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Owner	David Lane: Chief Compliance Officer
Document Area	Compliance
Applicability	Providence Systemwide + PGC
Labels	Posted on Internet

PSJH-CPP-POL Code of Conduct

Scope:

This policy applies to the not-for-profit, non-profit entities of Providence and its Affiliates (collectively known as "Providence") and their workforce members (caregivers, professional staff, and members of the Providence System Board; Community Boards; and Foundation Boards, trustees, volunteers, trainees, interns, apprentices, students.), independent contractors, vendors and all other individuals working at the ministry, whether they are paid by or under the direct control of the facility; employees of affiliated organizations (collectively, "workforce members"). Where an organization is not wholly or majority owned, exceptions may apply.

☑ Yes ☐ No Is this policy applicable to Providence Global Center (PGC) caregivers?

This is a governance level policy, vetted by Executive Council with a recommendation for approval by the Providence Board, and signed by the appropriate delegate.

Purpose:

To define personal and professional standards of conduct and acceptable behaviors for all workforce members, while carrying out assigned responsibilities within Providence. This policy, along with the Code of Conduct, shall guide workforce members in business interactions with interested parties (e.g., suppliers, vendors, physicians, donors, politicians, etc.).

Definitions:

Compliance Program is fully described in the Compliance Program Description approved by the Board of Directors.
Workforce Member is defined as all caregivers, professional staff, and members of the Providence System Board; Community Boards; and Foundation Boards, trustees, volunteers, trainees, interns, apprentices, students.), independent contractors, vendors and all other individuals working at the ministry, whether they are paid by or under the direct control of the facility; employees of affiliated organizations (collectively, “workforce members”).

Policy:

Providence maintains a Code of Conduct (The Code) approved by the PSJH Board of Directors/Board of Trustees for its workforce members across the Providence family of organizations. This document describes and encourages behaviors in support of our mission, vision, and values to prevent and halt unethical or unlawful behavior as soon as reasonably possible after discovery. The Code provides Providence workforce members an understanding of expectations and their responsibilities as a Providence employees including their responsibility to report concerns.

Requirements:

1. The Code will be provided either in paper format or electronically to caregivers prior to hire but in no event later than 90 days of hire. Thereafter, a link will be provided to the Code whenever an update occurs and will also be included within the annual mandatory compliance education.
2. It is the responsibility of workforce members to:
    a. Act in a manner consistent with the Code, its supporting policies and procedures as well as applicable federal, state and local laws, and regulations;
    b. Support the Code by holding others accountable to the standards of conduct established in the Code;
    c. Seek clarification of any part of the Code that is not understood or where a question arises; and
    d. Report concerns or alleged violations promptly as outlined in the Code
3. The Code is available to workforce members in printed and/or electronic form in languages determined by management to meet the needs of Providence's diverse workforce.
4. The Code is reviewed and updated periodically.
5. Generally, the Code will cover the following topics:
    a. Mission and values.
    b. Purpose of the Code.
    c. Information on the Compliance Program.

d. How to report a concern.
e. Non-retaliation and corrective action.
f. Commitment to ethical and legal business practices.

6. Other ministry specifics operationalizing the Providence Code of Conduct may be implemented as long as they do not conflict with the Providence Code of Conduct.

Document Linkage:

Applicable Policies (and Supporting Standards if applicable)	**PSJH-CPP-POL Compliance Program Policy** • PSJH-CPP-STA Records Retention and Disposal Standard ◦ Records Retention and Disposal Schedule • PSJH-CPP-POL Fraud, Waste, Abuse Prevention and Detection Standard • PSJH-CPP-STA Anti-Corruption Compliance Standard **PSJH-CPP-POL Disclosure Program and Duty to Report Policy** • PSJH-CPP-STA Investigations Standard • PSJH-CPP-STA Nonretaliation Standard • PSJH-CPP-STA Compliance Reporting Obligations Standard **PSJH-CPP-POL General Privacy Policy** • PSJH-CPP-STA Privacy Sanctions Standard **PSJH-CPP-737 Reporting and Investigating Potential Compliance Issues & Reportable Compliance Events Policy** (WA & AK hospitals) **PSJH-CPP-738 Contract Policy -Management, Storage, and Reporting Requirements** (WA & AK hospitals only) **PSJH-CPP-POL Conflicts of Interest Policy** • PSJH-CPP-STA Vendor/Supplier Interactions Standard • PSJH-CPP-STA Gifts, Gratuities, and Business Courtesies Standard • PSJH-CPP-STA Conflict of Interest in Research Standard **PSJH-CYBR-950 Information Security Management Policy** • PSJH-CYBR-950.08 Acceptable Use Standard **PSJH-CLIN-1203 Nondiscrimination Policy** **PSJH-CLIN-1204 Trusted Decision Maker Delegation Policy** **PSJH-CLIN-1206 System-wide Patient Rights and Responsibilities Policy**

