

Code of Conduct

Effective: 01/01/2002

Hospice, Home First, Home Health, Skilled Nursing & Rehab /
NCSVHs, Assisted Living Centers, PruittHealth, Pharmacy Services,
Care Management, Nutritional Supply, Therapy Services, Medical
Supply, Partner Services / HR
Compliance
Version: 6

Reviewed: 09/20/2018
Revised: 09/20/2018

I. INTRODUCTION

Why do we have a Code of Conduct? Our Code of Conduct (sometimes referred to in this document as the “Code”) provides guidance to all partners of PruittHealth, Inc., its subsidiaries, and affiliates (collectively, “PruittHealth” or the “Organization”). Our Code describes the values, standards, and expectations of the Organization. It is meant to assist you in carrying out your day to day activities in accordance with appropriate legal, ethical, and moral standards. Compliance with this Code is required for all partners. The Code also applies to those with whom PruittHealth has a business relationship, including subcontractors, independent contractors, physicians, agents, vendors, and consultants.

At PruittHealth, we recognize and embrace the importance of maintaining an environment of integrity, honesty, and respect. Accordingly, we affirm the following commitments to our stakeholders:

To our patients: We are committed to providing high quality care that is medically necessary, promptly delivered, cost effective, sensitive, and compassionate, to providing outstanding customer service, and to protecting the privacy, security, and confidentiality of your protected health information.

To our partners: We are committed to maintaining a work environment in which all partners are treated with fairness, dignity, and respect, where all are provided opportunities to grow and to develop professionally, and where we maintain a team environment in which all ideas are considered.

To our fellow healthcare professionals: We are committed to providing a work environment with great facilities, modern equipment, and outstanding professional support.

To our third party payers: We are committed to working with our payers in a way that demonstrates our commitment to the delivery of efficient and cost-effective healthcare.

To our regulators: We are committed to an environment in which compliance with laws, regulations, and sound business practices is “woven into” our corporate culture. We recognize that it is our responsibility to self-govern and monitor adherence to our Code of Conduct.

To the communities we serve: We are committed to understanding the particular needs of the communities that we serve and to providing quality, medically necessary, cost-effective healthcare in these communities.

It is our individual and collective responsibility to understand and to comply with this Code and the laws and regulations that pertain to our Organization and to report to the PruittHealth Compliance Department any concerns of noncompliance that come to our attention. If you have

Printed copies are for reference only. Please refer to the electronic copy for the latest version.

Code of Conduct

Effective: 01/01/2002

Hospice, Home First, Home Health, Skilled Nursing & Rehab /
NCSVHs, Assisted Living Centers, PruittHealth, Pharmacy Services,
Care Management, Nutritional Supply, Therapy Services, Medical
Supply, Partner Services / HR
Compliance
Version: 6

Reviewed: 09/20/2018
Revised: 09/20/2018

questions regarding this Code or PruittHealth's policies or practices, please contact your supervisor or the Chief Compliance Officer or, if you prefer to remain anonymous, you may use the Committed to Caring Hotline at 1-800-222-0321.

II. CONDUCTING COMPANY BUSINESS

A. The Prevention of Fraud, Waste, and Abuse

As participants in government healthcare insurance programs, our Organization is committed to detecting and preventing fraud, waste, and abuse related to our participation in these programs. Our goal is to assure that we are proper stewards of the resources given to us in exchange for the goods and services that we provide to our patients. PruittHealth has implemented policies and procedures for assuring the Organization's compliance with the laws and regulations that govern us as healthcare providers and suppliers. In addition, PruittHealth provides numerous educational opportunities that are designed to inform our partners, agents, and contractors on legal and regulatory compliance matters.

Federal and state laws prohibit healthcare entities and their employees from knowingly submitting false claims for payment to government payers. Some examples of actions that may result in the submission of false claims are: billing Medicare or Medicaid for services that were not provided or were not medically necessary; billing for undocumented services; assigning inaccurate codes to claims in order to increase reimbursement; billing for services provided to patients who are not eligible to receive the services; falsifying medical records or cost reports; and knowingly retaining overpayments for services that were improperly billed.

