

CONIFER
HEALTH SOLUTIONS®



Standards of Conduct



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Providing the foundation for better health. That's our purpose at Conifer Health. It's why we exist.

Our values – Unity, Integrity, Service and Respect – guide us each day in fulfilling that purpose for the clients, patients and members we serve. Those values remind us that how we act is just as important as what we do.

Most of the time, there is a clear difference between what's right and what's wrong. But sometimes making the correct decision is not so easy. That's why we have our Standards of Conduct to guide us. All of our stakeholders – clients, patients, members, suppliers, owners and team members – count on us to adhere to these Standards of Conduct and to the highest levels of professionalism.

We also have an [Ethical Decisions Guide](#) to help us in making choices that align with our values, Standards of Conduct and other obligations. When in doubt, use this guide – and the support of our Ethics and Compliance organization, if necessary – to help make the right choices. They are fundamental to living our purpose.

Since Conifer Health's founding in 2008, we have focused on maintaining the highest standards of ethical behavior in our industry. I am confident that, with your help and continued dedication, we will continue to enhance our reputation in the years to come.

With these Standards of Conduct to help guide us, we can all take pride in our shared commitment to living our purpose and values.

Stephen M. Mooney
President and CEO



Who We Are

Our Story, Purpose And Values

The Conifer Health heritage is made up of more than 30 years of healthcare operations management experience. It is deeply rooted in hospital and physician knowledge, and industry-leading investments in innovation that help build lasting relationships among hospitals, physicians, employers and consumers.

We are team members, each committed to common guiding behaviors and holding ourselves to the highest of standards. With the dedication and expertise of nearly 15,000 professionals, we provide managed services to health systems, their health plans and managed populations. Our value-based solutions enhance consumer engagement, drive clinical alignment, manage risk, and improve financial performance.

Through it all we are guided by our values of Unity, Integrity, Service and Respect, as we aspire to fulfill our purpose of providing the foundation for better health and help our clients meet the unique needs of the communities they serve.

About the Standards of Conduct

Conifer Health empowers all team members to make decisions that positively impact our reputation in the marketplace. We conduct ourselves in a manner consistent with our values and guiding behaviors.

Individual actions, both in and out of the workplace, shape how the marketplace views Conifer Health. That is why it's so important that we each take responsibility for our actions and behave ethically in all situations. Contact your supervisor, department leadership, Human Resources representative, or our Ethics and Compliance organization about any concerns you may have.

Our Standards of Conduct provide an overview of some of the legal and ethical standards we are each expected to follow every day. If you are unsure of what to do in a situation, you have support.

Please read the Standards of Conduct carefully. As a Conifer Health team member, you are required to certify that you have read and understand the Standards of Conduct and how they relate to your job responsibilities. If you have questions, refer to the "Asking for Guidance and Voicing Concerns" section at the end of the booklet or contact Ethics and Compliance at ethics@coniferhealth.com for more information.

Ethics and Compliance Program

We believe that conducting business ethically and striving to do the right thing each and every time are vital to our success. Our Ethics and Compliance Program is designed to help you be aware of, understand, and follow federal and state laws and regulations related to your job. The elements of the Ethics and Compliance Program are embedded

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into the DNA of our organization and help team members make ethical decisions. Complying with the program helps build the Conifer Health brand, creates a competitive advantage, and ultimately differentiates our company in the marketplace.

The Ethics and Compliance Program develops

and distributes awareness materials, facilitates ethics and compliance training, investigates potential issues, and provides channels for team members to voice their concerns.

Written Policies, Procedures, and Standards of Conduct

Conifer Health maintains an extensive library of policies and written guidelines to ensure that every team member knows and understands his or her individual responsibilities regarding ethical business practices. The library is available on our intranet site, iCon.

