



Blue Star Imaging at The Star

CODE OF CONDUCT

Mission Statement: Blue Star Imaging at The Star (“BSI”) has a strong commitment to its referring physicians and the community to provide quality diagnostic examinations and exemplary patient care. This facility will be recognized for its dedication to excellence in patient care and diagnostic imaging services. We strive to meet or exceed the needs of our customers by establishing high standards of performance.

- 1. Introduction:** BSI is dedicated to adhering to the highest ethical standards. common sense, good business judgment, ethical personal behavior, as well as compliance with applicable laws, policies and procedures are what we expect from all BSI employees. This Code of Conduct (the “Code”) details the fundamental principles, values and framework for action within the organization. It is intended to deter wrongdoing and promote honest and ethical conduct, compliance with all applicable governmental laws, rules and regulations, and prompt internal reporting of violations and compliance concerns. Individual conduct must be in a manner that protects and promotes organizational-wide integrity and enhances our ability to achieve our Mission. This Code is intended to provide a general overview of basic compliance concepts and to give guidance on acceptable behavior for BSI personnel, including all those who work on behalf of BSI – our employees, vendors, contracted employees, consultants, and others affiliated with us or doing business in BSI facilities or offices. This Code is not intended to fully describe the laws that apply to employees or to detail company policies and procedures. An expanded overview of the BSI Compliance Program is provided in the BSI Compliance Manual, which includes the Compliance Policies and Procedures. These policies expand upon, or supplement, many of the principles discussed in this Code. This Code will be reviewed annually by the Compliance Committee.
- 2. Commitment to Ethical and Legal Conduct:** Government regulation of the health care industry is increasingly complex. Both federal and state governments have made health care fraud and abuse a top enforcement priority. We take our responsibility to comply with laws and regulations very seriously. We ensure that we actively take steps to prevent and detect any violation of these laws and correct any violation that may be identified.
- 3. Fraud, Waste and Abuse:** We have adopted policies to prevent and detect fraud, waste and abuse. This Code and related Compliance Policies and Procedures outlines the intent of these policies. Our policies and various federal and state laws prohibit false claims and other fraudulent activity. Each employee, vendor, and contracted employee must adhere to the standards in this Code and to the related policies addressed in the Compliance Program. Violations of these standards or policies can result in disciplinary measures, up to and including termination of employment.

Violations may also result in civil actions and penalties.

We are all required to:

- Read and certify our understanding of this Code within 30 days of employment and annually.
- Use this Code in our daily decisions.
- Follow BSI policies and procedures.
- Talk about this Code and its application with our manager.

- Contact the Compliance Hotline with questions.
- Report violations.
- Participate in training and education on this Code

4. Leadership Responsibilities: While all employees are obligated to follow our Code and related policies, we expect our leaders to set the example and to be role models in every respect. We expect everyone in the organization with managerial and supervisory responsibilities to exercise such responsibilities in a manner that is thoughtful and respectful. We expect an environment in which all staff are encouraged to raise concerns and propose ideas. We also expect that our leaders will ensure staff has sufficient information to comply with laws, regulations and policies, as well as the resources to resolve ethical dilemmas. They must help to create a culture that promotes the highest standards of ethics and compliance. This culture must encourage everyone in the organization to share concerns when they arise. We must never sacrifice ethical and compliant behavior in the pursuit of business objectives.

5. Questions About this Code: After you have read this Code and reviewed the related policies in the Compliance Program, you may have questions about how the standards apply to situations you may face. You may want to report a potential violation of company policy or violation of a federal or state regulation. You should always feel comfortable talking about your questions and concerns. There are several ways you can have your questions answered, even if you wish to ask them anonymously. You may address these questions with your manager or directly with the Compliance Committee. You may also address your concerns through the Compliance Hotline. Accessing the Compliance Hotline is easy, anonymous, and confidential.

6. Acknowledgement Form: After you have read this Code, reviewed the associated policies in the Compliance Policies and Procedures and had the opportunity to have your questions answered, you must sign the acknowledgement form. By signing the form, you are acknowledging that you have read and understand this Code and related policies and will abide by them.

