

LIVING OUR VALUES

CODE OF CONDUCT
2026



**PULLMAN
REGIONAL
HOSPITAL**

DEAR TEAM,

At the heart of our mission is a simple but profound commitment: to be the best place to work and the best place to receive care. Achieving this begins with our values: trust, transparency, and teamwork. Trust allows us to depend on one another, transparency ensures we are aligned in purpose, and teamwork elevates the extraordinary results we achieve together.

Every decision we make is guided by the human experience—for our patients, their loved ones, and each other. Our work is not only about delivering exceptional clinical outcomes, but also about creating moments of compassion, dignity, and experiences that people carry with them for a lifetime.

Your voice as an employee matters deeply. We listen to your ideas, your concerns, and your aspirations because they shape the future of our hospital. Your perspectives help us improve care, strengthen our culture, and innovate in ways that reflect the needs of those we serve.

This organization thrives when our mission aligns with your personal values. For me, that's making a positive impact on the community I serve. Every day, we contribute to a healthier, stronger place to live—not just through healthcare services, but through outreach, education, and partnerships that address the broader needs of our neighbors.

Thank you for bringing your talent, heart, and dedication to this work. Together, we will continue building the premier place to work and receive healthcare.



Matt Forge, CEO

Our Mission

Pullman Regional exists to nurture and facilitate a healthier quality of life for our community.

Our Vision

Pullman Regional is a community leader of integrated health and healing activities where our values guide and inspire, and science and technology quietly enable people to comfort, encourage, and heal.

Our Values



TEAMWORK



TRUST



TRANSPARENCY

Our Value Statements:

- Pullman Regional will be universally aligned in purpose to support our individual needs while meeting the greater health needs of our organization and region.
- Everything we do together is patient and community centered.
- Pullman Regional will embrace the evolution of healthcare collaboratively while building on our strong history and commitment to the delivery of compassionate and reliable healthcare.
- Pullman Regional will embrace the opportunities the future holds through innovation, open and challenging thought processes, and trust change.

Navigating the Code of Conduct

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What is the Code of Conduct?

Why is it Important to Me?



Our values serve as a guide for the decisions we make.

The Code of Conduct highlights the connection between the work we do every day and our values. It provides examples of what it means to live our values: Trust, Transparency and Teamwork.

To achieve Pullman Regional's mission and vision, each of us must do our part to deliver extraordinary care in accordance with the law, Pullman Regional policies and procedures and our Code of Conduct.

This resource guide is the foundation of our Ethics Committee and Compliance Program. It outlines:

- The organization's ethical and professional standards.
- The methods which are available for reporting issues in conflict with our standards.

All employees, volunteers and independent contractors are responsible for knowing, understanding and following our Code of Conduct and the policies and procedures it reinforces.

For more information on any topic presented in this guide, refer to Pullman Regional's policies and procedures.

Ethical Self-Assessment

Pullman Regional has a commitment to prevent unethical or unlawful behavior, to halt such behavior as soon as possible after its discovery, and to discipline employees who violate the standards in this Code of Conduct. We expect that all employees will comply with this Code, seek clarification through appropriate channels when questions or issues arise, and assist in any investigation of wrongdoing.

This Code cannot cover all circumstances or anticipate every situation. If you encounter a situation not addressed specifically by this Code, you should apply the overall philosophy and concepts of this code to the situation. You should also be mindful of the values by which Pullman Regional stands and uphold the values and vision of the organization.

Since the Code of Conduct cannot address every potential situation, here are some general questions to help apply the principles in this guide:

- How would the issue appear to someone outside Pullman Regional?
- Will my actions hurt my reputation, the reputation of my colleagues or the reputation of the organization?
- Is this an ethical thing to do?
- Are my actions consistent with the Code of Conduct?
- Will my actions violate any laws, regulations or Pullman Regional procedures?



EXCELLENCE

Aspiring to be the best place to work and receive healthcare.

EXCELLENCE BEHAVIOR STANDARDS

I research the best practices in my area of expertise and proactively seek opportunities for continued growth and improvement.

- I care for myself so I can bring a positive and helpful attitude to my daily work.
- I accept coaching as part of continuous improvement.
- I seek to understand, not just be understood
- I deliver high-quality outcomes while maintaining integrity.
- I assess my own competence and seek consultations and help from qualified resources when appropriate.
- I commit to being accountable for zero harm.
- I know my voice is valued, and I provide helpful input in constructive ways.





