not be shared or otherwise used by other individuals, including team members. It is your responsibility to safeguard your personal login information.

This includes your network and remote access credentials.

- Protect your password, never share it. Never write it down.
- Never re-use your passwords and never re-use Endeavor Health account or password information to secure a personal or private account.
- Use Multi Factor Authentication (MFA) when conducting Endeavor Health business (whenever it is supported).

Use of Technology

Endeavor Health technology is to be used solely for the benefit of Endeavor Health and our patients.

- All software used in connection with Endeavor Health business must be properly licensed and used in accordance with that license.
- Endeavor Health computers, systems, and computer accounts are intended for business

use only. All information transmitted or stored in Endeavor Health computers, systems and applications, including chat messages, email and voicemail, is considered property of Endeavor Health, even if considered personal by a team member. Endeavor Health may monitor, use, delete or review such information as deemed appropriate.

Recognize Threats

Some tips to keep in mind:

- Treat external email, attachments, and links with extra care.
- Do not take action based on email, text messages, or phone calls from unknown persons. Take the time to verify the identity of the individual with whom you are communicating.
- IT personnel will never ask for password information over the phone or in e-mail correspondence.
- Do not leave your workstation unlocked or unattended.
- Create a passphrase rather than using a single word to secure your account.
- If a QR Code directs you to a website, never enter any information unless you know the site is authentic.
- It is up to you to report problems and suspicious activity as soon as possible to help keep patients, our workforce members, and our networks safe.



Safeguarding Information

Patient Privacy

Endeavor Health Values

Earn Trust—*Act with integrity and accountability to earn and maintain trust.*

Patient Information

To earn and maintain our patients' trust, we expect you to keep protected health information (PHI) confidential and adhere to the Health Insurance Portability and Accountability Act (HIPAA), Privacy and Security policies, as well as other patient privacy laws and regulations. PHI is any information about a patient that relates to their past, present or future health conditions, their eligibility for healthcare, their payment for healthcare and includes the fact that they are a Endeavor Health patient. You should prevent the release or access of any personal or confidential information about a patient unless it is necessary for legitimate business operations or patient care.

Electronic Medical Records Access

Accessing patient information should only be for a HIPAA permissible reason (i.e., treatment, payment, or operations). Privacy violations, accessing PHI for curiosity or any other impermissible reason may result in corrective action up to and including termination. Employees may not access their own medical record. Instead, as our patients do, employees should use MyChart/**NorthShoreConnect** to review their electronic medical record or may request a copy from Health Information Management.

Research

Certificates of confidentiality issued by the National Institutes of Health should be considered for research studies that are of a particularly sensitive nature.

Our Business Partners

Our vendors, suppliers, and other external entities are required to protect any PHI they receive. The data oversight vendor risk framework facilitates comprehensive oversight to assist Endeavor Health in mitigating these risks. It ensures the implementation of necessary safeguards and contracts. Prior to sharing data with external organizations or granting third-party access to our networks or PHI, follow the vendor risk assessment process to obtain approval.

Team Member Responsibilities

At Endeavor Health, safeguarding PHI is every team member's responsibility. All team members are expected to complete privacy training, and understand and comply with Endeavor Health Privacy Policies.

Tips—all of the below describe inappropriate access to a medical record:

1. Accessing a team member's record to find out if they missed a week of work because of a health condition.
2. Accessing the Emergency Department census list to find out if news reports of a gunshot victim is your friend.
3. Accessing your cousin's record to find out if she is pregnant.
4. Accessing a celebrity's record to share information with your friends.



Resources

Report suspicious activity to:

spam@eehealth.org

spamadmin@northshore.org

[Certificate of Confidentiality Information](#)

Safeguarding Information

External Communications and Social Media

Endeavor Health Values
Building Relationships—Develop meaningful connections that have a positive impact on everyone who crosses our path.

At Endeavor Health, we are privileged to have talented, passionate team members who are deeply involved in our communities and in the healthcare industry and regularly engage in dialogue around our organization and current events. We strive to support you in engaging on social media and other external channels when representing Endeavor Health by providing clear guidelines that foster a safe, supportive environment, protect patient privacy and safeguard our reputation.

Our Patients

Respect patient privacy and confidentiality at all times and never share patient information or photos with media, on a website, social media page or other public forum without appropriate authorization.

When posting online or communicating externally, be respectful to all and keep in mind that others may perceive you as representing Endeavor Health even when engaging in a personal capacity and outside of work hours. Be mindful of our core values and consider how your words may impact our patients, their families and others, as well as your own reputation. Information posted online can travel fast and live forever, even if deleted.