7. BSI Compliance Program:

BSI is committed to an effective Compliance Program that includes the following elements mandated by the OIG:

- Designation of a BSI Compliance Officer and BSI Compliance Committee
- Development of written Compliance Policies and Procedures and the BSI Code of Conduct, which contains written standards of conduct
- Open lines of communication, including a toll-free hotline and internet-based reporting that permits anonymous reporting without fear of retaliation
- Appropriate training and education
- Internal monitoring and auditing activities
- Enforcement of disciplinary standards
- Response to detected deficiencies

The Compliance Program also defines roles and responsibilities, assigns oversight for compliance, and conducts assessments of the Program's effectiveness.

BSI encourages open communication without fear of retaliation. This facilitates our ability to identify and respond to compliance problems. If there are any questions or concerns regarding compliance with state or federal law, or any aspect of the Compliance Program, including the compliance policies or procedures, employees should seek immediate clarification from their manager or the Compliance Committee. You can also

call the toll-free Compliance Hotline (855-754-2758) or report via the internet at www.bluestarimaging.ethicspoint.com. If anyone has knowledge of, or in good faith suspects any wrongdoing:

- In the documenting, coding, or billing for services, equipment or supplies
- In the organization's financial practices
- Involving any violation of any law or regulation
- Involving a violation of BSI or facility policy
- Any other compliance concern

They are expected to promptly report it so that an investigation can be conducted and appropriate action taken.

Remember:

- NO RETALIATION will be permitted against BSI employees who bring forward concerns made in good faith. Only where it has been clearly determined that someone has made a report of wrongdoing maliciously, frivolously, or in bad faith will disciplinary action be considered.
- Below is the procedure for reporting and investigating potential compliance issues:
- If at any time, BSI personnel become aware of or suspect illegal or unethical conduct or a violation of BSI policies, they must report it immediately to an appropriate individual. Such individuals may include their immediate supervisor, Team Lead, Compliance Committee, Human Resources, Executive Officer, etc.
- Anyone may also make a report by
- using the toll-free Compliance Hotline 844-741-2047 or via Web Reporting on the internet at <http://bluestarimaging.ethicspoint.com>
- Self-reporting is encouraged and will be given due consideration in potential mitigation of any disciplinary action that may be taken.
- Once a report is received, an appropriate person will then conduct an investigation into the allegations to determine the nature, scope, and duration of wrongdoing, if any. A plan for corrective action will be developed.

- 8. Enforcement of Disciplinary Standards:** BSI personnel who violate the law, BSI or facility policies, or the guidelines described in the BSI Code of Conduct, Employee Handbook, or any other requirement, including the duty to report suspected violations, are subject to disciplinary action.

Disciplinary actions will reflect the severity of the noncompliance, up to and including immediate termination. In addition, adherence to compliance and ethical standards will be part of the job performance evaluation criteria for all personnel.

Managers and the Compliance Committee are expected to work with human resources to assure that each instance involving the enforcement of disciplinary standards is thoroughly documented and that disciplinary standards are enforced consistently across the organization. All BSI employees are expected and required to adhere to and follow the BSI Compliance Policies.

- 9. Managers Receiving Complaints:** Managers receiving a complaint that raises a potential compliance issue will promptly report the complaint to the Compliance Committee. Complaints that do not raise a potential compliance issue will be referred to the appropriate department (i.e., human resources, IT, billing, etc.). Managers will not take any retaliatory action against personnel who report complaints in good faith and/or cooperate in an investigation.

Retaliation or reprisal against anyone for reporting a complaint in good faith or cooperates in an investigation is strictly prohibited by law and is a violation of both this Code and BSI policy.

