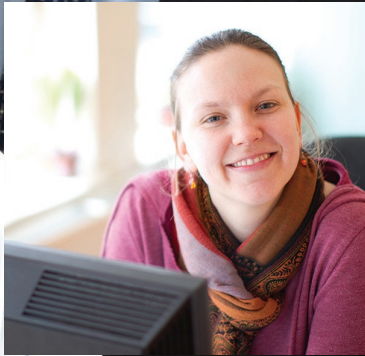




LEHIGH VALLEY
HEALTH NETWORK

Code of Conduct



A Message from LVHN's President and CEO

Dear board members, LVHN colleagues and members of our medical staffs:

This Code of Conduct (“the Code”) is intended to provide information that will guide you to make decisions that will foster an ethical culture throughout Lehigh Valley Health Network (LVHN). The Code applies to everyone in all LVHN entities, including, but not limited to, physicians and advanced practice clinicians in Lehigh Valley Physician Group (LVPG), our board members, our colleagues, our medical and allied health staffs, and Health Network Laboratories (HNL). **Note that you will find cross references to pertinent policies in the footnotes. These policies provide additional guidance.**

At LVHN, quality medical care, research and education are our top priorities, and ethics should be at the forefront of everything we do. By sharing our expectations regarding integrity and compliance, we seek to give our colleagues, providers, suppliers and other partners practical and structured guidance. Our credo is simple: Always do the right thing – even when no one is watching.

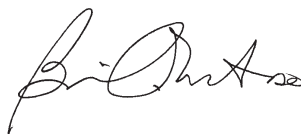
Getting the job done is not all that counts. Just as important is HOW we achieve our outcomes. Doing the right thing goes beyond simply complying with the laws, regulations and policies that govern LVHN and the services we provide. It means conducting ourselves with the utmost integrity in everything we do.

It is expected that you will thoroughly review our Code of Conduct at least annually and refer to it whenever a situation arises that requires you to exercise critical judgment. **When you complete annual compliance training each year, you sign an acknowledgement confirming that you agree to read and abide by this Code.**

If you have any questions about what is written in this booklet or, if after reading it, a concern comes to mind, please contact an LVHN compliance or privacy officer by calling 610-402-9100. If your concern is related to compliance or privacy at HNL, call 484-425-8150. If you prefer, you may report your concern anonymously by calling the Compliance Hotline (877-895-2905).

Demonstrating compliance and integrity in everything we do is everyone's responsibility.

Sincerely,



Brian Nester, DO, MBA

President and CEO, Lehigh Valley Health Network

LVHN CODE OF CONDUCT

TABLE OF CONTENTS

INTRODUCTION.....	4
LVHN MISSION AND VALUES	5
PATIENT CARE AND TREATMENT	6
PATIENT CONFIDENTIALITY AND PRIVACY	6
WORKPLACE CONDUCT AND EMPLOYMENT PRACTICES	7
Diversity and Equal Employment Opportunity.....	7
Health and Safety.....	7
Drug-Free Work Environment	7
Protection of Controlled Substances.....	7
Ineligible Persons.....	8
License and Certification Renewals.....	8
Environmental Compliance.....	8
Reporting Information Accurately and Completely	8
INFORMATION TECHNOLOGY AND COMPANY RESOURCES	9
Proprietary Information and Intellectual Property	9
Retention and Disposal of Documents and Records	9
Personal Use of Company Resources	9
BUSINESS RELATIONSHIPS	10
Conflicts of Interest.....	10
Relationships With Subcontractors and Suppliers.....	10
Interactions With Referral Sources	10
Accepting and Giving of Gifts	11
Political Relations.....	11
Marketing and Advertising Practices.....	11
Billing Practices	11
RESEARCH, INVESTIGATIONS AND CLINICAL TRIALS	12
DUTY TO REPORT SUSPECTED VIOLATIONS	13
Talking It Through	13
CONFIDENTIALITY AND NON-RETALIATION	14
INVESTIGATION AND ENFORCEMENT.....	14

INTRODUCTION

Our Code of Conduct demonstrates LVHN's absolute commitment to the highest standards of ethics and compliance, and assists us with adhering to these standards, while carrying out our daily activities. The guidance in this Code applies to our relationships with patients, other providers, third-party payers, subcontractors, independent contractors, vendors, consultants, competitors and one another.