Our Workforce

The organization's Electronic Communications & Social Media and Media Relations Policies provide detailed guidance to help you navigate external communications matters. In general, we recognize that what you do on your own time is your own business. However, certain conduct can be extremely adverse to Endeavor Health's reputation and to the trust that our patients, team members and others place in us. Violation of these policies may result in disciplinary action up to and including termination.

In all communications, be professional and use good judgement. When sharing any information about Endeavor Health and our services to educate the public, provide information to our communities, increase awareness or for any other purposes, do so in a truthful, factual and informative manner that provides a fair representation of services and care provided while protecting patient and business confidentiality.

Media Requests and Public Statements

Only those approved by the External Communications Team may speak in an official capacity on behalf of Endeavor Health.

- Any proactive media engagement or response to reactive inquiries must be routed through and approved by the External Communications Team prior to any comment or information being provided. Media includes reporters, editors, photographers, producers or any other representatives of newspapers,

magazine, trade publications, radio, television, internet periodicals, websites and blogs.

- When posting on social media, posts should not imply the individual is speaking on behalf of the organization unless approved by the External Communications Team.
- If Endeavor Health or our services are the subject of your social media post, clearly indicate that your views do not represent those of Endeavor Health and that you are not speaking on behalf of Endeavor Health. It is best to include a disclaimer such as "The postings on this site are my own and do not reflect Endeavor Health's position."
- Any websites, social media profiles or other external communications bearing the Endeavor Health brand are not to be developed without the prior approval of the System Marketing Team.



Safeguarding Information

Frequently Asked Questions

Can I film a video for my social media profile at work during a break or over lunch if my badge is turned over and no branding is visible?

This would not be appropriate and is a violation of our code of conduct. Even if your badge or signage is not visible, the environment may still be identifiable as an Endeavor Health location and there is significant risk of confidential or protected information being shown or others being visible, even if unintentional. This also runs counter to the trust that those in our spaces place in us to provide a supportive, healing, professional and safe environment. Videos filmed for personal reasons for personal social media profiles are to be filmed outside of our facilities on your personal time and regardless of when and where filmed must always abide by this code of conduct, as well as our media and social media policies.

I have a close relationship with a high-profile patient or patient who has garnered media interest, and I am proud of their successful treatment. I would love to post on social media about this or share it externally. Can I share as long as I do not use the patient's name?

This would not be an appropriate disclosure of patient information as the patient could still be easily identifiable. If both you and the patient are interested in sharing their story, please reach out to the External Communications team who can work with you on the appropriate process and channels.

I am attending a rally/event this weekend to advocate for an issue that is important to me and would like to wear my Endeavor Health uniform and post about it on social media. There may be media in attendance. Endeavor Health has not taken a position on the issue as an organization or has a different position than I do. Do I need to contact External Communications?

Yes. We know our team members are passionate about lending their expertise and voices to causes they care about, which include supporting actions and positions which may or may not always align with those of the system for various reasons.

Whenever possible, we seek to partner with our team members as spokespeople as it is advantageous for both the team members and the organization and conveys alignment. We know this is not always possible. In these circumstances, no sharing or access of Endeavor Health information or affiliation is permitted, including any documents, images, access to facilities, logos or marks on uniforms or otherwise.

I was contacted and asked to speak at a major industry event. Do I need to let External Communications know?

Yes. Not only can the External Communications team help ensure the information provided is consistent and up to date, but they can also help you



maximize exposure for the opportunity, manage media inquiries and minimize any potential risk associated with the opportunity.

I see on NextDoor that people are complaining about an Endeavor Health policy or event. Can I comment and set the record straight?

Our System External Communications and Social Media teams regularly monitor online conversation about the System. There are a number of factors that our team weighs when determining whether to comment online. Please notify the System External Communications or Social Media team to evaluate the situation before responding or posting.

I have noticed on social media that one of my colleagues is posting threatening language or otherwise displaying concerning behavior, and I do not feel safe working around them. Should I report this?

Yes. Fostering a safe and supportive work environment is of the utmost importance. Please notify your manager, Human Resources or the Compliance Team for review.

Resources

Contact information:

privacyofficer@EEHealth.org

[Corporate Compliance Department](#)

Business Conduct and Use of Endeavor Health Assets

It is not unusual for members of the Endeavor Health team to show interest in activities such as launching new business ventures, providing consulting services to industry,³ participating in speaking engagements, or serving on external boards of directors.

