Summit Healthcare Association

CODE OF CONDUCT AND ETHICS

Summit Healthcare Association Mission:

Trusted to deliver exceptional, compassionate care, close to home.

Summit Healthcare Association Vision:

To be the health system of choice.

Summit Healthcare Association Values

Patient First

Quality and Safety
Teamwork
Respect
Accountability
Communication

SHINE Behavioral Standards:

• Always SHINE – show respect and be kind.
• Always work together – we are on the same team.
• Always serve others – no job is beneath you.
• Always maintain high standards of quality and safety – best practice every time.
• Always communicate clearly – be compassionate.
• Always practice integrity – maintain confidentiality.
• Always be accountable – take responsibility.
• Always empower – create an environment of success.
• Always excel – don't settle for mediocrity.
• Always promote wellness – make choices for a healthy lifestyle.

Reference Policy: AW1084 Code of Conduct and Ethics

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October 2026

A MESSAGE FROM OUR CHIEF EXECUTIVE OFFICER

Summit Healthcare Association has developed and adopted this *Code of Conduct and Ethics* to provide guidance on the standards of ethical business and care practices which direct our organization. We are committed to provide the highest quality of care to our patients. Summit strives to achieve this objective through compliance with all applicable laws, Government regulations, third-party payer requirements, and policies and procedures. To ensure that we fulfill this commitment while operating in a complex and highly regulated health care delivery environment, we have implemented a system-wide Compliance Program.

A key element of Summit's Compliance Program is the *Code of Conduct and Ethics*, which serves as the foundation of our Compliance Program. The *Code of Conduct and Ethics* is derived from our mission and vision, and affirms the values and professional standards that already exist among our employees and colleagues. We are committed to following the *Code of Conduct and Ethics*.

Our success requires the active participation of every individual associated with our organization. **If you know or suspect that a law, regulation, policy, or our Code of Conduct and Ethics is not being followed, it is your responsibility to report this information.**

To assist you in carrying out your compliance responsibilities, we have designated a Corporate Compliance Officer and Deputy Compliance Officer. You can reach out to the Compliance Staff, your supervisor or director, or an administrator if you have any questions or concerns. Alternatively, if you prefer, you may call our dedicated Compliance Hotline to report a concern or make a complaint on a confidential basis. The phone number of the Hotline is 1-844-965-3490. Calls to the Hotline may be made anonymously.

Regardless of your reporting method, I can assure you that Summit Healthcare Association will not tolerate retaliation for good faith reporting of issues or concerns to anyone in management, the Summit Compliance Staff, or the Hotline.

Summit Healthcare Association is committed to implementing an effective Compliance Program. Our compliance efforts are critical to providing high quality services to our patients and upholding our mission, vision and values.

Sincerely,



William C. Gardner, MBA, MSN, HCM, RN
CEO

INTRODUCTION TO THE CODE OF CONDUCT AND ETHICS

Summit Healthcare Association is committed to serving our patients in an ethical, legal, and responsible manner, consistent with our organization's mission, vision and values. We strive to provide high quality services in compliance with all applicable laws, regulations, and guidelines, as well as Summit's policies and procedures. Summit recognizes its obligation to comply with all applicable requirements related to participation in Federal health care programs (e.g., Medicare and Medicaid), including the provision of high quality, medically necessary services, and the submission of accurate and complete claims and bills.

The *Code of Conduct and Ethics* contains the following 8 elements:

Element 1: Quality of Care
Element 2: Compliance with Laws and Regulations
Element 3: Work Place Integrity
Element 4: Billing, Coding, and Records Integrity
Element 5: Protection and Use of Information, Property, and Assets
Element 6: Conflicts of Interest
Element 7: Non-Retaliation and Duty to Report
Element 8: Compliance Responsibilities

The *Code of Conduct and Ethics,* as well as all applicable laws, regulations, guidelines, and Summit's policies and procedures shall be observed by everyone in our work environment or whom are acting on behalf of the organization. No one, regardless of position, will be allowed to compromise adherence to the *Code of Conduct and Ethics*, laws, regulations, business standards, policies, or procedures. Behaviors associated with misconduct and failure to comply with the *Code of Conduct and Ethics* or applicable laws, regulations, policies and procedures may result in:

(1) Serious damage to our standing and reputation with our patients and business partners;
(2) Legal or regulatory action against the organization and/or individual employees;
(3) Fines, penalties and/or sanctions; and/or
(4) Disciplinary action (including termination of employment or contract).

