

Code of Conduct

Integrity in Action



OUR MISSION

Founded by the Sisters of Bon Secours, our hospitals have as their mission, care for the sick, the dying and their families within a Catholic Ethos.

Inspired by the Gospel and sharing in the healing mission of Jesus, we recognise the dignity and uniqueness of each person, seeking to provide high quality, holistic care which is characterised by compassion, respect, justice and hope.

OUR VISION

Inspired by God's hope for the world, we will be a ministry where staff want to work, clinicians want to practice, people seek wellness and communities thrive.

OUR VALUES

Human Dignity

We commit to uphold the sacredness of life and to be respectful and inclusive of everyone.

Integrity

We commit to act ethically and to model right relationships in all of our individual and organisational encounters.

Compassion

We commit to accompany those we serve with mercy and tenderness, recognising that "being with" is as important as "doing for."

Stewardship

We commit to promote the responsible use of all human and financial resources, including Earth itself.

Service

We commit to provide the highest quality in every dimension of our ministry.

Introduction

Bon Secours Health System CLG (Bon Secours) carries forward the healing ministry of Jesus, through the ownership, management and governance of facilities, programmes and services to improve the health and wellbeing of the community and is dedicated to bringing 'Good Help' to those in need.

Bon Secours carries on a ministry founded originally in Paris by the Sisters of Bon Secours in 1824. Today, it is the largest independent healthcare provider in Ireland, with a network of modern JCI- accredited hospitals and world-class medical treatment facilities located in Cork, Dublin, Galway, Limerick, and Tralee, together with a Care Village in Cork.

As a ministry of the Roman Catholic Church Bon Secours is a charity and operates on a not-for-profit basis, re-investing surpluses in furtherance of its mission. Bon Secours is financially self-sustaining, and so must generate the surpluses necessary to fund its current activities and invest to ensure its long-term relevance and viability.

With over 4,300 staff, approximately 1,000 beds and 500 leading consultants, Bon Secours treats over 400,000 patients a year, seeking to provide compassionate, world-

class medical treatment to all those it serves – "Advanced Medicine and Exceptional Care".

In July 2019 Bon Secours Health System became affiliated with Bon Secours Mercy Health, Inc. Bon Secours Mercy Health is non-profit Catholic healthcare ministry in the United States. The health ministry employs more than 57,000 staff in 43 hospitals and 1,000 sites of care across seven states, including Ohio, Kentucky, New York, Virginia, South Carolina, Florida and Maryland.

The Mission of Bon Secours Health System is caring for the sick, the dying, and their families, within a Catholic Ethos. We translate this care into action through a set of five Core Values, through which we endeavour to make our care a reality at all levels of the organisation. Founded in 1993, the Health System was formed to carry on the Ministry of the Sisters of Bon Secours, which is a ministry of the Catholic Church. But health care is also a business, and business decisions are made every day through the prism of our Mission, Values and Ethos.

Bon Secours is committed to the tradition and principles of Catholic Social thought in all of its business dealings and practices. We express this in how we live our

Mission, translating it into action through our Values. In particular, our Values also call us to safeguard the earth and its resources and to help people and communities thrive.. Through our environmental, social and governance (ESG) activities, we are demonstrating our commitment to being of service, honouring human dignity and serving as stewards of the earth's limited resources. We act with integrity and hold ourselves accountable for promoting the common good.

This Code of Conduct is a supplement to Bon Secours Mercy Health's Code of Conduct and is a natural and appropriate extension of our Mission, Vision and Values. It provides greater specificity for our actions in the increasingly complex and ever-changing world of health and health care. At the centre of this Code of Conduct, and permeating its pages, is an enduring commitment to ethical behaviour. It is a manual for "integrity in action." Our Board of Directors and Executive Management Team urge you to read it and keep it close by as a reference for you in your daily work.

Thank you for choosing to be part of Bon Secours Health System! God bless you and your work.