These relationships can foster innovative ideas and discoveries, ultimately benefiting the general public through the transfer of scientific knowledge. These pursuits align with Endeavor Health's mission, particularly when they involve a mutually beneficial exchange of ideas or have

the potential to provide meaningful support for Endeavor Health's research, education, or clinical operations.

When establishing connections with partners, like pharmaceutical and medical device manufacturers, other healthcare professionals, or patients, it is crucial to avoid conflicts or any appearance thereof between your personal financial interests and the interests of Endeavor Health. Accepting gifts from vendors, business partners, or patients may be perceived as inappropriate. Endeavor

Health employees must not, under any circumstances, offer, solicit, or accept anything of value that could be seen as conferring an unfair advantage or bribe. Your responsibility as an Endeavor Health team member is to conduct yourself in a manner that promotes a collegial, honest, and fair environment.

3. A person or entity (or an entity controlled by, or under common control with, such a person or entity) that manufactures, distributes, or otherwise provides a medical device, implant, pharmaceutical, other health-related product or software recommended, prescribed or utilized in patient care or supplies or performs a service related activity or function that may be recommended, prescribed or utilized in patient care

Business Conduct and Use of Endeavor Health Assets

Conflicts of Interest

Endeavor Health Values
Earn Trust—Act with integrity and accountability
to earn and maintain trust.

Our Patients

Endeavor Health patients expect and deserve quality care, free from medical decisions influenced by real or perceived personal interest. When team members participate in personal enterprises, community or industry activities, appropriate patient care and privacy must always stay top of mind. When building relationships with our patients, you must create an environment of transparency surrounding your personal enterprise and relationships you have with industry.

Our Team Members

It is also important for you to be transparent and disclose any personal financial interests to Endeavor Health that might influence, or appear to influence, your decisions or actions as an Endeavor Health team member. You must follow guidelines designed to manage any real or perceived conflicts of interest you may disclose. As an Endeavor Health employee, you are expected to treat people fairly and not take advantage of your relationship with Endeavor Health for personal gain.

Our Vendors and Business Partners

When entering into a contract with vendors and other partners, Endeavor Health establishes contractual obligations that are expected to be followed. Endeavor Health also expects that suppliers and their sales representatives will conduct themselves in accordance with Endeavor Health policy, industry norms, and relevant laws. The acceptance of gifts or any other incentives aimed at inappropriately influencing relationships or business outcomes is strictly prohibited.



Frequently Asked Questions

If my department is having a holiday raffle for team members, can I solicit the suppliers we use frequently?

Suppliers should not be asked for gifts for employees. The Endeavor Health Foundations may solicit suppliers for fundraising events when the events are not tied to specific contracts or events in the relationship with the supplier. Accepting reasonable gifts from suppliers or vendors provided at their own will is acceptable.

Can a Principal Investigator (PI) enroll patients in a study where the PI has financial interest?

This situation may lead to a perceived conflict where outsiders may believe the patients are being enrolled in the study because of the PI's relationship with the sponsor. Financial interests must be disclosed so that an appropriate conflict management plan can be developed.

Resources

Compliance Office:

[Corporate Compliance Department](#)

847-570-5284

compliance@eehealth.org

Research Conflict of Interest

[Office for Human Research Protection
guidance on managing Conflict of Interest](#)

Business Conduct and Use of Endeavor Health Assets

Use of Endeavor Health Assets

Endeavor Health Values
Earn Trust—Act with integrity and accountability
to earn and maintain trust.

Our Patients

The assets of Endeavor Health encompass more than just equipment, supplies, funds, email, internet, software, and office spaces/real estate. They extend to encompass elements such as medical records, conceptual ideas, financial data, intellectual property rights, research data, and business strategies related to Endeavor Health activities. The direct beneficiaries of these assets are the patients and communities we serve. Safeguarding our assets is a means by which we not only protect our patients but also ensure the delivery of the best possible patient experience.

Our Workforce

Every team member is tasked with safeguarding all of our organization's assets and following related policies including those related to intellectual property. These assets are intended for business-related purposes, and any illicit or unethical use is strictly forbidden. Generally, utilizing any Endeavor Health asset for personal purposes without prior supervisory approval is not allowed. However, occasional use of items like copying facilities or telephones, where the cost to Endeavor Health is negligible, is permitted. Any community or charitable use of organization resources requires prior approval from

senior management. It is explicitly prohibited to use organization resources for personal financial gain unrelated to the organization's business.

Intellectual property created by Endeavor Health personnel which potentially was developed during working hours, involved the use of Endeavor Health facilities or resources, or is related to their Endeavor Health duties or business, including research, clinical activities, and educational programs, must be submitted to the Research Institute or other departments as applicable for determination of ownership.

