

## COMPLIANCE 1.0

## UHS COMPLIANCE PROGRAM

**Scope:** All subsidiaries of Universal Health Services, Inc., including facilities, Independence Physician Management (IPM), Prominence Health Plan and UHS of Delaware Inc. and their personnel.

**Purpose:** To assure compliance with all laws, rules and regulations relating to federal and state health care programs.

**Policy:** The mission of UHS is to provide quality, cost-effective health care in a positive and productive work environment. In fulfilling this mission, UHS is dedicated to adhering to the highest ethical standards and recognizes the importance of full compliance with all applicable state and federal laws. Accordingly, the UHS Board of Directors and management have adopted this Compliance Program.

**Procedure:**

The Compliance Program is a part of the routine operations of all UHS facilities and corporate functions. Through its Code of Conduct and through various other means, UHS communicates to all personnel the intent to comply with all applicable laws. In addition, the Compliance Program will:

- Review the organization's business activities and consequent legal risks.
- Educate all personnel regarding the Code of Conduct and compliance requirements and train relevant personnel to conduct their job activities in compliance with state and federal law and according to the policies and procedures of the Compliance Program ("Compliance Policies").
- Implement auditing, monitoring and reporting functions to measure the effectiveness of the Compliance Program and to address problems in an efficient and timely manner.
- Include enforcement and disciplinary components to assure that all personnel take their compliance responsibilities seriously and adhere to all compliance requirements.

Overall responsibility for operation and oversight of the Compliance Program belongs to the UHS Board of Directors. However, the day-to-day responsibility for operation and oversight of the Compliance Program rests with the Chief Compliance Officer, who will have direct access to the UHS Board of Directors and will make regular reports to the Board or an appropriate committee of the Board on the status of the UHS Compliance Program. The Chief Compliance Officer will be assisted in these duties by the UHS Compliance Committee.

As a part of its Compliance Program, UHS shall adopt a Code of Conduct, Compliance Manual and Compliance Policies which shall apply to all UHS subsidiaries, facilities and personnel. The UHS Office of General Counsel and/or Chief Compliance Officer may develop and distribute field memoranda concerning the implementation of certain aspects of the Compliance Program

("Field Memoranda"). These Field Memoranda carry the same weight and effect as the UHS Compliance Policies. All UHS subsidiaries, including all facilities, IPM and Prominence Health Plan and UHS of Delaware, Inc., shall be deemed to have adopted all Compliance Policies and, Field Memoranda as well as all provisions of the UHS Code of Conduct and Compliance Manual. These documents shall be made readily available to UHS personnel.

No persons shall have authority to act contrary to any provision of the Compliance Program or to condone any such violation by others. Any persons with knowledge of information concerning a suspected violation of law or violation of a provision of the Compliance Program shall be required to report promptly such violation as directed in the Code of Conduct and Compliance Manual.

Any person who violates any provision of the Compliance Program, including the duty to report suspected violations, shall be subject to disciplinary measures. UHS will take steps to investigate all reported violations to assure that the Compliance Program is effective in preventing, detecting, and eliminating violations of law and UHS policies. In addition, promotion of and adherence to the Compliance Program will be part of the job performance evaluation criteria for all persons covered by the Compliance Program.

UHS will attempt to communicate changes or modification of the Compliance Program concurrent or prior to the implementation of such changes or modifications; however, UHS reserves the right to change, modify, or amend the Compliance Program or Manual as deemed necessary by UHS without prior notice.

Each UHS facility, IPM and Prominence (with the exception of UHS of Delaware, Inc.) shall have a designated Facility Compliance Officer who will have the primary responsibility to oversee the compliance programs and obligations of the respective facility. The FCO shall establish a Compliance Committee and act as the chair for the committee. The Acute and Behavioral Divisions, IPM and Prominence will each have a Division Compliance Officer who will report regarding compliance-related matters to the Chief Compliance Officer. With the approval of the UHS President, the Chief Compliance Officer may also function as a Division Compliance Officer.

Should any persons have questions or uncertainties regarding compliance with applicable state or federal law, or any aspect of the Compliance Program, including related policies or procedures, they should seek immediate clarification from the Chief Compliance Officer, UHS General Counsel, Facility Compliance Officer, a supervisor, or through the UHS Compliance Hotline and Web Reporting program.

**Revision Dates:**

**7-27-2020; 10-12-17; 10-01-2015; 10-26-2012**

**Implementation Date: 10-21-2010**

**Reviewed and Approved by:**

**UHS Compliance Committee**