- 10. Licenses and Certifications:** Employees, individuals retained as independent contractors and privileged practitioners who require professional licenses, certifications or other credentials are responsible for maintaining the current status of their credentials and shall comply at all times with federal and state requirements applicable to their respective disciplines. We do not allow any employee, independent contractor or privileged practitioner to work without a valid, current license or credentials. Processes have been implemented to assure documentation of compliance with each position description requirement.
- 11. Ineligible Persons- Excluded Individuals and Entities:** BSI does not do business with, hire or bill for services rendered by individuals or entities that are excluded or ineligible to participate in federal healthcare programs. BSI Managers and the Compliance Committee are responsible for screening personnel and maintaining a record of this information at every site. BSI personnel and vendors have a responsibility to report to their manager, human resources, or the Compliance Committee if they become excluded, debarred or otherwise ineligible to participate in Federal healthcare programs. BSI has a policy that describes the requirement that appropriate checks be performed for applicable individuals in accordance with state and federal laws relating to exclusion from government healthcare programs and licensure status.
- 12. Diversity and Equal Employment Opportunity:** We are committed to providing an inclusive work environment where everyone is treated with fairness, dignity and respect. We embrace the diversity of our coworkers, physicians, vendors, and patients. We never harass or discriminate on the basis of race, ethnicity, religion, gender, sexual orientation, gender identity or expression, national origin, age, disability, veteran status or any other characteristics protected by law. We embrace diversity because it is our culture, and it is the right thing to do.
- 13. Conflicts of Interest:** A conflict of interest may occur if an employee's outside activities, personal financial interests, or other personal interests influence or appear to influence his or her ability to make objective decisions for the organization. A conflict of interest may also exist if the demands of outside activities hinder or distract an employee from the performance of their job responsibilities or cause an employee to use company resources for other than company purposes. You are obligated to ensure that you remain free of conflicts of interest in the performance of your responsibilities. You must disclose any situation where you or your immediate family has a direct or indirect ownership, investment, income or compensation agreement with any person or vendor with which our organization does business. If you have questions about a potential conflict of interest, contact your Compliance Committee for clarification.

Examples of conflicts of interest include:

- A direct or indirect interest in any transaction which might in any way affect an employee's objectivity, independent judgment or conduct in carrying out his or her job responsibilities.
- Conducting any business or performing any services for another individual or company while at work.
- Using BSI property or other resources for outside activities.
- Direct or indirect involvement in outside commercial interests, such as vendors, physicians, patients, competitors or others having a business relationship with the facility, which could influence the decisions or actions of an employee performing his or her job.
- Using or revealing outside the facility any confidential or proprietary information concerning the facility.
- Using for personal gain confidential or "insider" information obtained as a result of employment with

the facility.

BSI personnel are required to disclose any situation that creates an actual or potential conflict of interest to their supervisors or the Compliance Committee. In some situations, a waiver may be obtained when full disclosure and appropriate reviews are made and approval is granted.

Violations of conflict of interest policies are subject to corrective action, up to and including immediate dismissal. If appropriate under the circumstances, BSI may seek to recover damages or improperly received gains and/or encourage prosecution for potential criminal offenses.

- 14. Privacy and Security of Information:** Patient health information is protected under both state and federal laws. Under federal law, this is referred to as “protected health information” or PHI and is governed by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the Health Information Technology for Economic and Clinical Health (HITECH) Act of 2009, and their regulations, including the HIPAA Privacy Rule and the HIPAA Security Rule.

The HIPAA Privacy Rule provides federal privacy protections for PHI held by covered entities such as BSI and describes patient rights with respect to their PHI. The HIPAA Security Rule requires covered entities and their business associates that use PHI to use administrative, physical and technical safeguards to assure the confidentiality, integrity, and availability of electronic protected health information.

BSI facilities have policies and procedures in place addressing the applicable privacy and security requirements. All personnel receive training on HIPAA requirements and are expected to obey these requirements and keep PHI confidential during its collection, use, storage and destruction. BSI personnel are not permitted to access, obtain, disclose or discuss PHI without written authorization from the patient or their legal representative, unless necessary for treatment, payment or healthcare operations or required by law.

We also collect, generate and develop data related to our business and business activities and operations. This includes financial information, employee information and payroll data, pricing and marketing information, company strategic business plans, supplier and contractor information and proprietary information. This sensitive business data is the property of our organization and should not be disclosed or discussed outside your job responsibilities.

Employees have access to electronic medical records and our business data through uniquely assigned passwords. Access to electronic data is given based on job responsibilities. NEVER share your password with anyone, not even a supervisor or manager. No employee should ever ask you for your password. When leaving your workstation ALWAYS logout. NEVER leave a workstation signed on with your password for others to use. If anyone access data with your password, you will be held accountable for all access. If you feel your password may have been compromised, it is your responsibility to report this to the Help Desk.