Frequently Asked Questions

Can I use de-identified patient diagnosis data from Endeavor Health in a private business venture?

De-identifying patient data in a HIPAA compliant manner can be complex. Even if you have properly de-identified the data, the data is still an asset and property of Endeavor Health and cannot be used without proper approvals and contract protections in place.

I have an idea for a new software tool based on departmental workflows I've observed at Endeavor Health. Can I develop the tool and bring it to market?

Discoveries or inventions by employees and professional staff members during the scope of their role at Endeavor Health will be considered the property of Endeavor Health. If you have any ideas that you would like to bring to market, please consult the Research Institute.

If my child's sports team is selling something (candy, wrapping paper, etc.) to raise money, is it ok for me to solicit my colleagues by emailing our department distribution list and hanging a sign-up sheet in the break room?

While we encourage community support, Endeavor Health does not allow these types of fundraising activities, during working time, or at any time in patient care areas, using Endeavor Health resources.

Resources

Compliance Office:
[Corporate Compliance Department](#)
847-570-5284
compliance@eehealth.org



Business Conduct and Use of Endeavor Health Assets

Strategic Partnerships

Endeavor Health Values

Pursue Excellence—*Seek out ways to keep learning and growing so we can deliver the best care to all, every time.*

Partnership is a valuable resource in achieving our mission and goals. We recognize that, in some cases, we are stronger by partnering with others. In doing so, ethical, compliant and legal partnerships are our goal.

Anticompetitive Behavior

We compete fairly and comply with all antitrust laws. Such laws protect organizations from unfair trade practices and promote competition. In supporting this commitment:

- We do not solicit information or enter into agreements with competitors to fix wages, prices, or divide market shares.
- We do not steal or share trade secrets or confidential and proprietary business information.
- We do not enter into restrictive terms with other health systems or competitors that are not reasonably necessary to a defined and unrelated legitimate business collaboration.

All contracts negotiated with a competitor, contractor or supplier must be competitive and at fair market value.

Questions or concerns regarding anti-trust matters should be directed to the Legal Department.

Bribery and Corruption

We ensure all services, goods or other items of value are not offered or received due to bribery or corrupt practices. In supporting this commitment:

- We do not accept or offer any payment for the referral of healthcare services covered by Medicare, Medicaid, or other health benefit program.
- We do not offer bribes, kickbacks, or illegal payments of cash or other gift/value in any form and in any amount.
- We do not make political contributions directly or indirectly with organizational funds, assets, or resources to support any political party, cause, committee or candidate for public office.
- We do not enter into partnerships with a vendor or other third-party based on undue influence, coercion, or pressure. All business is conducted with integrity and ethical practices.

Questions or concerns regarding bribery and corruption should be directed to the Compliance Department.

Fraud and Abuse

We partner with physicians to enhance the delivery of safe and seamless care to our communities with ethical and compliant physician arrangements. In supporting this commitment:

- We do not violate the **Stark Law** nor the **Anti-Kickback Statute**.
- We do not pay for or offer to reward anyone for the referral of patients.
- We do not offer gifts or things of value to any physicians or health care providers to induce or encourage the referral of business.
- We do not make payments to healthcare providers unless an appropriately documented arrangement is in place and the compensation is consistent with fair market value.

If you have questions or concerns related to fraud and abuse or to ensure appropriate documentation of financial relationships with physicians is in place, contact the Legal Department.

The Stark Law (or the Physician Self-Referral Law) prohibits physicians from referring patients to receive certain designated health services payable by Medicare or Medicaid from entities with which the physician or an immediate family member has a financial relationship, unless an exception applies.

The Anti-Kickback Statute prohibits any payment of anything of value to knowingly induce or reward referrals or the generation of business involving any item or service payable by Medicare, Medicaid or other federal health care programs.

Workforce Support

All of us who work at Endeavor Health know the importance of maintaining a safe, healthy, and secure environment for our patients, our families, and our colleagues. Each of us must do our part to create this environment by actively engaging in safe behaviors, identifying and mitigating workplace hazards, following our health and safety protocols, and preparing for potential emergencies that may impact our organization.

Workforce Support

Health, Safety, and Wellbeing

Endeavor Health Values

Act with Kindness—*Meet people where they are and show empathy through listening.*

Build Relationships—*Develop meaningful connections that have a positive impact on everyone who crosses our path.*

Our Team Members

All of us who work at Endeavor Health know the importance of maintaining a safe, healthy, and secure environment for our patients, our families, and our colleagues. Each of us must do our part to create this environment by actively engaging in safe behaviors, identifying and mitigating workplace hazards, following our health and safety protocols, and preparing for potential emergencies that may impact our organization.