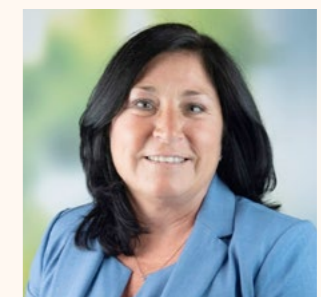
Alan Sharp

Group Chief Executive Officer
Bon Secours Health System



Paddy Broe

Chairperson
Bon Secours Health System



Donna Abbondandolo

Chief Compliance Officer
Bon Secours Mercy Health

Purpose

Every Bon Secours staff member has an important role to play in advancing Bon Secours Mission and supporting this Code of Conduct by honouring the dignity of each person, acting with integrity, demonstrating compassion, promoting stewardship and being of service to others. The Code of Conduct applies to all who have a relationship with Bon Secours, including, but not limited to, our Board of Directors, members of our Executive Management Team, our staff and our volunteers.

Given its importance, the Code of Conduct is reviewed and approved by both the Executive

Management Team and the Board of Directors. All policies across Bon Secours should be consistent with this document. For details and procedures associated with areas governed by various policies, please refer to the policies themselves. Some Compliance related policies are referenced in this Code of Conduct, others may be reviewed and downloaded directly from QPulse our document repository.

As a staff member of Bon Secours Health System, one of the team, you are an ambassador, influencer and advocate for our organisation at all times. How you do what you do matters!



Culture

Guided by our Mission, Vision and Values, we aim to build and strengthen our core culture behaviours across Bon Secours. We will focus our efforts to empower, unify, and creating agile teams who are passionately committed to Bon Secours. This will be underpinned by further development and support for staff. We will strive to empower staff to display these core culture behaviours every day:

- BE EMPOWERED**
We are leaders in Catholic health care, acting with integrity, transparency and accountability.
- BE UNIFIED**
We are one team, acting with inclusion, collaboration and respect.
- BE AGILE**
We are open to smart risk-taking in a dynamically changing industry.
- BE COMMITTED**
We are dedicated to our Mission, our communities and our Catholic identity.



Code of Conduct

Our Mission, Vision and Values provide guidance as we deliver quality care, make sound, ethical decisions, meet Bon Secours goals and bring good help to those in need. Our Code of Conduct is intended to be an impactful summary of the standards of behaviour we expect from all staff, Board members, members of our Executive Management Team, volunteers, contractors, and suppliers.

To support us in shaping and maintaining this culture of integrity, accountability and transparency we have written our Code of Conduct as a supplement to Bon Secours Mercy Health's Code of Conduct in order to emphasise our full commitment to compliance with all applicable laws and regulations. Our Code of Conduct has been drafted to make these expectations easy to remember and applicable to our everyday workplace situations. Not every situation you may encounter may be addressed in our Code of Conduct, however, each standard is underpinned by our policies and Standard Operating Procedures (SOPs) which provide more detailed guidance. As employees, we are accountable for the integrity of our decisions and actions. Our Code of Conduct provides the foundation of expectations as we do our work each and every day.



Integrity in Patient Care and Supporting the Communities We Serve

- Honour the rights of patients and treat patients with dignity and respect.
- Provide compassionate care and strive to exceed standards for quality care and patient safety.



Integrity in Financial and Billing Information

- Exercise good faith and honesty in all dealings and transactions.



Integrity in the Workplace

- Respect diversity and promote inclusion.
- Protect the confidentiality of patient, resident, staff and organisational information.
- Avoid conflicts of interest and/or the appearance of conflicts.
- Use our resources responsibly.



Legal and Regulatory Compliance

- Adhere to all laws, regulations, and policies that govern what we do.



Ethical Responsibility

- Report any suspected or actual breach of our Code of Conduct, law, regulation or policy.