Federal and state laws also prohibit offering, soliciting, paying, or receiving any form of gift, payment, or remuneration (*i.e.*, the transfer of anything of value, whether direct or indirect, in cash or in kind) for the purpose of inducing or rewarding the referral of patients for items or services reimbursable by government payers. Improper referrals may also lead to the submission of false claims.

The violation of these laws may result in criminal, civil, or administrative penalties, including fines or imprisonment, exclusion from participation in Medicare and Medicaid, and the loss of licensure, any or all of which may be imposed upon entities within the Organization as well as upon individual partners.

It is our belief that when we follow the policies, procedures, and systems established by PruittHealth, the claims submitted for payment will be appropriate and accurate. If you have any concerns regarding claims for reimbursement or suspect any noncompliance or violations of applicable law, we need to know in order to investigate and make corrections as necessary. As noted above, if you have any such concerns, please inform your supervisor and/or the Chief Compliance Officer.

Printed copies are for reference only. Please refer to the electronic copy for the latest version.

Code of Conduct

Effective: 01/01/2002

Hospice, Home First, Home Health, Skilled Nursing & Rehab /
NCSVHs, Assisted Living Centers, PruittHealth, Pharmacy Services,
Care Management, Nutritional Supply, Therapy Services, Medical
Supply, Partner Services / HR
Compliance
Version: 6

Reviewed: 09/20/2018
Revised: 09/20/2018

B. Gifts and Entertainment

1. Current and Prospective Business Partners

We understand that partners and entities in the Organization must build solid working relationships with other healthcare providers, vendors with whom we do business (or propose to do business), and others in the communities that we serve. We also recognize that we all have an obligation to demonstrate integrity and professionalism in all of our actions and not to engage in behavior that could improperly skew healthcare decision-making to the detriment of our patients or payers. Accordingly, PruittHealth partners should avoid situations that create the appearance of an improper influence – such as offering or accepting inducements in the form of gifts or entertainment – that could affect a policy, decision, or action of the Organization or other healthcare providers.

PruittHealth partners are generally discouraged from giving gifts to and accepting gifts from the Organization’s current or prospective business partners. PruittHealth partners are not permitted to offer, give, solicit, or receive any gifts from current or prospective business partners who are in a position to refer, receive referrals, or influence the referral of any government healthcare program business if the value of such gift is greater than a nominal amount or is intended, or could be intended, to influence the referral of patients or other business that may be reimbursed by government healthcare programs. As a general rule of thumb, the term “nominal,” in the context of gifts to healthcare providers, might be understood to apply to gifts with a retail value of no more than \$50, or an annual aggregate total of \$300 per recipient. Any prospective gifts of greater value should be discussed with the Chief Compliance Officer. Cash gifts, including cash equivalents such as gift cards, should never be offered to, or accepted from, potential or existing business or referral sources under any circumstances.

Business entertainment, when carried out with professionalism and integrity, is often a normal part of the development and maintenance of professional relationships. PruittHealth partners may accept an invitation from, or extend an invitation to, a current or potential business partner if the event is reasonable and customary (and not intended to induce, reward, or influence the referral of patients for items and services reimbursed by government healthcare programs). For example, a modest restaurant meal may be considered reasonable and customary, but an all-expenses paid vacation would not be. Business entertainment events should occur infrequently (*e.g.*, no more than four times per year) with the same business partners. Occasionally, current or prospective business partners invite PruittHealth partners to attend training or educational activities and offer to cover travel and lodging expenses. PruittHealth partners are discouraged from accepting such invitations, unless there is a demonstrable need to participate. Participation in such events should be approved by the Chief Compliance Officer.

Printed copies are for reference only. Please refer to the electronic copy for the latest version.

Code of Conduct

Effective: 01/01/2002

Hospice, Home First, Home Health, Skilled Nursing & Rehab /
NCSVHs, Assisted Living Centers, PruittHealth, Pharmacy Services,
Care Management, Nutritional Supply, Therapy Services, Medical
Supply, Partner Services / HR
Compliance
Version: 6

Reviewed: 09/20/2018
Revised: 09/20/2018

If there is any doubt as to whether a proposed gift, event, or expense is appropriate, PruittHealth partners are encouraged to consult with the Chief Compliance Officer.