Endeavor Health is committed to creating a holistic place of care and safety for our patients and advancing the overall physical, emotional and financial wellbeing of our team members so they can perform at their very best. Part of ensuring a safe environment for our team members and our patients is our zero-tolerance position around aggressive behavior, threatening language and abuse of any kind.

Physical Health & Safety: We develop targeted initiatives related to reducing health risk factors at the workplace that can lead to accidents, musculoskeletal disease, respiratory and cardiovascular disease, hearing loss, communicable disease exposures and other stress related disorders. This includes implementing policies and guidelines on the safe use of equipment and Personal Protective Equipment (PPE) that reduce the risk of injury and protect our bodies from harm. Verbal threats and physical assaults will not be tolerated and will be immediately addressed, including reporting to law enforcement.

Emotional Wellbeing: We develop programs that strategically support team members in achieving and maximizing emotional and mental health. This includes leveraging the use of our RISE team and Employee Assistance Program (“EAP”) resources to assist with trauma support, as well as wellness programs focused on recharging our bodies to prevent fatigue or burnout.

Financial Wellbeing: We support employees with programs that match specific financial concerns impacting their health and wellbeing (i.e., access to financial planners, child/parental care search, access to paid leave, retirement savings, and other financial and support programs).



Resources

[Employee Health Policies](#)

[Team Member Health Portal](#)

[Wellbeing Page on Forward Together](#)

[Reporting, Reviewing and Responding to Allegations of Abuse policy](#)

Workforce Support

Mutual Respect

Endeavor Health Values
Respect Everyone—*Champion diversity, equity and inclusion for all through mutual respect.*

Our Patients

- At Endeavor Health we all work with the underlying mission to “help everyone in our communities be their best.” As a system, we continue to strive to improve health equity and better health outcomes for all our patients.
- We are committed to earning the loyalty of those who come to us for care and those who play a role in providing that care. We believe in living our values, acting with kindness, earning trust and pursuing excellence in every interaction with patients and families, physicians, and visitors.

Our Team Members

- At Endeavor Health we believe our team members thrive in an environment that fosters mutual respect, free from harassment and discrimination. Endeavor Health’s diverse community is strengthened when we focus on teamwork and act with compassion, integrity, consideration and cooperation.
- At Endeavor Health, we treat all team members with respect. Our employee relations team promotes direct communication with employees to resolve any concerns as they arise. We strive to ensure that every employee has a voice and a place to express concerns

or ask questions. We recognize that employees have a right to join or not to join a union or employee association, but do not believe it is necessary for employees to be represented by a union to be heard or supported.

- Sometimes, we may experience discord, frustration or conflict within our work departments. There are a number of communication avenues available to employees to resolve concerns. Employees should always feel free to directly contact their immediate manager. If that is not feasible, they may proceed up the chain of command. If an employee feels a problem has not been addressed or resolved to their satisfaction, or if they prefer not to discuss the concerns with department leadership, they may contact Human Resources or Corporate Compliance.

Resources

[Endeavor Health Mission, Vision and Values](#)

HR Service Center
847-570-5111

[ServiceNow HR Service Catalog](#)

Contact the Corporate Compliance Office
847-570-5284

compliance@EEHealth.org



Social Responsibility

Endeavor Health is committed to keeping our community healthy. We recognize that our community is complex and diverse, with a range of health needs across all socioeconomic groups, races and ethnicities. We are always looking for new ways to address healthcare disparities and achieve health equity in our community.

Social Responsibility

Community Engagement

Endeavor Health Values
Build Relationships—*Develop meaningful connections that have a positive impact on everyone who crosses our path.*

Community Benefit

Endeavor Health is committed to keeping our community healthy. We recognize that our community is complex and diverse, with a range of health needs across all socioeconomic groups, races and ethnicities. We are always looking for new ways to address healthcare disparities and achieve health equity in our community.

Endeavor Health commits significant funding for community benefits across the system, including charity care, language interpretation services, financial and in-kind donations to local nonprofits, health professions education, research, community health improvement activities and more.

Our Community Impact & Engagement Team partners with nonprofit organizations, local public health departments and internal leaders to assess and understand the most pressing local health needs. This work serves as a foundation to develop initiatives in collaboration with community partners to address priority needs and improve community health and equity.