Providing Safe, Extraordinary Care

What You Need to Know

- Create an inclusive, safe environment for patients, visitors, customers and colleagues.
- Always treat others with compassion, respect and dignity.
- Be honest and fair in all actions.
- Make clinical decisions based on each individual patient's identified needs, not their financial circumstances.
- Use AIDET (Acknowledge, Introduce, Duration, Explanation and Thank you)
- Look for opportunities to improve the patient experience.
- Speak up about concerns or suspected misconduct.
- Safeguard patient and business information from inappropriate access and/or use and maintain the integrity of HIPAA.
- Document and bill appropriately and accurately.
- Use Pullman Regional resources responsibly.
- Report potential conflicts of interest.
- Do not accept, offer or give anything of value in exchange for the referral of patients or personal gain.



Working together toward shared goals

EMPLOYEE RESPONSIBILITY

At Pullman Regional Hospital, we achieve advanced professional and ethical standards. We demonstrate these behaviors while on campus and when providing exceptional care to patients and visitors.

All employees are expected to:

- Read and understand the Code of Conduct, then apply it to your position.
- Live the values of our Code of Conduct in your daily work and follow Pullman Regional Hospitals procedures consistently.
- Be engaged, ask questions, report issues, and support your fellow workers in upholding our standards.

OUR LEADERSHIP PROMISE

As leaders at Pullman Regional, we commit to living our values of Trust, Transparency, and Teamwork in every decision and action. Our promise to you is:

- We will listen and respond. Your voice matters. We will seek out your ideas, address your concerns, and involve you in shaping solutions.
- We will model integrity and accountability. We set the example by upholding our Code of Conduct, admitting mistakes, and taking corrective action when needed.
- We will create a safe and respectful environment. We are responsible for fostering a culture where every employee feels valued, supported, and empowered to speak up.
- We will support growth and development. We invest in you—providing opportunities for learning, professional advancement, and recognition of your contributions.
- We will champion teamwork. We remove barriers, encourage collaboration, and celebrate achievements as one team dedicated to extraordinary care.

Culture of Safety

Every Patient, Every Time

Every member of Pullman Regional's staff is integral to daily operations and the human experience. We all work together, along with our policies and procedures, to create a positive atmosphere in our Hospital and clinics. Defining these standardized practices supports a culture of safety. Our community and staff are counting on each individual to follow these procedures and live our values. We do this every day, for every patient, and every co-worker, every time. It is everyone's responsibility to uphold these standards by speaking up in the event of non-compliance or concern of potential patient harm.

The responsibility we share is how we achieve extraordinary care.



Transparency

Reporting Compliance Issues



At Pullman Regional, we report concerns that suspected misconduct that could violate state or federal laws, Pullman Regional policies and procedures, or the Code of Conduct.

There are several ways to report concerns or suspected violations:

- **Contact Your Supervisor:** You are encouraged to talk to your supervisor about concerns or suspected violations.
- **If you cannot speak with your supervisor,** Human Resources may be an additional resource. Contact Human Resources if the situation involves inappropriate behavior, harassment, fair treatment, payroll or disciplinary issues.
- **Contact Human Resources:** hr@pullmanregionalhospital.freshservice.com
- **Report by Phone:** Corporate Compliance line **(509) 336-7521**
- This line is not intended to replace your normal reporting process, but it is another resource available to you.
- **Report anonymously online:** Care Alert
- This website allows you to report your concern confidentially. When submitting a report online, you may remain anonymous or identify yourself to be contacted directly by Pullman Regional's Compliance department if additional details are needed.

Investigation & Resolution

At Pullman Regional, we review and respond to concerns, inquiries and allegations of misconduct promptly.

If necessary, we take action to:

- Implement changes to prevent a similar violation from happening.
- Initiate corrective and/or disciplinary action.
- Notify the appropriate governmental agency.

Non-Retaliation

At Pullman Regional, we enforce a strong non-retaliation procedure to protect team members or members of the public who report in good faith.

You must report any actual or suspected behavior that is not consistent with our values.

CONFIDENTIALITY

We make every effort to maintain the anonymity of the reporting individual. We will keep all reports confidential to the extent allowed by law or policy.

Disciplinary Action

Violations of the Code of Conduct, or a Pullman Regional policy or procedure, may result in counseling and/or disciplinary action, up to and including termination.

