

CODE OF ETHICS

2025

MISSION, VISION, VALUES

MISSION

Your Health. Our Passion.
One Community.

VISION

We will be the first place our community turns to for health and wellness.

VALUES

We put the patient first.
We act with courage and compassion.
We are ONE team.
We never stop learning, never stop improving.
We know our employees are the best thing about our organization.
We are the community we serve.
We love our work.

CODE OF ETHICS

Much has changed in the 100 years since our organization began caring for our community. The 20-bed hospital founded in Weymouth in 1922 is today an expansive health system that includes primary and specialty care, acute care, urgent care, home and community care, emergency medical services across numerous locations serving a region with more than one million residents.

One concept, however, has remained steadfast and true through the years and decades. For 100 years, our mission has been centered on providing outstanding, high quality, patient-centric care to the community we serve, with the highest commitment to ethics and integrity.

Our **Code of Ethics** is designed to help all of us do the right thing in our interactions with others. It specifies the standards to which we hold ourselves accountable. Everyone at South Shore Health is expected to read, understand and comply with our Code. In addition, the Code outlines the obligation we each have to speak up about any actions or situations that may violate our Code or the law. Both our Code and the law provide protection for individuals who report suspected wrongdoing in good faith. It is essential that each of us remains resolute in our individual obligations to do the right thing, and speak up when something feels wrong. Our commitment to Just Culture reinforces that we welcome and encourage you to speak up and feel safe doing that.

It's always the right time to do the right thing. If you have any concerns about doing the right thing, the **Code of Ethics** is your guide. If you have questions, please contact your leader and/or our Compliance Department at 781-624-8828 or via email to compliance@southshorehealth.org.

Thank you for representing South Shore Health with honesty and integrity in all that you do, so we may realize our vision of being the first place our community turns to for health and wellness.



Allen L. Smith, MD, MS
President & CEO

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DEFINITIONS

Colleagues: Refers to all employees, volunteers, graduate medical education providers, students, trainees, employed physicians and other health care providers or other persons whose work is conducted at the direction of South Shore Health and its affiliates, including South Shore Hospital.

Medical Staff: Refers to the organized body of licensed physicians and other healthcare professionals who are permitted by law, and who are credentialed and privileged by South Shore Hospital to provide medical care within the hospital or facilities.

Advanced Practice Clinicians (APC): Refers to independent licensed non-physician practitioners, including both advanced practice registered nurses as well as physician assistants.

Individuals: Includes all parties employed by, contracted with, or associated with South Shore Health that are subject to this Code of Ethics. This includes all Medical Staff Members (non-employed and employed), South Shore Health Colleagues, APCs, contractors (such as locums and temp agency nurses), vendors, and any and all individuals and/or entities South Shore Health contracts with.

INTRODUCTION

South Shore Health developed this Code to provide key information about ethical and compliance situations that could arise while performing your job. It is imperative that the affairs of South Shore Health are conducted in compliance with all applicable laws. We are committed to providing you with the resources you need to understand and comply with these rules. The Office of General Counsel is available for consultation regarding the applicability or interpretation of particular statutes or regulations.

Your commitment to ethics and compliance is critical to the success of our Health System. It is everyone's responsibility to become familiar with these requirements. If you are a leader, it is your responsibility to set an example of ethical conduct and to encourage your staff to follow all Health System policies, procedures and rules.

Not every topic described in this Code will apply to you and situations may arise that are not covered here. You may also be subject to additional requirements such as the Medical Staff Bylaws and government rules and regulations. You should contact your leader or the Compliance Office if you have any questions. If there is any difference between the information outlined here and other South Shore Health policies, procedures, or guidelines, you should comply with this Code and notify the Compliance Office and your leader of the discrepancy.

Any Individual who disregards or violates this Code, the Compliance Program, or any other applicable policies or procedures may be subject to corrective action up to and including termination. The corrective action imposed will be determined on a case by case basis and will depend on the nature, severity and frequency of the violation. Violations of this Code by non-employed Medical Staff/APC staff members may be subject to review and action under the Medical Staff Bylaws, as applicable. In addition, South Shore Health may have an obligation to bring violations to the attention of the appropriate outside authorities or licensing boards.

COMPLIANCE IS EVERYONE'S JOB

If you become aware of a potential compliance issue, it is your responsibility to do one or more of the following:

- Call the Compliance Department at ext. 4-8828 or 781-624-8828.
- Call the Compliance Speak Up Line to make a confidential report at 800-461-9330 at any time (24/7).
- You can also make a confidential report on our website at SouthShoreHealth.org/speak-up.
- Make a report via email to: compliance@southshorehealth.org.
- Individuals can also:
 - Notify your leader.
 - Reach the Compliance Department via the [Compliance Corner](#), located on My.SouthShoreHealth.org.
- If you become aware of an actual or potential legal breach reach out to the Office of the General Counsel at ext. 4-8617, 781-624-8617, or legal@southshorehealth.org.

PATIENT CARE

Federal and state law provide for specific patient rights. At South Shore Health, we recognize our responsibility to respect these rights regardless of race, color, creed, religion, national origin, age, sex, sexual orientation, gender identity, marital status, veteran's status, disability, status with regard to public assistance, membership or activity in a local commission, political affiliation, or place of residence. Please refer to the [Patient Rights and Responsibilities Policy](#) for a full list of rights and responsibilities afforded to patients while in our care.

