

CORPORATE COMPLIANCE POLICY

POLICY

Peckham, Inc. (the Company) is committed to conducting itself as a good organizational citizen with the utmost of professional integrity, ethics, and honesty. This commitment extends to every aspect of the Company's business and to every work-related activity of its employees, contractors, and individuals with responsibility pertaining to the ordering, provision, marketing, documentation, coding, or billing of services reimbursable by Federal health care programs, or in the preparation of claims, reports, or other requests for reimbursement for such items or services with the statutes, regulations, and written directives of Medicare, Medicaid, and all other Federal Health Care programs (as defined in 42 U.S.C. § 1320a-ib(f), hereinafter collectively referred to as the "Federal health care programs"). This commitment to compliance applies to all employees, board members, or persons receiving any services or participating in programs.

Rev. Board Approval Date [10/2025]

PROCEDURES

The Company's Corporate Compliance Program (the Program) provides the framework necessary to allow the maximum protection against unethical finance behavior, conflict of interest, violation of federal/state/and or local laws, and violation of the Code of Ethics & Conduct in our company. This introduces the procedural framework for the Program with applicable laws and regulations, which may include, but are not limited to, Federal laws and regulations.

The Program is designed to provide maximum protection in a legal environment where even innocently made mistakes can lead to liability for both the Company as a whole and individuals. The Company provides all covered individuals with the tools needed to perform their functions

at the highest possible level and the Program stresses education and open lines of communication. This Program also recognizes a need for easy confidential resource options to be made available to violation reporters.

DEFINITIONS

1. **Covered Individuals:** Except as otherwise provided within this Program, the term “Covered Individuals” refers to all of Company employees and members of the Board of Directors.
2. **Corporate Compliance Officer:** Senior staff member selected by the Chief Executive Officer to manage the Company’s Program. The Corporate Compliance Officer has necessary access to legal counsel, Chief Executive Officer, and Board of Directors, to enforce the Program.
3. **Corporate Compliance Program:** Procedural framework established to provide maximum assurances the Company follows all billing, collection, medical records and other documentation requirements and to provide avenues for errors/problems/concerns in the Company to be appropriately and timely identified and corrected. Sets the framework for the Company’s confidential and secure third-party reporting structure.
4. **Conflict of Interest:** A situation in which a person, such as an employee, or a professional, has a private or personal interest sufficient to appear to influence the objective exercise of their official duties. (See Conflict of Interest Policy)
5. **Unethical Finance Behavior:** The unethical systematic recording and analysis of the business and financial transactions associated with generally accepted accounting principles (GAAP).
6. **Violation of Federal/State/Local Laws:** A situation where a person is known not to be in legal compliance with a law. (See Legal Requirements Policy)
7. **Violation of the Code of Ethics & Conduct:** Willful or innocent actions that are in direct violation of Company policy, procedures, code of conduct, and/or implied (See Code of Ethics & Conduct)

RESPONSIBILITY

1. The Company Board of Directors has authorized the Chief Executive Officer to designate a Corporate Compliance Officer, who is responsible for oversight of the Program. The Corporate Compliance Officer is an individual with enough organization-wide authority

to promote and enforce the Program. The Corporate Compliance Officer is responsible for the following duties:

- Develop and implement policy, procedures, and practices designed to ensure compliance with the requirements of this Program.
 - Review and propose modifications to the Program.
 - Monitor the effectiveness of the Program.
 - Educate staff on the Program.
 - Ensure adequate staff training on billing, file documentation rules and regulations
 - Conduct investigations into complaints received.
 - Ensure adequate notifications are made to the Chief Executive Officer.
 - Report to the Chief Executive Officer regularly on compliance matters.
 - Provide and evaluate avenues for staff to report complaints/concerns/questions.
 - Review all new programs, internal/external audit findings, changes in billing/documentation rules and regulations, etc., to ensure the Company remains in compliance.
2. The Corporate Compliance Officer ensures Covered Individuals are adequately trained in the Program; and Code of Ethics & Conduct; and maintains each employee's participation. By documenting the occurrence of violations or compliance problems and corrective measures taken in response to such problems, the Company will better ensure its reputation for providing honest and accurate services is preserved and enhanced.
 3. Each Covered Individual has attested they received, read, understood, and will abide by Peckham's Code of Ethics & Conduct. The Corporate Compliance Officer regularly reviews the Code of Ethics & Conduct to determine if revisions are appropriate and makes any necessary revisions based on such a review. Any such revisions are distributed for attestation in a timely manner.