Training and Education

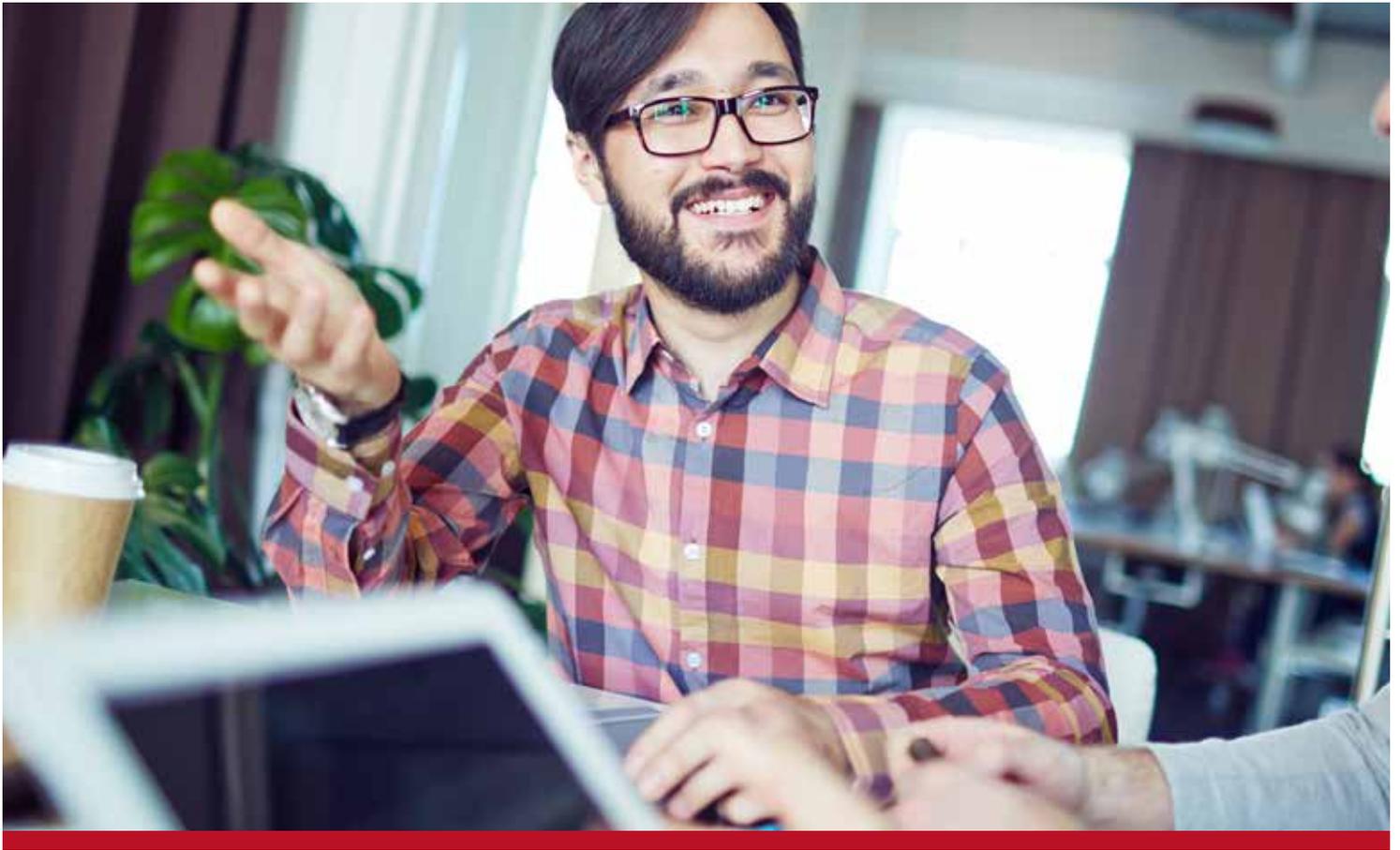
Training and education are critical to the effectiveness of our overall Ethics and Compliance Program. Ethics and compliance training is required for all new team members (including full-time, part-time, temporary workers, contractors and volunteers) and must be completed within 30 days of the date of hire. After that, all team members, contractors, temporary workers, and volunteers are trained annually.

All annual courses must be completed prior to the established deadline. If a team member does not complete all required annual training courses by the deadline, he or she may be subject to disciplinary action, up to and including termination. Please contact the Ethics and Compliance organization at ethics@coniferhealth.com if you have any questions regarding your obligations.

Workplace, Team Member and Client Experience

How We Treat One Another

Conifer Health's team members are the company's most valuable asset. We make every effort to provide a safe working environment that promotes fairness and respect for all, and where diversity and inclusion are valued. We treat each other with dignity and respect, and do not tolerate harassment, bullying or discrimination.