Just Culture

We align with the principles of “Just Culture” to build an environment of safety. A Just Culture defines three types of errors:

1. Error because of human factors (i.e. fatigue, equipment failure, system failures)
2. At-risk behavior that differs from standards (i.e. work-arounds)
3. Reckless behavior

If an error occurs, these definitions guide the actions of management to respond to the incident fairly.

Good Faith Reporting

Q: I have serious concerns that a co-worker is violating a Pullman Regional procedure. Will I get in trouble if I report my concern and I am wrong?

A: No. We prohibit retaliation against individuals who report in good faith. Good faith reporting means that you have a strong belief that a potential violation has occurred and delivering all the facts you know.

Service

Serving others and our community

SERVICE BEHAVIOR STANDARDS

- I treat everyone as the most important person I will see today and strive to exceed their expectations.
- I follow the 10/5 rule: acknowledging someone at 10 feet away with a smile and saying “hello” at 5 feet away.
- I help lost guests and new employees by escorting them to their destination.
- I anticipate patients’ needs, respond quickly and always ask, “Is there anything else I can do for you?”
- I value the diversity of our patients and customers and show sensitivity to others’ needs.
- I promote a safe and clean environment by removing trash, eliminating clutter and keeping equipment in working order.
- I always use AIDET (Acknowledge, Introduce, Duration, Explanation and Thank You).
- I manage up and maximize confidence and trust in my colleagues and minimize fear and worry for our patients and community.
- I follow our organization’s Aesthetic Guidelines when making decisions about spaces our patients and my colleagues experience. For questions, contact the External Relations & Marketing Department.



Safety, Health & the Environment

At Pullman Regional, we are committed to a safe, drug and alcohol free work environment.

You are required to:

- Know how Pullman Regional safety procedures apply to your job.
- Immediately notify your supervisor if you identify a situation or safety hazard presenting a danger to yourself or others.
- Smoking is only allowed in designated areas.
- Complete mandatory training.
- Report to work free from the influence of drugs, legal or illegal, that may affect your ability to safely perform your job responsibilities.
- Immediately notify your supervisor if you observe an individual who appears to be impaired.

We make an effort to reduce our impact on the environment by:

- Utilizing resources appropriately and efficiently.
- Recycling when possible.
- Following all requirements for the handling, storage and disposal of hazardous materials.

Get Involved! Pullman Regional has a Workplace Safety Committee and Equity and Inclusion Committee.

Workplace Conduct & Employment Practices

At Pullman Regional, we embrace diversity.

A diverse workforce enables us to meet the needs of our diverse patient population and community.

Pullman Regional is an equal opportunity employer and does not discriminate based on sex, race, religion, color, gender, national origin, ancestry, physical or mental disability, marital status, age, sexual orientation, veteran status or any other factor protected by federal, state or local law.

At Pullman Regional, we are committed to maintaining a work environment that is free from harassment, discrimination and retaliation.

We do not tolerate behavior that is disrespectful, abusive, harassing or coercive towards co-workers, customers, patients, visitors or community members. If you believe you may have observed or experienced discrimination, harassment or violence at Pullman Regional, immediately report the incident to your supervisor and/or Security.

Examples of such behavior are:

- Bullying or making degrading jokes, comments or nicknames.
- Unwanted sexual advances, invitations, comments, posts or messages.
- Retaliation for reporting or threatening to report harassment.
- Acts and/or threats of violence.
- Possession of weapons on Pullman Regional premises except as authorized.

Compassion

Providing comfort and care through the human experience.

COMPASSION BEHAVIOR STANDARDS

- I demonstrate respect, dignity and worth to every person with my positive words, my tone of voice and my body language.
- I care for patients the way I want my family members and friends to be cared for. I treat guests as I want my family treated.
- I strive to make every experience a positive one by listening and communicating to patients, families, customers and one another with care.
- I display kindness and offer help without being asked. I know rudeness is never acceptable.
- I go above and beyond ordinary care to meet the personal needs of those we serve, remembering it is the little things that provide comfort, safety and reassurance.
- I involve patients as active participants in their care, honoring their expertise and knowledge of their personal health.
- I help patients with the next step in their healthcare journey by considering their future and being forward thinking.
- I embrace this community and take ownership of OUR patients through my role.





Patient Rights

At Pullman Regional, we treat our patients with respect and dignity.

This means:

- We help patients exercise their rights, such as the right to privacy, to receive care free from discrimination and to file a grievance.
- We provide patients with the necessary information to make informed health care decisions and respect their right to refuse treatment.
- We help patients understand any financial assistance available to them.
- We honor each patient's right to visitation. Patients are informed of the reason for any restriction or limitation of visitors. Please refer to the Visitor Policy.