The commitment to abide by Summit's *Code of Conduct and Ethics* is documented via an attestation which is completed by our workforce members: employees, medical staff, administration, contracted entities, business partners, vendors, clinical students, volunteers and agents acting on behalf of the organization, as well as our governing board and foundation board members.

ELEMENT 1
QUALITY OF CARE

We are committed to providing high quality care and services.
Our primary responsibility is to our patients and their families.

- We will strive to provide the best level of care possible to patients.
- We will provide quality care and services consistent with the philosophy that all aspects of patient care are to be taken seriously.
- We will promote the well-being of our patients. We will plan medical interventions to improve their health and welfare.
- We will provide services to meet the identified needs of our patients. We will avoid the provision of services which are unnecessary.
- We will adhere to a uniform standard of care for all patients served throughout the association.
- We will respect the dignity of each patient by responding to all patient questions, concerns and needs in a timely and sensitive manner.
- We will provide ethical healthcare and adhere to bioethical principles; conflicts will be resolved fairly and objectively.
- We will treat every patient and their family with respect, courtesy and compassion at all times.
- We will inform patients of therapeutic alternatives and the risks associated with the care they are offered. Patients are active participants in medical decisions affecting their care.
- We will accurately represent ourselves and our capabilities to our patients.
- We will treat patients in a manner that takes into account their individuality, cultural needs and preferences.
- We will not discriminate against a patient for any reason including race, color, sex, national origin, age, disability, or any other classification protected by law.
- We will maintain the confidentiality of patient medical records consistent with all laws and professional standards.
- We will follow all applicable laws regarding patient rights; we will honor their choice for healthcare services.
- We will safeguard patient privacy, protected health information and confidentiality in accordance with the law.
- We will not turn away patients who are in need of our services based upon their ability to pay or any other reason unrelated to patient care
- We will protect the integrity of clinical decisions regardless of how it impacts finances of the organization, staff, leaders or physicians.

ELEMENT 2

COMPLIANCE WITH LAWS AND REGULATIONS

We are committed to maintaining high standards of business and professional integrity. We will provide patient care and conduct business in accordance with all applicable laws, regulations, and policies.

- We will conduct business in a fair, honest and proper manner.
- We will market only the services available and the level of licensure and accreditation.
- We will promptly report to Management, Administration, the Compliance Officer, or the Compliance Hotline whenever a possible violation of law, regulation, or policy has occurred. All compliance issues or reported concerns will be acted upon in a fair and prompt manner.
- We will not tolerate any retaliation or other negative action against an employee who reports a suspected violation or concern in good faith.
- We will not provide or accept kickbacks, bribes, rebates, or anything of value in order to influence or arrange for the referral of patients and services covered and payable by a Federal health care program.
- We will ensure that all agreements with an individual or organization that may be a referral source or generate referrals are in writing and approved by appropriate management and legal counsel prior to execution.
- We will bill patients and third-party payers in accordance with applicable laws, regulations, policies, and procedures.
- We will comply with our False Claims Act policies and educate employees, contractors and agents on their elements including: 1) preventing and detecting fraud, waste and abuse in Federal health care programs; 2) whistleblower rights and protections; and 3) penalties for false claims and statements.
- We will not admit or transfer patients based on economics. Decisions are based on the clinical needs of the patient and our scope of services.
- We will strive to ensure that complete and accurate patient medical records are maintained in accordance with Federal and state privacy and security laws, regulations, and policies.
- We will ensure that confidential patient information is accessible only to health care personnel involved in the patient's care, third party payers, and others authorized to review patient information.
- We will not hire or contract with individuals or entities that have been sanctioned by the Office of Inspector General (OIG) of the U.S. Department of Health and Human Services, e.g., excluded from participation in Federal health care programs, or barred from a state health care program, e.g. Medicaid.
- We will expect all employees and contractors to be familiar with applicable laws, regulations, and policies governing their area of work and responsibilities.

ELEMENT 3

WORK PLACE INTEGRITY

We recognize that our employees are our most valuable asset.
We are committed to creating a work place where employees are treated with respect and fairness while empowered to get the job done at or above expectations.