Harassment, bullying and discrimination take many forms, including:

- Unwelcome remarks, gestures or physical contact
- The display or circulation of offensive, derogatory or sexually explicit pictures or other materials, including through email and on the Internet
- Offensive or derogatory jokes or comments (explicit or by innuendo)
- Verbal or physical abuse or threats

Please refer to our [Purpose, Values and Guiding Behaviors brochure](#) for examples of how we treat one another. Notify the HR Service Center at 888-327-7726 if you experience or witness discriminatory conduct or harassment in your workplace, or experience retaliation for reporting discrimination or harassment.

Q: What do I do if I unintentionally committed a violation of Conifer Health's Standards of Conduct and I'm concerned about retaliation if I self-report?

A: Conifer Health promotes an environment in which mistakes can be raised without the fear of retaliation and encourages team members to admit a known mistake through email (ethics@coniferhealth.com) or the Ethics Action Line (1-800-8-ETHICS).



Embracing diversity in every aspect of our business is vital to our long-term success.



Diversity and Inclusion

Conifer Health actively creates and promotes an environment that is inclusive of all people and their unique abilities, strengths and differences, and promotes diversity as a strategic and competitive business advantage for the organization.

Embracing diversity in every aspect of our business is vital to our long-term success. We respect the diversity in each other, our clients and vendors, and the communities where we serve and live.

Team members should never harass, bully, or discriminate on the basis of race, ethnicity, religion, gender, sexual orientation, national origin, age, disability, economic status or ability to pay, veteran status or any other characteristics protected by law.

We believe team members who have physical or mental disabilities are entitled to reasonable accommodations to be able to perform their job responsibilities.

Team Member Privacy

At times, Conifer Health team members may have access to sensitive or confidential health information of colleagues. We must protect the confidentiality of this information and hold it to the same level of protection that we provide for the clients we serve.

Workplace Health, Safety and Security

We provide a safe, healthy and relaxed workplace for all team members and visitors. Unsafe workplace health, safety and security practices can lead to serious consequences.

Team members are expected to follow all workplace health, safety, and security policies and practices; cooperate with officials who enforce the policies and practices; take necessary steps to protect themselves and other team members; and immediately report all accidents, injuries and unsafe practices and conditions.

Q: Are former co-workers allowed to visit me at work?

A: No. Our policies and procedures generally prohibit former team members from entering client sites. However, former team members are allowed on the premises of client sites in the event they are receiving treatment or a family member is a patient at the facility.

For more information on workplace health, safety and security, please refer to the Team Member Handbook and applicable policies and procedures located on iCon.

Smoking, Drugs and Alcohol

We are committed to providing a healthy working environment and have strict standards regarding smoking, drugs, narcotics and alcohol. Team members are expected to follow Conifer Health's policies while on company property or during any time when representing the company.

Smoking

Conifer Health is a smoke-free workplace. All team members and visitors are not allowed to smoke while on company property or during any time when representing the company. This includes the use of electronic cigarettes or "e-cigarettes."

Drugs and Narcotics

Team members are not allowed to use, possess, sell or exchange illegal drugs or drugs that will impair performance while on company property or during any time when representing the company.

Alcohol

Team members are not allowed to use, possess, sell, or exchange alcohol while on company property or during any time when representing the company, except when associated with an approved business meal or sponsored social event.

Enforcement Standards

We take our commitment to compliance with the Standards of Conduct very seriously. Team members are informed that any violation of the Standards of Conduct, policies, and applicable federal and state laws and regulations may result in appropriate disciplinary action, up to and including termination.

Conifer Health utilizes a progressive coaching and performance improvement process, providing team members with a fair, equitable and consistent method of guiding team members toward acceptable performance and conduct.