- 15. Social Media and Technology:** One of the largest patient privacy issues facing health care organizations today is the increasing popularity of social networking sites. Employees must remember that information about our patients and their care is private – no matter the setting. Individuals who post information or photos about patients, with or without using names, are violating HIPAA privacy laws and the company privacy policies. To maintain the confidentiality and integrity of patient information, employees are prohibited from using these social networking sites in connection with patients and patient data while at work and from accessing them from any company-owned computer. Even when using social networking sites away from work, employees must adhere to privacy guidelines, avoiding any mention of patient care that could identify a patient or family

member. It is the responsibility of employees who observe a violation by their coworkers to report it immediately to the Compliance Hotline or their manager.

All communication systems, including computers, electronic mail, Internet access, telephones and voice mail are the property of BSI and are to be used primarily for business purposes in accordance with electronic policies and procedures. Limited responsible personal use of communication systems is permitted. However, users should assume these communications are not private. Users of computers and telephone systems should presume no expectation of privacy in anything they create, store, send, read, access or receive on the computer or telephone system. The organization reserves the right to monitor usage, access and content of these communication systems consistent with policies and procedures.

To maintain the confidentiality and integrity of patient and confidential information, such information should be sent through the internet only in accordance with the policies and procedures, which require, that certain individual and/or entity data be encrypted.

Users may not use internal communication systems or access the internet at work to post, store, transmit, download, or distribute any threatening, obscene, or false materials. Communication systems should not be used for anything constituting or encouraging a criminal offense, giving rise to civil liability, or otherwise violating any laws.

16. Submission of Accurate Claims and Information: All claims and requests for reimbursement from the Federal healthcare programs including Medicare, Medicaid, TriCare, and the Veterans Administration – and all documentation supporting such claims or requests – must be complete and accurate and comply with legal requirements. They must reflect reasonable and necessary services ordered by appropriately licensed medical professionals who are participating providers in the healthcare program.

BSI expects all persons involved in healthcare billing and claims reimbursement activities to submit timely, accurate and proper claims and information. Appropriate documentation is needed to support all claims, and the diagnosis and procedure codes on bills must accurately reflect the information documented in the medical records and other applicable documents. BSI personnel must adhere to all relevant rules and regulations pertaining to federal and state healthcare program requirements, as well as the applicable facility's billing policies, including but not limited to the following:

- Accuracy in all billing activities, including the submission of claims and information
- Billing for items actually rendered
- Billing only for medically necessary services
- Billing with correct billing reports
- Preparing accurate cost reports
- Assuring that no duplicate billing occurs

The Federal False Claims Act and Deficit Reduction Act protect government programs from fraud and abuse. BSI complies with these and all laws and has policies to detect, report and prevent waste, fraud and abuse, as well as provide protection for whistleblowers.

If a billing error is identified subsequent to the submission of a claim, the error should be reported using the following process:

- The facility will use best efforts to quantify the overpayment ASAP.
- The billing department supervisor shall immediately report all potential or actual overpayments from government payors to the Compliance Committee.

- Within 60 days after identification, the facility will repay the overpayment unless otherwise ordered.
- BSI will take remedial steps to prevent reoccurrence.

17. Referral Statutes: The Anti-Kickback statute and Stark Law (Sections 11288B(b) and 1877 of the Social Security Act), as well as state laws, prohibit the offer or payment of any compensation or other remuneration to any party for the referral of patients and/or federal healthcare business. The Stark Law prohibits billing Medicare, Medicaid or other government payers for services rendered as a result of an improper financial arrangement with a referring physician or an immediate family member of a referring physician (an immediate family member is defined under federal law as a spouse, natural or adoptive parent, child, or sibling; stepparent, stepchild, stepbrother or stepsister; father-in-law, mother-in-law, son-in-law, daughter-in-law, brother-in-law, or sister-in-law; grandparent or grandchild; and the spouse of a grandparent or grandchild).

