

# ADVOCATE AURORA ENTERPRISES

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<b>Dept. Name:</b> Compliance	<b>Policy Effective Date:</b> April 1, 2021	<b>Last Reviewed:</b> March 31, 2021
<b>Scope:</b> AAE & Wholly Owned Affiliates	<b>Responsible Reviewer(s):</b> Chief Compliance Officer & Compliance Committee	

## CODE OF CONDUCT

This Code of Conduct establishes the principles of ethical and moral conduct for Advocate Aurora Enterprises, Inc. ("AAE"). The purpose of this Code of Conduct is to provide guidance regarding how to effectively comply with AAE's corporate compliance program (the "Compliance Program").

This Code of Conduct shall apply to AAE, any wholly owned subsidiary of AAE, and any other entity that AAE maintains a controlling voting interest in if AAE separately states in writing that this Code of Conduct applies to such entity. Any of the aforementioned entities shall individually and collectively be included within the term "AAE" for purposes of this Code of Conduct. All AAE officers, directors, committee members, administrators, employees, supplemental staffing contractors, and other workforce members operating under the supervision of AAE (collectively, "Workforce Members") shall be required to comply with this Code of Conduct in the performance of their duties to the organization. Non-Workforce Member representatives of AAE, such as contractors or external advisors and consultants, should also be directed to conduct themselves in a manner consistent with this Code of Conduct when they are acting on behalf of AAE.

This Code of Conduct is an essential component of the Compliance Program. It provides guidance to ensure that the organization conducts itself and its business in a legal and ethical manner and emphasizes the common values that guide AAE's actions. Failure to adhere to the standards described in this Code is a serious matter that may lead to disciplinary action, including termination.

Each supervisor and manager is responsible for ensuring that the Workforce Members under their supervision are acting ethically and in compliance with this Code of Conduct and with all applicable laws and regulations. Workforce Members are expected to ask questions if the laws and regulations are unclear or if they have questions about the Code of Conduct or any of AAE's policies and procedures. AAE's Compliance Program is managed by the Compliance Department under the direction of AAE's Chief Compliance Officer ("CCO"). The CCO and members of the Compliance Department will be available and responsive to Workforce Members when questions arise.

AAE, through its CCO and Compliance Department, monitors the success of its Compliance Program and Workforce Members' adherence to the standards set forth in this Code of Conduct on a regular basis. AAE is committed to the success and integrity of its Compliance Program. AAE prioritizes correction of any identified deficiencies in its compliance activities and creates solutions to ensure compliance with this Code of Conduct and the Compliance Program across the AAE enterprise.

This Code of Conduct is a living document that will be amended and updated from time-to-time to accurately reflect AAE's Compliance Program. The basic principles are as follows:

1. ***Culture of Ethics and Compliance.*** It is the responsibility of all Workforce Members to help maintain an ethical and compliant culture within the AAE enterprise. All Workforce Members are responsible for understanding the standards of conduct described in this Code of Conduct,

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for asking questions, and for reporting any compliance concerns to appropriate organizational leadership.