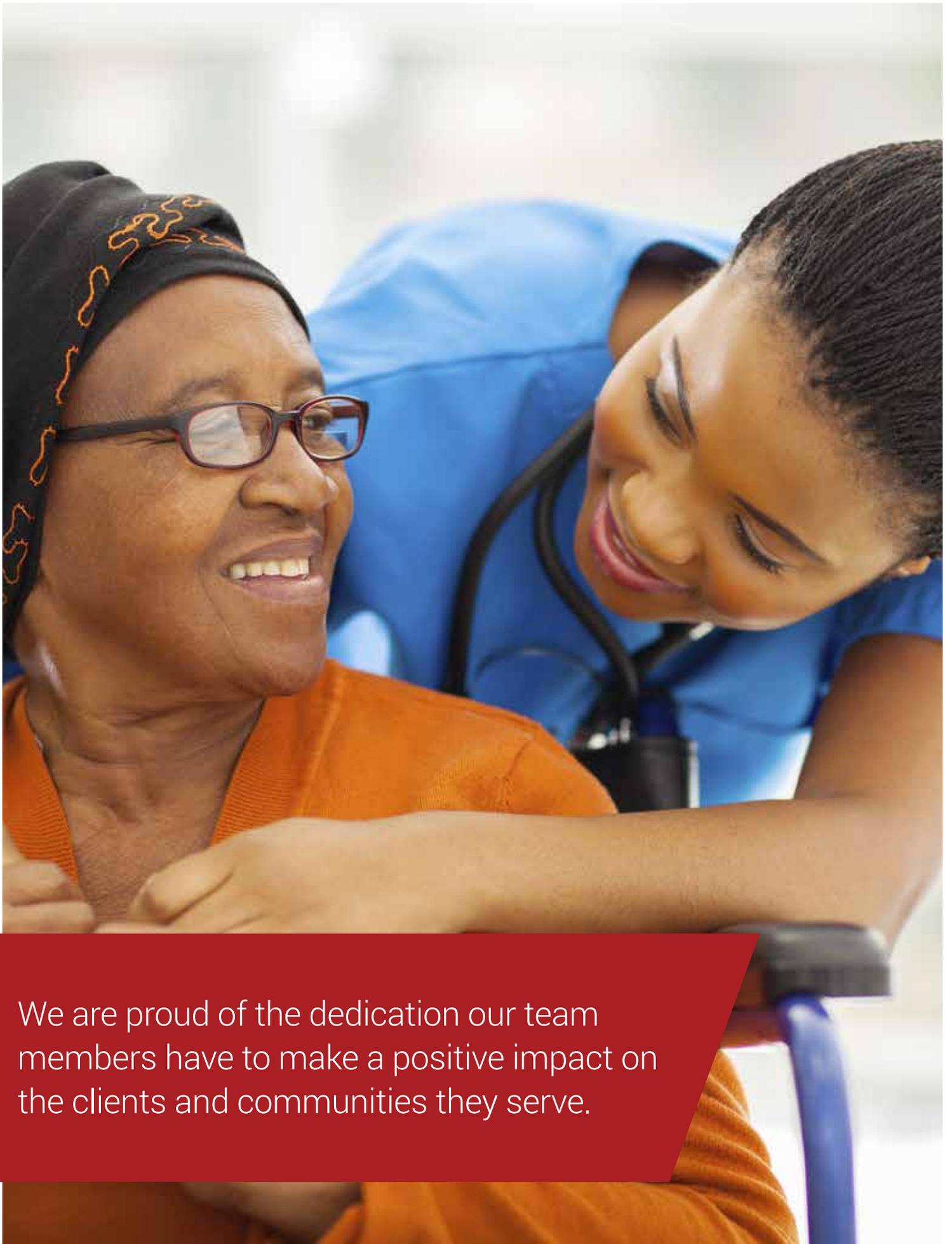
Any team member who authorizes or participates directly in a violation of the Standards of Conduct, policies, and applicable federal and state laws may be subject to disciplinary action, up to and including termination. Any team member who deliberately fails to report a violation or hinders an investigation may be subject to disciplinary action, up to and including termination.

Disciplinary guidelines are communicated to team members in training at the time of hire and annually, and are posted on iCon, as well. A summary of disciplinary guidelines are included in the Team Member Handbook, which is provided at the time of hire or upon request, and is also available on iCon.

Labor Practices

Conifer Health is committed to following all applicable wage and hour laws and regulations, including those concerning work hours, compensation, human rights and working conditions. Conifer Health will comply with all federal, state, and local laws and regulations, including unknowingly doing business with a vendor that illegally or improperly employs under-age workers. Conifer Health also prohibits the use of any forced labor.