Community Investment Fund

The Community Investment Fund (CIF) is one of many ways in which we seek to engage locally and provide community-connected care. Each year, our health system awards approximately \$10 million to local partners to elevate health and wellbeing, advance health equity and support local economic growth. CIF liaisons from throughout our system engage with local partner organizations to foster connection and measure impact.

Giving Back

Endeavor Health team members have a variety of opportunities to support local nonprofits in need. Some of these include:

- Annual holiday collection drives
- Collection drives responding to local needs
- Volunteer opportunities, including community events in partnership with Endeavor Health and local social service organizations.
- Community service through leadership positions on local organizations' boards, committees, etc.

Anchor Organizations

Our hospitals are anchor organizations in the communities that we serve. In some places we are the largest employer and major purchaser of goods and services. Endeavor Health has

embarked on a journey to increase our capacity to intentionally leverage our long-term, place-based resources to impact community health and well-being. These efforts include capacity-building through the Health Care Anchor Network and prioritizing where we can have the greatest impact with local and inclusive hiring and procurement and environmental stewardship.

Governance

A system governing body, the System Office of Community Health Equity and Engagement (SOCHEE) coordinates the interconnected priorities of community impact; health equity, diversity, equity and inclusion; and anchor strategy.

Resources

- [Endeavor Health Community Page](#)
- [Endeavor Health Community Investment Fund](#)
- [Endeavor Health Policy for Outside Organization Support](#)

Social Responsibility

Environmental Stewardship

Endeavor Health Values

Act with Kindness—*Meet people where they are and show empathy through listening.*

Values

Endeavor Health is committed to promoting and enhancing a healthier environment for our patients, their families, and our team members, and improving health outcomes for the communities we serve. We recognize that climate change directly impacts the health of our patients and our communities. We strive to minimize the environmental impact of our operations through regular and ongoing adoption of new opportunities to conserve resources, reduce consumption, support sustainable procurement and manage waste in an environmentally responsible, efficient, and cost-effective manner without compromising patient safety or care.

Our Patients and Communities

Endeavor Health is committed to providing a physical environment that promotes the highest quality of patient care and safety. To support this commitment, we use environmentally responsible products as much as possible, and strive to eliminate the use of any substance that causes environmental damage or health or safety hazards. This includes maintaining a clean environment using environmentally preferable

chemical alternatives where feasible. Additionally, we have prohibited target chemicals of concern from the furnishings and furniture we purchase, switching to safer alternatives.

We embrace our responsibility to be a leader in environmental sustainability both within the healthcare sector and the communities we serve. This includes recognizing and helping support underserved communities who are least able to prepare for, and recover from, extreme weather events, poor air quality, and other impacts related to climate change.

Our Team Members

Endeavor Health maintains a multi-disciplinary System Green Team focused on setting goals and ensuring the development and implementation of environmental sustainability practices. We offer all team members opportunities to engage and contribute through a variety of community focused and system-wide celebrations, team member-focused healing garden spaces and focused department initiatives. Additional information and the latest information on our system goals and achievements can be found on the Green Team corporate page.

Resource

[Green Team page](#)



Social Responsibility

Political Activity

Endeavor Health Values

Build Relationships—*Develop meaningful connections that have a positive impact on everyone who crosses our path.*

Endeavor Health supports your right to engage in political activity on your personal time and for personal reasons. However, federal, state, and local laws limit how Endeavor Health, along with its employees and representatives, may engage with the political process. To promote compliance with these laws, it is Endeavor Health's policy that employees and representatives of Endeavor Health may not engage in political activity, directly or indirectly, with Endeavor Health resources or on behalf of Endeavor Health unless authorized to do so as a part of official work responsibilities.

Examples of prohibited political activity include, but are not limited to:

- Speaking on behalf of Endeavor Health regarding political issues.
- Donating Endeavor Health money to a political cause.
- Purchasing tickets to a political fund-raising event with Endeavor Health resources.
- Using Endeavor Health work time or resources to support political activity or make a political contribution.

Our Patients

At Endeavor Health, it is essential for us to interact with our patients in a manner that is free from political bias. While we may hold personal political beliefs, it is crucial that these beliefs do not influence our interactions with patients or their families. Out of consideration for our patients, we kindly request that you avoid discussing political views. If patients mention the topic, please redirect the conversation to ensure a focus on their healthcare needs and concerns.

Our Team Members

There is no prohibition from Endeavor Health for team members engaging in political activity for personal reasons and with personal resources. Should an individual have an interest in seeking public office, they should consider any impact it may have on their work role, responsibilities, and relationships with Endeavor Health and consider discussing with their HR representative or the Government Affairs Office beforehand. Endeavor Health guidelines regarding personal political activity include:

- Do not refer to Endeavor Health, or its various entities, as your employer or to your position at Endeavor Health.
- Do not wear your employee badge or uniform while participating in personal political activity.