When BSI facilities enter into financial arrangements for the purchase of goods and/or services with physicians (including immediate family members), physician groups, any entity owned or operated by physicians, and/or any other existing or potential healthcare referral sources, they will consider the appropriate use of resources, and all agreements and contracts must be in accordance with legal statutory and regulatory requirements, as well as BSI policies and procedures.

BSI facilities and their personnel will not solicit or receive from any person or entity, nor offer or give to any person or entity, anything of material value if that person or entity is in a position to refer business to a BSI facility or if the BSI facility is in a position to refer business to that person or entity, except as permitted by law.

BSI facilities and their personnel shall not submit or cause to be submitted a bill or claim for reimbursement for services provided pursuant to a prohibited referral.

All agreements between BSI facilities and physicians (including immediate family members of physicians) or other referral sources must be submitted in accordance with the BSI contracting process and will be prepared, reviewed and approved by the BSI executive team and legal counsel to assure their compliance with the Anti-Kickback Statute, Stark Law, and state law requirements.

All agreements where remuneration is exchanged between a BSI facility and a physician or other referral source must, at a minimum, be based on upon fair market value and be commercially reasonable and shall not take into account the value or volume of referrals to any BSI facility.

Any non-monetary compensation to physicians or staff is subject to tracking and annual limits and must not be based upon the volume or value of referrals or violate the Anti- Kickback Statute or Stark Law.

We never offer, give or receive something of value in hopes of inducing referrals or as a reward for referrals from other businesses. The “something of value” does not have to be money. It can also be services, gifts, entertainment or anything else that has value to the recipient. We never offer, accept, or give bribes or kickbacks. We never compensate anyone based on referrals. If you believe that someone has offered or received a bribe or kickback, or provided something of value in exchange for referrals, contact the Compliance Hotline.

18. False Claims Law and Whistleblower Protection: BSI intends to fully comply with the False Claims Act (FCA) (31 U.S.C. Sec. 3729-3722) and any similar state laws. These laws fight fraud and abuse in government healthcare programs. Under the FCA, individuals can bring a lawsuit in the name of the United States by filing a complaint confidentially “under seal” in court if they discover that a fraudulent claim has been made for reimbursement by a government agency. The FCA applies to both organizations and individuals who engage in

billing fraud. FCA lawsuits function to recover government funds paid as a result of false claims. Fines against the entity that submitted the false claims include a penalty of up to three times (treble) the government's damages, civil penalties for each false claim, and the costs of the lawsuit. The federal FCA applies to claims for reimbursement for federally funded programs (Medicare and Medicaid). The FCA contains a "qui tam" provision ("whistleblower" act), which permits a private person with knowledge of a false claim to file a lawsuit on behalf of the United States Government. An individual who exposes wasteful, harmful, and illegal acts is often called a "whistleblower" or "qui tam relator," and they may be awarded a percentage of the funds recovered. The FCA provides protection for qui tam relators from termination, demotion, suspension, or discrimination related to these claims. However, if an individual files such a lawsuit frivolously or without accurate knowledge, they may be subject to sanctions, including the responsibility for paying the other party's attorney's fees and damages. If a qui tam relator is convicted of criminal conduct, the qui tam relator will not receive any proceeds and will be dismissed from the lawsuit.

In addition to the FCA, there are individual state laws providing that persons who report fraud and abuse by participating healthcare providers in the state's program may be entitled to a portion of the recovery. Similar to the federal FCA, there are protections against retaliation.

The Federal False Claims Act and Deficit Reduction Act protect government programs from fraud and abuse. BSI complies with these and all laws and has policies to detect, report and prevent waste, fraud and abuse, as well as provide protection for whistleblowers.

We are ALL required to:

- Tell someone if we see an error or something false and fix it.
- Not sign our name unless we know the statement is true.
- Not sign other peoples' names or share information.
- Raise possible dishonesty with managers, Compliance Committee, or the Compliance Hotline.
- Compete fairly (We comply with all antitrust laws and do not illegally obtain or use proprietary information from competitors).

19. Government Investigations, Subpoenas and Audits: It is the policy of BSI to cooperate fully with any lawful government investigation, subpoena or audit. If facility or BSI personnel are contacted at a BSI workplace by an official, representative, investigator or other individual acting on behalf of the government, they should immediately contact the BSI Compliance Committee. BSI employees must consult with the Compliance Committee before responding to any requests to make sure that contacts with government entities are handled properly.