Service is at the heart of our values. Every day, we serve our clients and communities.



We are proud of the dedication our team members have to make a positive impact on the clients and communities they serve.

To ensure all work performed is compensated correctly, team members compensated on the basis of hours worked must report and record time accurately and in accordance with policy and procedures. Labor practices, as well as other applicable federal and state laws, are posted in team member break areas.

How We Treat Our Clients and Communities

Service is at the heart of our values. Every day, we serve our clients and communities. We are proud of the dedication our team members have to make a positive impact on the clients and communities they serve.

Conifer Health is rooted in community programs, giving team members a variety of ways to give their time and talent to organizations that mean the most to them. Collectively, we commit to foster good health, combat hunger and connect humanity.

As team members, we strive to make every client's experience positive. We treat our clients as we treat each other, with dignity and respect.

Our Commitments to Conifer Health

Conflicts of Interest

All team members have a duty to protect the interests of Conifer Health when entering into a transaction, arrangement or relationship that may potentially benefit the private interests of the team member in a position to exercise substantial influence or control over the affairs of the company.

Conifer Health recognizes the right of team members to engage in activities outside of their employment with the company. These activities are of concern to Conifer Health if they conflict with the team member's duties and responsibilities at the company. A policy of full disclosure must be followed to assess and prevent potential conflicts of interest from arising.

A conflict of interest may occur if outside activities or personal interests influence or appear to influence the ability to make objective decisions in the course of performing job responsibilities. A conflict may also exist if outside activities distract a team member from his or her job performance. In addition, Conifer Health or our client resources may not be used for non-work related activities. Any time a team member has a question about whether an outside activity may appear to be a conflict of interest, the team member should contact his or her leader, Human Resources representative or the Ethics and Compliance organization at ethics@coniferhealth.com.

Upon hire, all team members must complete a Conflict of Interest Statement. Conifer Health leaders (managers and above) are required to complete the Conflict of Interest Statement annually thereafter. If, throughout the year, a conflict or potential conflict arises, that team member is obligated to discuss the matter with his or her supervisor and complete an updated Conflict of Interest Statement. The Chief Compliance Officer or designee, in collaboration with Human Resources, will review all Conflict of Interest Statements.

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Some examples of conflicts of interest include:

- A team member or relative owns a company or service that does business with Conifer Health
- A relative or close friend reports to a supervisor who affects their job responsibilities, pay and promotions
- A team member starts a business that provides similar services to similar clients as those of Conifer Health
- A leadership team member provides paid consulting services to clients in his or her spare time
- Outside employment or activities that use the equipment, personnel or other resources of Conifer Health
- A team member uses his or her position at Conifer Health (and the relationships with fellow team members) to raise money for various purposes (e.g., school fundraising activities, selling Girl Scout cookies, etc.)
- Outside activities with a person or entity, or financial interests in an entity, that does business with Conifer Health, particularly when the team member may influence a Conifer Health decision involving that business

Financial Integrity

All financial information must reflect actual transactions and conform to Generally Accepted Accounting Principles. All funds or assets must be properly recorded in Conifer Health's books and records. Conifer Health maintains a system of internal controls to provide reasonable assurances that all transactions are executed in accordance with our leadership team's authorization and are recorded properly so as to maintain the accountability of company assets.

Intellectual Property

Any work of authorship, invention or other creation (“Development”) developed by a Conifer Health team member during the scope of his or her employment with Conifer Health will be considered the property of Conifer Health, including any patent, trademark, copyright, trade secret or other intellectual property right. The following will be considered in assessing whether something is created during employment:

- The nature of the team member’s work
- Whether the development is related to Conifer Health’s service lines
- Whether the team member was directed to produce the development as part of his or her job responsibilities
- Whether the team member used Conifer Health’s intellectual property or resources at least in part to make the development
- Whether the team member created the development while being paid by Conifer Health

If any development created is eligible for copyright, it will be considered “Work for Hire” under the United States Copyright Act, with Conifer Health identified as the author and owner of such work.

Political, Legislative and Regulatory Activities

Conifer Health encourages team members to participate in political activities such as voting in federal, state, and city elections, and become educated about issues that affect the communities where we live and serve. However, involvement in political activities must remain separate from team member work-related responsibilities.