- If your title or affiliation is used to identify you, you should clearly share that your views are your own and do not represent Endeavor Health.
- Do not otherwise position yourself as a Endeavor Health representative in personal political activity.
- Do not use Endeavor Health resources or time to prepare political materials, seek political contributions, or otherwise engage in personal political activity.

Individuals who are interested in engaging in political activity or who have received an inquiry relating to political activity should contact their HR or Government Affairs representative. The Government Affairs representative should direct, advise, and oversee all political activity on behalf of Endeavor Health to ensure full compliance with applicable federal, state, and local rules and regulations.



Embracing Differences

At Endeavor Health, we welcome and treat patients from all backgrounds and cultures with compassion, respect and empathy. We see, hear and value all team members and patients.

Embracing Differences

Diversity, Equity & Inclusion

Endeavor Health Values

Respect Everyone—*Champion diversity, equity and inclusion for all through mutual respect.*

“Diversity is not about how we differ. Diversity is about embracing one another’s uniqueness.”

Our Patients

At Endeavor Health, we welcome and treat patients from all backgrounds and cultures with compassion, respect and empathy. We see, hear and value all team members and patients. We believe that our strength resides in our differences connecting our best to serve our diverse communities. We are committed to every person attaining their full health potential, and no one being disadvantaged from achieving this potential because of social position or other social determinants such as employment or education.

Our Team Members

At Endeavor Health, our strength resides in our differences, and we value and celebrate that. Our goal is to create a place where everyone is embraced and empowered to be their authentic selves. We provide opportunities for individuals with diverse backgrounds and lived experiences to learn and grow. We value the similarities and differences of all our team members, regardless of race, gender identity, religion, sexual orientation, religion, nationality, disability or other protected status. This allows us to create a more inclusive,

inviting, healthy environment where all our team members can thrive.

We measure and take action on how inclusive we are through our team member engagement program. We have targeted tactics to learn and connect with our team members focusing on overall inclusion, and inclusion of our historically under-represented team members.

We celebrate our diversity through heritage days and months, telling stories from diverse voices and the rich cultures of our team members. Our employee resource groups play a key role in creating a greater sense of belonging, creating safe spaces for team members to reflect, share, and connect.

We embed diversity, equity, and inclusion education in all our onboarding and leadership development programs, recognizing that DEI is not separate from how we lead, it is integral to how we all lead. Our DEI education offers online and interactive education sessions for topics from Implicit Bias to Cultural Humility to Allyship.

We also focus on increasing community partnerships, including with high schools and community colleges, for greater diversity in hiring, and leading to a more diverse pipeline for today and tomorrow.

A more diverse, equitable workforce promotes greater creativity and collaboration, creating the Endeavor Health of the future. And a more diverse workforce allows us to provide more culturally competent care and greater health equity to truly help everyone in our communities be their best.

Frequently Asked Questions

[How can I get involved?](#)

Visit the Endeavor Health [Employee Resource Groups](#) site.

[How do I learn more about diversity, equity, and inclusion at NS-EEH?](#)

Visit the [Diversity, Equity, & Inclusion](#) site.



Responsible Business Practices

We have established and maintain a high standard of compliance with applicable regulations, accuracy, and completeness in documenting, maintaining, and reporting financial information.

Responsible Business Practices

Patient Billing

Endeavor Health Values
Earn Trust—Act with integrity and accountability
to earn and maintain trust.

Our Patients

Patients have the right to appropriate medical care. We will ensure fair billing and debt collection practices for all patients uniformly and will not discriminate or adjust such practices based on their insurance.

We have established and maintain a high standard of compliance with applicable regulations, accuracy, and completeness in documenting, maintaining, and reporting financial information. This information serves as a basis for managing our business and is important in meeting our obligations to patients, employees, bondholders, suppliers, those charged with governance and others.

Our Team Members

Patient care must be clinically necessary, appropriate and properly documented. Patient charges, claims and records are accurately documented for billing.

We have the right to bill and be paid fairly. We are legally required to ensure we are not intentionally or accidentally overbilling our patients.

1. We enforce procedures to detect and prevent fraud, waste and abuse (see *examples and important definitions*).

2. We educate employees, contractors and agents working for us on our standard of compliance with fair billing practices and other regulations.
3. We conduct ourselves in an ethical and legal manner including cooperating with federal and state agencies.
4. We will report potential or suspected incidents of fraud, waste, and abuse or other wrongdoing, timely process applicable refunds and protect team members from retaliation.