QUALITY CARE AND PATIENT SAFETY

Our Health System is dedicated to assisting patients with financial, social, and other needs whenever possible to ensure they receive the right care at the right time. South Shore Health is monitored by several regulatory agencies, including The Joint Commission, and strives to uphold our quality standards, improve our processes and ensure our approach remains consistent and in compliance. We are also committed to providing the support and resources you need to provide services to our patients.

All Individuals must be committed to meeting patient care needs first and foremost. This means providing necessary care in a safe and timely manner and avoiding unnecessary care. Patients and families should be treated with respect and dignity, with patient and family needs being considered every step of the way.

CONFIDENTIALITY, PRIVACY AND SAFEGUARDING PROTECTED DATA

At South Shore Health, we are committed to safeguarding any "protected health information" (PHI) and complying with the privacy regulations established as part of the Health Insurance Portability and Accountability Act of 1996 (HIPAA). PHI is considered to be any health related information, such as past, present, or future physical or mental health conditions, and demographic information. Protected information may include: PHI, ePHI, credit card information, insurance subscriber numbers, information containing Social Security numbers and any other confidential or proprietary information.

You may only use protected health information without authorization for the following reasons:

- **Treatment:** You may share PHI with doctors, nurses, technicians, students or other South Shore Health personnel to provide medical treatment or services.
- **Payment:** You may use and disclose PHI to an insurance carrier or third party payer to verify coverage and make sure that claims are billed and paid correctly.
- **South Shore Health Operations:** PHI may be used for administration, planning and quality assessment purposes, functions which are necessary to run our Health System and ensure that all of our patients receive quality care.

Otherwise, PHI may only be disclosed when patients authorize it or when it is required by law. The impermissible use or disclosure of a patient's information is a serious violation of HIPAA and can result in discipline up to and including termination.

Individuals are permitted to view his/her own medical record, but the access is "ready only." **Colleagues are not permitted to make changes/additions/deletions to their own electronic medical record.** You may not access the record of a family member, colleague, or any other individual without a legitimate business purpose.

HOW YOU CAN PROTECT PHI

- Use the minimum amount of—and only the information you need—to do your job. If it is not needed for our job, it should not be accessed or shared.
- Never disclose patient information to those not authorized to receive it—not even friends or family of the patient.
- Avoid discussing patient information in public areas.
- Never post information about a patient on social media.
- Take all confidential information with you after faxing, copying or sharing in a meeting.
- Securely destroy PHI in a shred bin. Do not dispose of PHI in a regular trash or recycling bin.
- Only use devices approved by South Shore Health and that are both password protected and encrypted. Do not discuss patients via unencrypted text messaging or personal email accounts.
- Make sure confidential information cannot be seen by others on your desk or computer screen.
- Only leave general appointment information on a patient's home answering machine or cell phone (voice or text). Do not mention the specific condition, treatment, department, healthcare provider's name, or reason for the appointment.

Do not access a patient's electronic health record without a legitimate business need. Access to PHI can, and will, be monitored. Audits to identify inappropriate access to electronic health records are performed when requested by a patient, if South Shore Health patients appear in the news, on a random basis, or if a patient is identified as high-risk (such as those who are also colleagues or high-profile individuals [e.g., local athletes or celebrities]). Confidential and proprietary information may include business information, financial information,

marketing information, medical data (e.g., for a study), documents and plans associated with South Shore Health's business and services, patient-specific information, personnel records, medical records, and salary and payroll information.

Everyone has an obligation to keep confidential and proprietary information safe. Do not share this information with anyone outside of our Health System, unless your role requires you to do so for an authorized business purpose or you are required to disclose the information because of a government investigation.

ARTIFICIAL INTELLIGENCE (AI)

AI technologies, such as generative AI and machine learning tools, offer exciting possibilities to improve patient care and streamline business processes. As a healthcare organization, we recognize these advances while always balancing the unique risks these tools could also pose—especially regarding protected health information (PHI) and proprietary data. PHI or any portion of a medical record may not be entered into any public AI platform. Likewise, South Shore Health proprietary business information or individually identifiable information may not be entered into any public AI platform to ensure business integrity and maintain regulatory compliance. AI programs will be reviewed through South Shore Health AI governance structures. Use of AI that has not undergone review by the appropriate South Shore Health Governance is prohibited. Please see the [South Shore Health Policy on Acceptable Use of Artificial Intelligence \(AI\)](#) for more information.

WHO YOU SHOULD CONTACT

You should report any concerns you have about privacy to your leader as well as to the Compliance Department at ext. 4-8828 or 781-624-8828, through the Compliance Speak Up Line at 800-461-9330 (available 24/7), through our secure web portal at SouthShoreHealth.org/speak-up, or via email to compliance@southshorehealth.org.

PROTECTION OF RESEARCH

South Shore Health supports human subject research in accordance with all federal regulations and with approval by the Institutional Review Board (IRB). Through research, advances in drug products, methods of treatment and medical devices, we have the potential to improve the lives of people in our community, state and nation.