2. Patients and Family Members

We recognize that it is not unusual for patients or family members to want to give gifts to PruittHealth partners as a showing of their appreciation for the great care that we provide to our patients on a daily basis. Nevertheless, however well-intentioned their motivations may be, we recognize that the acceptance of such gifts could lead to the appearance that certain patients are favored or may receive additional care. Accepting gifts from patients could also create the appearance that patients are being taken advantage of.

Therefore, PruittHealth partners should not accept gifts, tips, or payments from patients, families, or others that have the effect of rewarding individual partners. Such gifts should only be accepted if they are donated to a Health Care Center or provider office for fair distribution among all partners or patients. In addition, such gifts should never be solicited or encouraged by PruittHealth partners. All other gifts should be refused or returned, with the explanation that they violate PruittHealth policy. If the person attempting to give a gift persists, he or she should be directed to your supervisor or to the Chief Compliance Officer.

Likewise, PruittHealth partners should not offer or give gifts or anything of value (other than traditional marketing items, such as pens, coffee cups, or similar items) to prospective patients or their families in an effort to induce them to select items or services to be provided by a PruittHealth provider.

3. Public Officials

Federal and state laws generally prohibit giving gifts or anything of value to government officials for the purposes of influencing their decisions. PruittHealth partners are prohibited from giving gifts to government officials for this reason. While PruittHealth partners are encouraged to participate in the political process on their own behalf however they may desire, the Organization's political participation, like that of all corporate entities, is limited by law. Accordingly, no PruittHealth funds or resources should be used to contribute to political campaigns, political parties, or other political organizations, unless expressly permitted by state or federal law. The Chief Executive Officer must approve any gift or political contribution prior to it being made by or on behalf of any entity in the Organization.

C. Documentation and Records

It is the policy of PruittHealth that all documentation and records be accurate and thorough. Documentation in our patients' clinical records should clearly and accurately paint the picture of the care that has been provided to them. The Organization also maintains a high standard of accuracy and completeness in its financial records, which serve as the bases for

Printed copies are for reference only. Please refer to the electronic copy for the latest version.

Code of Conduct

Effective: 01/01/2002

Hospice, Home First, Home Health, Skilled Nursing & Rehab /
NCSVHs, Assisted Living Centers, PruittHealth, Pharmacy Services,
Care Management, Nutritional Supply, Therapy Services, Medical
Supply, Partner Services / HR
Compliance
Version: 6

Reviewed: 09/20/2018
Revised: 09/20/2018

managing our businesses and are necessary in meeting our obligations to patients, partners, and others with whom we do business, as well as in complying with applicable laws and regulations.

The Organization has adopted a *zero-tolerance policy* for the falsification of any record, including without limitation, medical or clinical records, billing or financial records, payroll, contracts, expense reports, or receipts. Partners are prohibited from altering, removing, or tampering with any information that has already been entered into a record that would cause the entry to be false, inaccurate, or misleading. Only the original author should make corrections or additions to existing documentation, and only then in accordance with PruittHealth policy. A partner should never share his or her unique password to any electronic system or use someone else's unique password to log-on to any electronic system. In addition, the use of signature stamps is strictly prohibited, and PruittHealth partners should never accept a stamped physician signature or a physician's signature on a blank document.

All documentation and records should be well-organized, carefully maintained, and retained in accordance with applicable law and PruittHealth policy.

D. Conflicts of Interest and Duty of Loyalty

PruittHealth partners have an obligation to put the interests of our patients and of the Organization ahead of personal or other business interests. A conflict of interest may exist if you (or perhaps members of your family or your friends) have outside activities or personal interests that influence – or that could even appear to influence – your ability to make objective decisions in the course of your job responsibilities. A conflict of interest might exist if the demands of any outside activities could hinder or distract you from the performance of your job or cause you to promote the interests of another.

Potential conflicts of interests should be disclosed to your supervisor at the time of hire or as they occur. While some conflicts may be resolved if they are properly disclosed and addressed, partners should avoid any situations involving a conflict between their personal interests and the interests of our patients or the Organization. It is important to remember that, while on the job, your duty of loyalty is to PruittHealth and the patients of its affiliated providers.