While on Conifer Health property or during any time when representing the company, team members must refrain from participating in political activities unless such activities have been reviewed and approved by the Legal, and Ethics and Compliance departments. This includes providing gifts or payments of any kind to or on behalf of any government representative or team member.

Team members are not permitted to use Conifer Health resources for any political activities or campaigns, unless such activities have been reviewed and approved by the Legal, and Ethics and Compliance departments.

Electronic Media

All communication systems, including but not limited to computers, email, intranet, Internet access, telephones and voice mail, are the property of Conifer Health and are to be used primarily for business purposes in accordance with Conifer Health’s policies and procedures related to electronic communications.

Users of Conifer

Health’s computer and telephonic systems should presume no expectation of privacy in anything they create, store, send or receive. Conifer Health reserves the right to monitor and/or access communication usage and content consistent with its policies and procedures.

Team members may not use internal communication channels or access the Internet at work to post, store, transmit, download or distribute any threatening materials; knowingly, recklessly or maliciously false materials; obscene materials; or anything constituting or encouraging a criminal offense, giving rise to civil liability or otherwise violating any laws. Additionally, these channels of communication may not be used to send chain letters, party invitations, personal broadcast messages or copyrighted documents that are not authorized for reproduction; nor are they to be used to conduct a job search or any other use that would violate Conifer Health’s Equal Opportunity Employment policies.

Conifer Health reserves the right to monitor and/or access communication usage and content consistent with policies and procedures.

Team members who abuse our communication systems or use them excessively for non-business purposes may lose these privileges and be subject to disciplinary action in accordance with Human Resources policies and procedures.

Team members are expected to follow Conifer Health's Information Security policies which govern the use of information systems. Only assigned user IDs and passwords shall be used. Passwords must never be shared or disclosed. Team members must never use tools or techniques to break or exploit Conifer Health or its clients' information security measures. Conifer Health's information systems may not be used to access inappropriate or prohibited websites.

Q: Can I log into the system for the purpose of allowing a co-worker to perform work duties when that co-worker's access has been disabled?

A: No. Multiple policies (HRS.02.22 Use of Information and Technology Systems and Workplace Monitoring, and HRS.02.08 Employee Conduct and Work Rules) and the Standards of Conduct prohibit password sharing. Even if you do not give your co-worker your password, allowing another team member to work under your user credentials is prohibited. If a team member's access has been disabled, contact the Information Services Help Desk at 877-787-7247 immediately to reach a resolution.

Social Media

If your affiliation with Conifer Health is known when communicating in any public forum, including via the Internet or on social media sites such as Facebook, Twitter, LinkedIn, SnapChat, Instagram, etc., you must keep your own views independent from Conifer Health's views. In addition, remember that individuals' perceptions of you on social media can affect their perception of Conifer Health. Further, do not post confidential information related to patients, clients or Conifer Health on such sites.

Requests for Information

Conifer Health information disclosed outside of the organization must be accurate, complete and consistent, and distributed in line with company policies. We all represent Conifer Health. If someone contacts you for information related to our business operations, be sure to reach out to your supervisor or department leadership about the request. Please do not attempt to respond to any request for information by yourself.

- **News media:** All media inquiries should be directed to External/Media Communications at Conifer.Communication@ConiferHealth.com.
- **Team member information:** All requests for information on current and past team members should be directed to the Human Resource Service Center at 888-327-7726.
- **Client information:** Conifer Health team members should never release client information. Refer to your supervisor if you receive such a request.

No Solicitation

Conifer Health policy limits solicitation and distribution of literature to team members during working hours and in working areas by all persons and organizations. This policy applies to team members and non-team members while on Conifer Health premises or within Conifer Health-run departments at client sites. No team member should ever be pressured to participate in a Conifer Health fundraising initiative to support charitable organizations. Parties with a legitimate contractual relationship with the company may be allowed to provide information where appropriate and when consistent with our values and services. No individual shall engage in sales solicitation directed at Conifer Health team members or clients.