All Individuals involved in research are responsible for protecting human subjects, maintaining confidentiality, and ensuring each participant is informed and freely consents to participate in the research. Falsification or manipulation of research results is illegal and compromises the integrity of an individual as well as the organization. To the extent research grants and awards are received, funds must be used in accordance with federal laws and contractual requirements.

If you become aware of an actual or potential legal breach reach out to the Office of the General Counsel at ext.4-8617, 781-624-8617, or legal@southshorehealth.org

WORKPLACE CONDUCT

South Shore Health is committed to providing a healthy, safe, and productive workplace. The workplace must be free from discrimination and harassment based on race, religion, color, gender, gender identity, age, national origin, disability, disabled or veteran status, sexual orientation and/or any other status protected by state or federal law.

SAFETY AND PROTECTION OF THE ENVIRONMENT

Our Health System is committed to practices that promote a safe and healthy physical environment, prevent damage to the environment, reduce or avoid exposure to environmental hazards, enhance human and community resources and conserve natural resources. In addition, we are committed to the safe and responsible handling, storing, transporting, use and disposal of biomedical waste, hazardous materials and other waste products.

You must comply with applicable local, state and federal environmental laws. It is important that you learn and understand what is required for everyone's safety and protection.

WHO YOU SHOULD CONTACT

You are required to report all spills and releases of hazardous materials immediately to the Public Safety Department at 781-624-8288 or the Emergency Line at 781-624-7777 so that any necessary corrective actions can be made and appropriate cleanup initiated.

EMPLOYEE RELATIONS AND EQUAL OPPORTUNITY EMPLOYMENT

South Shore Health has established policies and procedures for hiring, recruitment, retention, transfers, promotion and education. Our Health System values diversity and has no tolerance for discrimination based on race, color, religion, national origin, sex, age, gender identity, disability, sexual orientation, military status or other status protected under law. We expect everyone to uphold and reinforce these policies and procedures, regardless of your position with our Health System.

South Shore Health will work to ensure that all colleagues are able to participate in federal and state healthcare programs. Any changes to colleague eligibility status should be reported to the Compliance Department immediately.

HARASSMENT

South Shore Health will not tolerate sexual harassment, comments, or other conduct that creates an intimidating or offensive work or patient care environment.

All individuals that visit or work in our Health System, including patients, family members and visitors should always feel comfortable. This is particularly important with respect to patient admissions, transfer and discharge operations. Complaints of inappropriate conduct will be reviewed promptly and our Health System will not tolerate threats or acts of retaliation against Individuals for reporting such matters. Everyone is

expected to fully comply with all applicable federal, state and local laws and regulations relating to health, safety and the environment.

Refer to the [Employee Behavior: Harassment based on Race/Color/Religion/Gender/Sexual Orientation/National Origin/Age/Disability Policy](#) and the [Employee Behavior: Sexual Harassment Statement](#) documents for additional information.

DRUGS, ALCOHOL AND VIOLENCE

Individuals who are under the influence of, or adversely affected by, any drug, controlled substance (subject to certain exceptions noted below), or alcohol are not permitted to work, enter, or remain on our premises other than to seek medical treatment for these impairments. Such behavior on the part of Individuals will be addressed according to this Code, our Health System policies and Medical Staff Bylaws.

Other types of prohibited conduct include violent behavior, possession of or carrying firearms or other dangerous weapons, threats and the possession, use, distribution or sale of drugs, controlled substances or alcohol. The exceptions to this rule are the possession and use of a prescription medication in accordance with the prescribing practitioner's instructions and the possession, use or distribution of any controlled substances required in the conduct of our business.

South Shore Health may use any lawful method of inquiry it considers necessary to determine whether any Individual has engaged in conduct that interferes with or adversely affects our business, including: theft from our Health System or any other person, suspicion of possession of drugs, alcohol, firearms or any other behavior prohibited or restricted by law on our premises. All Individuals are expected to participate in and fully cooperate with South Shore Health's security efforts and inquiries, including drug testing for cause.

USE OF SOCIAL MEDIA

South Shore Health has several policies and procedures with the goal of maintaining the highest standards of data privacy and security with respect to patient information. South Shore Health Colleagues are prohibited from using social media during work hours, either on a personal device or a device provided by South Shore Health, unless the colleague has been approved by management to use social media for a legitimate business purpose.

South Shore Health expects colleagues to use all social media and social networking sites appropriately. The Social Media and Social Networking Policy applies to all South Shore Health Colleagues and their use of social media and social networking in all forms, including web sites, applications, blogs, vlogs, podcasts, and video sharing sites. Posting any patient information using social media violates federal and state law, and is a violation of South Shore Health's privacy and security policies, as well as this Code.

Colleagues should remember that comments posted on public internet sites can be seen by anyone, including South Shore Health. Colleagues are further cautioned they should have no expectation to privacy on such sites. Posts made to social media and networking platforms can be viewed by members of the community, and may be seen as representing the thoughts and views of South Shore Health. Posting in a "private" group, or marking a post as private, does not make sharing patient information permissible.

Anyone who violates these policies is subject to South Shore Health's Corrective Action Policy and potential disciplinary action. Anyone who posts patient information could face personal liability including severe fines and penalties. Refer to our [Social Media and Social Networking Policy](#) as well as the [Corrective Action Policy](#) for more information.

