

General Compliance Disciplinary Standards

Contractors, Providers and their employees must report any activity or conduct believed to be in violation of the PrimeTime Health Plan (PThP) Code of Conduct or any Federal or local law, regulation, or ethical standard. Any employee found to have known of such allegation but failed to report it may be subject to disciplinary action, up to and including termination. Reports of noncompliance or suspected noncompliance should be based on facts and objective information only, and will be treated with complete anonymity.

Contractors, Providers and their employees must work to ensure prompt and consistent action against violations, however, in some situations it is difficult to know the appropriate way to proceed. Since we cannot anticipate every situation that will arise, it is important that we have an approach to handle new questions or problems. Reporting actual or suspected violations should be done in accordance with the recommendations outlined below:

Things to consider:

- Make sure you have all the facts. In order to reach the right solutions, we must be as fully informed as possible.
- Ask yourself: What specifically am I being asked to do? Does it seem unethical or improper? This will enable you to focus on the specific question you are faced with, and the alternatives you have. Use your judgment and common sense; if something seems unethical or improper, it probably is.
- Discuss the problem with your supervisor. This is the basic guidance for all situations. In many cases, your supervisor will be more knowledgeable about the question, and will appreciate being brought into the decision-making process. Remember that it is your supervisor's responsibility to help solve problems. If you are uncomfortable discussing the problem with your supervisor you can talk to your general manager or human resources manager.
- Seek help from Company resources. In cases where it may not be appropriate or timely to discuss an issue with a supervisor or local management, contact the Company Compliance Officer.
- You may report violations in confidence and without fear of retaliation. If a situation requires that your identity be kept secret, your anonymity will be protected. The Company does not permit retaliation of any kind against employees for good faith reports of suspected violations.
- Ask first, act later: If you are unsure of what to do in any particular situation, you should seek guidance before you act.

- Contractors, Providers and their employees are subject to the Company's Code, which describes procedures for the internal reporting of violations of the Code. All employees must comply with those reporting requirements and promote compliance with them by others. Failure to adhere to this Code by any employee will result in disciplinary action, up to and including termination.

Legal Compliance

The Company is required to comply with many laws and regulations at the federal and local level. Employees are under a continuing obligation to familiarize themselves with any and all legal requirements that affect the performance of his or her job duties and to keep abreast of changes and revisions to legal requirements and regulatory policy. Employees shall ensure that all activities undertaken by or on behalf of the Company are in compliance with all applicable federal and local laws and regulations. Some of the laws and regulatory requirements that pertain to the Company's products include, but are not limited to:

- Federal False Claims Act
- Anti-Kickback Statute
- Health Insurance Portability and Accountability Act (HIPAA)
- Physician Self-Referral (Stark) Statute
- Title I regulations
- Code of Federal Regulations, specifically 42 C.F.R. § 400, 403, 411, 417, 422, 423, 1001 and 1003.
- Regulatory guidance produced by the Centers for Medicare and Medicaid Services (CMS), including requirements in the Medicare Managed Care Manual (MMCM) and the Prescription Drug Benefit Manual (PDBM), as well as all other policy guidance.
- Applicable State laws and contractual commitments

Obeying the law is the foundation on which the Company's ethical standards are built. If a law conflicts with a policy, employees must first comply with the law. Violation of the standards in this document may result in disciplinary action, up to and including termination. Moreover, violations of this document may also be violations of the law and may result in civil or criminal penalties for employees, their supervisors, and/or the Company. Employees who encounter a situation that may violate, or lead to a violation of this document should immediately seek guidance from their supervisor and/or the Company's Compliance Officer. Employees may also contact the PTHP Compliance and/or FWA hotline anonymously and without fear of retaliation at:

- **PTHP Compliance & FWA Hotline:** 1.866.307.3528 OR <https://aultcarepthp.alertline.com>