Follow our Code

Bon Secours Health System Directors, members of its Executive Management Team, staff, volunteers, contractors and suppliers are expected to:

- Be familiar with and follow our **Code of Conduct!**
- **Speak up! Ask for help** when you're not sure about something and **report concerns**. There is no reprisal for asking questions or making reports in good faith.
 - If you have HR-related questions or concerns, please reach out directly to our **HR Team** or your designated **HR Business Partner**.
 - If you have questions or concerns relating to clinical matters, contact your **Line manager** or **Quality and Risk manager**.
 - Concerns about the safety or quality of care provided may be reported to a member of your **hospital management team** or

to the **Chief Nursing, Quality and Patient Safety Officer**.

- If you see or hear anything else that seems inconsistent with our Code of Conduct, applicable law, regulation or internal policies:
 - » Speak to your Line manager or another member of management.
 - » Speak to our Chief Data Protection Officer and European Compliance Officer by calling **086 1022730** or email **compliance@bonsecours.ie**
- » Use the 24/7 Bon Secours Health System Speak Up Helpline by calling **1800 851 883** or submit an on-line report using our webform: **www.mycompliancereport.com/MCR** using the code BSIRE
- Cooperate with internal or statutory investigations. Respect requests for confidentiality within the limits of the law.



Integrity in Patient Care and Supporting the Communities We Serve

Patient Rights

As a Catholic health care organisation Bon Secours is committed to respecting the inherent dignity of every person. We honour the right of individuals to receive compassionate, safe and high-quality care.

Together we will:

- Make no distinction in the availability of services or the care we provide based on age, gender, disability, race, religion, sexual orientation, family status or civil status, member of the Traveller community or any other class protected by law.
- Respect the rights of patients and residents including, but not limited to, the following:
 - Ensure patients are informed of their rights.
 - Respond promptly and courteously to patient and resident's inquiries and requests.
 - Respect the rights of patients to consent to or refuse treatment as expressed through an advance healthcare directive and care planning.
 - Follow the process for disclosing medical errors and adverse events.
 - Ensure patients are aware of their right to complain.
 - Ensure that patient and residents visitation policies are applied fairly

and are not restricted, limited or denied based on classes that are protected by law.

- Respect right to refuse students and trainees as part of care team.
- Contact relevant persons if you do not clearly understand the needs of patients, residents and/or their family members.
 - Involve patient, residents and their designees where appropriate in decision making regarding their care and when discussing available options including their wish for a second opinion.
 - Respect the patients and residents right to privacy and adhere to Data Protection laws and confidentiality policies.
 - Provide patients with information regarding the safety and security of personal possessions.
 - Patients education needs and learning ability are assessed and documented in their medical record.
 - Bon Secours is committed to the dignity, health and well-being of our patients and residents.

Quality Care

All staff will treat patients, residents and those who use our services with compassion, understanding and respect. We will provide a clear explanation of the patient's condition, proposed treatment, the benefits

and any potential risks of proposed treatments and possible alternatives using translation services where necessary.

We provide medically necessary and appropriate care, make clinical decisions based on identified health care needs and involve individuals in decisions about their care, as they are able. We are committed to the delivery of care that is safe, effective, person-centred, timely, efficient, and equitable and consistent with Joint Commission International standards of care.

Culture of Safety programme

Behaviours that are intimidating and disrespectful.

Behaviours disrupt the culture of safety and prevent collaboration, communication, and teamwork, which is required for safe and highly reliable patient care. Disrespect is not limited to outbursts of anger that humiliate a member of the health care team; it can manifest in many forms, including the following:

- Inappropriate words (profane, insulting, intimidating, demeaning, humiliating, or abusive language)
- Shaming others for negative outcomes or mistakes, or for asking questions or for assistance
- Unjustified negative comments or complaints about another licensed practitioner's care
- Refusal to comply with known and generally accepted practice standards, which may prevent other

licensed practitioners from delivering high-quality care

- Not working collaboratively or cooperatively with other members of the interdisciplinary team
- Creating rigid or inflexible barriers to requests for assistance or cooperation
- Not returning pages or calls promptly or directing anger or impatience toward staff when paged or called.