Examples and Important Definitions

Fraud: Intentionally and knowingly submitting false information or making misrepresentations of fact to receive a benefit.

Example: Billing for services not provided

Waste: Inefficient or ineffective practices, systems, or controls that result in unnecessary costs to a government program or an overuse of services.

Example: Ordering excessive or more comprehensive diagnostic testing than medically necessary

Abuse: Excessive improper practices resulting in unnecessary costs to a government program.

Example: Inappropriate coding, such as unbundling, upcoding, or incorrect coding to increase reimbursement

Frequently Asked Questions

What should I do if a patient complains to me about potential errors on their bill?

You should direct the patient to the Financial Assistance Resources listed here so that the questions can be investigated.

What should I do if I suspect fraud, waste or abuse are occurring?

You should first report your concerns following your Chain of Command. If the issue is not resolved, you should escalate your concerns.

Resources

NorthShore

[Financial Assistance | NorthShore](#)

Evanston-847-570-2100

Glenbrook-847-832-6200

Highland Park 847-926-5300

Skokie-847-933-6780

Swedish

[Financial Assistance | Billing | Swedish Hospital \(swedishcovenant.org\)](#)

773-989-3841

NCH

[Financial Assistance—Northwest Community Healthcare \(nch.org\)](#)

847-618-4542

EEH

[Financial assistance | Edward-Elmhurst Health \(eehealth.org\)](#)

866-756-8348

Responsible Business Practices

Books and Records

Endeavor Health Values
Earn Trust: *Act with integrity and accountability to earn and maintain trust.*

Federal law requires Endeavor Health's books and records to accurately reflect the true nature of the transactions represented. You must not create or be a part of the creation of any records intended to mislead or to hide anything that is improper.

It is against policy to knowingly cause the Endeavor Health's books and records to be inaccurate. Falsifying records can include:

- making records appear as though payments were made to one person when payments actually were made to another,
- submitting expense accounts which do not accurately reflect the true expense or
- creating any records that do not accurately reflect what occurred.

Expenses properly incurred performing Endeavor Health business and in accordance with the Employee Expense Reimbursement policy, must be documented accurately and completely on expense reports, and submitted timely.

Payments and other transactions are to be properly authorized by management, and to be accurately and completely recorded in

accordance with generally accepted accounting principles. Payments may not be made if any amount is to be used for a purpose other than that described in the documents supporting the transaction. Slush funds or similar off-book accounts, in which there is no accounting for receipts or expenditures on corporate books, are strictly prohibited. Endeavor Health's high standard of accuracy and documentation is necessary for tax and financial reporting requirements.

All assets and liabilities of Endeavor Health must be recorded on the general ledger. Failure to record or disclose funds, assets, or liabilities is not permitted. Permanent entries in Endeavor Health's records must never be altered.

Record Retention

Endeavor Health's records create a history of our relationships with our patients, staff and business collaborators. Many of these records are required by law and are retained based on the applicable laws.

These records range from employee records to tax and finance records to research records.

Responsible business practices require that relevant records not be destroyed if any litigation, government investigation or audit is ongoing. Until the matter is closed, destroying records to avoid disclosure in a legal proceeding may be a criminal offense.

Frequently Asked Questions

How do I learn what the expense reimbursement policy is?

Visit [PolicyStat](#) and search "Expense Reimbursement" in the search bar to review the current policy. Instructions for processing expense reports can be found in [ServiceNow](#).

What should I do if I have concerns about Endeavor Health's accounting, payroll or record retention policies?

You should report your concerns following the Chain of Command. If the issue is not resolved, you should escalate your concerns.



Here to Help— the Compliance Office

The Compliance Office has experts or can engage a subject matter expert in all areas of compliance impacting our organization. We are available to partner with you to help make your career at Endeavor Health a success.

Here to Help—the Compliance Office

We have compiled this Code of Conduct to serve as a guide. For matters and questions requiring more in-depth response, you have a dedicated Endeavor Health Compliance team ready to support you. The Compliance Office has experts or can engage a subject matter expert in all areas of compliance impacting our organization. We are available to partner with you to help make your career at Endeavor Health a success.

Contact Information

Connect with the Compliance Office

compliance@eehealth.org

847-570-5284

Corporate Compliance Hotline

877-275-3642

Connect with the Privacy Office

privacyofficer@eehealth.org

Additional Resources

[Corporate Compliance Department](#)

