

# Plan de Salud Menonita

August 31, 2018

**PSM' Code of Conduct**

**Guide to Individual  
Behaviors**

ESTÁS EN  
**BUENAS  
MANOS**



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# What is our policy?

- PSM policy is to discourage unethical and unlawful behaviors as soon as they are identified and to apply corresponding disciplinary action to whom violate this Code of Conduct.
- This policy applies to all PSM 'employees and its business associates.



# Who must follow the Code?

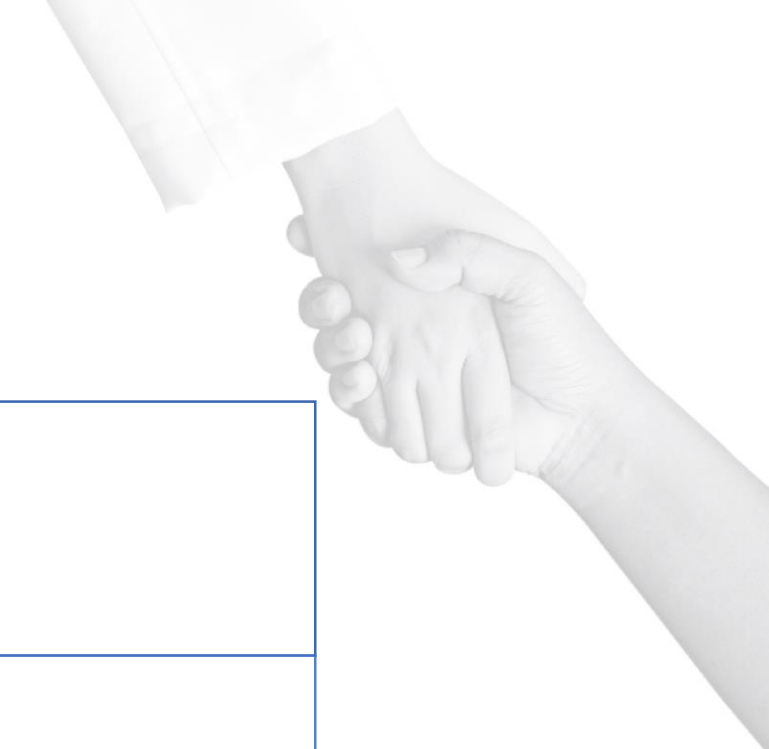
- This Code applies to all directors, corporate officers, employees (exempt, non exempt, temporary) agents, individual contractors and delegated entities of the corporation at all time and anywhere.
- Business Associates and contractors should adhere to this Code because their behavior impact in every activity which they are related and involve us.
- Violations to this Code of Conduct are subject to disciplinary action that can include termination of employment.
- Criminal and civil penalties may apply in some circumstances.
- Disciplinary actions includes the lack of diligence of supervision positions on reporting violations to this Code.



# Ethical Culture

## Principals behind the Code of Conduct

- Act ethical and honest to safeguard the corporation integrity.
- Never engage in dishonest or illegal acts even if directed to do so by a supervisor, corporate officer, other employee or independent contractor.
- Report immediately any request to engage in a dishonest or illegal act to your supervisor, compliance officer, human resources representative or to the Ethical/compliance helpline( or website).





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# Compliance and ethical reporting helpline

- This is a tool that will be available to seek guidance or to report any known or suspected violation to this Code of Conduct.
- This helpline will be available 24 hours, seven days a week.
- Ethics helpline will be completely confidential and will not permit any retaliation or intimidation for reporting any unethical or illegal event.
- This resource is intended to supplement existing internal communication channels and not intended to replace management team interventions.





# Specific Behaviors expected under this Code

## Cooperation with investigations

- Full cooperation is expected employees at all levels, agents , healthcare providers, consultants and contractors, and every delegated entity, during and after internal or external investigation.
- Quick, honest, reasonable and verifiable information is expected.
- Organization will not discriminate or allow any retaliation or intimidation against you because of reports or complaints made in good faith or your participation in an investigation of violation of this Code of Conduct.
- It is a violation to this Code knowingly make false accusations.
- Confidentiality , including informants identity anonymous, will be protected, unless law or regulations compelled to disclose.



## Specific Behaviors expected under this Code

- **Equal Employment Opportunity**
  - Organization will not discriminate and will base every employment decision upon individuals qualifications and skill, and regardless race, color, sex, age, disability, religion, nationality, sex orientation or any other characteristic protected by law.
- **Alcohol and Drug Free Environment**
  - Non of us shall come to work under the influence of alcohol or any illegal drug.
  - You should not keep or store any illegal substance or alcohol in your workplace, including your car at the organization parking premises.
  - Employer may do searches to employee belongings to this purposes if a suspicion or accusation is presented.
- **Weapons**
  - No weapon will be permitted within any organization owned or controlled by premises( including your car).



## Specific Behaviors expected under this Code

- **Domestic Violence**

- Any act of violence, threat, intimidation , disruptive behavior in organization premises or any place at which an event is conducted or sponsored by the corporation, will be tolerate. You should report immediately to your supervisor, HR rep, or Compliance officer, if you have knowledge of any violent or threatening situation.

- **Anti-fraud**

- There is cero tolerance to any illegal or fraudulent act.
- Fraud is any intentional conduct perform with the purpose to misrepresent facts to obtain benefits to which you are not entitled.

- **Confidential Information**

- We can not disclose any confidential information entrusted to us by the corporation, its clients or any other business related person.





## Specific Behaviors expected under this Code

- **Anti-trust**

- We are committed to avoid conduct that is, or create the appearance, of illegal anti-competitive activity. We believe in a fair and competitive market system where no single company has a monopoly in services or products.

- **Conflict of interest**

- Its prohibited as a corporate policy.
- Conflict of interest arises when you are directed or indirectly connected to a present or potential supplier, competitor or customer, and in some circumstances, family members. This prohibition also includes use and disclosure of corporate intellectual property , trade secrets, technology and any other corporate property.

- **Kick backs, Bribes and pay-off**

- Are prohibited under any circumstances.
- You can never offer payment, gifts, services or entertainment to local or federal officer or agent in return of favorable treatment.
- You can not accept any payment, gift or anything of value to benefit or give service to any individual, organization or agency.



## Specific Behaviors expected under this Code

- **Cooperation with government inquiries**
  - Corporation might be requested to cooperate with a government investigation or to respond to a request for information about how we conduct business. It is our policy to cooperate fully and truthfully on all such matters.
  - Please notify immediately to your supervisor or to the Compliance Officer if you are contacted by a government representative for this purposes.
- **Retention and destruction of records**
  - Management of records will be in accordance to corporate policies and in compliance of regulatory procedures.
  - When litigation or government investigations are pending, relevant corporate records must be kept until matter is officially closed.
  - Refer to our Compliance Officer for information or documentation destruction restriction.



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# PSM' Commitment to Code of Conduct

- PSM will ensure that the Code of Conduct is made available to all directors, corporate officers, employees and delegated entities.
- As a condition of holding your employment, each employee must certify that has received , been trained, has received or has access to and will comply with this Code of Conduct.
- PSM will make Code of Conduct and Compliance Programs available in a regular basis. Its compulsory attending to these Code of Conduct trainings to avoid disciplinary actions.
- PSM has an open door policy and encourage you to communicate any idea or concern with your supervisor. Speak up promptly.

**ACT RIGHT!**