Violence in the workplace

- Hospitals develop and implement written policies and procedures to prevent and respond to workplace violence.
- Hospitals implement a process to report incidents in order to analyse incidents and trends.
- Hospitals implement a process for follow-up and support to victims and witnesses affected by workplace violence, including trauma and psychological counselling, if necessary.
- Hospitals implement a process for the reporting of workplace violence incidents to the People and Culture committee.

Mission Interests Policy

To support Bon Secours in our continued delivery of Mission, the Bon Secours Mission Interests Policy is a key vehicle that enables leaders and staff to understand the role they play in the delivery of our Mission 'bringing Good Help' to those in need.

Bon Secours Mission Interests Policy creates a structure that assists Mission priorities to continue. Mission priorities are enacted at all levels of the organisation so that our delivery of care is fully aligned to our Catholic Ethos, our Foundation Story, and to our Mission as it is structured today in Bon Secours.

The primary function of the Mission Interests Policy is to ensure that the Mission and Core Values of Bon Secours continue to shape our organisational Vision, Strategic Planning, and operational decisions.

Ethics

Bon Secours leadership and staff have a professional and legal and moral responsibility to create and promote an environment and culture that operates within an ethical framework. This ethical framework is based on the ‘**Bon Secours Core Ethical Principles Policy**’ which guides Healthcare delivery in Bon Secours.

Ethical principles apply to both the System’s business and clinical activities alike.

This **Code of Conduct** is a reaffirmation of our commitment to a high level of ethical conduct and standards in conjunction with the Mission and Values of Bon Secours.

Healthcare is a relationship between people. Professionals respond to the trust placed in them with expertise and empathy. Catholic healthcare ethics involves seeking the good of the

patient as a whole person, taking into consideration the authentic freedom of the person and his or her own sense of what is good, both practically and morally. The tradition of Catholic healthcare values:

- The dignity of the person, respecting patient autonomy and informed consent.
- A culture of life, with compassionate care for the vulnerable, aged and dying.
- Justice in healthcare delivery.
- Compassionate Care.
- The value of teamwork and collaboration.
- Our social responsibility in the community.

Our ethical principles ensure that we commit to the following:

- disclose ownership and any conflicts of interest.
- honestly portray our services to patients and residents.
- protect confidentiality of patient and resident information.
- provide clear admission, transfer, and discharge policies.
- bill accurately for our services and ensure that financial incentives and payment arrangements do not compromise patient or resident care.
- encourage transparency in reporting organisational and clinical performance measures.
- establish a mechanism by which health care providers and other staff may report clinical errors and raise ethical concerns with impunity,

including disruptive staff behaviour related to clinical and/or operational issues.

- support an environment that allows free discussion of ethical concerns without fear of retribution.
- provide an effective and timely resolution to ethical conflicts that arise.
- ensure non-discrimination in employment practices and provision of patient care in the context of the cultural and regulatory norms of the country.

Ethical Responsibilities

- It is the responsibility of **leadership** to support a culture of ethical practice and decision making that supports the protection of patients and their rights, by their example and by setting the tone which values high ethical standards. Management must also support any staff member who has an ethical concern in raising their concerns.
- All consultants and staff should familiarise themselves with the Bon Secours **Core Ethical Principles** Policy and be aware of how to raise an ethical concern.

Contact ethics@bonsecours.ie



The Clinical Ethics Committee (CEC)

To support an ethical culture across the system, the Clinical Ethics Committee (CEC) provides support and guidance to staff on decisions of a clinical ethical nature, reflecting on the moral and ethical implications of clinical decisions.

The Research Ethics Committee (REC) is a subcommittee of the CEC. Bon Secours encourages research that will enhance patient experience and outcomes. Before it can commence, all Research taking place in Bon Secours must come to the REC for review. The REC reviews all relevant research and provides ethical approval to ensure that the research aligns with relevant legislation, guidelines and values and within the ethos of the Bon Secours.

Only when approval has been granted should the research commence.