HOW YOU CAN COMPLY

To maintain compliance with HIPAA, other laws and our standards, you should NOT:

- Take pictures or videos on-site unless prior approval is received.
- Post, blog, tweet, or otherwise disclose any information about patients, research subjects, or any other confidential information.
- Use social media to communicate with patients or post photos.
- Post harassing comments related to any colleague or patient.
- Use your South Shore Health email address to sign up for social media.

USE OF MARKETING MATERIALS

Our marketing, communications, and public relations programs are designed to strengthen South Shore Health's brand and position its Medical Staff and APC Staff, programs, and clinical services for growth and success. Medical Staff/APC Staff are responsible for providing South Shore Health with accurate information regarding practices and/or credentials and for reporting any inaccurate statements that may have been made in any such materials, announcements, web pages, and programs to their Leader or the Compliance Office.

Colleagues should not represent themselves as speaking for South Shore Health without express permission to do so. Communicating without authority risks misrepresenting our organization and misleading our community.

Media contacts: If contacted by the media or press about South Shore Health, immediately speak to your Leader, the Marketing and Communications Department, or the Human Resources Department before responding. Do not disclose confidential, proprietary, or patient information to the media or press without first reviewing the request with the aforementioned parties.

Use of logo and name: South Shore Health developed guidelines on how and when their name and logo may be used; always check these guidelines to be sure any use you plan is permitted.

Public presentations: All presentations on topics related to your work at South Shore Health require approval from your Leader. They must conform to logo and name-use standards and policies governing outside activities.

Endorsements: It is generally not appropriate to endorse a company's product or service on behalf of South Shore Health. In some circumstances, it may be permissible to recommend products or services we used and found successful or participated in developing. These exceptions always require the explicit approval of Marketing and Communications, as well as the relevant institution's public affairs and/or marketing department.

IF YOU HAVE QUESTIONS

If you have any questions about our marketing materials or how they can be used, please contact the Marketing & Communications Department at ext. 4-4038, or 781-624-4038.

CONFLICTS OF INTEREST, GIFTS, AND CONTRIBUTIONS

South Shore Health has established policies regarding conflicts of interest, gifts, and political contributions.

CONFLICTS OF INTEREST

The South Shore Health Compliance Office has rules regarding conflicts of interest. The Office of Research also developed guidelines for conflicts of interest that apply to research activities, regardless of funding or funding source.

Individuals have a duty to avoid conflicts of interest that may conflict, or appear to conflict, with the mission and business activities of our Health System. This applies not only to your own direct and indirect interests, but also to those of your immediate family members. South Shore Health Colleagues are required to disclose any relationships or activities that conflict, or appear to conflict, with South Shore Health's interests to the Compliance Office.

Members of the executive team, directors, Medical Staff/APC Staff, and other selected committee members are required to sign an acknowledgment and to disclose any conflicts or potential conflicts on an annual basis.

If you have questions about whether a relationship poses a potential conflict, you should consult with the Compliance Office. Refer to our [Conflict of Interest Policy](#) for more information.

DISCLOSURE EXAMPLES

The following situations would need to be disclosed to the Compliance Office:

- You have an ownership interest in a company that supplies cleaning products to South Shore Health.
- You serve as a consultant for a local nursing home.
- You have a second job that interferes with your responsibilities at South Shore Health.
- Your partner, who resides with you, works for one of South Shore Health's vendors.

GIFT POLICY

The giving and receiving of gifts at South Shore Health is governed by several important policies. The aim of these policies is to help prevent actual or perceived conflicts of interest and/or violations of the Stark Law and Anti-Kickback Statute.

- **Gifts from patients and families:** Cards, candy, flowers or other nominal gifts may be accepted if offered by the patient or their family member. Gift cards regardless of value are not acceptable. More substantial gifts are never to be solicited or accepted from patients or families. South Shore Health has a policy against colleagues receiving gifts of more significant value from patients or families to prevent actual or perceived conflicts of interest (e.g. gift cards, tickets to events). Patients may wish to express gratitude to health care providers, but we should avoid any appearance that a different level of care is provided to patients who give significant gifts to their care team.
- **Gifts from vendors and industry professionals:** Gifts from vendors or organizations outside of South Shore Health pose a particular risk of creating actual or apparent conflicts of interest. For this reason, South Shore Health has adopted high standards in this area. South Shore Health prohibits accepting gifts of any kind from vendors. This includes gifts provided by both existing and potential vendors. Prohibited gifts include, but are not limited to, tickets to sporting events, conferences, concerts, dinners, gift baskets, or gift cards (regardless of value).
- **Gifts amongst colleagues:** Gifts may be exchanged amongst colleagues if they are of modest value (subject to applicable limitations and/or policies).

We encourage all colleagues to refer to the [Conflict of Interest Policy](#) as well as the [Business Courtesies to Potential Referral Sources Policy](#) for additional information. Other sources of relevant information may include the [Vendor Interactions Policy](#) and the [Pharmaceutical and Medical Device Company Interactions Policy](#).

WHAT YOU CAN DO

If you are unable to accept a gift based on the information above and our associated policies:

- You should encourage the gift giver to contact the South Shore Health Foundation at 781-624-8600 or via email to foundation@southshorehealth.org.
- You may always contact the Compliance Department for guidance on how to appropriately handle the specific scenario.