While it would be impossible to list every situation in which a conflict of interest might exist, a few examples of potential conflicts of interests include: Where you or a family member may receive personal gain by participating in a business decision made by PruittHealth; where you or a family member has a business or financial interest or leadership role in a PruittHealth vendor or competitor; using confidential information that belongs to PruittHealth for personal gain; accepting personal gifts or entertainment from a person or entity that does business (or seeks to do business with) PruittHealth; and taking personal advantage of a business opportunity that a partner learns about while working within the Organization.

Printed copies are for reference only. Please refer to the electronic copy for the latest version.

Code of Conduct

Effective: 01/01/2002

Hospice, Home First, Home Health, Skilled Nursing & Rehab /
NCSVHs, Assisted Living Centers, PruittHealth, Pharmacy Services,
Care Management, Nutritional Supply, Therapy Services, Medical
Supply, Partner Services / HR

Reviewed: 09/20/2018

Revised: 09/20/2018

Compliance
Version: 6

E. Confidential Business Information

Every organization develops or owns business information that it wants to protect. Although you may use the confidential business information of PruittHealth on a daily basis to perform your job, it is not public information, and it should not be shared with others. Some examples of this type of information include partner data, patient lists, financial data, business data, physician or other provider information, research data, clinical information, strategic plans, information about prospective transactions, marketing strategies, processes, techniques, computer software, and copyrighted documents. This information should be treated as proprietary and confidential. It should not be released to anyone outside of PruittHealth unless properly authorized.

F. Proper Use of PruittHealth Assets

We should all protect the Organization's property and assets. PruittHealth's resources, property, and assets, such as company time, materials, supplies, computers, equipment, facilities, and information are to be used only to fulfill the Organization's goals and purposes and not for purposes other than activities related to your job. Your supervisor must approve any proposed personal, community, or charitable use of the resources of PruittHealth.

G. Communications Systems

All PruittHealth communications systems, including e-mail accounts, texts, and internet access, are the property of PruittHealth and are to be used for PruittHealth's business purposes (e.g., to communicate with customers and vendors, to research relevant topics, and to obtain useful business information). Unnecessary or unauthorized internet usage causes network and server congestion, slows other users, takes away from work time, consumes supplies, and ties up printers and other shared resources. Unlawful internet usage may also garner negative publicity for PruittHealth and expose the company to legal liability. Partners should be familiar with the Organization's policies on internet usage, privacy, and security.

H. Handling of Controlled Substances and Other Drugs

Many PruittHealth partners, as part of their job responsibilities, routinely access and handle prescription drugs, controlled substances, and other medical supplies, such as drug samples and hypodermic needles. The use of these substances are subject to various regulatory requirements and may be only administered pursuant to physician orders. These items must be handled properly and only by authorized individuals (e.g., pharmacists, pharmacy technicians, nurses, other healthcare professionals) to minimize risks to our patients, our partners, and the Organization. Under no circumstances should these items be administered to our patients unless there has been an appropriate determination of medical necessity and the administration is made pursuant to the order of a physician (or physician extender, where appropriate). These items should not be accessed for personal use.

Printed copies are for reference only. Please refer to the electronic copy for the latest version.

Code of Conduct

Effective: 01/01/2002

Hospice, Home First, Home Health, Skilled Nursing & Rehab /
NCSVHs, Assisted Living Centers, PruittHealth, Pharmacy Services,
Care Management, Nutritional Supply, Therapy Services, Medical
Supply, Partner Services / HR
Compliance
Version: 6

Reviewed: 09/20/2018
Revised: 09/20/2018

I. Substance Abuse

To protect the interests of our partners and patients, we are committed to an alcohol-free and drug-free work environment. All partners must report for work free from the influence of alcohol, illegal drugs, and lawful controlled substances that have been improperly obtained. Partners are also prohibited from manufacturing, distributing, dispensing, or possessing these items while on PruittHealth premises. Any partner who reports to work while under the influence of alcohol or drugs, or whose attendance or performance is impaired by off the job use, will be subject to disciplinary measures, up to and including termination. Please refer to the partner handbook for more information. Any partner who is arrested for substance abuse or the possession of illegal substances should notify his or her supervisor as soon as possible.