Each local site has a Facility Ethics Committee (FEC) which can give guidance to staff and patients on ethical matters and refer issues to the CEC.

Contact bshs.research@bonsecours.ie



Integrity in Financial and Billing Information

Business and Financial Information

Bon Secours is committed to maintain a high standard of accuracy, completeness in the documentation and reporting of all financial records which are important in meeting our obligations to our patients, residents, staff, contractors and suppliers.

Bon Secours is committed to protecting the confidentiality of information that is proprietary to Bon Secours as well as preparing complete and accurate documents. If your role allows you to have insight into confidential information, you must protect the confidentiality of this information. If your role requires you to prepare documents, you must do so in a truthful, complete, legible and timely manner.

This includes, but is not limited to:

- Personal information of our staff and Partners, including when they receive care in a Bon Secours facility.
- Cost reports and accounting records
- Clinical data and outcomes.
- Management discussions and analysis provided to Partners.
- Expense accounts and time sheets.

Record Retention and Destruction

Bon Secours is committed to retaining information that may be necessary for continuity of care, billing, and for compliance with legal, tax, financial and other reporting requirements. Bon Secours is also committed to securely destroying such records when they are no longer needed in accordance with the Bon Secours Personal Record Retention Policy.

Enter information into the medical record, business records or regulatory or financial reports in a truthful, complete, legible, and timely manner. Retain and destroy records (either in paper or electronic format such as personal data held on **BonsConnect** our electronic healthcare record) as required by law and Bon Secours policy. If you are unsure how long to retain or when to destroy certain records, talk to your Line manager. Never destroy records that you believe may be requested or that have been requested for an audit, a legal case, a data subject access request or by a Regulator.



If anyone asks you to dispose of records related to a data subject access request, an audit, legal case or an inquiry, contact the Compliance Office before you proceed.

Integrity in the Work Place

Safeguarding Patient and Resident Information

Bon Secours is committed to protecting the confidentiality of our patient and residents' personal data which they have shared with us for the purpose of receiving care. All staff and service providers are required to safeguard personal data which identifies an individual and relates to their past, present, or future care and payment for those services. It includes health information (such as diagnosis and treatment plans) as well as demographic information (names, addresses, phone numbers, Personal Public Service (PPS) Number, date of birth, medical record number, payment information and other personal information). Bon Secours staff who avail of our services also must be given the highest level of confidentiality with respect to their medical records and the personal data contained in them.

Where Bon Secours hold personal data about any individual, they have a right to a copy of it, have it amended where inaccurate, the right to object to, or restrict its processing or request its erasure.

The confidentiality of personal data is protected by Data Protection legislation and the General Data Protection Regulation (GDPR).

What's required?

- Follow Bon Secours Data Protection and Personal Data Security Policy.

Examples:

- Do not permit or provide access to patient's or residents records by individuals who are not directly involved as members of the patient's or residents care team.
- Do not give or remove personal data in any format to anyone without proper written authorisation.
- Do not leave personal data in any form (paper or electronic) unattended or accessible to individuals unauthorised to view it.
- Do not discuss patient details in a public area where conversation may be overheard by others or in an electronic forum that is open to the public.

GDPR provides privacy rights related to personal data for all individuals within the European Union (EU) and also provides safeguards for the exportation of personal data outside the EU. Before exporting personal data outside the EU, you must consult with the Chief Data Protection Officer.

Staff must comply with all applicable Data Protection laws, handle personal data responsibly and for legitimate business purposes only. Immediately report suspected breaches of the

handling of personal data to a line manager, your Local Data Protection Representative (LDPR) or the Chief Data Protection Officer.

Staff who engage in unauthorised access or disclosure of personal data may be subject to disciplinary action as provided for in Bon Secours Disciplinary policy.

! *Before exporting any personal data outside the EU consult with the Chief Data Protection Officer.*

Conflicts of Interest

Bon Secours is committed to assuring that business decisions are free of any potential conflicts, are unbiased and are in the best interests of the organisation. The existence of a potential conflict of interest or conflict of commitment may occur if your family relationships, outside activities or personal interests influence, or appear to influence, your ability to make objective decisions associated with your workplace responsibilities.