POLITICAL CONTRIBUTIONS

South Shore Health funds and assets may not be used for political campaign contributions. This prohibition applies to both direct contributions and indirect assistance of candidates or political activities (e.g., to Political Action Committees or PACS).

Our Code does not prevent Individuals from making personal contributions. However, under no circumstances will you be reimbursed by South Shore Health for such contributions. You may not use your time working at South Shore Health for personal political fundraising or solicitations. You should consult with the Compliance Office before agreeing to participate in a political activity that could involve our Health System.

CONTRACTING

All contractual arrangements must comply with applicable federal and state laws. Prior to executing arrangements for items and services, all contracts must be reviewed and approved by the Office of General Counsel. There may also be additional review and due diligence that our Information Security and Compliance teams must undergo before engaging with the contracting party(ies). Additionally, we verify that all contracted parties are eligible to participate in federal and state-funded healthcare programs.

The Health System is divided up by internal client within the Office of the General Counsel and that client list has been circulated to all leaders. For contracting approval, reach out to your assigned counsel.

COMPLIANCE OFFICE

South Shore Health established a Compliance Office to share information about ethical and regulatory requirements and ensure we meet Health System standards. The Compliance Office maintains independence from operational responsibilities and has direct access to South Shore Health's CEO and Board of Directors. The Compliance Office is a resource to everyone and is committed to ensuring that all reports of potential misconduct are addressed, including ensuring implementation of necessary corrective actions.

REPORTING PROCESS

South Shore Health has established several ways to report incidents, situations, or ask questions related to compliance matters.

Everyone has the responsibility to report an instance of non-compliance or suspected non-compliance. Doing nothing is not an option. You may report:

- **By calling:** Call the Compliance Office directly at ext. 4-8828 or 781-624-8828.
- **Confidentially:** Call the Compliance Speak Up Line at 800-461-9330 to speak to an agent at any time (24/7). Calls are routed to a third-party vendor who specializes in confidential compliance reporting, where your anonymity can be guaranteed if you choose to report in that way. You may also report anonymously through a secure web portal via SouthShoreHealth.org/speak-up.
- **In person:** Visit the Compliance Office at 780 Main Street, 3rd floor, South Weymouth, MA 02190, Monday through Friday during regular business hours.
- **In writing:**
 - Via interoffice mail (mailbox #82), or regular mail, c/o South Shore Health, Mailbox #82.
 - Via email (compliance@southshorehealth.org).
 - For Colleagues, through the [Compliance Corner](#) available on My.SouthShoreHealth.org.

Confidentiality will be maintained to the fullest extent possible. However, as an investigation progresses, continued anonymity may not be possible if the confidential hotline is not used. If you prefer to remain anonymous, please understand that the review process may be limited if the information you provide is not

specific and we are unable to gather additional details. The more details you provide, the more thoroughly we can investigate your concerns.

NON-RETALIATION

South Shore Health will not retaliate against anyone for reporting in good faith a violation or suspected violation of applicable law, this Code, our policies or procedures, or a general compliance concern. Furthermore, we will not tolerate any retaliation against parties who report such concerns in good faith.

Refer to our [Retaliation Protection Policy](#) for more information.

If you feel you have been retaliated against, reach out to:

- Jennifer Mahoney, Chief Compliance & Audit Officer, at ext. 4-8803 or 781-624-8803, or
- Joseph Driscoll, General Counsel, at ext. 4-8865, or 781-624-8865, or
- Dr. Allen Smith, Chief Executive Officer, in writing to asmith@southshorehealth.org or at ext. 4-8170 or 781-624-8170

GOVERNMENT RULES AND REGULATIONS

South Shore Health must comply with many laws and regulations (e.g., Medicare, Medicaid, other state and federal health care programs) and is committed to providing you with the information you need to assist us in these efforts.

KICKBACKS AND REFERRALS

Medical Staff/APC Staff members may not accept or give anything of value to an individual or organization where one of the purposes of the gift may be to obtain referrals of patients. The Anti-Kickback Statute and the Stark Law govern South Shore Health's relationships with referring providers. It is important to understand that arrangements that appear to be "good business" in other industries could be illegal in health care. We all must comply with the rules that apply to the health care industry.

The Anti-Kickback statute is a criminal law that prohibits the knowing and willful payment of "remuneration" (anything of value) to induce or reward patient referrals or the generation of business involving any item or service payable by the federal health care programs (e.g., drugs, supplies, or health care services for Medicare or Medicaid patients).

The Physician Self-Referral Law, commonly referred to as the Stark Law, prohibits physicians from referring patients to receive "designated health services" payable by Medicare or Medicaid from entities where the physician or an immediate family member has a financial relationship, unless an exception applies.

