

Code of Conduct



EPIC MANAGEMENT, L.P.

WHAT IS A COMPLIANCE PLAN AND CODE OF CONDUCT?

The Compliance Plan and Code of Conduct are formal statements of EPIC's standards and rules of ethical business conduct. We need a Compliance Program for the following reasons:

- To provide a formal statement of EPIC's standards and rules of ethical conduct to all EPIC employees and business partners.
- To inform employees about existing and future laws and EPIC policies.
- To investigate reports of unethical or unlawful behavior and stop such behavior after it is discovered.
- To protect EPIC from legal action if a breach of ethical conduct should occur.

The Compliance Program applies to everyone. No person's job or position at EPIC is more important than preserving EPIC's reputation for integrity.

The Code of Conduct is a key part of EPIC's Compliance Program. There are nine areas of conduct covered in the code:

- 1. Ethical Responsibilities**
- 2. Compliance with Laws and Regulations**
- 3. Fraud and Abuse**
- 4. Patient's Rights**
- 5. Anti-Trust**
- 6. Safety, Health and Environment**
- 7. Confidentiality and Business Information**
- 8. Employee's Rights and Obligations**
- 9. Financial Accounting and Records**

The Code of Conduct cannot anticipate every circumstance an employee may encounter. If you have questions or need advice about a specific situation, talk to your supervisor or your administrator, or call the Compliance Hotline.

ETHICAL RESPONSIBILITIES OF ALL EPIC EMPLOYEES

Every Employee's Responsibility:

ETHICAL PERFORMANCE

As an employee of EPIC, you have an obligation to be honest in all your dealing with clients, patients, vendors, and third parties. You must know and comply with applicable laws and all policies and procedures. Claims of ignorance, good intentions, or using poor judgement will not be accepted as an excuse for noncompliance. Maintaining ethical standards is everyone's responsibility. If you know of a problem, you cannot remain silent. You must step forward to solve it!

EPIC Manager's Responsibility:

ETHICAL LEADERSHIP

Leadership requires setting a personal example of high ethical standards in the performance of your job. It is up to you as management, to set the tone for EPIC. You must take responsibility for the actions of your employees. You will be accountable for making sure that your employees understand and apply the ethical standards set forth in this booklet. This is accomplished through adequate training, supervision and vigilance. You must also listen to your employee's questions and diligently act on their concerns.

If you are confronted with an "ethical" situation, judge your response or actions by the following:

- Does it comply with the law and/or EPIC policy and procedures?
- How would it look to family, friends, patients, and the community?
- If you know it's wrong, don't do it!

In order to provide you with every avenue possible in which to raise your concerns, EPIC has a Compliance Hotline **909-335-4153** for EPIC employees. The Corporate Compliance Officer operates the Hotline and each call will be treated confidentially, and all calls will be investigated. **EPIC absolutely prohibits any employee from taking retribution against a Hotline caller.**

COMPLIANCE WITH LAWS & REGULATIONS

We will comply with all laws and regulations that apply to EPIC's operations, business and dealings.

- We must comply with both the spirit and letter of all laws that apply to EPIC operations, business and dealings. We must cooperate with the government officials who are responsible for administering and enforcing those laws and for monitoring and regulating EPIC's activities.
- We are expected to have a practical, working knowledge of the laws and regulations that affect our job responsibilities.
- If a representative of any government agency contacts you, you should immediately consult with your supervisor for guidance to insure that the government agency receives full cooperation.



FRAUD AND ABUSE

We will maintain honest and accurate records concerning the provision of health care services, and never offer, pay or receive any money, gifts or services in return for the referral of patients or to induce the purchase of items or services.

Employees must not make false statements or misrepresentations at any time.

We will not engage in any of the following activities, all of which are prohibited by law:

- Billing for supplies or services not delivered;
- Misrepresenting or duplicate billing of services actually rendered;
- Falsely certifying that services were medically necessary;
- Seeking to collect amounts exceeding the co-payment and deductible from a Medicare or Medi-Cal beneficiary who has assigned benefits; or
- Soliciting, offering or receiving a kickback, bribe or rebate in exchange for patient referrals.

We bill only for services actually rendered. Services rendered must be accurately and completely coded to ensure both proper billing and integrity of the medical data base. Billing must comply with the requirements of state and federal payors and conform to all payor contracts and agreements.