The Code is the cornerstone of our Compliance Program. We developed the Code to provide guidance on how to achieve our ethical standards and comply with applicable laws and regulations. Abiding by the Code is mandatory for everyone in our network – our Board of Trustees, our leaders, members of our medical staffs, our colleagues and our vendors.

The guiding principles that are set forth in this Code are meaningful only if you are willing to make a personal commitment to maintaining the highest standards of ethical conduct. You are a valuable member of LVHN's team. We trust you and expect that you will follow these guidelines – every day and in every decision you make.

This Code is not meant to cover every situation that may arise or provide every detail of our policies and procedures. In some instances, the Code fully addresses the covered subject. In other cases, however, the subject matter requires additional guidance for those who are (or should be) seeking direction. To provide additional guidance, LVHN has developed policies and procedures to expand upon or supplement many of the principles addressed in the Code. **As noted in the message from LVHN's president and CEO, you will find cross references to pertinent policies in the footnotes.**

While all LVHN colleagues are obligated to follow our Code, we expect our leaders to set an example and to be role models for ethical conduct in every situation. Our supervisors shall create an environment where all team members feel free to raise concerns and propose ideas. Supervisors will ensure that those on their team have sufficient information and resources to comply with applicable laws, regulations and the policies that apply to their jobs.

We hope that you would feel comfortable bringing any concerns you might have to your immediate supervisor, so that any compliance issue or ethical dilemma may be resolved. If you are not comfortable doing so, you may contact an LVHN compliance officer or privacy officer by calling 610-402-9100. If your concern is related to compliance or privacy at HNL, you may call 484-425-8150.

Knowing whom to reach out to for more information about a potential compliance or ethics issue makes it easier for us to investigate. However, if you prefer, you may report your concern anonymously through the Compliance Hotline by dialing 877-895-2905 or by completing a form on the internet at LVHN.ethicspoint.com. This hotline is operated by a third-party vendor. You may reveal your identity if you choose to, but you are not required to do so, in order to file a report regarding an issue that causes you concern.

LVHN MISSION AND VALUES

Mission Statement

We heal, comfort and care for the people of our community by providing advanced and compassionate health care of superior quality and value, supported by education and clinical research.

Values

- We dedicate ourselves to service.
- We respect each individual's dignity and right to privacy.
- We demonstrate ethical behavior in our attitudes, actions and words.
- We commit ourselves to teamwork, collaboration and honest, open communication.
- We value the contributions of physicians, advanced practice clinicians, nurses and other colleagues in the pursuit of clinical excellence.
- Empathy and compassion guide us in creating an environment of understanding and concern for all.

Our behavior will be guided by the principle that all patients, colleagues, providers and visitors deserve to be treated fairly with respect and consideration. As such, we will:

- Fairly and accurately represent ourselves and our capabilities;
- Provide services to meet the identified needs of our patients and seek to avoid the provision of services that are not medically necessary;
- Adhere to a uniform standard of care throughout the organization to the extent possible;
- Strive to provide quality care regardless of the setting in which that care is provided; and
- Bill for services in accordance with applicable laws and regulations.

Triple Aim

We will make every effort to optimize our performance by simultaneously pursuing three dimensions, which are known as the "Triple Aim":

- Improving the patient experience of care (including quality and satisfaction);
- Improving the health of populations; and
- Reducing the cost of health care.

¹ Patient Rights and Responsibilities (Administrative Policy)

² Emergency Medical Treatment and Labor Act (EMTALA) Transfer of Patients... (Administrative Policy)

³ Advance Directive for Healthcare (Administrative Policy)

⁴ HIPAA... (Administrative Policies)

⁵ Social Media Participation (Administrative Policy)

PATIENT CARE AND TREATMENT

¹We treat all patients with dignity, compassion and respect while providing cost-efficient, quality care that is medically necessary, timely and appropriate. We will not discriminate on the basis of a patient's age, gender, disability, race, religion, national origin, sexual orientation, gender identity or ability to pay in our admission and treatment of patients.