- We will provide a work environment for all those associated with Summit that is free from harassment and intimidation. We will not tolerate verbal, physical, or sexual harassment.
- We will make all employment and promotion decisions without regard to race, color, sex, national origin, age, disability, or any other classification protected by law.
- We will continually strive to build confidence and professionalism in every employee.
- We will maintain open lines of communication so that the views of each employee may be considered and their opinions given proper respect.
- We will show respect and consideration for one another, regardless of status or position.
- We will apply the *Code of Conduct and Ethics* and personnel policies to all employees regardless of position in the work place.
- We will provide reasonable training opportunities to assist employees in building and maintaining their professional skills.
- We are committed to maintaining a work place that protects the health and safety of our patients and employees. We will report to appropriate management staff any practice that may violate a safety standard.
- We will not tolerate any work place violence, including threats, harassment, or bullying toward an individual. Possession of weapons in the workplace is prohibited.
- The manufacture, sale, possession, distribution, or use of illegal drugs while working will not be permitted. We will not tolerate any individuals working under the influence of illegal drugs or alcohol.
- We will comply with Federal, state, and local laws, regulations, and rules that promote the protection of health and safety.
- We will familiarize ourselves and comply with the contents of the *Code of Conduct and Ethics*, as well as with policies and procedures applicable to the employment and responsibilities at Summit.

ELEMENT 4

BILLING AND CODING PRACTICES

We shall promote the preparation and maintenance of timely and accurate patient records and billing for rendered services, as documented in a patient's medical records.

- We will promote the correct coding and billing for services as provided and documented in a patient's medical record.
- We will ensure that claims submitted for payment are properly coded, documented, and billed in accordance with all applicable laws and regulations.
- We will not knowingly submit, or cause to be submitted, for payment or reimbursement a claim that we know to be false, fraudulent, or fictitious.
- We will promote the periodic review of bills, reimbursement, and medical records to ensure compliance with applicable billing, coding, and documentation requirements.
- We will promote the regular review of records relating to credit balances and promptly refund any overpayments.
- We will promote timely and complete preparation and maintenance of medical documentation and billing records in a manner consistent with applicable laws and regulations.
- We will assist patients to understand the potential costs of their care and the details of their bill. Financial counseling services will be available.
- We will promote the disclosure to third party payers (and patients) of any errors in billing, and refund any money received to which we are not entitled.
- We will promote the reporting and refunding of any identified overpayments made by Federal health care programs within 60 days of identification and verification.
- We will not promote the routine waiver of third party payer patient cost-sharing, e.g., deductibles and co-payments.
- We will not alter or prematurely destroy any document in response to, or in anticipation of, a request for those documents by any Government agency or court.
- We will respond to all questions and complaints related to a patient's bill in a direct, truthful, and timely manner.

ELEMENT 5

PROTECTION AND USE OF INFORMATION, PROPERTY AND ASSETS

We are committed to protecting Summit's property and information against loss, theft, destruction, and misuse.

- We will correctly use and care for all property and equipment entrusted to us.
- We will maintain and inventory supplies and fixed assets, and keep them secure.
- We will respect the property and possessions of a patient, and not engage in any unauthorized use.
- We will not make unauthorized copies of computer software or use unauthorized software on Summit's or a patient's computer equipment.
- We will not communicate or transfer any information or documents to any unauthorized persons.
- We will honor the privacy of patients and not reveal or discuss patient-related information except with health care personnel involved in the patient's care, payment of services, or other reasons directly related to care or payment.
- We will not use computers, software, e-mail, facsimile machines, and other technology to communicate information to unauthorized individuals. Further, the use of technology to send offensive, discriminatory, or harassing messages is prohibited.
- We will safeguard the use and disclosure of protected health information, including information related to treatment, medical history, current health status, payment for treatment and other information contained in patient records, in accordance with the Health Insurance Portability and Accountability Act (HIPAA) privacy and security regulations, state laws, and Summit's policies and procedures.

ELEMENT 6

CONFLICTS OF INTEREST

We are committed to acting in good faith in all aspects of our work.
We will avoid conflicts of interest or the appearance of conflicts between the private interests of any employee and her/his work duties.

- We will exercise good faith and fair dealing in all transactions that involve our responsibilities to Summit.
- We will devote our attention and activities to Summit and its patients during our working time.
- When possible, we will avoid any activity, practice, or act that creates an actual or apparent conflict of interest with Summit.
- We will report an actual or perceived conflict of interest to Summit's management and/or Compliance Officer.
- We will not abuse or misuse our position for personal and improper gain.

ELEMENT 7

NON-RETALIATION AND DUTY TO REPORT

We will report concerns about actual or potential wrongdoing without the fear of retaliation.