Admissions, Transfers & Continuity of Care

At Pullman Regional, the decision to admit, discharge or transfer a patient is based on the patient's clinical needs and our ability to provide safe care.

This means:

- We continually evaluate that the appropriate current best practices are met.
- We provide care regardless of race, religion, gender, gender identity, national origin, age, disability, sexual orientation, payer source or ability to pay.



Trust

Delivering on promises

TRUST BEHAVIOR STANDARDS

- I earn respect by keeping promises, fulfilling expectations and holding myself accountable.
- I understand it is my responsibility to stay informed of

organizational projects, priorities and requirements through avenues including but not limited to: email updates, department meetings, All Staff and the Intranet.

- I am honest with others and respond truthfully, with the best interest of the patient at heart.
- I listen to others' input before rushing to judgment.
- I speak up to report errors as well as patient safety and environmental concerns. I focus on improvement rather than blame and take ownership in problem-solving and solutions.
- I safeguard patient confidentiality and never discuss private information in public places.

Quality of Care

At Pullman Regional, we strive to provide extraordinary care to all patients.

To ensure every patient receives extraordinary care, we:

- Regularly monitor patient outcomes, quality metrics and patient satisfaction scores.
- Identify ways to improve the quality of care we provide.
- Report any safety or quality of care concerns.
- Take the necessary steps to prevent future incidents.

Qualified Caregivers

At Pullman Regional, we employ and contract with qualified individuals and entities.

All employed and contracted staff who operate with a state issued license must abide by the practice standards set forth by their governing board.

It is critical that employees, contractors and affiliated physicians maintain the required credentials to perform their job.

We do not hire, contract with or bill for services provided by individuals or entities that:

- Are excluded or ineligible to participate in federal or state healthcare programs.
- Are debarred by the Government Services Administration (GSA).
- Have been convicted of a crime involving government business.

Employees, contractors and affiliated physicians are required to notify management should they become excluded or otherwise ineligible to participate in federal or state healthcare programs.



Information Technology

Much of our business today is created and stored on electronic systems. To safeguard information from unauthorized access, you are required to:

- Follow Pullman Regional's Acceptable Use policy.
- Protect your passwords from use by another person.
- Log off or "Lock" the computer when you leave it unattended or are finished using it.
- Access the 'minimum necessary' information to perform your assigned job duties.
- Access and use email and the Internet in line with our usage standards.
- Save all information to the appropriate location.

You are responsible for all activity, including Internet activity, performed using your user ID and password. All software used or downloaded to any Pullman Regional computer must be approved in advance by IT.

Report Lost or Stolen Devices

If a laptop, computer or mobile device is lost or stolen, it must be reported within 24 hours to IT.

Confidentiality and Privacy

At Pullman Regional, we protect confidential patient and business information.

In healthcare, we collect sensitive information. To protect our patients:

- Examinations, consultations and treatment should be carried out discreetly.
- Patient information should never be discussed in public areas or with anyone who is not directly involved in the patient's care.
- Medical records are retained and destroyed in accordance with the law and Pullman Regional procedure.

Potential privacy violations may be reported by contacting the HIPAA Committee at HIPAACommittee@pullmanregional.org

Did You Know?

It is appropriate to access a patient's record to:

- ✓ Provide care to the patient.
- ✓ Accurately bill the patient's insurance company.
- ✓ Review the quality of care provided to the patient.



It is not appropriate to access a patient's record to:

- ✗ Satisfy curiosity
- ✗ Follow the care of a family member or friend.
- ✗ Acquire demographic information, such as telephone numbers or mailing address, of co-workers or other patients for which you are not providing care.