J. Violence-Free, Discrimination-Free, and Harassment-Free Workplace

Our concern for others prohibits threatening, aggressive, or abusive behavior, and carrying weapons on any premises of the Organization. PruittHealth has a zero-tolerance policy regarding violence, threats of violence, or aggressive behavior intended to threaten or intimidate others in the workplace. Any behavior contrary to PruittHealth's commitment to a violence-free workplace will result in disciplinary action up to and including termination.

PruittHealth prohibits discrimination and any form of harassment based upon a person's race, color, creed, religion, national origin, gender, age, or any other bases protected by federal or state law. This includes any inappropriate or unwelcome comments made on these grounds, including, but not limited to, slurs, epithets, derogatory comments, and threats, whether verbal or non-verbal. It also includes verbal or physical behavior of a sexual nature that creates an intimidating, hostile, or offensive working environment.

PruittHealth partners should at all times strive for the highest standards of performance, professional behavior, and integrity. This includes respectful communication and behaviors. Incidents involving threatening, discriminatory, or harassing behaviors should immediately be reported to your supervisor, someone else in your chain of command, or a PruittHealth Partner Services representative.

K. Health, Safety, and Environment

PruittHealth is committed to providing a healthy and safe place for our partners to work. It is the Organization's policy to comply with all applicable laws and regulations designed to protect and promote the health and safety of our partners, including laws governing the handling, and storage of hazardous materials, wastes, and other pollutants. PruittHealth policies have been developed to protect our partners from potential workplace hazards and all partners are expected to abide by them. It is your responsibility to understand how your job responsibilities may impact the environment and assure that you are compliant with PruittHealth policy. If you have

Printed copies are for reference only. Please refer to the electronic copy for the latest version.

Code of Conduct

Effective: 01/01/2002

Hospice, Home First, Home Health, Skilled Nursing & Rehab /
NCSVHs, Assisted Living Centers, PruittHealth, Pharmacy Services,
Care Management, Nutritional Supply, Therapy Services, Medical
Supply, Partner Services / HR

Reviewed: 09/20/2018

Revised: 09/20/2018

Compliance
Version: 6

questions about environmental regulations or the proper handling of hazardous materials, ask your supervisor for assistance. It is important that you immediately advise your supervisor of any workplace injury or danger of injury or any discharge or threat of discharge of what might be hazardous substances.

L. Marketing and Advertising

PruittHealth uses marketing and advertising materials to educate the public, educate our customers, report to the community, increase the awareness of our services, obtain new business, and recruit partners. We should not make any false or misleading statements about our Organization, our services, other organizations, or about the patient eligibility requirements for any items or services provided by the Organization.

M. Government Inquiries and Investigations

It is the policy of PruittHealth to cooperate with every reasonable inquiry and investigation initiated by federal, state, and local government authorities seeking information regarding the Organization's operations. Partners should also be aware, however, that PruittHealth is entitled to all safeguards provided by law, including representation by legal counsel at the outset of any investigation. If any government agent approaches you for an interview or requests documents or other information, you should let the investigator know that the Organization intends to cooperate, but that the matter must be discussed first with PruittHealth's attorneys. Any such request should be immediately reported to the Legal Department of PruittHealth, which will provide advice on how to proceed.

III. PATIENTS

A. Patient Care – Patient Choice

Our mission is to provide quality healthcare to all of our patients. This means that we should treat all patients with respect and dignity and provide care that is both necessary and appropriate, without regard to race, color, age, religion, national origin, disability, marital status, or sexual orientation.

Our commitment to quality care requires that we involve patients and their families in decisions about their care to the greatest extent possible. We inform patients about care options available to them, the risks associated with the care they select, and the consequences of refusing treatment. We also honor our patients' rights, including their right to develop advance directives to direct the care that they will receive when they can no longer make or communicate decisions themselves.

Printed copies are for reference only. Please refer to the electronic copy for the latest version.

Code of Conduct

Effective: 01/01/2002

Hospice, Home First, Home Health, Skilled Nursing & Rehab /
NCSVHs, Assisted Living Centers, PruittHealth, Pharmacy Services,
Care Management, Nutritional Supply, Therapy Services, Medical
Supply, Partner Services / HR

Reviewed: 09/20/2018

Revised: 09/20/2018

Compliance
Version: 6

Compassion and care are part of our commitment to the communities we serve. While we strive responsibly to reduce the unnecessary readmission to our community hospitals, we do not undertreat patients for any reasons, economic or otherwise. We strive to provide health education, health promotion, and illness prevention programs as part of our efforts to improve the quality of life for our patients and the communities of which we are a part.

