

PROVIDER CODE OF BUSINESS CONDUCT & ETHICS

Provider Code of Business Conduct and Ethics

- **Code of Business Conduct and Ethics.** This training provides an overview of the corporate policies, laws and regulations applicable to Health Network One and its subsidiaries. - (Referred to herein as HN1)
- Standards of Conduct (or Code of Conduct) state compliance expectations, principles and values by which the organization operates.
- This training will help you identify, prevent and report any illegal, improper or unethical conduct within HN1 and promote effective business controls.

Corporate Vision

HN1's vision is to “develop and market products, through our family of companies that facilitates access for consumers and payers to quality and cost effective healthcare”. The extensive HN1 network of providers help to support this vision by providing quality service to our clients. To ensure that we meet this goal, HN1 has established a set of business conduct guidelines based on the HN1's code of ethics.

Code of Business Conduct and Ethics

The Code of Business Conduct and Ethics are standards of conduct that:

- Promotes ethics, compliance and corporate values;
- Describes compliance expectations;
- Serves as a guidance to prevent, identify and report real or suspected situations of non-compliance, fraud, waste and abuse;
- Establishes commitment to integrity, ethical behavior and compliance with Federal and State laws, rules and regulations applicable toHN1.

This Code is part of HN1's Compliance Program and is an important part of its internal control structure.

Responsibilities

- Report any suspected or real violation of the Code.
- Act honestly and ethically and promote integrity at all levels.
- Respect and comply with all applicable laws, rules and regulations.
- Total cooperation during and after internal or external investigations and availability to be interviewed.
- Provide reasonable and honest information, provide verifiable facts and supporting documentation.
- Avoid situations where your ability to effectively carry out your job responsibilities could be compromised.
- Responsible for knowing, understanding and complying with Code of Business Conduct and Ethics, as well with the Compliance Program and all JN1 policies and procedures.

How to identify real or suspected situations of compliance, fraud, waste and abuse?

Ask yourself

- Is it consistent with the Code?
- Is it ethical?
- Is it legal?
- Will it reflect well on me, my employer or HN1?
- Would I want to read about it in the newspaper?

If the answer is “NO” to any of these questions, DO NOT do it.

- If you identify any situation related to these questions, **REPORT**.
- If you have doubts, **STOP** and ask.
- To report or ask questions about any situation, use any of our lines of communication.

Can I report Anonymously?

Yes, through the Compliance Help Line.

- Compliance Hot Line - 1 (866) 321-5550 (Toll Free)
- All reports are investigated in complete confidentiality and without fear of retaliation or intimidation. After reporting a violation, you can expect that:
- Each concern will be carefully evaluated before it is referred for investigation or resolution.
- The concern will be handled promptly, discreetly and professionally.
- The concern will be addressed by the appropriate personnel, which may include representatives from Compliance, Legal Affairs, HIPAA Privacy/Security and/or other relevant designee(s).

Our Promise

1. HN1 will not discriminate, retaliate or discriminate against any person who makes a report or complaint in good faith for participating in an investigation into code violations, compliance program, any internal policy procedure, or any unethical behavior.
2. Confidentiality, including maintaining the informant's identity anonymous, will be protected, subject to applicable laws, regulations and/or legal proceedings.
3. It is considered a violation of o HN1's Code of Conduct and Ethics to knowingly make a false accusation.
4. Any employee or independent contractor who harasses, threatens or retaliates against another employee or independent contractor for reporting compliance violations will be subject to applicable discipline.

Violations of the HN1 Code of Conduct/Ethics

- Violations of HN1's Code are subject to disciplinary/corrective, civil or legal action, including but not limited to termination of employment or contract. In some cases, civil and criminal penalties may apply.
- Disciplinary actions might be taken against those who, because of their lack of diligence or oversight, fail to prevent or report violations.
- Disciplinary actions will be enforced in a timely, consistent and effective manner.
- Some violations, may be so serious that they warrant immediate notification to government authorities before, or simultaneously with, the beginning of an internal investigation.

Work Environment

Work Conduct

- Equal Employment
- Freedom from Harassment of any kind
- Safe and Productive Work Environment
- Respect of each other's individuality and diversity

Behavior when representing the Company outside the Workplace

- Professional and courteous
- Prepared and knowledgeable of organization's business objectives

Open Door

- The Organization provides effective lines of communication to address your concerns

Confidential Information

- It is HN1's policy to protect the privacy of past, present and prospective customers, members, plan participants, its employees and other similar parties, consistent with applicable laws.
- Safeguarding confidential information requires compliance with all related policies and procedures, protect paper documents and individual workstations; manage passwords properly, secure software, back up critical data; and use data software and networks safely and responsibly.
- You must not share or disclose non-public information with co-workers, family, friends or others for non-authorized, healthcare related purposes.

Conflict of Interest

What is a Conflict of Interest?

- A conflict of interest exists when a healthcare professional with responsibility to others is influenced (consciously or unconsciously) by financial, personal or other factors which involve self-interest.
- The influences may be attributed to:
 - Activities and relationships
 - Entertainment, gifts and gratuities
 - Interest or expectancy in a business opportunity
 - Indirect relationships such as spouse or relative who may receive improper personal benefits as a result of your position.

Providers (and their staff) have a duty to avoid conflicts of interest as specified in their contracts and, by laws regulating fair dealing in commercial relationships.

ATTESTATION

- I certify that I know where to access the Code of Business Conduct and Ethics and I agree to read, understand and comply with it, as part of my contract with HN1.
- I understand that it is my duty to promptly report any potential or actual violation that I know or identify, using any of HN1's lines of communication.
- I understand that any violation to these documents may result in disciplinary measures that could include the termination of my contract.
- I understand that completing compliance training's is a condition of my contract with HN1.
- I understand that it is my responsibility to promptly disclose any potential conflict of interest to HN1, failure to do so may be subjected to disciplinary actions.

