Title: CORPORATE COMPLIANCE –STANDARDS FOR BUSINESS CONDUCT, DISTRIBUTION AND TRAINING AT MHS

Scope:
All employees, volunteers, vendors, and Medical Staff

Policy Statement:
To establish requirements for distributing, collecting acknowledgments, and conducting orientation and annual Compliance training for employees, volunteers, vendors and Medical Staff related to MultiCare Health System’s Standards for Business Conduct (“Standards”).

Procedure:

I. Distribution for Employees:
   A. Each new employee receives a copy of the Standards at New Employee Orientation (NEO).
   B. Acknowledgements are signed and provided to management as part of the 90 day orientation checklist.

II. New Employee Training:
   A. Each new employee receives training on the Standards at NEO.

III. Annual Compliance Training:
   A. Every employee receives Compliance Training each year using materials provided by the Corporate Compliance Department.
   B. Should any employee fail to complete the annual Compliance training by the end of the year, the employee may be immediately suspended without pay until such time as he or she completes the training.
      1. Suspensions must be coordinated with and reported to Employee Relations.
      2. All such suspensions are unpaid. The employee is not permitted to use Paid Time Off (PTO) or Annual Leave (AL) for the time away, nor are they permitted to pick up extra shifts in the pay period to make up for the missed shifts.
   C. An employee on leave at the end of the year who did not complete the annual training prior to taking leave, must receive the current year’s refresher training within 30 calendar days of his or her return. This will satisfy the annual training requirement for both years.

IV. Code of Conduct:
A. The Standards are available on the Corporate Compliance web-site on MHSnet.

B. Vendors shall be provided access to the MHS Code at their orientation and via the MHS extranet.

C. Non-employed members of the MHS Medical Staff will be sent a copy of the new Standards handbook every time it is updated. Access is always available via the MHS extranet.

D. Volunteers are oriented to the Standards at their orientation. Access is available via MHSnet.

**Related Policies:**
MHS P & P: “Vendor Representatives”

**Point of Contact:** VP, Corporate Compliance & Internal Audit 459-8002

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| Original Date:    | 11/09              |
| Revision Dates:  | 2/10; 12/12        |
| Reviewed with no Changes Dates: | *None* |

Distribution: MHS Intranet