

**NORTHEAST HOSPITAL CORPORATION  
HUMAN RESOURCES POLICIES AND PROCEDURES**

**Policy #:** 5.20  
**Subject:** Lahey Health Code of Conduct  
**Applies to:** All Hospital Colleagues

As they gain experience, most people develop a personal set of values that they use as a guide for leading their lives. Responsible institutions – and Lahey Health is among them – do the same. The Lahey Health Board of Trustees has adopted this Code of Conduct because it believes that the values this Code expresses are critical to the success of Lahey Health’s mission.

Reputation is what determines whether patients and their families decide to trust us with their care. And Lahey’s reputation is built on individual decisions that you and we make every day. We rely on our CREATE behaviors and values to guide our actions. Imagine what happens when we all do the right thing every day no matter what the consequences. It gives us a reputation for trustworthiness.

Lahey Health has placed its trust in you. We assume you will do what is right, even when no one is watching. The purpose of this Code is to give you guidance when you encounter difficult issues. We could have made the Code a lengthy, detailed list of do’s and don’ts. But no set of rules can anticipate every situation. Consider this Code to be a compass.

**At Lahey Health, everyone – trustees, executives, medical staff members, other colleagues, volunteers, and our business partners - must follow these standards:**

- Put the care, safety, dignity and well-being of our patients ahead of everything else.
- Comply at all times with the Confidentiality Statement you signed at the outset of your association with Lahey.
- Tell the truth regardless of the consequences - whether you are speaking about patient outcomes, describing Lahey’s services (and those of its competitors), creating patient, billing or financial records, answering the questions of a government inspector or speaking up with concerns.
- Treat all individuals with the highest standard of respect, dignity and compassion regardless of their race, color, ethnicity, national origin, age, gender, sexual orientation, physical abilities, religious beliefs, financial resources, citizenship or appearance.
- Take responsibility for learning and following Lahey policies and procedures and for speaking up if you think they need to be changed - seek advice if you are not sure what the Lahey policy is in a particular situation.
- Never seek results by illegal or unethical means. At Lahey Health we do not offer gifts or other favors to referral sources, business partners, persons seeking elected office or government regulators.
- Keep our workplaces safe and clean.
- Make sure that our workplaces are free of any form of harassment.

- Do not accept any gift from those with whom we currently, or may, do business. Only accept a gift from or on behalf of a patient if it is a flower arrangement, holiday basket, baked good or the like and is shared with colleagues in your department or unit; all other gifts must be politely declined and/or returned.
- Always disclose facts and circumstances that might give even the appearance of a conflict of interest or a personal benefit to you.
- Speak up whenever you think someone is doing something illegal, unethical or otherwise improper. You can speak with the person involved, your supervisor, members of the Human Resources or Legal Departments, or a Compliance colleague. You can also anonymously use the Compliance Hotline – 24 hours a day, 7 days a week – at 1-855-392-5782 or at [www.laheyhealth.ethicspoint.com](http://www.laheyhealth.ethicspoint.com). The Hotline is run by an independent company.

It is our duty to speak up – so that Lahey can address problems and keep them from happening again. And Lahey Health will not tolerate retaliation of any kind – not even in the form of a cold shoulder - against a person who reports a concern in good faith.

**Those of you who are supervisors or other Lahey leaders must also do the following:**

- Make sure that the colleagues reporting to you are aware of this Code as well as Lahey policies and procedures - provide them with explanations and updates as well as examples, through your own conduct, of what is expected.
- Urge others to raise concerns of illegal, unethical or other improper conduct, and protect those that do so from retaliation in any form.

This Code of Conduct will not have value unless we are all held responsible for abiding by it. Individuals who are found to have violated the Code or engaged in illegal conduct will therefore be subject to appropriate corrective action, up to and including termination of association with Lahey. Any person at Lahey who violates a law may also be exposed to that law's enforcement provisions.

We are grateful that you have chosen to be a member of the Lahey Health community, and we appreciate your adherence to Lahey's values.

---

Philip M. Cormier, CEO

---

Althea C. Lyons, VP Human Resources

Date Issued: November 2016

Date Revised: January 2019