An interview of facility or BSI personnel may be requested by a government official, representative, investigator or other individual acting on behalf of the government. The BSI Compliance Committee should be immediately notified and may be consulted regarding any such request.

A government official, representative, investigator or other individual acting on behalf of the government may arrive at a BSI facility or premises with written authority seeking documents. This authorization may come in the form of a demand letter, subpoena or search warrant. BSI personnel should notify the Compliance Committee immediately before responding to such requests. Once there has been notice of an investigation, the destruction portion of any policy on record retention is suspended and NO documents may be destroyed until notified otherwise by the Compliance Committee. If a government official, representative, investigator or other individual acting on behalf of the government presents a valid search warrant and identification,

personnel must understand that they have the authority to enter the premises, to search for evidence of criminal activity, and to seize those documents or items listed in the warrant. No individual shall interfere with the search and must provide the documents or items sought in the warrant. BSI employees are always clear and truthful in what they say to those who make inquiries and cooperate with government officials.

20. Workplace Conduct and Employment

Equal Employment Opportunity/Non-Discrimination

It is BSI policy to provide equal employment opportunities to all employees, prospective and current. BSI is committed to providing an inclusive work environment where everyone is treated with fairness, dignity and respect. BSI complies with all laws and regulations relating to equal employment and non-discrimination matters for all protected classes of employees. Reasonable accommodations will be made for known disabilities in accordance with the Americans with Disabilities Act (ADA). BSI personnel with questions concerning these guidelines or who are aware of any breach of the Equal Employment

Opportunity (EEO) guidelines, should contact the human resources department.

Safe and Drug-Free Workplace

The health and safety of our patients is our primary concern. BSI employees follow health and safety policies and regulations that apply to our work and the guidance provided by the Safety and Quality Manuals. This includes following procedures for handling and disposing of hazardous materials. To protect the interests of our employees and patients, we are committed to an alcohol and drug-free workplace. All employees should report to work free of the influence of any illegal drug or alcohol. We may use drug-testing as a means of enforcing this policy. Employees are required to report any unsafe situations to their manager or via the Compliance Hotline.

Positive Work Environment

Harassment can be particularly harmful to the work environment. Thus, we have a special responsibility to report any instances of harassment that we may see or know about. Requests for sexual favors, sexual advances, and other unwelcome verbal or physical conduct of a sexual nature are violations of our values and policies.

BSI is committed to compliance with federal and state wage and hour laws, including:

- The Fair Labor Standards Act (FLSA)
- The Immigration and Nationality Act
- The Consumer Credit Protection Act (CCPA)
- The Family Medical Leave Act (FMLA)
- The National Labor Relations Act (NLRA)
- Other applicable laws and regulations relating to the wages and hours of workers.

21. Steps: If you believe that the organization, a fellow employee, student, vendor, contractor, or anyone else is violating an internal policy or procedure or a federal or state law or regulation, it is your responsibility to report your concern. Employees reporting information in good faith will not be subject to any kind of reprisal or retribution.

1. Discuss your concern with your Team Lead. Your Team Lead is most aware of your policies and procedures and is best able to evaluate your concern. If you feel uncomfortable discussing your concern with your Team Lead, or if your initial reporting to your Team Lead was unsuccessful, please report your concern through any of the resources below.

2. Contact your Director. If you feel uncomfortable discussing your concern with your Team Lead, you can

report your concern to either your Director or to the Compliance Committee.

3. **Contact your Compliance Committee.** Your Compliance Committee is available to talk to anyone about their concerns regarding an alleged violation of policy or procedure, or a federal or state law or regulation.
4. **Call the Compliance Hotline at 844-741-2047 or <http://bluestarimaging.ethicspoint.com>:** The Compliance Hotline is a confidential, anonymous reporting tool that anyone can use to report an alleged violation, concern, or work-related activity that may not live up to our values, business practice policies, the law or regulations. You do not have to give your name. Calls can be made 24 hours a day, 7 days a week. The calls are not answered internally. An independent, professional organization is under contract to answer our calls. All reports that are received will anonymously be transferred confidentially to the Compliance Committee for investigation and follow-up. All calls will receive a confidential caller number and instructions on how to follow-up. This process will allow callers the ability to receive an update on how the report is progressing.