2. **Compliance Training and Education.** AAE provides resources, education, and training to its Workforce Members to ensure all individuals possess the knowledge and understanding related to compliance concerns and obligations particular to the individual's position and job responsibilities. Such training and education is conducted on a regular basis in accordance with AAE's Compliance Education and Training Policy and updated to remain current with applicable laws, regulations and areas of concern.
3. **Workforce Member Responsibility to Comply with All Applicable Laws, Regulations, Policies and Procedures.** Workforce Members are responsible for performing their responsibilities and activities in compliance with all applicable laws, regulations, and AAE policies and procedures, including, specifically the following:
  - a. **Anti-Kickback Statute.** Workforce Members are responsible for recognizing gifts or other benefits that may violate the Anti-Kickback Statute. Workforce Members must confirm that any arrangements with contractors or vendors guard against payment or receipt of remuneration in exchange for the referral of patients or for ordering items or services to be reimbursed, in whole or in part, under Medicare or Medicaid.
  - b. **Documentation Standards.** AAE and its Workforce Members are responsible for safeguarding the integrity of its documentation and recordkeeping systems. This includes the accuracy and completeness of all employment and business documents and records, and all records and documentation of services and items provided to clients or patients of any wholly-owned subsidiary of AAE.
  - c. **Excluded Individuals/Entities (Sanction Screening).** AAE and its wholly-owned subsidiaries do not knowingly employ, do business with or contract with individuals or entities who have been excluded from participation in government health care programs. AAE conducts regular, ongoing sanction screening of its Workforce Members, independent contractors and vendors. Workforce Members are required to inform the CCO immediately if they become excluded, debarred or ineligible.
  - d. **False Claims Act.** AAE prohibits Workforce Members from knowingly making, presenting or causing to be presented a false record or statement in order to allow or assist AAE or any of its wholly-owned subsidiaries in obtaining payment from a government health care program.
  - e. **Whistleblower Protections.** AAE prohibits retaliation and protects Workforce Members from being fired, demoted, threatened or harassed for bringing forward any instances of potential noncompliance or from filing a whistleblower lawsuit.
  - f. **Stark Law.** All financial relationships with physicians must be reviewed by the Compliance Department. Questions or concerns about relationships/arrangements with physicians, physician groups, immediate family members of physicians, or entities owned by one or more physicians should be referred to the CCO.
  - g. **HIPAA.** Workforce Members are responsible for complying with all applicable requirements set forth in the HIPAA Privacy Rule and HIPAA Security Rule in the

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performance of their job functions. All Workforce Members handling or otherwise having access to Protected Health Information are required to complete training regarding compliance with the HIPAA Privacy and Security Rules on at least an annual basis.

- h. **State Laws.** Workforce Members are responsible for complying with applicable state laws and regulations in the states in which AAE or any of its wholly-owned subsidiaries operate, including, as applicable, any requirements of a state's Medicaid Program.
4. **Asking Questions and Clarifications.** AAE encourages all Workforce Members to ask questions and speak with their manager or the CCO about compliance with laws, regulations, AAE policies and procedures, or this Code of Conduct. The CCO and managers will speak openly and often about compliance issues brought to AAE's attention by Workforce Members or other individuals.
5. **Prohibition on Gifts with "Strings Attached."** This Code of Conduct strictly prohibits Workforce Members from offering, receiving, or asking for gifts or favors in exchange for influence or assistance in a transaction.
6. **Workforce Member Responsibility to Maintain Confidentiality and to Safeguard Patient Information.** Workforce Members who are in possession of, or have access to, confidential, sensitive or proprietary information, including Protected Health Information ("PHI") and information proprietary to AAE or its affiliates, have the obligation to protect and safeguard the information in a manner that prevents unauthorized use or disclosure. Any unauthorized use or disclosure of PHI or other confidential information may result in disciplinary action up to and including termination.
7. **Conflicts of Interest.** Workforce Members are obligated to keep themselves free from conflicts of interest in the performance of their responsibilities. AAE has established a Conflicts of Interest Policy that details the process and requirements for disclosure of potential Conflicts of Interest and how such requirements apply to Workforce Members.
8. **How to Report Compliance Concerns.** AAE encourages and expects Workforce Members to utilize the following reporting methods for concerns and questions:
  - a. Speak with your immediate manager or supervisor;
  - b. Speak with a member of leadership, including a member of the Human Resources Department;
  - c. Contact the Chief Compliance Officer; and/or
  - d. Call the toll-free Compliance Hotline at (available twenty-four (24) hours a day, seven (7) days a week):
    - i. Phone: 833-921-5106
    - ii. Email: [advocateauroraenterprises.ethicspoint.com](mailto:advocateauroraenterprises.ethicspoint.com)

AAE shall promptly investigate and respond to compliance concerns as they are made known to managers, the Human Resources Department, the CCO, or through the Compliance

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Hotline. If a Workforce Member would prefer to remain anonymous, the individual may report their compliance concerns anonymously through the Compliance Hotline.

9. ***Non-Retaliation Policy for Good Faith Reporting.*** No retaliatory action will be taken against any Workforce Member who makes a good faith report of a compliance or ethics concern.
  
10. ***Consequence for Failure to Compliance with the Code.*** Failure to comply with this Code of Conduct may result in disciplinary action, including suspension or termination of employment, termination of contractual relationships or removal from corporate office, committee membership, and/or membership on the AAE Board of Directors. Additionally, individuals may be subject to fines and prosecution under federal or state law, if applicable.