B. Privacy and Security of Patient Information

As part of the services we provide, we collect information about our patients' medical conditions, histories, medications, and other factors to provide the best possible care. All patient information, including patient names, Social Security numbers, diagnoses, and treatment records, as well as any other data by which a patient could be identified, constitute "protected health information" or "PHI," as that term is defined by the Health Insurance Portability and Accountability Act or "HIPAA." The PruittHealth HIPAA Notice of Privacy Practices describes our patients' rights and our responsibilities in regarding to using, disclosing, and protecting our patients' PHI.

Our patients' information is confidential. We do not release or discuss such information with others unless it is permissible and necessary to serve our patients. We do not disclose confidential information that violates the privacy rights of our patients. All disclosures of patients' PHI should be specifically authorized or permitted by state and federal law. Partners should only access patient information to the extent and when it is necessary to do their jobs. For example, patient information may be internally accessible to authorized PruittHealth partners for the purpose of monitoring quality assurance, performance improvement, and compliance activities. If you are unsure about whether or not to use or disclose a patient's PHI, please contact the PruittHealth Privacy Officer or the Chief Compliance Officer.

Partners should not take photographs or recordings of a patient using any type of equipment (e.g., cameras, smart phones, or other electronic devices) without the prior authorization of the patient or the patient's designated representative. Partners should never keep or distribute any unauthorized photographs or recordings of a patient through multimedia messaging or social media networks. A photograph or recording of a patient, or the manner in which it is used, may be treated as patient abuse if it demeans or humiliates a patient, regardless of whether the patient authorized the photograph or recording and regardless of the patient's cognitive status.

C. Reporting Patient Harm

1. [Reporting Abuse, Neglect, Mistreatment, and Exploitation of a Healthcare Center Patient](#)

Printed copies are for reference only. Please refer to the electronic copy for the latest version.

Code of Conduct

Effective: 01/01/2002

Hospice, Home First, Home Health, Skilled Nursing & Rehab /
NCSVHs, Assisted Living Centers, PruittHealth, Pharmacy Services,
Care Management, Nutritional Supply, Therapy Services, Medical
Supply, Partner Services / HR
Compliance
Version: 6

Reviewed: 09/20/2018
Revised: 09/20/2018

Any allegation, suspicion, or occurrence of abuse, neglect, exploitation, mistreatment (including injuries of unknown source), or misappropriation of property of a patient of a PruittHealth healthcare center should be reported immediately to the healthcare center Administrator (or the individual in charge), who should notify the state survey agency in accordance with state and federal requirements. A reasonable suspicion that a crime has been committed against a patient should be reported in accordance with the paragraph below.

2. Duty to Report a Reasonable Suspicion that a Crime Has Been Committed Against a Healthcare Center Patient

Federal law provides that all PruittHealth partners and contractors have an individual duty to report any reasonable suspicion that a crime has been committed against a patient of a PruittHealth healthcare center. Reports are to be submitted both to the state survey agency and to local law enforcement no later than 24 hours after forming the suspicion, unless there has been serious bodily injury to a patient, in which case the report must be submitted immediately (not later than 2 hours). Failure to report could result in a penalty of up to \$300,000 and exclusion from participating in federal healthcare programs.

IV. PATIENT REFERRALS AND ADMISSIONS

A. We Do Not Pay For Referrals.

We accept patient referrals based solely upon a patient's clinical needs and our ability to render the medically necessary services. We do not pay or offer to pay any amount – hospitals, physicians or other persons – for obtaining a referral of a patient. No partner or other person acting on the behalf of PruittHealth may enter into any agreement or arrangement that is related, directly or indirectly, to inducing or rewarding the referral of patients.