²A patient with an emergency medical condition will only be transferred to another facility at the patient's request or if the patient's medical needs cannot be met at LVHN.

We respect our patients' right to and need for effective communication and the information needed to exercise their rights. We shall involve patients, and, as appropriate, their representatives, in their care and treatment. We will inform patients or their representatives of their rights to participate in their care and make their own health care decisions after receiving appropriate disclosure of their diagnosis, prognosis and treatment alternatives.

³Patients should be informed of their right to refuse treatment to the extent permitted by law, and to be informed of the potential medical consequences of such refusal.

PATIENT CONFIDENTIALITY AND PRIVACY

We respect and strive to protect each patient's personal privacy and preserve the confidentiality of medical record information. We make every effort to comply with all laws and regulations related to the privacy and security of patient information, including the Health Insurance Portability and Accountability Act of 1996 (HIPAA). Patients will be advised of these rights in writing at the time of admission. ⁴LVHN has developed policies and procedures to safeguard patients' protected health information, and we endeavor to comply with these policies and procedures.

⁵We will not share patients' protected health information without their permission, except when authorized or required by law. We will not discuss patient information with co-workers, except when necessary to perform our jobs. We will not discuss patient information where it may be overheard by others, and we will not leave written patient information where the public or other patients might see it. **When you complete annual compliance training each year, you sign a Confidentiality Statement acknowledging that you understand what is expected of you in this regard, and you will act in accordance with these expectations.**



WORKPLACE CONDUCT AND EMPLOYMENT PRACTICES

Equal Employment Opportunity

^{6,7}LVHN promotes an equal opportunity workforce and does not discriminate on the basis of race, color, religion, sex, national origin, age, disability, sexual orientation, gender identity or gestation (pregnancy) with regard to any offer of employment, termination of employment or condition of employment. We are committed to providing an inclusive work environment where everyone is treated with fairness, dignity and respect. We hold ourselves accountable for the manner in which we treat one another and for the manner in which people around us are treated. We are committed to recruit and retain a diverse staff reflective of the patients and communities we serve. ⁸We will not tolerate harassment in any form, including offensive or inappropriate language, jokes, slurs or intimidation.

Respect and Inclusion

We deliberately and respectfully promote and value talents and perspectives of our workforce, we hold all colleagues accountable to actively respect and appreciate all aspects that differentiate one individual from another. This inclusive strategy is critical to our ability to promote delivery for culturally responsive services, improved health care quality and equitable outcomes, more effective education for learners and research that enhances health status and quality of life.

Health and Safety

We will comply with all legal requirements, LVHN policies and industry standards that promote the protection of workplace health and safety. ⁹If there is a serious workplace injury or any dangerous situation presenting a risk for injury, you should report the situation immediately so that timely corrective action may be taken to resolve it.

Drug-Free Work Environment

We are committed to a drug-free work environment. ¹⁰Reporting to work under the influence of any illegal drug, having an illegal drug in your system, or using, possessing or selling illegal drugs while on LVHN work time or property, may result in immediate termination. We may use drug testing as a means of enforcing this policy. We also recognize that individuals might take prescription or over-the-counter medications, which could impair judgment or other skills required for job performance. If you have questions about the effect of such medication on your performance, or if you observe someone who appears to be impaired while at work, you should immediately report your observations to your supervisor.

Protection of Controlled Substances

Some of our colleagues routinely have access to prescription drugs, controlled substances and other medical supplies.

¹¹Many of these substances are governed and monitored by specific regulatory agencies and must be administered only following a physician's order. ¹²Prescription and controlled medications and supplies must be handled properly and only by authorized individuals, in order to minimize potential risks. If you become aware of inadequate security precautions for drugs or controlled substances or the diversion of drugs from LVHN, you should report the situation immediately.