Scenarios that may raise concerns under these laws include:

- Offering or receiving anything of value to convince a patient or a patient's family member to buy an item or service from South Shore Health,
- Offering anything of value to a physician that encourages a patient to receive care at South Shore Health,
- Receiving payment for performing specific duties when South Shore Health does not actually require these duties,
- Not requiring documentation for time spent performing contracted duties,
- Compensation paid for contracted services that is above the fair market value for those services,
- Accepting free accommodations, meals, or travel for speaking engagements in exchange for medical referrals,
- Termination of contractual arrangements with Medical Staff/APC Staff members who do not refer a certain number of patients to South Shore Health, and
- Providing money in the form of research grants, consulting agreements, medical director agreements and/or marketing agreements when the money and benefits are paid, even in part, with the intent to induce referrals.

Although there are exceptions to these laws, their interpretation is complex and should be undertaken by a professional who specializes in this area. Every agreement involving compensation or referrals with a Medical Staff/APC Staff member, or a referral source, must be reviewed and approved in advance and in writing by the Compliance Office. Refer to our [Business Courtesies for Potential Referral Sources Policy](#) as well as the [South Shore Health Procedure: Business Courtesies Reporting](#) for more information.

EMERGENCY TREATMENT, PATIENT TRANSFERS, AND DISCHARGES (EMTALA)

The care that we provide in our Emergency Department is an integral part of the services we offer. Our Emergency Department is a place where anyone may come for care regardless of his or her ability to pay.

You must comply with the EMTALA (Emergency Medical Treatment and Labor Act) law. This law was established to make sure that patients are not transferred from South Shore Health to another facility (or vice-versa) unless it is medically necessary or appropriate. Refer to our [Patient Transfers and Discharges Policy \(EMTALA\)](#) for guidance.

CURES ACT/INFORMATION BLOCKING

The CURES act helps patients retain access to their electronic health information, while also supporting security measures to prevent inappropriate access and protecting patient privacy.

South Shore Health will not engage in any practice that interferes, prevents, or discourages patient access to, or use of their own electronic health information. South Shore Health is committed to providing patients with access to their health information through the use of Epic, MyChart, and will provide copies of digital images and PHI through Health Information Management.

BILLING AND CODING OF SERVICES

Billing for services not documented or provided could be considered a False Claim under federal law and may result in significant financial penalties. The False Claims Act provides “whistleblower protections.” South Shore Health will not retaliate against anyone for filing a report of a False Claims Act violation in good faith.

All Individuals have an obligation to ensure that the services provided are supported by appropriate documentation and that claims submitted to payers accurately reflect services rendered. Coding and billing rules are complex and may vary by payer. It is critical that staff involved in charging, coding and billing familiarize themselves with internal policies and external requirements and raise potential issues immediately.

You should never charge, code or bill if the service was not provided and/or documented. Any concerns regarding billing, charging and coding should be referred to the Compliance Office or to the Office of the General Counsel (OGC). You should also notify the Compliance Office or the OGC before contacting government payers about issues that are different than routine claims or payments. The engaged parties will notify the Medical Staff Office of any substantiated concerns or violations by Medical Staff/APC Staff.

The Commonwealth of Massachusetts has adopted its own False Claims Act, modeled on the federal law. The state law prohibits knowing submissions of false or fraudulent claims for payment of state funds including the submission of claims for payment of health care services to MassHealth or other state programs. Penalties for violating the state False Claims Act include triple damages, monetary penalties for each false claim, and the costs of the government’s investigation or lawsuit. The state False Claims Act also contains whistleblower provisions. Refer to the [Fraud & Abuse Reporting Protections Policy](#) for further detail.

IF YOU SEE SOMETHING, SAY SOMETHING

If you have questions about how to document or properly bill for a service, you can contact the Compliance Department with your questions. If you believe South Shore Health is submitting or has submitted improper claims for reimbursement, contact the Compliance Office immediately at ext. 4-8828, 781-624-8828, through the Compliance Speak Up Line at 800-461-9330, via secure web portal at SouthShoreHealth.org/speak-up, via e-mail to compliance@southshorehealth.org, or through the [Compliance Corner](#), located on My.SouthShoreHealth.org.

USE OF ASSETS AND RESOURCES

South Shore Health’s materials, supplies, facilities, and equipment are to be used only for our business purposes. South Shore Health Information Systems are business tools for authorized use only. Activities on all systems are monitored.

You may not engage in activities for personal convenience or profit on South Shore Health time, nor may our resources be used for such purposes. Any act by an Individual that involves theft, fraud, embezzlement, misuse or misappropriation of our Health System assets violates this Code.

MISUSE EXAMPLE

An administrator asks her assistant to assemble and print labels for her annual holiday card mailing to friends and family. Use of our Health System resources (staff time and supplies) for a personal matter is not compliant with our standards.

ACCURACY OF REPORTS

South Shore Health has adopted a Record Retention Policy. (Refer to our [Management and Retention of Patient Health Records Policy](#) for more information.)

You must ensure that Health System records accurately reflect our operational, financial and strategic activities. This includes documentation relating to accounting and finance documents, expense accounts, time records, and reimbursement requests. It also applies to any and all clinical and treatment documentation. Everyone is individually responsible for records within their department and for complying with any laws, acts or statutes that govern the particular business area.

MEDICAL STAFF RECRUITMENT

The recruitment and retention of Medical Staff and APC Staff requires special care on the part of both South Shore Health and its Medical Staff/APC Staff members. Medical Staff recruitment (especially of private practice physicians) has implications under the Anti-Kickback Statute, the Stark Law, and Internal Revenue Service rules governing the tax-exempt status of South Shore Health and its affiliates.