Breach of Protected Health Information

Q. I accidentally faxed a patient's laboratory results to the wrong machine. What should I do?

A. If it was faxed to an entity that manages HIPAA:

1. Inform them of the error and to destroy the fax
2. Notify your supervisor
3. Notify HIPAA officer

If it was faxed to an entity that does not manage HIPAA:

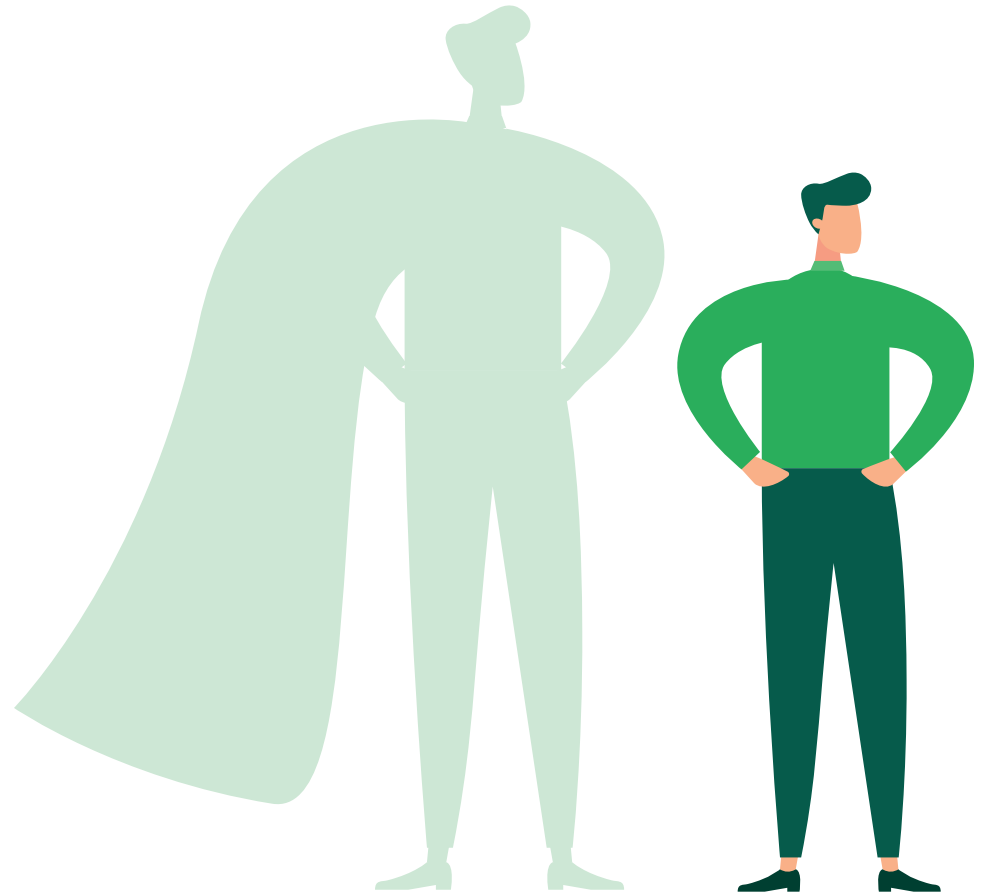
1. Same as above 3 steps
2. Notify patient
3. Consult with HIPAA officer upon patients response

Integrity

Doing the right thing for the right reason

INTEGRITY BEHAVIOR STANDARDS

- I recognize I am a representative of Pullman Regional.
- I do the right thing—whether or not anyone is watching.
- I demonstrate positive values, ethical behavior and moral conduct. I choose acts that show respect.
- If I make a mistake, I admit it and learn from the situation so that I won't make the same mistake again. Then, I move on.
- I am fiscally responsible by not wasting the organization's time, resources or equipment. I act like an owner and treat company resources as if they are my own.
- I uphold Pullman Regional's Code of Conduct, dress code, policies and procedures; and speak up when I notice others do not.
- I ensure the privacy and validity of all medical records, correspondence and confidential conversations.





Conflicts of Interest

At Pullman Regional we disclose potential conflicts of interest. The disclosure of potential conflicts of interest ensures that decision at Pullman Regional are made free from personal gain.

Questions about compliance:

Refer to hospital's compliance officer.

"Conflicts of interest" are situations in which financial or other personal considerations may compromise, or appear to compromise, your ability to make unbiased decision while performing your job duties. It applies to all employees, contractors, and volunteers.

Examples of Potential Conflicts of Interest

- Employment or financial interest in a company that conducts business, or wishes to do business with Pullman Regional.
- Outside jobs or positions that interfere with ones ability to perform their job without distractions at the expectations set forth by Pullman Regional.
- Hiring or contracting with a family member to provide goods and/or services.
- Making business decisions that could benefit family or friends at the expense of Pullman Regional.
- Receiving gifts of monetary value in exchange for recommending or using products or services.
- For vendor gifts, refer to vendor policy

Any conflict of interest must be disclosed to Human Resources. Failure to do so may result in disciplinary action, up to and including termination

Gifts & Entertainment

At Pullman Regional, we do not solicit or accept gifts or money from any person or entity that does business or seeks to do business with Pullman Regional.