⁶ Employment Discrimination (HR Policy)

⁷ Equal Employment (HR Policy)

⁸ Harassment (HR Policy)

⁹ Workers' Compensation (HR Policy)

¹⁰ Drug/Alcohol Use... (HR Policy)

¹¹ Medication – Narcotics... (Administrative Policy)

¹² Medication – Diversion... (Administrative Policy)



¹³ OIG Exclusion Review
(Administrative Policy)

¹⁴ Licensure, Certification (HR
Policy)

¹⁵ Waste Management Program
(Environment of Care
Policy)

Ineligible Persons

¹³We will not contract with or employ an individual or entity who/that is excluded from or ineligible to participate in state or federal health care programs; suspended or debarred from federal government contracts; or has been convicted of a criminal offense related to the provision of health care items or services, nor will we bill for items or services rendered, ordered or prescribed by those individuals or entities. We also will not contract with, employ or bill for services rendered by an individual or entity who/that has not been reinstated in state or federal health care programs after a period of exclusion, suspension, debarment or ineligibility. LVHN routinely searches the Department of Health and Human Services Office of Inspector General's (OIG's), certain states', and others' lists of such excluded and ineligible persons and entities. An employee must notify Compliance Services immediately by calling 610-402-9100 if the employee becomes excluded, debarred or ineligible to participate in state or federal health care programs; or has been convicted of or charged with a criminal offense related to the provision of health care items or services.

License and Certification Renewals

All colleagues in positions that require professional licenses, certifications or other credentials shall maintain their credentials in active status and shall comply at all times with federal and state requirements applicable to their respective disciplines. ¹⁴To ensure compliance, we will require evidence that an individual's license or credential is in active status. We do not allow anyone to work without a valid, current license or proper credentials.

Environmental Compliance

LVHN strives to comply with all environmental laws, regulations and related hospital policies and operate with the necessary permits, approvals and controls. We act to preserve our natural resources to the fullest extent reasonably possible. We maintain proper procedures to provide a clean environment of care and to prevent pollution.

¹⁵In order for LVHN to comply with these laws and regulations, all colleagues must understand how their job duties may impact the environment, adhere to all requirements for the proper handling of hazardous materials, and immediately alert their supervisor to any situation involving the discharge of a hazardous substance, improper disposal of hazardous or medical waste, or any situation that may be potentially damaging to the environment.

Reporting Information Accurately and Completely

Health care is a highly regulated industry, and LVHN has frequent dealings with governmental agencies. These agencies include, but are not limited to, the Department of Health and Human Services, Centers for Medicare and Medicaid Services, Occupational Health and Safety Administration, Food and Drug Administration, Internal Revenue Service and related state and local agencies. We make every effort to comply with the regulatory and reporting requirements of all federal, state and local agencies.

We are required to record, compile, maintain and submit substantial information to these governmental agencies on a regular basis. Dishonesty could result in severe penalties, such as monetary fines, imprisonment or exclusion from participation in state or federal health care programs. Therefore, we expect all colleagues who prepare information for and/or submit information to government agencies to do so in a diligent manner and with the highest degree of integrity.

When LVHN is asked to provide documents or information to a government agency, it is our policy to fully cooperate, as required by law. Any request for documents or information received from a government agency must be immediately directed to your manager. Managers shall notify Compliance Services.



INFORMATION TECHNOLOGY AND COMPANY RESOURCES

Proprietary Information and Intellectual Property

Confidential information about LVHN's business strategies and operations is a valuable asset. ¹⁶Colleagues shall not share this information with others unless the individual has a legitimate need to know this information and has agreed to maintain its confidentiality. Confidential information includes, but is not limited to, client lists and clinical information, pricing and cost data, employee lists, information pertaining to mergers and acquisitions, financial data, research data, strategic plans, marketing strategies, supplier information and proprietary computer software.