	PSJH-CLIN-1212 Event Reporting and Response Policy and Procedure **PSJH-MED-308 Excluded Individual Checks – Medical Staff Policy** **PSJH-REH-1005 Excluded Individuals and Entities Checks – Vendors Policy** **PSJH-RCS-1603 Patient Bad Debt Assignments Policy** **PSJH-REH-1011 Supplier Diversity, Equity, and Inclusion Policy** **PSJH-REH-1006 Supplier Onboarding Policy** **Policies and Standards on the Caregiver Service Portal:** • Acceptable Use Standards (KB Article) • Background Check and Excluded Individual Checks Policy • Confidentiality Policy • Counseling and Corrective Action Policy • Social Media Policy • Solicitation and Distribution Policy • Standards of Conduct Policy • Use of Cell Phones/Personal Devices Policy
Other Supporting Documents	Compliance Program Overview Compliance Program Description

References:

eCFR :: 12 CFR 1239.10 -- Code of conduct and ethics
The Ultimate Guide to a Code of Conduct

Attachments:

Providence Code of Conduct Poster 2023

Applicability:

1For purposes of this policy, “Affiliates” is defined as any not-for-profit or non-profit entity that is wholly owned or controlled by Providence St. Joseph Health (PSJH), Providence Health & Services, St. Joseph Health System, Western HealthConnect, Kadlec, Covenant Health Network, Grace Health System, Providence Global Center*, NorCal HealthConnect, or is a not-for-profit or non-profit entity majority owned or controlled by PSJH or its Affiliates and bears the Providence, Swedish Health Services, St. Joseph Health, Covenant Health, Grace Health System, Kadlec, or Pacific Medical Centers names (includes Medical Groups, Home and Community Care, etc.). *Policies and/or procedures may vary for our international affiliates due to regulatory differences.

Attachments

COC FINAL 2023.pdf

Approval Signatures

Step Description	Approver	Date
Document Management Office	Naomi Margolis: Senior Compliance Specialist	11/2026

Applicability

AK - Credena Health, AK - Providence Alaska MC, AK - Providence Kodiak Island MC, AK - Providence Medical Group, AK - Providence Seward MC, AK - Providence St. Elias Specialty Hospital, AK - Providence Valdez MC, CA - Credena Health, CA - Healdsburg Hospital, CA - Petaluma Valley Hospital, CA - Physician Enterprise Northern, CA - Physician Enterprise Southern, CA - Providence Cedars-Sinai Tarzana MC, CA - Providence Holy Cross MC, CA - Providence LCM MC San Pedro, CA - Providence LCM MC Torrance, CA - Providence Mission Hospitals, CA - Providence Queen of the Valley Medical Center, CA - Providence Redwood Memorial Hospital, CA - Providence Saint John's Health Center, CA - Providence Saint Joseph MC, Burbank, CA - Providence Santa Rosa Memorial Hospital, CA - Providence St. Joseph Hospital - Eureka, CA - Providence St. Joseph Hospital Orange, CA - Providence St. Jude Medical Center, CA - Providence St. Mary Medical Ctr Apple Valley, MT - Credena Health, MT - Providence St. Joseph MC, Polson, MT - St. Patrick Hospital, NM - Covenant Hobbs Hospital, OR - Credena Health, OR - Providence Ctr for Medically Fragile Children, OR - Providence Health Oregon Labs, OR - Providence Hood River Memorial Hospital, OR - Providence Medford MC, OR - Providence Medical Group, OR - Providence Milwaukie Hospital, OR - Providence Newberg MC, OR - Providence Portland MC, OR - Providence Seaside Hospital, OR - Providence St. Vincent MC, OR - Providence Willamette Falls MC, PACE, PHCC - Home & Community Care, PHCC - Home Health, PHCC - Home Medical Equipment, PHCC - Hospice, PHCC - Infusion/Pharmacy, PHCC - Palliative Care, Providence, Providence Express Care, Providence Global Center, Providence Physician Enterprise, Providence Traditional Health Workers, TX - Covenant Children's Hospital, TX - Covenant Health - ACO, TX - Covenant Health Partners, TX - Covenant Hospital Levelland, TX - Covenant Hospital Plainview, TX - Covenant Medical Center, TX - Covenant Medical Group, TX - Covenant Specialty Hospital, TX - Grace Clinic, TX - Grace Surgical Hospital, WA - Credena Health, WA - EWA Providence Medical Group, WA - Kadlec Regional Medical Center, WA - NWR Providence Medical Group, WA - PacMed, WA - Providence Centralia Hospital, WA - Providence DominiCare, WA - Providence Holy Family Hospital, WA - Providence Mt. Carmel Hospital, WA - Providence Regional MC Everett, WA - Providence Sacred Heart Med Ctr & Children's, WA - Providence St. Joseph's Hospital, WA - Providence St. Luke's Rehabilitation Medical, WA - Providence St. Mary MC, WA - Providence St. Peter Hospital, WA - SWR Providence Medical Group, WA - Skilled Nursing / AL, WA - Swedish Medical Center, WA - Swedish Medical Group, WA - USFHP

Standards

No standards are associated with this document