When any payor agreement requires the collection of co-payments and/or deductible amounts, these amounts will be collected to the full extent of the agreement. Decision to waive any co-payment or deductible must be disclosed and implemented in accordance with EPIC's discount policy.

We prohibit any payment that may be viewed as a bribe, kickback or inducement. Prohibited inducements include gifts of more than small value, excessive entertainment or other considerations given to government employees, physicians or any other party in a position to influence patient referrals.

Other policies and documents addressing fraud and abuse include but not limited to:

Administrative Policy & Procedure Manual
Management Information Systems Section
Physician Section & Business Office Section
Employee Handbook
Discount and Co-payment Guidelines

PATIENTS' RIGHTS

Patients must receive quality care delivered in a considerate, respectful and cost-effective manner. Patients have the right to make their own health care decisions after disclosure of all relevant information.

- We must at all times treat patients with dignity and respect.
- We shall continue to seek new approaches to increase the quality of care delivered to our patients while ensuring that care is delivered in a cost-effective manner.
- Treatment of patients shall be consistent with appropriate informed consent as determined by California law. Questions concerning a patient's competence or the right of another person to act on a patient's behalf should be handled in accordance with EPIC's policy.
- We must protect a patient's personal privacy and preserve the confidentiality of a patient's medical treatment program, including the patient's medical records. We must observe the highest standards of ethical and legal conduct with respect to such information.



Other policies and documents addressing the patients' rights include but not limited to:

Patient's Bill of Rights

Administrative Policy & Procedure Manual
Quality Management Section
Physician's Section
Medical Records Section

Employee Handbook

Non-Disclosure Acknowledgment

ANTI-TRUST

We will avoid activities that reduce or eliminate competition, control prices, allocate markets or exclude competitors.

- The purpose of antitrust and trade regulation laws is to protect EPIC and other companies from unfair trade practices, promote competition, and preserve the free enterprise system. The antitrust and trade regulation laws are based on the belief that businesses and individuals should act independently in order to serve the economic good of all.

- We will negotiate and enter into contracts with competitors, potential competitors, contractors or suppliers on a competitive basis based upon factors like price, quality and service. If you have responsibilities such as purchasing, planning or marketing this is especially important.

- We will not share with competitors any pricing information not normally available to the public. This could be perceived as an effort to fix fees or limit competition.

- When attending trade shows, professional meetings and other gatherings, we will avoid subjects that affect competition including prices, pricing policy, profit margins, or credit and billing practices.



Other policies and documents addressing antitrust and trade include but not limited to:

Administrative Policy & Procedure Manual
Legal Guidelines and Responsibilities Section

Employee Handbook

SAFETY, HEALTH AND ENVIRONMENT

We will maintain a safe and healthy working environment.

- We have a responsibility to follow safe operating procedures, to safeguard our health as well as that of our co-workers and patients, and to maintain a safe and healthful workplace.
- The United States has federal, state and local agencies to ensure that everyone complies with laws and regulations affecting safety, health and environmental protection. It is our policy to comply with the standards and regulations of these agencies.
- If you do not know the correct procedure for handling or disposing of any material, promptly ask your supervisor or another EPIC resource such as your safety officer for assistance.



Other policies and documents addressing safety, health and environment include but not limited to:

Administrative Policy & Procedure Manual
Emergency/Safety/OSHA Section
Infection Control Section
Radiology Section
Laboratory Section
Employee Handbook

Organized Plans of Operation Manual

CONFIDENTIALITY AND BUSINESS INFORMATION

We will protect confidential and proprietary information including patient information.

- Never disclose confidential patient information to any unauthorized person. Common curiosity makes us wonder about people we know who have become patients. It is never ethical or proper to look in a patient's confidential record unless it is required as part of your job.
- We must safeguard EPIC's confidential information and trade secrets. Confidential and trade secret information includes any information that is not generally disclosed to the public. This information generally describes proposed EPIC actions that would be useful or helpful to EPIC's competitors.

Examples of confidential and trade secret information includes:

- Financial data
 - Planned new project or information about areas where EPIC intends to expand
 - Employee information, wage and salary data
 - Capital investment plans and projected earnings
 - Changes in management or policies of EPIC
- Discuss restricted, or exclusive, information with others only on a need-to-know basis. Be cautious about accidentally discussing confidential information or trade secrets in social conversations or normal business relations.