EDUCATION/TRAINING

The Program is designed to be as interactive as possible, so the standards and procedures become second nature in Covered Individuals daily routines.

1. **Initial Training:** The New Hire Orientation curriculum is developed and delivered to all new employees. Completion records of the training modules and attestations are retained in the Human Resource Information System (HRIS).
2. **Continuing Education:** The Corporate Compliance Officer shall review the results of recent internal/external audits, and/or recurring questions/concerns raised by employees. The Corporate Compliance Officer shall take appropriate actions to inform and educate Organization employees about the topics of any recurring employee questions and changes in applicable legal standards.

Whether or not the inclusion of new or changed topics is appropriate, the Corporate Compliance Officer shall see to the development and scheduling of compliance training to covered individuals. Completion records are retained in the HRIS.
3. **Responses to Questions/Concern:** However well covered individuals think they understand the substantive standards of the Program upon the completion of initial training; inevitably further questions arise on the job due to the complexity of legal standards. For the Company to provide constant educational access to covered individuals, the Corporate Compliance Officer is available to answer questions/concerns regarding the Program, legal requirements of federally funded programs or other documentation.

REPORTING OF AND RESPONSE TO VIOLATIONS

1. **Reporting:** If a covered individual becomes aware of any wrongdoing under the standards set forth in this program, whether committed by that person or by someone else, they must report the wrongdoing to the Corporate Compliance Officer. A third-party system called EthicsPoint can be used for anonymous reporting, or the Corporate Compliance Officer can be contacted directly. If the report concerns the Corporate Compliance Officer, the Chief Executive Officer or a board member investigates your report, if it concerns the Chief Executive Officer, a board member is notified of the report.
2. **Response:** A report of a wrongdoing under the Program, is responded to through the EthicsPoint site. The Reporter is issued a password to communicate with the investigator. Check back to look for questions from the Investigator or to see the status of the report. The Corporate Compliance Officer or the Employee Relations Department conducts the

appropriate investigation, enters into the report and completes a summary for each report received. The investigator determines whether the alleged wrongdoing is a violation of the Program, Code of Ethics & Conduct, is a violation of federal law, or otherwise puts the Company at risk of economic injury or injury to reputation.

If the Corporate Compliance Officer, Chief Executive Officer, and legal counsel conclude reporting to governmental authorities is or may be appropriate, they shall inform the Company's Board of Directors immediately. The Chief Executive Officer, in consultation with the Company's Board of Directors and legal counsel, if appropriate, shall then be responsible for determining whether and how a timely and thorough report should be made to the appropriate governmental authorities on behalf of the Company. The Corporate Compliance Officer shall make modifications to the Program as needed to help prevent future violations like any detected through the reporting system.

3. **Retaliation:** The Company shall not take disciplinary action against an employee for merely reporting what the employee reasonably believed to be a violation of this Program. However, the Company may take disciplinary action against an employee on several basis related to reporting. First, an employee knowingly fabricated, distorted, exaggerated, or minimized a report of wrongdoing either to injure someone else or to protect them or others. Second, an employee whose report contains admissions of personal wrongdoing will not be guaranteed protection from discipline. The Company generally gives positive weight to self-confession in determining disciplinary action; but the extent depends on factors such as whether the employee's conduct was previously known to the Company, whether discovery of the conduct was imminent, and whether the confession was complete and truthful.
4. **Enforcement:** Covered individuals are expected to comply with the Program. The Company uses a progressive discipline policy except where immediate termination is justified due to the seriousness of the violation. (See Progressive Disciplinary Policy)

AUDITS & IMPROVEMENTS

1. The Corporate Compliance Officer continuously reviews the effectiveness of the Program. This review includes but is not limited to the following: (a) examining the effectiveness of the employee training; (b) timeliness of conducting and completing

investigations; (c) the effectiveness of employee training on billing and documentation; and (d) monitoring the number of reports received from the Program.

RECORDS

1. The Company retains records in accordance with applicable law, and it is dedicated to cooperating fully with all legitimate requests for information by outside entities.

Rev. 10/2025

Policy Purpose (CARF Section 1.A)