Bon Secours Executive Management Team, staff in decision making roles and Board members are required to disclose actual or potential conflicts per the Bon Secours Conflict of Interest Policy. All actual and potential conflicts will be appropriately managed. If you have any questions about potential conflicts or commitments, please contact the Compliance Team.

Information Security

Bon Secours maintains and monitors security systems, data back-up systems and appropriate storage capabilities in order to safely maintain the confidentiality, integrity, and availability of information in line with requirements of the Network and Information Security Directive (NIS2).

All staff must participate in cyber security continuous learning and assessment activities to ensure the highest level of knowledge and alertness to the dangers that are posed to our data assets. Insider threat is a particular concern, whether intentional or unintentional. As such, all staff are obliged to report any suspected breeches of the Acceptable Use Policy and should ensure that their own access privileges are maintained at the minimum levels required for their role and should adhere at all times to the information security standards for user account management.

Those who have privileged user levels of access have greater responsibility so should undertake additional training and assessment and engage in continuous monitoring and improvement initiatives as required.

Appropriate Use of Resources

Bon Secours is committed to fostering good stewardship of its resources. All staff shall be responsible when using Bon Secours assets, including time, material, supplies, equipment and information. Use all Bon Secours

communications devices primarily for work purposes in accordance with Bon Secours policies. All users of BSHS IT resources must comply at all times with the requirements of the IT acceptable Use Policy (AUP) and the approved BSHS Information security standards. This includes, but is not limited to telephones, computers, electronic mail, intranet, Internet access all of which are the property of Bon Secours.

Remember that you do not have a right to privacy with respect to anything you create, store, send or receive on Bon Secours computer and telephonic systems.

NOTE: Bon Secours reserves the right to monitor and/or access all communications usage and content.

Travel and Business Expenses

Bon Secours is committed to reimbursing staff for appropriate travel and business-related expenses. If travel and other expenses are required for your job, you shall fully understand Bon Secours travel and expense policies and submit requests for reimbursement in accordance with them.



Discrimination and Harassment

Bon Secours is committed to providing a professional work environment free from discrimination or harassment and will not tolerate discrimination and/or harassment based on age, gender, disability, race, religion, sexual orientation, family status or civil status, membership of the Traveller community or any other class protected by law. Do not engage in or tolerate any form of discrimination or harassment.

Gifts

Bon Secours is committed to conducting business with integrity. Accepting gifts, entertainment or meals from outside sources can create an appearance of impropriety and potentially breach Bon Secours policy and should therefore be considered with the utmost care. If in any doubt, staff should consult with their immediate Line manager.

Bon Secours as part of Revenue Enhanced Reporting requirements (ERR) will report monthly on any gifts made to employees to ensure compliance with tax obligations in relation to the 'Small Benefit Scheme'.

Any donations of cash received are to be brought to your Line manager's attention. Such donations must only be used for the purposes that they were given for.



For general purposes, the following are examples of items that staff can consider acceptable:

- Individually you may accept non-cash gifts of nominal value (e.g., pens, mugs, note pads, etc.) from contactors or suppliers.
- Edible or perishable items (e.g., confectionary, fruit, flowers, etc.).
- In certain circumstances you may accept tickets to sporting or cultural events where you have consulted with your immediate Line manager prior to accepting.

We may NOT:

- Accept cash, cash equivalents (e.g., gift cards), non-business-related meals.
- Accept invitations to events involving overseas travel, hotel accommodation.
- Accept discounts on goods or services, recreational equipment or prizes.
- Encourage patients to give, lend or bequeath money or gifts that will directly or indirectly benefit you.

Gifts must be infrequent, reasonable and not in exchange for favours or other gifts. Refer to Bon Secours Code of Conduct – Business Relationships policy for further details.

