

## COMPLIANCE 7.0

## REPORTING UNETHICAL OR ILLEGAL CONDUCT

**Scope:** All subsidiaries of Universal Health Services, Inc., including facilities and UHS of Delaware Inc. and their personnel.

**Purpose:** To provide a mechanism for employees to report any known or suspected ethical violations or other activity that may be inconsistent with any provisions of the UHS Code of Conduct, Compliance Program, or UHS or facility policies, or that an employee believes may otherwise violate any law or regulation, including a mechanism for anonymous reporting.

**Policy:** UHS is committed to complying with all applicable laws and regulations including those designed to prevent and deter fraud, waste and abuse. The organization desires a climate that discourages improper conduct and facilitates open communication of any compliance concerns and/or questions. If any UHS subsidiary employees, including facility and UHS of Delaware employees, have knowledge of, or in good faith, suspect any wrongdoing in the documenting, coding, or billing for services, equipment, or supplies; in the organization's financial practices; involving any violation of any law or regulation; or involving a violation of any UHS or facility policy, they should promptly report it so that an investigation can be conducted and appropriate action taken.

There are many ways to report suspected improper conduct. In most cases, any concerns should be brought to the attention of a supervisor. However, if this does not result in appropriate action, or if an employee is uncomfortable discussing these issues with their supervisor, they should take their concerns to another member of management, or use the reporting methods available through the UHS or facility compliance programs. Failure to report any known illegal conduct can have serious consequences. Retaliation or reprisal against anyone for making a good faith report is strictly prohibited by law and is a violation of both the UHS Code of Conduct and UHS policy. Employees who report improper or illegal conduct are required to participate in any subsequent investigation.

Supervisors receiving a complaint that raises a potential compliance issue shall report the complaint to the Facility Compliance Officer. Complaints that do not raise a potential compliance issue should be referred to the appropriate department (e.g., risk management, Human Resources, facility management). Facility Compliance Officers shall report all complaints with potential compliance issues to the CEO and also to the Division Compliance Officer and/or Chief Compliance Officer.

Sometimes employees may become suspicious of innocent activities due to insufficient information. To prevent misunderstanding, we encourage all employees to immediately bring any concerns forward using the established internal channels.

Employees may be reluctant to discuss wrongdoing with their employers out of fear of retaliation. However, no retaliation will be permitted against an employee who brings forward concerns made in good faith. Only where it has been clearly determined that someone has made a report of wrongdoing maliciously, frivolously, or in bad faith will disciplinary action be considered.

**Procedure:**

1. If at any time, an employee becomes aware of or suspects illegal or unethical conduct or a violation of UHS or facility policies by another employee, a board member, a vendor, a contractor, medical staff member or a volunteer, the employee must report it immediately to an appropriate individual. Such individuals may include the employee's immediate supervisor, management, risk management, Facility Compliance Officer, applicable Human Resource Director, the Division Compliance Officer, the Chief Compliance Officer or the UHS Office of General Counsel.
2. Any employee may also make a report by using the toll-free Compliance Hotline (1-800-852-3449) or via Web Reporting on the internet at [www.uhs.alertline.com](http://www.uhs.alertline.com). Reports using these methods may be made anonymously, if the employee chooses.
3. Employees may contact appropriate UHS Corporate Departments by U.S mail, email, fax, or phone calls to report suspected illegal or unethical conduct. The Compliance Office may enter these communications into the UHS Compliance Hotline and investigate as required under **Compliance Policy 9.0 - Investigations**.
4. Self-reporting is encouraged. Anyone who self-reports their own wrongdoing or violation of law will be given due consideration in potential mitigation of any disciplinary action that may be taken.
5. Once a report is received, an appropriate person will then conduct an investigation into the allegations to determine the nature, scope, and duration of wrongdoing, if any. UHS investigates all non-frivolous claims of wrongdoing.
6. If the allegations are substantiated, a plan for corrective action will be developed. Appropriate corrective action may include restitution of any overpayment amounts, notifying an appropriate governmental agency, disciplinary action or making changes to policies and procedures to prevent future occurrences.
7. Retaliation in any form against anyone who makes a good faith report of wrongdoing or cooperates in an investigation is strictly prohibited. If any employee feels that they have been retaliated against, the employee should report it immediately, using any of the

reporting methods referenced in this policy.

Our commitment to compliance and ethical conduct depends on all employees. Should any employee find themselves in an ethical dilemma or suspect inappropriate or illegal conduct, they should remember the internal processes that are available for guidance or for reporting suspected unethical conduct, including the Compliance Hotline and Web Reporting program.

**Revision Dates:**

**10-12-2017; 10-01-2015; 10-26-2012**

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**Reviewed and Approved by:**

**UHS Compliance Committee**