Summit has adopted a broad Non-Retaliation Policy to protect employees who report their concerns. No disciplinary action or retaliation will be taken when you report a perceived issue, problem, concern, or violation to management, administration, compliance staff, or the compliance hotline "in good faith." "In good faith" means an employee actually believes or perceives the information reported to be true. We value each individual. Everyone has the right to be treated fairly and with respect.

All employees, medical staff, contractors and agents who act on behalf of the organization have the responsibility to report legal and regulatory concerns. Failure to report compliance concerns may result in disciplinary action, up to and including termination from employment or contract.

How to Report Concerns and Ask Questions

Summit Healthcare encourages employees to report concerns and ask questions. All staff have the responsibility to report compliance and regulatory concerns and may choose any of the following:

Discuss the question or concern with your direct supervisor. Your direct supervisor is familiar with the laws, regulations, and policies that relate to your work.

If you are not comfortable with talking to your supervisor or feel you did not receive a satisfactory response, contact your manager or director. You may also contact another manager or director, or an administrator.

You may contact the Deputy Compliance Officer at 928-537-6510 or the Corporate Compliance Officer at 928-537-6556.

You may contact the Compliance Hotline at 1-844-965-3490. Compliance Staff receive and address hotline reports in a confidential manner. You may remain anonymous if desired.

You may report directly to the agency which governs the regulations or laws you are concerned about. Examples are Centers for Medicare and Medicaid, Office of Inspector General, Arizona Department of Health Services, and the Office for Civil Rights. If you need assistance, contact the Compliance Staff using the phone numbers listed above and we will help you.

ELEMENT 8
COMPLIANCE RESPONSIBILITIES

RESPONSIBILITY OF EMPLOYEES

All employees are expected to follow all applicable laws, regulations, and policies. Anyone who knows about a violation must report this information. If an employee does not report a violation, he/she may be subject to disciplinary action even if not directly involved. Reporting does not protect an employee from disciplinary action regarding his/her own performance or conduct, but their honesty in reporting will be considered. If a violation is suspected, employees are encouraged to speak up and discuss the situation with their direct supervisor or another leader who is familiar with the related laws, regulations and policies. See 'How to Report Concerns and Ask Questions' in previous page.

RESPONSIBILITY OF MANAGEMENT

Management is expected to demonstrate a commitment to ethical and legal behavior that is consistent with Summit's mission and Compliance Program. Management is responsible for maintaining an environment that stresses a commitment to compliance with the *Code of Conduct and Ethics* and with laws, regulations, and policies, as well as prohibits retaliation or reprisals against employees who report actual or suspected compliance violations. A supervisor or manager has an obligation to ensure that employees:

- Receive, read, and understand the *Code of Conduct and Ethics;*
- Understand their affirmative duty to report actual or suspected *Code of Conduct and Ethics* violations;
- Know about and follow all laws, regulations, and policies within the scope of their responsibilities;
- Know the procedures for reporting suspected or actual violations; and
- Encourage others to ask questions and to report actual or suspected violations.

If an employee comes to you with a question regarding compliance with a law, regulation, or policy, you are responsible for:

- Taking steps to ensure the employee does not fear or experience retaliation;
- Maintaining the employee's confidentiality;
- Collecting accurate information regarding the employee's report;
- Pursuing the right process so that reports of violations or suspected violations can be further investigated; and informing the employee that you have followed through on his or her report.

RESPONSIBILITY OF CONTRACTORS, VENDORS AND AGENTS

All entities who contract with Summit Healthcare Association and agents who act on behalf of Summit Healthcare Association are expected to follow all applicable laws, regulations and policies.

ATTESTATION AND ACKNOWLEDGMENT for the CODE OF CONDUCT AND ETHICS - Policy AW1084

- I have received and read the Summit Healthcare Association *Code of Conduct and Ethics*.
- I understand that the *Code of Conduct and Ethics* applies to my employment/contract with Summit and that following all applicable laws, regulations, policies, and the *Code of Conduct and Ethics* are conditions of my employment/contract.
- I will utilize the *Code of Conduct and Ethics* to guide my decisions and behavior.
- I will speak up and seek guidance from Summit's Managers, Administration, the Compliance Staff, or contact the Compliance Hotline with any compliance questions or concerns.

My signature below reflects that I have received, read and agree to comply with the Summit Healthcare Association *Code of Conduct and Ethics*.

Employee/ Agent /Contractor Signature Printed Name Date

Department or Agency/Company Name Employee ID #

Summit Healthcare Association
2200 E. Show Low Lake Road
Show Low, Arizona 85901
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