Lobbying Activity

As a charitable organisation Bon Secours does not engage in political activity and limits any lobbying efforts so that they are consistent with the Lobbying Act 2015. Individuals may participate in political activity that is strictly unrelated to Bon Secours and performed during personal time.

Only Board members and members of the Executive Management Team are allowed lobby on behalf of Bon Secours and are required to keep a record of any interactions they have with elected representatives and certain public officials and senior civil servants (Designated Public Officers or DPOs).

Some examples of things we may and may NOT do:

- Authorised persons may conduct a limited amount of lobbying as allowed by legislation. This type of activity is organised/ conducted through the Executive Management Team only.

We may NOT:

- Use Bon Secours revenues directly or indirectly for political activities or in support of political campaigns.
- Seek or approve reimbursement for personal expenses related to any political activities including money spent in support of any political candidate or political action committee.
- Solicit political contributions from Bon Secours staff.

Social Media

Bon Secours is committed to the responsible use of social media and ensuring that the use of social media communications uphold our ethical values, our dedication to promoting a positive and respectful work environment and our commitment to providing excellent care to our patients and residents. Language posted on social media can affect patients, residents and their family's perception of Bon Secours. Staff shall not post any personal data or confidential information on websites, Facebook, Twitter or any other social media site.

All inquiries from the media must be referred to our Marketing Department.

Bon Secours Marketing shall determine when, where and how the Bon Secours name and brand may be used on social media platforms.





Intellectual Property

Bon Secours is required to comply with all applicable intellectual property laws. You shall respect the intellectual property and copyright laws regarding books, trade journals and other applicable resources that you use.

Substance Abuse and Impairment in the Workplace

Bon Secours is committed to providing a safe, drug-and alcohol-free environment for our patients, residents visitors and staff. Staff, service providers, volunteers, contractors and suppliers may not be under the influence during work time. Staff are required to report any unsafe situation immediately to their Line manager and the Head of Human Resources.

Diversity and Inclusion

Bon Secours is committed to diversity and inclusion in the workplace. All staff shall respect diversity, which is the existence of the gifts, talents and attributes of people, processes and functions, both the differences and the similarities. They will promote inclusion, which means creating and fostering an environment in which all are included, respected and supported so that we may advance and accelerate our Mission, Vision and Values.

Legal and Regulatory Compliance

Screening of Excluded Individuals and Suppliers

Bon Secours will not knowingly employ, contract or bill for any individual, Contractors or entity that has been listed as debarred, excluded or ineligible for participation in their profession.

Bon Secours expect all individuals and entities associated with Bon Secours to be appropriately credentialed, licensed and otherwise qualified to perform their duties.

Bon Secours routinely searches the Office of Foreign Assets Control, European Union Consolidated List of Sanctions list, United Nations Security Council Consolidated List and the Financial Crimes Enforcement Network

amongst others on staff members, contractors and suppliers to Bon Secours.

Additionally, Bon Secours carries out screening of staff as part of the recruitment process and recertification of annual of professional registration. Screening consists of:

- Garda Vetting: Completed prior to offer being made for new recruit and then a Re-vetting process for all staff every 5 years.
- Proof of Professional Registration (NMBI, CORU and the IMC): obtained prior to commencement. Primary source verification is completed for the professional bodies for overseas qualifications. An annual recertification is carried out by the relevant anniversary date.



All staff who are excluded, debarred or are convicted of criminal offences related to the provision of health care services during employment, must immediately report the action to the Chief People Officer and Compliance Office.

Human and Worker Rights

Our Code of Conduct mandates ethical and responsible practices across our supply chain. We require all suppliers and partners to comply with fair labour standards, human rights protections, and environmental sustainability measures. This includes prohibiting forced or child labour, ensuring safe working conditions, paying fair wages, and sourcing materials responsibly. We conduct regular audits and assessments to ensure compliance and take corrective action as necessary.



