

# Presbyterian Code of Conduct



Approved by the PHS Board of Directors  
December 2024



## A message from our President & CEO

Presbyterian is committed to ensuring all patients, members and the communities we serve can achieve their best health. They trust us to conduct our work in an ethical manner, to do what we say we will do and to meet the ever-changing requirements of healthcare.

This responsibility belongs to both the organization and to each of us as workforce or board members. Each person's actions, whether on-site or remote, reflect our commitment to ethical behavior and treating others with fairness and respect. Our Code of Conduct identifies the basic standards Presbyterian requires of its workforce. These standards help us earn and maintain the trust of our patients, members, employees, communities and business partners.

This Code provides guidance but does not address every situation in our complex and heavily regulated environment. We are all expected to ask questions and use good judgement. If you have questions or concerns, please contact your manager, the Compliance Department or Human Resources.

Thank you for all you do for Presbyterian and for the communities we serve.



A handwritten signature in black ink that reads "Rishi Sikka". The signature is fluid and cursive.

Rishi Sikka, MD  
President & CEO

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## Who we are

### Our purpose

Presbyterian exists to ensure all of the patients, members and communities we serve can achieve their best health.

### Our vision

We aspire to earn the letter below by meeting patients and members where they are, with care and coverage that makes their journey easy and affordable.

Dear Presbyterian,

Thank you for respecting me as an individual and supporting my health journey by providing compassionate, safe, high-quality care and coverage. Presbyterian makes healthcare easy and affordable for me and my family.

– Patients and Members

### Our culture

How we work matters here. Built on a legacy of CARES Commitments, together, we create a reliable and just culture where every person belongs, contributes, feels safe, is respected and experiences joy. We value trust, communication and each individual's dignity and well-being. We are One Presbyterian – a diverse, connected community where teamwork makes the difference.

### Our commitment

The CARES Commitments are part of the Presbyterian legacy. They refer to our commitment to **C**ollaborate, be **A**ccountable, **R**espect, **E**ngage, and **S**erve.

### Unified in our purpose, strengthened by our differences

We commit to an inclusive and equitable environment where everyone is valued and empowered for success. Our environment reflects the diversity of our community, learns from all perspectives, provides affordable, accessible and culturally appropriate healthcare and champions health equity for our New Mexico communities.

## How we work

At Presbyterian, we commit to the following standards of conduct.

### Culture of safety & well-being

- Promote a culture of safety through personal behavior and organizational process.
- Always seek to eliminate patient and member harm.
- Strive for a safe work environment free of preventable infectious disease exposures, lifting injuries, workplace violence and staff harm.
- Maintain a Just Culture to encourage the routine reporting of errors or concerns, without fear of retaliation and to facilitate process improvements.
- Support the safety and well-being of our workforce through wellness programs and a healthy work-life balance.

### Uphold ethical & regulatory standards

- Uphold our Code of Conduct as it applies to all Presbyterian workforce and board members.
- Seek the best course of action in every situation. When challenged with ethical dilemmas, obtain the advice and direction of supervisors, managers or senior leaders.
  - Protect and uphold Presbyterian's reputation and legacy for integrity and community service in all personal and professional actions.
  - Adhere to all laws and regulations. Uphold an atmosphere that promotes and supports Presbyterian's efforts to ensure compliance with laws and regulations.
  - Know and abide by Presbyterian policies. They serve as guides to understanding how Presbyterian does business in a highly regulated industry.
  - Complete annual training as required.
  - Understand that violations of our Code of Conduct or underlying laws, regulations, or Presbyterian policies could result in corrective action. This can be up to or including termination of employment, suspension of privileges, or termination of business relationships.
  - Retain documents, email, data and other records for the appropriate and legally required length of time per [record management policies](#) (🔒).



Workforce includes leaders, employees, independent practitioners, contractors, volunteers, students & vendors.

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## Respect everyone

- Promote positive behaviors and work environments. Disruptive and/or harassing behaviors, intimidation or retaliation by individuals at any level is not allowed. Leadership will address such behaviors with all workforce.
- Promote teamwork, respect and listen to colleagues' perspectives, respond timely, and collaborate to provide quality care and service.
- Build a framework based on mutual trust that enables teams to work well together.
- Honor and encourage patients' and members' rights to participate in and make decisions about their care. This includes the right to refuse care when permitted by law.
- Inform patients and members about their illnesses, treatment plans, pain management, treatment alternatives and outcomes in a way they can understand.
- Provide interpretation services, when needed.
- Identify yourself to patients and members by providing your name, role and purpose for the interaction.
- Listen to and document patients' and members' concerns and complaints so they can be addressed.