Each South Shore Health recruitment package or commitment should be in writing and be consistent with the guidelines established by the Office of the General Counsel. New or unique recruitment arrangements must be reviewed and approved in advance and in writing by the South Shore Health Compliance Office and the Office of the General Counsel.

GOVERNMENT INVESTIGATIONS

South Shore Health will cooperate in all government investigations by coordinating its responses through South Shore Health's Office of the General Counsel.

If you learn of, or are contacted about any government investigation pertaining to South Shore Health or your activities at South Shore Health (including any contacts or attempted contacts with you at home or in your office), you must contact the Office of the General Counsel immediately. If you are contacted by a representative from any governmental authority or agency, you should first confirm the agent's/investigator's identification and then refer any questions or requests for information to the Office of the General Counsel.

You should never, under any circumstances, destroy, fabricate, or alter any South Shore Health records, information, or documents in anticipation of a request for such documents from a court or any government agency. When communicating with any government agent or investigator, you should **always tell the truth.**

If you become aware of an actual or potential legal breach reach out to the Office of the General Counsel at ext. 4-8617, 781-624-8617, or at legal@southshorehealth.org

CLOSING THOUGHTS

Our Code of Ethics serves as a vital framework that guides us in maintaining the highest standards of integrity, respect and accountability within our hospital. As your Chief Compliance Officer, I am deeply committed to fostering a culture where ethical conduct is not just expected, but ingrained in every aspect of our work. Each of us plays a critical role in upholding these principles, ensuring that we not only meet regulatory requirements, but also exceed expectations of the patients and community we serve.

By adhering to our Code of Ethics, we are not only protecting the trust of those who rely on our care, but also creating a work environment where everyone feels valued, supported, and empowered to speak up. Our commitment to a just culture means we actively support learning, fairness, and transparency, empowering each of you to raise concerns and speak up without fear of retaliation. We are building a highly reliable and resilient system, one that thrives on collaboration, continuous improvement, and the dedication to our entire organization. By embracing these values, together we can ensure that South Shore Health continues to be a place where both patients and staff are treated with the utmost respect and care.

I invite you to contact me and my team if you need help understanding the Code or other policies. Our success as an organization depends on each of you and your commitment to quality service and ethical conduct. Thank you for your contribution to our success and for being a part of the amazing team at South Shore Health.

Best regards,

Jennifer Mahoney, JD
VP, Chief Compliance & Audit Officer
South Shore Health
781-624-8803 (direct)
Jmahoney2@southshorehealth.org

COMPLIANCE IS EVERYONE'S JOB

- Call the Compliance Department at ext. 4-8828 or 781-624-8828.
- Call the Compliance Speak Up Line to make a confidential report at 800-461-9330 at any time (24/7).
- Make a confidential report on our website at SouthShoreHealth.org/speak-up.
- Make a report via email to: compliance@southshorehealth.org.
- Reach the Compliance Department via the [Compliance Corner](#), located on My.SouthShoreHealth.org.

ADDITIONAL RESOURCES

If you have any additional questions about the topics mentioned above, the below resources are available to you.

RELATED POLICIES:

- [Patient Rights and Responsibilities](#)
- [Employee Behavior: Harassment Based on Race/Color/Religion/Gender/Sexual Orientation/National Origin/Age/Disability](#)
- [Employee Behavior: Sexual Harassment Statement](#)
- Medical Staff Bylaws
- [Social Media and Social Networking Policy](#)
- [Corrective Action Policy](#)
- [Conflicts of Interest Policy](#)
- [Business Courtesies to Potential Referral Sources Policy](#)
- [Vendor Interactions Policy](#)
- [Pharmaceutical and Medical Device Company Interactions](#)
- [Retaliation Protection Policy](#)
- [Patient Transfers and Discharges \(EMTALA\)](#)
- [Fraud & Abuse Reporting Policy](#)
- [Management and Retention of Patient Health Records Policy](#)

METHODS OF CONTACT

If you have any workplace issues—or have suggestions for making improvements at South Shore Health—please be in touch! While we prefer that you reach out to a South Shore Health contact first, as it allows for more immediate attention, you may contact an external organization without any fear of reprisal. The chart on the following pages provides internal and external contact information.

| IF YOUR CONCERN RELATES TO... | YOU MAY CONTACT |
|---|--|
| COMPLIANCE | |
| You want to report a known or suspected compliance concern. | <ul style="list-style-type: none"> ■ Call the Compliance Department at ext. 4-8828 or 781-624-8828. ■ Call the Compliance Speak Up Line to make a confidential report at 800-461-9330 at any time (24/7). ■ Make a confidential report on our website at SouthShoreHealth.org/speak-up. ■ Make a report via email to: compliance@southshorehealth.org. ■ Reach the Compliance Department via the Compliance Corner, located on My.SouthShoreHealth.org. |
| HIPAA | |
| You want to report a privacy violation. | <p>Notify the South Shore Health Privacy Officer, who will engage with HR/Benefits/Legal directly if necessary:</p> <ul style="list-style-type: none"> ■ Call the Compliance Department at ext. 4-8828 or 781-624-8828. ■ Call the Compliance Speak Up Line to make a confidential report at 800-461-9330 at any time (24/7). ■ Make a confidential report on our website at SouthShoreHealth.org/speak-up. ■ Make a report via email to: compliance@southshorehealth.org. ■ Mail to the Privacy Officer at <ul style="list-style-type: none"> – 55 Fogg Road, Mailbox #82 South Weymouth, MA 02190-2455. ■ Fax to 781-624-5140. |
| <p>For a HIPAA violation, you may also contact the Office of Civil Rights at: ocrprivacy@hhs.gov Toll Free: 800-368-1019 TDD Toll Free: 800-537-7697</p> | |
| QUALITY | |
| You want to report a quality concern. | <p>Call or email the Quality Management Department:</p> <ul style="list-style-type: none"> ■ Ext 4-8840 or 781-624-8840 |