Environmental Compliance and Safety

Bon Secours is committed to the care of the environment and the health and safety of our patients, residents, staff, and visitors. Staff shall comply with all health, safety, and environmental laws in all aspects of our healthcare operations. Follow Bon Secours procedures for the handling, storing, labeling, using, transporting, and disposing of solid and liquid wastes that are hazardous or infectious

including, but not limited to, the use of personal protective equipment (PPE). File any workplace accident report or required safety and environment reports in a truthful, complete, legible, and timely manner. Cooperate fully with statutory authorities in the event of an environmental incident or inquiry.

Anti-Fraud

Bon Secours is committed to conducting its affairs and activities in an honest, ethical, accountable and legal manner at all times.

Compliance’s performance of routine audits or reviews and monitoring, along with internal controls, help Bon Secours prevent and detect fraud. Bon Secours expects staff who reasonably suspects that a fraudulent activity may be/has taking place should, in the first instance, report the matter to their immediate Line manager, another Manager or the Compliance Team.



Examples of fraud include:

- Forgery or alteration of any document or account, including cheques, bank drafts or any other financial instrument.
- Claiming for fictitious, or inflated expenses.
- Irregularity in recording and reporting financial transactions.

Anti-Corruption, Fair Competition and Foreign and Domestic Financial Crimes

Bon Secours is required to comply with all laws governing anti-corruption, fair competition, laws governing foreign and domestic crimes and other laws and regulations pertaining to the issuance of public debt and related financial activities.

If a staff member suspects that any of these laws are not being adhered to, by any staff member, they should discuss it with their immediate Line manager, another Manager or the Compliance Team.

If your job requires you to make decisions, develop or submit reports, or otherwise be involved in any activities that could implicate these laws you must complete the required Bon Secours training on these topics.

Charitable Status

Bon Secours is a charity registered with the Charities Regulator with Registered Charity Number (RCN) 20027841 and also has charitable tax exemption from the Revenue Commissioners under CHY 10735.

Bon Secours complies with the Charities Act, 2009 and uses all its income for its main charitable purposes only.

Co-operation with Regulators

Bon Secours is committed to co-operating with regulators, as required by law, in furtherance of our goal of delivery of exceptional care. All requests for documents by a Regulator shall be referred to the Legal Department or other relevant Department.

Ethical Responsibility

Reporting Suspected or Actual Breaches

Staff have an obligation to report all potential or actual breaches regulation or law, Bon Secours policy or the Code of Conduct. For those who wish to remain anonymous, reports can be submitted using the Bon Secours Confidential Help Line. The Confidential Help Line supplements other avenues of communications within our organisation for raising questions or concerns. Bon Secours values and encourages honest discussion about ethical and compliance concerns that relate to the Code of Conduct and Bon Secours policies.

No Tolerance for Retaliation

Retaliation occurs when an individual (or a group of individuals, to include members of management) attempt to cause harm, intimidate or cause otherwise negative consequence to an individual for reporting or assisting in an investigation of a suspected or actual breach of a law, Bon Secours policy or the Code of Conduct. Report any form of retaliation to your line manager, the Compliance Office or to the Confidential Help Line. Bon Secours Compliance will fully investigate any allegation of retaliation.

! *Bon Secours has a zero-tolerance policy for any form of retaliation against someone who reports a concern in good faith.*

Management Responsibility

Members of the Executive Management Team and Senior Managers across Bon Secours must set an example and act when compliance and ethical issues are raised. They are responsible for ensuring that staff know the content of the Code of Conduct and any applicable policies. Line managers are responsible for seeking assistance from the Compliance Office for themselves and their staff when the right action is not clear and when questions arise.

Discipline

Any staff member who breaches the Code of Conduct or related policies and procedures may be subject to disciplinary action. The specific discipline will be based on the facts and circumstances, including the nature, severity and frequency of the breach.

! *Bon Secours Disciplinary policy will be firmly and fairly enforced with respect to all staff.*



Bon Secours Code of Conduct is updated periodically to respond to changing conditions and to reflect changes in the law and regulatory bodies. You are required to follow and support the behaviours outlined in this Code.