## Protect privacy & confidentiality

- Comply with the Health Insurance Portability and Accountability Act (HIPAA).
- Safeguard the privacy and confidentiality of patient and member information from intentional or unintentional uses or disclosures. Although Presbyterian collects patient and member information, we do not use or disclose this information without a medical or business need.
- Follow our [privacy](#) and [security policies](#) (🔒).
- Protect patient and member information by not posting their information or pictures online, even if the patient is not identified.
- Safeguard our business and workforce information.

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## Abide by law, professional licensure & privileging

- Abide by all federal and state laws including those that relate to patients, members, referrals and provider relationships.
- Perform your role free from alcohol, drugs or other controlled substances per Presbyterian policy.
  - Comply with all laws, regulations and policies related to environmental health and safety. This includes fire, chemical, biological, ergonomic, radiation and electrical safety. Appropriately handle, transport and dispose of medical waste and other hazardous materials.
    - Keep all required licenses and certifications current and renew in a timely manner.
    - Provide only those services within the scope of your licensure and for which you are privileged to perform at Presbyterian.
    - Ensure all reporting to the government is truthful and accurate. Never give false or misleading information to a government employee, agent or representative.
    - Do not employ or contract with ineligible parties per the [Excluded Individuals and Entities policy](#) (🚫).



## Maintain financial integrity

- Manage with integrity and prudence Presbyterian's financial and other resources. Hold others accountable for doing the same.
- Comply with laws pertaining to fraud, waste and abuse of government funds, and the resources entrusted to us.
- Ensure charges submitted are only for services or supplies provided, accurately represent the level of service provided and have proper documentation and coding.
- Support internal and external audits and recommendations. Assist with any corrective actions.
- Conduct all negotiations and contracting ethically and in accordance with laws and regulations.

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## Address conflicts of interest

- Identify situations where your personal interests may appear to conflict with Presbyterian's interests.
- Disclose situations to your manager and complete a disclosure form.
- Withdraw yourself from making decisions that may appear as a conflict.
- Refuse to accept or offer gifts or benefits or enter into relationships that may influence or be perceived to influence a decision or action taken on behalf of Presbyterian per the [conflict of interest policies](#) (⚠️). Relationships include those with individuals, competitors, vendors, suppliers or contractors (such as pharmaceutical, software and medical device companies).

## Expectations of our leaders

- Act with unquestionable integrity.
- Investigate suspected legal and ethical violations in accordance with the [Compliance Reporting and Investigation policy](#) (⚠️).
- Take corrective action when violations occur per the [corrective action policies](#) (⚠️).
- Create a culture of compliance, safety and quality. Implement changes for identified problems, as appropriate.
- Provide opportunities for workforce to participate in compliance, safety and quality education and initiatives.
- Manage disruptive and improper behaviors per policy.
- Provide patients and members the means to report their concerns.
- Uphold Presbyterian's ethical work environment. Never exempt any employee from the law.
- Create an environment free of harassment and discrimination.
- Support diversity and inclusion.
- Treat workforce with respect and listen to their ideas. When possible, involve workforce in decisions impacting their work.
- Help workforce experience a positive work environment and joy in their work.




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## See something, say something

If you see something that does not seem right, say something. We want to make sure it gets corrected. All workforce has a duty to report compliance concerns. This includes the following behaviors:

- Actual or suspected unethical or prohibited behavior, illegal activity or violation of Presbyterian policies and procedures;
- Improper posts to social media per the [policy](#) (
- Disruptive or inappropriate behavior including disrespectful language, sexual comments, inappropriate touching, anger outbursts, name-calling, racial or ethnic jokes or slurs, intimidation, or the deliberate failure to follow policies, address safety concerns or patient care needs;
- Action or inaction that may pose a danger, or result in substandard care;
- Any retaliation for raising or reporting ethical, compliance or other concerns. Retaliation is not allowed, no matter the status or tenure of the person responsible. Individuals who report concerns in good faith are protected from retaliation.

Presbyterian takes all concerns seriously. The Compliance Department will follow up and take appropriate actions on all reports. All reports are treated confidentially, as the law allows.

There are several ways to report. Contact:

- Your supervisor, manager or senior leader;
- Presbyterian's Compliance Department;
- Compliance and Fraud, Waste and Abuse Hotline (888) 435-4361 (anonymous); or
- Human Resources through AskHR (505) 923-8750.

The Compliance and Fraud, Waste and Abuse Hotline is available 24 hours a day, 365 days a year. An independent company answers all calls and will keep names anonymous, if requested. Those who choose to give their names will have their identity protected to the extent allowed by law. If you call, please give enough details to investigate your concerns.

For more information about Presbyterian's compliance program, visit the [Compliance Department's PresNet page](#) (

## Workforce commitment

As a member of the Presbyterian team, I acknowledge that I have read the Code of Conduct. I agree to support the purpose of Presbyterian and to abide by the standards above. I understand I will be held accountable if I fail to do so. I also understand that compliance with regulatory requirements is everyone's responsibility.

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Signature

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Date



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