B. We Do Not Accept Payments For Referrals That We Make.

Our healthcare providers refer patients based solely upon the patient's clinical needs and the abilities of the provider receiving the referral to render such medically necessary services. No partner or any other person acting on behalf of PruittHealth is permitted to solicit or receive anything of value, directly or indirectly, in exchange for the referral of patients. Similarly, when accepting patient referrals from another healthcare provider, we will not take into account the volume or value of referrals that the provider has made in the past (or may make in the future) to any provider within the Organization.

C. We Do Not Attempt Improperly to Induce Patients to Select PruittHealth.

Printed copies are for reference only. Please refer to the electronic copy for the latest version.

Code of Conduct

Effective: 01/01/2002

Hospice, Home First, Home Health, Skilled Nursing & Rehab /
NCSVHs, Assisted Living Centers, PruittHealth, Pharmacy Services,
Care Management, Nutritional Supply, Therapy Services, Medical
Supply, Partner Services / HR

Reviewed: 09/20/2018

Revised: 09/20/2018

Compliance
Version: 6

We do not offer gifts or other inducements to patients or families to persuade them to select PruittHealth. For example, we do not routinely waive insurance co-payments or otherwise provide financial benefits to patients in return for their admission to a PruittHealth provider, unless prior admission arrangements have been made in writing with specific insurance companies and their coverage plans. Under certain circumstances, PruittHealth may offer and agree to special financial arrangements (such as allowing monthly payments over time) to patients based purely upon their financial need. No professional courtesy discount, attorney settlement on accounts receivables, insurance only arrangement, free services, or any other type of special discount will be given to individual patients or to specific groups of individuals unless authorized through reimbursement and regulatory laws and directed through contract arrangements.

V. DOING BUSINESS WITH THE GOVERNMENT AND OTHER THIRD PARTY PAYERS

A. Coding and Billing for Services

PruittHealth is committed to preparing and submitting honest, accurate, and complete billing claims for the items and services that we provide that are in compliance with applicable law and contract requirements. We bill only for services ordered and rendered, and all claims must have adequate supporting documentation in the patients' medical records. It is our policy to apply the correct coding principles and guidelines that pertain to all PruittHealth entities and the services they provide.

We do not:

- Bill for items and services that were not rendered or are not medically necessary;
- Misrepresent the type or level of service rendered;
- Bill for non-covered services;
- Bill for services rendered by other providers, unless directed through contract or sub-contract arrangements as permitted by law; or
- Misrepresent or upcode the applicable service category (e.g., RUG or HHRG), eligibility, level of care, or medical diagnosis in order to obtain payment.

B. Cost Reporting

A substantial portion of PruittHealth business involves reimbursement under federal and state government programs that require the submission of cost reports. We adhere to a wide range of legal and regulatory requirements in the preparation of such cost reports.

Printed copies are for reference only. Please refer to the electronic copy for the latest version.

Code of Conduct

Effective: 01/01/2002

Hospice, Home First, Home Health, Skilled Nursing & Rehab /
NCSVHs, Assisted Living Centers, PruittHealth, Pharmacy Services,
Care Management, Nutritional Supply, Therapy Services, Medical
Supply, Partner Services / HR
Compliance
Version: 6

Reviewed: 09/20/2018
Revised: 09/20/2018

PruittHealth strives to maintain the highest ethical and legal standards and is committed to compliance with applicable federal and state laws in the preparation of its cost reports. The laws and regulations that apply to the preparation and submission of cost reports, while highly complex, define what costs are allowable and non-allowable and set forth the appropriate methodologies for claiming reimbursement for the cost of services provided to program beneficiaries. Given this complexity, all issues related to the completion and settlements of these cost reports must be communicated through or coordinated with the PruittHealth Reimbursement Department. It is important to stress that our providers and partners have the primary responsibility of ensuring the accuracy of information reflected on cost reports and in our books and records.

C. Agents of PruittHealth

Subcontractors and independent contractors are “agents” for PruittHealth or PruittHealth affiliates and as such act on their behalf while performing their duties. These individuals and entities are required to adhere to the same legal and ethical standards of conduct that apply to PruittHealth partners.

VI. USING THE COMPLIANCE PROGRAM

A. Personal Obligation to Report

We are committed to ethical and legal conduct that is compliant with all applicable laws and regulations. We are also committed to correcting errors and wrongdoing whenever they may occur. Each partner has an individual responsibility for monitoring and reporting any activity that may violate applicable laws, regulations, or this Code.