We make every effort to maintain, within limits of the law, the confidentiality of the identity of any individual who reports concerns or possible misconduct. There is no retribution or discipline for anyone who reports a concern in good faith.

22. **Personal Obligation to Report:** We are committed to ethical and legal conduct that is compliant with all relevant laws and regulations and correcting such wrongdoing wherever it may occur. Each employee has an individual responsibility to report any activity by any employee, physician, contractor, or vendor that appears to violate any law, regulation, accreditation standard, standard of medical practice, the Federal Healthcare Conditions of Participation, or this Code and its related policies maintained in the Compliance Program.

If a matter poses serious compliance risk to the organization or involves a serious issue of patient safety, the reporting individual should be satisfied that the issue has been given appropriate attention at the level to which it was reported. If not, the individual should report the matter to a higher level of management or to the Compliance Committee or the Compliance Hotline until satisfied that the full importance of the matter has been recognized and addressed.

23. **Internal Investigations and Corrective Actions:** We are committed to investigating all reported concerns promptly and confidentially to the fullest extent possible. The Compliance Committee coordinates findings from investigations and immediately recommends corrective action. We expect all employees to cooperate with investigation efforts and corrective action plans.

When an internal investigation substantiates a reported violation, it is the policy of the organization to initiate corrective action, including, as appropriate, making prompt restitution of any overpayment amounts, notifying the appropriate governmental agency, instituting disciplinary action as necessary, and implementing systemic changes to prevent future violations.

1. **Discipline.** All intentional violations of the standards outlined in this Code and the related Compliance Program will be subject to disciplinary action. The level of discipline imposed will depend on the nature, severity and frequency of the violation.
2. **Measuring Program Effectiveness.** We are committed to assessing the effectiveness of our Compliance Program. Effectiveness is determined through routinely conducting internal audits of issues that have regulatory or compliance indications, and through employee reviews.

24. **Acknowledgement Process:** All employees are required to sign an acknowledgement confirming that they have reviewed this Code, understand it represents mandatory policies, and agree to abide by it. New employees are required to sign this acknowledgement as a condition of employment. Each employee is also required to

participate in annual mandatory compliance training. Adherence to and support of this Code and the related policies in the Compliance Program are a requirement for continued employment.

- 25. Ethics and Compliance Support:** BSI's reputation is one of its most valuable assets. We are expected to do the right thing. We all have a responsibility to foster and protect BSI's reputation. Our values and this Code provide clear guidance for our business behavior.

At BSI performance is not only measured by the results achieved, but also how these results were achieved. This Code clearly expresses BSI's expectations as your employer and provides you with practical guidance and links to further information.

BSI's ethics and compliance program promotes open identification, discussion, reporting and resolution of ethics and compliance issues without fear of retaliation. We strive for a culture of mutual trust that encourages the free exchange of views across all organizational levels. A work environment with two-way dialogue and open doors is critical to our success. Every BSI employee can make a difference.

Whenever you are in doubt about correct behavior, seek advice. If you have a compliance concern, speak up. The BSI Compliance Committee is led by Rae McGarrity, BSI's Chief Operating Officer. BSI reports concerns to the Compliance Committee. In addition, the Compliance Hotline is available 24 hours a day, 365 days a year. Callers to the Hotline may remain anonymous, and those who choose to give their names will have their identity protected to the extent allowable by law.

You can also speak with members of the Compliance Committee directly:

Rae McGarrity, Compliance and Privacy Officer

Phone: (972) 497-4155

Email: RMcGarrity@DallasCowboys.net

Michelle Vig, Compliance and Privacy Officer

Phone: (972) 497-4157

Email: MVig@DallasCowboys.net

Jason Cohen, Esq., Compliance and Privacy Officer

Phone: (972) 497-4981

Email: JCohen@DallasCowboys.net

Matthew Strange, M.D., Compliance and Privacy Officer

Phone: (972) 497-4184

Email: MStrange@DallasCowboys.net