Conducting Business Fairly and Legally

Fraud, Waste and Abuse Laws

Conifer Health team members have an obligation under law and under our contracts with our clients to conform to the requirements of Medicare and Medicaid Programs. Fraud, waste and abuse involving the operations of Conifer Health are prohibited and will not be tolerated. We make every effort to submit accurate and truthful bills for services provided by our clients. We ensure that bills for client services meet federal healthcare program guidelines. If a team member identifies a billing error, he or she should notify a supervisor or contact Ethics and Compliance at ethics@coniferhealth.com. We work collaboratively with our clients to ensure that all known billing errors are corrected before a claim is submitted. If we learn of an error once a claim goes out, we work with Ethics and Compliance and the client to correct the root cause of the issue and make appropriate refunds.

Q: I have observed continuous inaccurate billing by my co-worker. Is it my responsibility to inform someone?

A: Yes. Conifer Health makes every effort to provide accurate and truthful billing for our clients to meet federal healthcare guidelines. It is everyone's responsibility to be accountable for the services we provide. You should report your concerns to your supervisor and/or to Ethics and Compliance via email or the Ethics Action Line.

Q: In the event a registration error is made which necessitates a charting and/or billing correction, do I document the error or correction? If so, how?

A: The error and correction should be noted within the original incorrect account and new account in case such information is needed in the future. Always remember to only document the minimum necessary amount of information. In such a scenario, a note should be entered into the original incorrect account number which references the newly created account number and that a correction was made. No patient information aside from the newly-created account number should be referenced in the note.

The Federal False Claims Act and Deficit Reduction Act protect government programs, including Medicare, Medicaid and TRICARE from fraud and abuse. Conifer Health complies with these and all laws and we have policies to detect, report, and prevent waste, fraud and abuse, as well as provide protection for whistleblowers. If you see a false claim or report, fix it and report it to your supervisor and/or Ethics and Compliance. Failure to do so will lead to disciplinary action up to and including termination of employment.

Some examples of fraud, waste and abuse include:

- Alteration or forgery of checks
- Any misuse or theft of funds
- Any irregularity in the handling or reporting of financial transactions
- Falsifying or altering any record or report including employment applications, payroll or time records, expense reports, medical or patient records, or healthcare claims
- Any irregularities of giving or receiving payment in connection with business transactions and the giving or obtaining of contracts