If you have any concerns or suspect that anything improper has occurred or may occur, we expect you to bring that information immediately to the attention of your supervisor and/or the Chief Compliance Officer, either directly or through the Committed to Caring Hotline. The Hotline is available 24 hours a day and serves as a resource for partners (as well as former partners) to ask questions, seek advice, clarify issues, raise concerns, and report suspected violations. The number for the Hotline is 1-800-222-0321. If you so desire, your anonymity will be protected. Retribution against anyone who acts in good faith to report a real or potential violation of applicable law or this Code is strictly prohibited.

If a partner is aware of a violation of applicable law or this Code and fails to report it, the failure to do so could be interpreted as an approval of the conduct at issue, which could result in disciplinary action. Supervisors who receive a report of a potential violation of this Code or applicable law should immediately advise the Chief Compliance Officer.

B. Internal Investigations of Violations

Printed copies are for reference only. Please refer to the electronic copy for the latest version.

Code of Conduct

Effective: 01/01/2002

Hospice, Home First, Home Health, Skilled Nursing & Rehab /
NCSVHs, Assisted Living Centers, PruittHealth, Pharmacy Services,
Care Management, Nutritional Supply, Therapy Services, Medical
Supply, Partner Services / HR

Reviewed: 09/20/2018

Revised: 09/20/2018

Compliance
Version: 6

We are committed to investigating reported violations as promptly and as confidentially as possible. Investigations will be directed by the PruittHealth General Counsel or Chief Compliance Officer and may be assisted by outside legal counsel where appropriate. The Chief Compliance Officer will coordinate findings from investigations and direct the implementation of corrections or changes, which are to be effected in a timely manner. We expect all partners to cooperate with such investigation efforts for the well-being of the Organization.

C. Disciplinary Actions

Noncompliance with applicable law has the potential to impair PruittHealth's reputation, standing, and ability to continue providing care to our patients. Accordingly, disciplinary action may be taken against individuals who fail to comply with our standards of conduct, policies and procedures, and applicable laws. An effective compliance program includes making recommendations regarding disciplinary actions for noncompliance. Refer to PruittHealth's policies on disciplinary action.

VII. ACKNOWLEDGMENT

PruittHealth requires each partner to sign an acknowledgment confirming that he or she has received and read this Code, understands it, and will abide by it. New partners will be required to sign this acknowledgment as a condition of employment, and all partners will be asked to execute and submit an annual acknowledgment. If you have any questions about the PruittHealth Code of Conduct or the acknowledgment form, please feel free to contact the Chief Compliance Officer.

Printed copies are for reference only. Please refer to the electronic copy for the latest version.

Code of Conduct

Effective: 01/01/2002

Hospice, Home First, Home Health, Skilled Nursing & Rehab /
NCSVHs, Assisted Living Centers, PruittHealth, Pharmacy Services,
Care Management, Nutritional Supply, Therapy Services, Medical
Supply, Partner Services / HR

Reviewed: 09/20/2018

Revised: 09/20/2018

Compliance
Version: 6

Code of Conduct Acknowledgment

I certify that I have read and understand the PruittHealth Code of Conduct and that I will abide by it.

Consistent with our Mission and Tenets of Customer Service, I understand that each partner involved in any operational, clinical, financial, or PruittHealth Provider Services process, is responsible, within the scope of his or her assigned responsibilities, for the outcome of that process.

I understand that I retain responsibility for any compliance issue or concern that I have identified until I have resolved it or, until I have reported it to someone within the Organization who has the authority to resolve it.

I acknowledge that I have a duty to report any alleged or suspected violation of applicable law or this Code. I agree promptly to report any potential violations that I become aware of and acknowledge that it is my responsibility to do so.

I understand that a violation of any section of this Code or applicable law constitutes grounds for disciplinary action, up to and including termination.

Signature

Title

Printed Name

Date

Entity/Office/Location

Please return this form to:

**Administrator or Director of
PruittHealth Entity/Office/Location**

(Name of Entity/Office/Location)

Attn: Acknowledgment
xc: Partner Personnel File

Printed copies are for reference only. Please refer to the electronic copy for the latest version.