This applies to employees, volunteers, contractors and their immediate family. A “gift” is any form of payment or other benefit with monetary value given to you. This may include gift cards, sporting event tickets, and meals provided by a vendor.

Questions about a gift?

Ask your supervisor or the Chief Reliability Officer.

Here is a road map for navigating the most common situations:

Gifts from Grateful Patients

If a patient wishes to send a gift, encourage them to express their gratitude to the Pullman Regional Foundation, leaving an online review, sending a letter to administration, or completing the Press Ganey survey.

Gift Giving

No employee, volunteer, or contractor is permitted to give a gift on behalf of Pullman Regional to induce a referral of any patient to Pullman Regional or to participate in the MSSP Aco.

Items That Are Not Considered Gifts

- Personalized plaques, trophies or awards that are routinely given to individuals and organizations outside of Pullman Regional Hospital.
- A ticket or pass for which the recipient performs a ceremonial role or function on behalf of Pullman Regional Hospital.
- A nominal or general gift from a patient such as flowers, a box of candy, or cookies to an entire department is acceptable.



Document Retention & Disposal

At Pullman Regional, we maintain accurate and complete medical and business records.

We depend on accurate and reliable information to make responsible business and clinical decisions.

Medical and business documents are retained or destroyed in accordance with the law.

For further information, consult the Pullman Regional policy on compliance of federal laws.

In particular, we rely on patient medical records in order to properly bill for the services and care provided.

Anyone who documents in the patients medical record is responsible for providing accurate and timely documentation.

Organizational Assets

At Pullman Regional, we use organizational resources responsibly.

As a public hospital, we have a duty to use resources appropriately.

This means we are responsible for:

- The proper use of Pullman Regional funds.
- Using supplies, equipment, and property bought and owned by Pullman Regional for business purposes only.

Pullman Regional has significantly invested in the property and equipment provided to employees. Employees should take care of all organizational property and equipment provided to them. Employees should report any and all issues with organizational property and equipment to the Maintenance Department.

Personal use of organizational property and equipment, as well as the removal of the organization's property from the premises is prohibited unless authorized by your department leader. Any violation of this may result in discipline or termination.

Coding and Billing

At Pullman Regional, we follow our coding and billing procedures in order to ensure that our bills are accurate and comply with all applicable local, state, and federal laws.

This means:

- We are committed to preparing and submitting accurate and complete claims
- We bill only for services that are provided and have the supporting documentation.
- We report any behaviors or requests that differ from accepted billing practices

What is the False Claims Act?

The False Claims Act (FCA) prohibits any person or organization from knowingly submitting false claims to the federal government, including Medicare.

Examples of possible violations of the FCA include:

- Billing for services that were not provided.
- Recording or processing any information inaccurately (i.e. changing a beneficiary name).
- Charging for services that were not medically necessary.
- Coding for services that are more expensive than the services that were actually provided.

Physician Relations

At Pullman Regional, we carefully review relationships with physicians and other health care providers for compliance with Physician Self-Referral and Anti-Kickback laws.

All decisions regarding patient care should be made based on what is best of the patient. Pullman Regional prohibits accepting, offering, or giving anything of value in exchange for the referral of patients or any patient-related services.

Customer & Business Associate Relations

At Pullman Regional, we expect consultants, contractors, vendors, and suppliers who work at Pullman Regional or on behalf of the organization to honor and abide by the organization's policies, procedures, and all applicable portions of the Code of Conduct.

Our relationships with consultants, contractors, vendors, and suppliers are managed in a manner that is free from conflicts of interest and consistent with applicable laws and ethical business practices. Anyone negotiating agreements on behalf of Pullman Regional has a responsibility to hold the organization's interests above all other entities and report any efforts to inappropriately influence business activities.

Media Communications

Refer all media to the External Relations Director:

Alison Weigley, alison.weigley@pullmanregional.org or marketing@pullmanregional.org

Social Media

Employees, contractors, vendors and volunteers are prohibited from posting any proprietary business material, such as business or marketing plans, or confidential patient health information. Please refer to Pullman Regional's Social Media policy or contact External Relations.





Scan to Report

Scan the above QR code to be directed to CareAlert to report concerns or issues.

***Pullman Regional Corporate
Compliance
(509) 336-7521***