| IF YOUR CONCERN RELATES TO... | YOU MAY CONTACT |
|---|--|
| <p>For a quality concern, you may also contact:</p> <p>The Joint Commission 1-800-994-6610 Office of Quality Monitoring General Inquiries: 630-792-5800 One Renaissance Boulevard Oakbrook Terrace, IL 60181</p> <p>The Department of Public Health Main: 617-624-6000 250 Washington Street TTY/ TDD: 617-624-6001 Boston, MA 02108</p> | |
| OFFICE OF THE GENERAL COUNSEL | |
| <p>The Office of the General Counsel (OGC) oversees and manages the provision of all legal services to South Shore Health to ensure maximum protection of its legal rights and to maintain its operations within the limits prescribed by law. OGC is available to provide legal guidance and counseling to all Individuals for matters relating to the operation of SSH and their respective job functions. Please do not hesitate to contact the OGC if you have any questions or concerns relating to a legal matter, or want to clarify your individual obligations as it pertains to your official South Shore Health job.</p> | <p>Contact the Office of the General Counsel:</p> <ul style="list-style-type: none"> ■ Ext. 4-8617, 781-624-8617, or legal@southshorehealth.org. |
| MARKETING | |
| <p>If you have questions about how marketing materials can be used, or a request for authorization to share information for South Shore Health.</p> | <p>Contact the Marketing & Communications Department:</p> <ul style="list-style-type: none"> ■ Ext. 4-4038 or 781-624-4038 |
| RISK PREVENTION | |
| <p>You want to report a patient safety/risk management issue.</p> | <p>Contact the Risk Management Department:</p> <ul style="list-style-type: none"> ■ Gretchen Kilbourne, Executive Director of Risk Management at ext. 4-8432 or 781-624-8432, or GKilbourne@southshorehealth.org |
| SAFETY | |
| <p>You want to report a spill or other release of hazardous material.</p> | <p>Contact:</p> <ul style="list-style-type: none"> ■ Public Safety: 781-624-8288 or ■ The Emergency Line: 781-624-7777 |

| IF YOUR CONCERN RELATES TO... | YOU MAY CONTACT |
|---|---|
| RETALIATION | |
| <p>South Shore Health will not retaliate against anyone for reporting in good faith a violation or suspected violation of applicable law, this Code, our policies or procedures, or a general compliance concern.</p> | <p>If you have concerns about retaliation, contact:</p> <ul style="list-style-type: none"> ■ Jennifer Mahoney, Chief Compliance & Audit Officer, at ext. 4-8803 or 781-624-8803. ■ Darleen Souza, SVP of Human Resources, at ext. 4-8543, or 781-624-8543 ■ Joseph Driscoll, General Counsel, at ext. 4-8865, or 781-624-8865. ■ Dr. Allen Smith, Chief Executive Officer, in writing to asmith@southshorehealth.org, or at ext. 4-8170 or 781-624-8170. |
| HARASSMENT | |
| <p>If you feel you have experienced harassment in any form.</p> | <p>Complaints of Harassment should immediately be brought to the attention of:</p> <ul style="list-style-type: none"> ■ The leader (supervisor, manager, etc.) or ■ The Department Director, or ■ The Vice President of the area, or ■ The Office of the General Counsel at ext. 4-8617, 781-624-8617, or legal@southshorehealth.org. ■ Jennifer Mahoney, VP, Chief Compliance & Audit Officer, at ext. 4-8803 or 781-624-8803 ■ Darleen Souza, SVP of Human Resources, at ext. 4-8543 or 781-624-8543 <p>Any manager, supervisor, or leader who receives a complaint must inform Employee Relations or the SVP of Human Resources Operations by the above listed methods. The complaint will be promptly investigated.</p> <p>Complaints of harassment regarding a member of the Human Resources Department should be directed to Dr. Allen Smith, Chief Executive Officer, in writing or through ext. 4-8170.</p> |
| <p>For a sexual harassment complaint, you may also contact the following external entities:</p> <p>US EEOC 15 New Sudbury Street, Room 475 Boston, MA 02203 Phone: 1-800-669-4000 Fax: 617-565-3196</p> | <p>The Mass. Commission Against Discrimination One Ashburton Place, Room 601 Boston, MA 02108 Phone: 617-727-3990 Fax: 617-994-6024</p> |

South Shore Health

55 Fogg Road, South Weymouth, MA 02190
781-624-8800 | SouthShoreHealth.org