¹⁷Colleagues shall protect LVHN's copyrights, trademarks and other intellectual property by complying with applicable policies and procedures. This obligation continues even after someone leaves LVHN. Colleagues shall not enter into agreements relating to LVHN's intellectual property without proper approval. LVHN also strives to comply with all intellectual property laws and not infringe upon the intellectual property rights of others.

Retention and Disposal of Documents and Records

LVHN is responsible for the integrity and accuracy of its documents and records to provide quality care, comply with regulatory and legal requirements, and to ensure that records are available to defend business practices and actions. ¹⁸LVHN is committed to retaining medical and legal records for as long as they may be potentially useful for business purposes or as required under applicable laws or regulations. ¹⁹Medical and business documents include paper documents, such as letters and memos; computer-based information, such as email or computer files on disk or tape; and any other media that contains information about LVHN or its business activities. Colleagues shall not alter or falsify information in any record or document. Colleagues also shall not tamper with records or remove or destroy them prior to the specified destruction date, or in an attempt to prevent appropriate authorities from reviewing the information for a government or internal investigation or audit.

Personal Use of Company Resources

We are responsible for preserving LVHN assets, including time, materials, supplies, equipment and information, and maintaining them for business-related purposes. As a general rule, personal use of any LVHN assets without prior supervisory approval is prohibited. The occasional limited use of items or equipment, such as copiers or telephones, where the cost to LVHN is insignificant, is permissible. ²⁰However, the use of LVHN resources for personal gain unrelated to LVHN business is strictly prohibited, and the use of LVHN resources for any community or charitable event or purpose must be approved in advance by your supervisor.

²¹All computers and communication systems, including computer files and drives, electronic mail, intranet service, Internet access and voicemail, are LVHN property and will be used primarily for business purposes. LVHN will permit very limited and reasonable personal use of computers and communications systems, but, when doing so, you should be aware that any LVHN electronic mail and other communications are considered to belong to LVHN and are not considered to be private. LVHN reserves the right to periodically access, monitor and disclose the content of computer files and drives, email and voicemail messages.

¹⁶ HIPAA-Confidentiality (Administrative Policy)

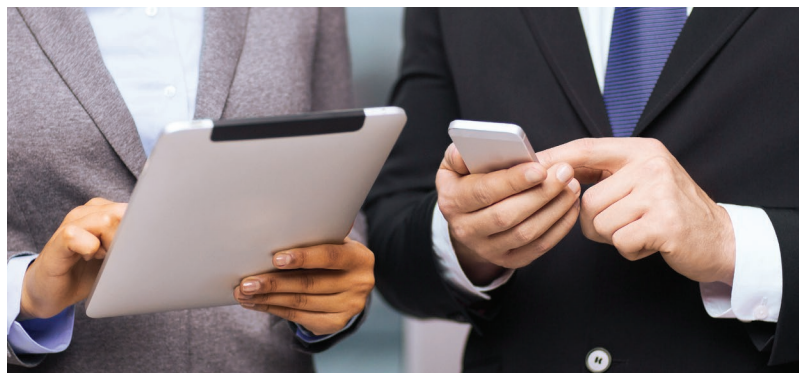
¹⁷ Intellectual Property (Administrative Policy)

¹⁸ Record Management and Retention Schedule (Administrative Policy)

¹⁹ Disposal of Office & Protected Health Information (Administrative Policy)

²⁰ Conflict of Interest or Commitment (Administrative Policy)

²¹ Acceptable Computer Use (Administrative Policy)



²² Contractual Agreements
(Administrative Policy)

²³ Contracting & Purchasing
(Administrative Policy)

²⁴ Vendor Policy Guide
(Administrative Policy)

BUSINESS RELATIONSHIPS

Conflicts of Interest

LVHN is committed to remaining free of conflicts of interest, when possible, and appropriately managing any potential conflict of interest. Conflicts of interest may arise in a variety of situations. A conflict of interest, or even the appearance of a conflict, may occur if outside activities or personal interests influence or appear to influence one's ability to make objective decisions while conducting business. Outside activities that require, or appear to require, so much of one's time that his or her professional duties are negatively impacted also may cause a conflict of interest. Conflicts of interest also may arise when an LVHN colleague or family member receives improper personal benefits as a result of his or her position in our network.