Other policies and documents addressing confidential and business information include but not limited to:

Administrative Policy & Procedure Manual
Medical Records Section

Employee Handbook

Non-Disclosure Acknowledgment

EMPLOYEE'S RIGHTS AND OBLIGATIONS

We will maintain a working environment free from harassment, abuse of any kind and unlawful discrimination. We expect supervisors, co-workers, vendors and medical staff to treat one another with dignity, respect and courtesy.

- EPIC is an equal opportunity employer. We prohibit discrimination in any work-related decision on the basis of race, creed, gender, age, disability status, national origin, medical condition, or any other illegal basis.
- We strictly prohibit harassment, including sexual harassment. Sexual harassment includes sexual advances, requests for sexual favors, or any sexually offensive verbal, visual or physical conduct, or when such conduct creates an intimidating, hostile or offensive work environment. Any form of harassment will not be tolerated.
- We are committed to providing an efficient and productive working environment. We must perform our job duties safely, competently and efficiently in a manner that protects EPIC's interests and those of their co-workers. Any involvement with illegal and/or mood altering drugs or consumption of alcohol in the work place by employees is prohibited and may result in corrective action, up to and including dismissal.

Other policies and documents addressing employee's rights and obligations include but not limited to:

Equal Employment Opportunity Commission

Administrative Policy & Procedure Manual
Human Resources Section

Employee Handbook

Non-Disclosure Acknowledgment

FINANCIAL ACCOUNTING AND RECORDS

We will maintain honest and accurate financial records.

- EPIC relies on its business records for making business decisions; for billing the government, third-party payors, customers and patients; for paying its vendors and for making representations to the government and others.
- We must record all entries in EPIC's books and records accurately, honestly and fairly so that these entries reflect the true nature and purpose of the transactions that are being recorded.
- No compromise of the integrity of financial records or financial statements and no "off the books" transactions will be permitted.
- Financial reports must fairly and consistently reflect performance and accurately disclose the results of operations. They must also comply with Generally Accepted Accounting Principles, regulations of the Centers for Medicare and Medicaid Services (CMS) and other applicable rules.
- Accuracy of EPIC's books and records begins with each employee. Whether the records are time cards, expense reports, general accounting records, purchasing records, or billing/coding entries, you have a personal responsibility to ensure that every document and entry is complete and accurate.

Other policies and documents addressing financial accounting and records include but not limited to:

Administrative Policy & Procedure Manual
Human Resources Section

Employee Handbook

CONCLUSION

This Code sets forth EPIC guidelines and expectations about proper job-related conduct. However, this Code cannot anticipate every situation that you as an employee may encounter.

You should consult with your supervisor for guidance if this Code does not provide adequate direction or if you are being pressured to compromise your behavior, whether by another employee, a physician, a supplier, a competitor or a patient. If you are unable to resolve your concerns with your supervisor, you should contact the Corporate Compliance Officer. Any questions about interpretations of the law or the legality of a particular course of conduct should be discussed with the Corporate Compliance Officer who may in turn consult with legal counsel.

No employee's concern is too small or unimportant if he or she thinks it implicates policies concerning proper conduct. An employee will find that by seeking guidance a resolution can be found which will both meet the employee's concerns and be consistent with this Code.

Who to Contact with Questions or Concerns

Your Manager

First contact for workplace issues

Human Resources

Internal ext. 4720
External 909-335-4195

Contact for policy guidance and interpretation, workplace issues, compensation and employee benefit concerns.

Compliance and Ethics

Corporate Compliance Officer
Internal ext. 4821
External 909-786-0821
Compliance Team Member
Internal ext. 4822
External 909-786-0822

Contact for questions or advice on:

- The Code of Conduct
- Corporate Compliance Plan
- Reporting violations or suspected violations of compliance or unethical behavior

Compliance Hotline 909-335-4153

Safety, Health, and Environment

Director of Risk Management and Safety
Internal ext. 4718

Contact to report unsafe conditions and workplace hazards.

ADDITIONAL INFORMATION



EPIC Management's Compliance Toolbox

<http://www.epicmanagementlp.com/compliance.aspx>