You must immediately disclose any *potential* conflict of interest involving yourself or an immediate family member to your supervisor or to Compliance Services by calling 610-402-9100. You should not make a decision on your own regarding whether your personal situation constitutes an actual conflict of interest. You must disclose any POTENTIAL conflict.

Relationships With Subcontractors and Suppliers



LVHN manages our consulting, subcontractors and supplier relationships in a fair and reasonable manner, free from conflicts of interest, and consistent with applicable laws and good business practices.

²²We promote competitive procurement to the extent it is feasible.

²³Our selection of consultants, subcontractors, suppliers and vendors is made on the basis of objective criteria including quality, technical excellence, price, adherence to schedules, service and maintenance of adequate sources of supply. Our purchasing decisions are made based on the supplier's ability to meet our needs, rather than on personal relationships.

We employ ethical standards in business practices in source selection, negotiation, determination of contract awards and the administration of all purchasing activities. We also comply with contractual obligations to not disclose vendor confidential information, unless permitted under the contract or otherwise authorized by the vendor.

Interactions With Referral Sources

LVHN is committed to conducting all business in a compliant manner. ²⁴Federal and state laws, including the federal Anti-Kickback Statute, prohibit direct, indirect or disguised payments (in the form of a cash payment, gift, contribution or other compensation) or anything of value in exchange for referrals of business.

No one affiliated with LVHN shall provide, or offer to provide, any payment or incentive (i.e., anything of value) – monetary or other – to any individual or entity as a way of increasing volume of referrals. Any compensation arrangement with a physician or other health care professional must be in the form of a written contract that is executed and maintained in accordance with federal, state and local laws, as well as applicable LVHN policies.

LVHN and its affiliated physicians shall not offer or accept payment or anything of value (i.e., items or services) in exchange for referrals of business. All referrals must be made solely on the basis of what is in the patient's best interest and in accordance with all applicable laws and regulations.

Accepting and Giving Gifts

No one to whom this code applies shall offer or receive gifts as bribes or kickbacks or in exchange for, or as a reward for, business referrals. Cash or a cash equivalent (e.g., gift card) should never be offered to or accepted from referral sources. When giving or receiving gifts to or from potential referral sources, the value must be minimal enough so as to avoid being, or even appearing to be, improper. Gifts may only be given or received in full compliance with LVHN policies and procedures.

Political Relations

Local, state and federal laws govern contributions made by organizations to political parties.²⁵ As an organization, LVHN does not participate in any political campaign on behalf of, or in opposition to, any candidate for public office. To ensure compliance, all efforts to influence legislative and regulatory matters related to local, state or federal levels of government, as well as any other non-lobbying contact with political officials or candidates, must be pre-authorized by, or coordinated through, the LVHN Office of Government and Legislative Affairs.

No colleague should be forced, directed or in any way urged to make a political contribution by a supervisor or fellow colleague. It is each colleague's right to decide whether or not to participate in political and community activities. Decisions by our colleagues regarding whether to contribute their own time, money or resources to any political or similar activity shall be entirely personal and voluntary.



²⁵ Political Activity, Lobbying and Government Contact (Administrative Policy)

²⁶ False Claims and Payment Fraud Prevention (Administrative Policy)

Marketing and Advertising Practices

Consistent with laws and regulations that govern such activities, LVHN may use marketing and advertising activities to educate the public, provide information to the community, increase awareness of our services, and to recruit colleagues. To ensure an accurate depiction of the services available to current and prospective patients, we are committed to maintaining truthful and unambiguous representations and descriptions of clinical services through all communications, including advertising and marketing.

Billing Practices

LVHN is committed to accuracy in billing and coding practices and to compliance with all governmental and third-party payer requirements.²⁶ We shall not knowingly allow anyone to present or cause to be presented any false, fictitious or fraudulent claims. Documentation in medical records must be accurate and complete. All claims for payment must be for services actually rendered and must be supported by adequate documentation in the patient's medical record. Inaccuracies in claims that are identified after submission must be immediately reported to a manager or to Compliance Services, so that corrective action may be taken.

²⁷ Responding to Allegations of Research Misconduct (Administrative Policy)

²⁸ Research Involving Human Subjects (Administrative Policy)

RESEARCH, INVESTIGATIONS AND CLINICAL TRIALS

LVHN follows the highest ethical standards in full compliance with federal and state laws and regulations in all human subject research projects conducted by our physicians and professional staff. ²⁷We do not tolerate research misconduct, such as fabricating or changing results, copying results from other studies without performing the clinical investigation or research, failing to identify and appropriately manage investigator or institutional conflicts of interest, or proceeding without Institutional Review Board (IRB) approval. Our first priority is always to protect patients and human subjects and respect their rights during their participation in human subject research projects.

²⁸Physicians participating in research investigations and clinical trials must fully inform their patients of their rights and responsibilities related to participating in the research or clinical trial. All patients asked to participate in a clinical investigation or research project must be offered a full explanation of alternative services that may prove beneficial to them. They also must be fully informed of potential discomforts and be given a full explanation of the risks, expected benefits and alternatives. These patients must be fully informed of the procedures to be followed, including those that are experimental in nature. Refusal of a patient to participate in a research study must not compromise his or her access to services. A patient's voluntary informed consent to participate in a clinical investigation or research project must be documented and retained pursuant to LVHN policies.

LVHN colleagues who perform research of any type must follow all applicable federal, state and institutional research policies and maintain the highest standards of ethics and accuracy in any written or oral communications regarding the research project. As is true for all accounting and financial record-keeping, LVHN's policy is to submit only true, accurate and complete costs related to research activity. All human subject research must be submitted to, and approved by, an IRB and conducted in accordance with established LVHN policies.



DUTY TO REPORT SUSPECTED VIOLATIONS

Illegal acts or improper conduct may subject LVHN to severe civil and criminal penalties, including large fines and being barred from certain types of business. ²⁹Any colleague who becomes aware of a violation or suspected violation of any of the laws or regulations that apply to our operations has a duty to report such violation or suspected violation immediately to a manager or to Legal Services or Compliance Services. Reporting a concern directly allows the investigator to obtain additional information, if needed. However, if you are not comfortable reporting your concern directly, you may report anonymously through the Compliance Hotline (EthicsPoint), either by phone or via the Internet. (See below.)

A report of a suspected violation may be made in person, by phone or in writing, to:

- A supervisor or department manager
- LVHN compliance or privacy officer 610-402-9100
- HNL compliance or privacy officer..... 484-425-8150
- Compliance Hotline (EthicsPoint)..... 877-895-2905
or www.lvhn.ethicspoint.com
- HR director, employee relations..... 484-884-3187
- Employee relations specialist..... 484-884-0148
- Legal Services 610-969-2774



All reports of suspected violations of law, this Code, LVHN policies or ethical standards will be promptly investigated. Anyone involved is expected to cooperate with these investigations. It will be considered a violation of this Code to prevent, hinder or delay discovery and full investigation of suspected violations.

Talking It Through

There are countless examples of ethical and legal problems and dilemmas that can arise in the workplace. When deciding how to best manage these situations, colleagues are encouraged to seek guidance from Legal Services or Compliance Services.

When making a difficult decision, seeking input from others is more likely to result in a reasonable solution. When you keep an ethical dilemma to yourself and struggle to address it alone, the outcome is likely to be less than optimal. Do not hesitate to call on those who are here to help you.

Adherence to all laws, regulations and policies that apply to what we do each day at LVHN requires constant diligence. That is why it is important for each of us to know and understand the laws, regulations and policies that are fundamental to our duties and to seek guidance when the path to the right decision is not clear.

The well-being of our network and those within it requires each and every one of us to make a personal commitment to always do what is right. We must never compromise our ethics in order to meet business objectives. This commitment will help ensure the continued success of LVHN and foster a working environment that conveys pride and enthusiasm.