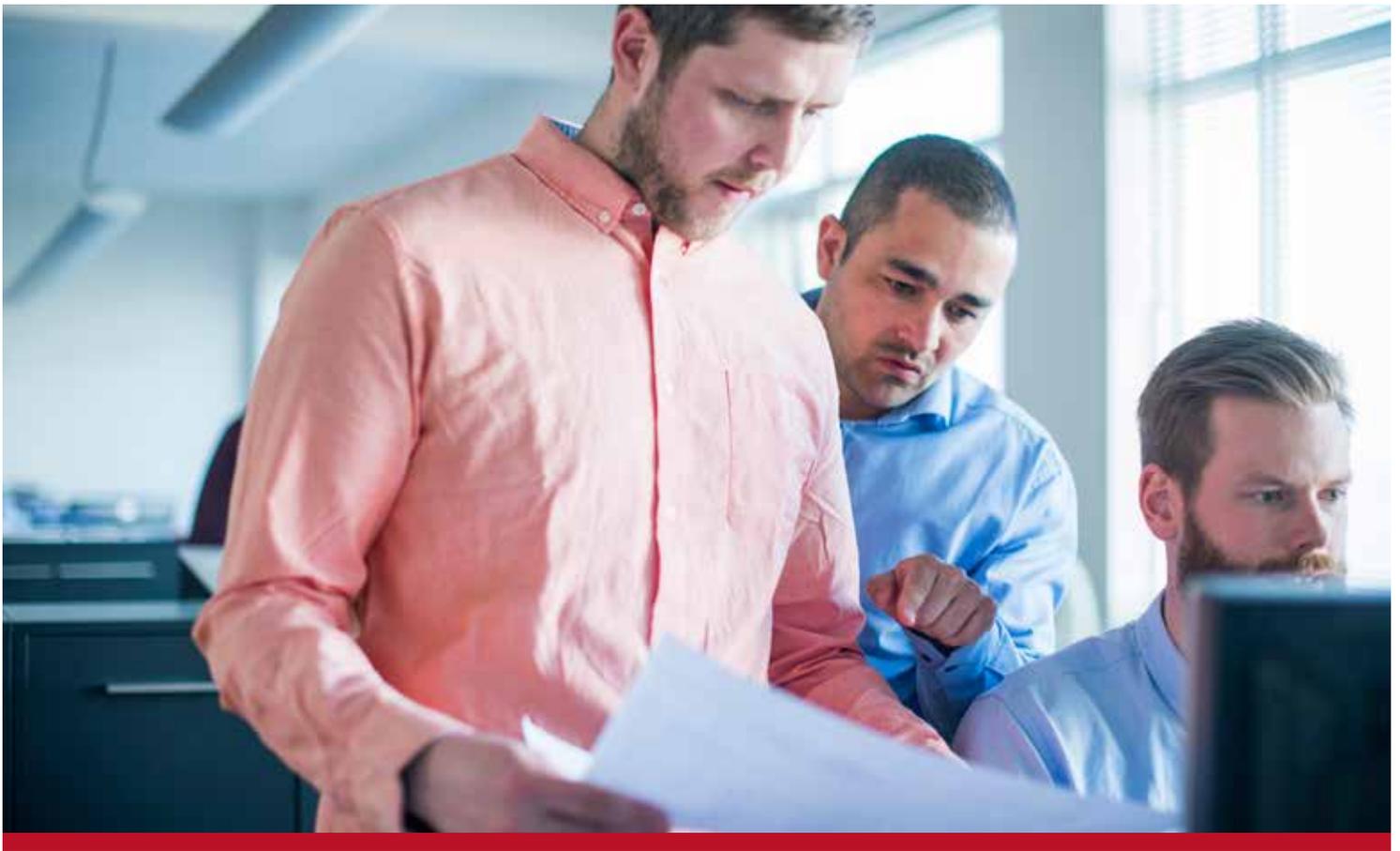
Privacy and Security Laws

Conifer Health's clients trust that we will protect the information provided to us, including confidential patient and proprietary information. We handle patient information the way we would want our own to be handled. We follow all federal and state laws governing how we should handle such information, including the Health Insurance Portability and Accountability Act (HIPAA).

Q: Am I permitted to review my own account to ensure it was billed correctly?

A: No. Conifer Health policy prohibits team members from accessing their own information. Team members should direct such an inquiry to their supervisor. Note that while some client sites have more lenient provisions, as a Conifer Health team member, you are obligated to follow whichever policy and procedure is stricter.

We access health and personal information and share it with co-workers only when authorized to do so and for the purpose of doing our jobs. We release information to vendors or others only in accordance with proper procedures and never post patient information to a website or public forum, even if the patient is not identified. We take steps to prevent identity theft by protecting Social Security numbers and other personal data and by securing our systems from unauthorized access.



Q: Am I prohibited from accessing and/or working on the account of a family member or friend?

A: Yes, Conifer Health prohibits team members from accessing their own information and the information of their family members or friends for any reason. Should you receive such a request (e.g., billing inquiry) direct your family member or friend's inquiry to a colleague and inform them that your colleague will assist.

Consumer Protection Laws

Applicable Conifer Health team members are expected to follow all laws related to consumer protection. A team member should report any known or suspected instances of non-compliance with these laws to his/her supervisor or Ethics and Compliance.

Ineligible Persons

Do not contract with, employ, or knowingly bill for services rendered by an individual or entity that is excluded or ineligible to participate in federal healthcare programs, suspended or debarred from federal government contracts, or has been convicted of a criminal offense related to the provision of healthcare items or services. These individuals or entities are not eligible to do business with or be employed by Conifer Health. To ensure safeguards, we perform Office of Inspector General (OIG) and General Service Administration (GSA) checks upon hiring or contracting and then routinely throughout the year for all team members.

Gifts and Entertainment

Never offer, give or receive something of value in hopes of inducing business or as a reward for business from clients. The “something of value” is not limited to only money. It can be services, gifts, meals, entertainment, travel or anything else that has value to the recipient. Never offer, accept or give bribes or kickbacks. Never compensate anyone based on referrals.

“GIFTS” means any item of value – including everything ranging from promotional items like t-shirts to flowers and gift baskets – if the recipient is not expected to pay for the item.

“ENTERTAINMENT” is attendance at any event such as a sporting event, concert or play where the recipient is not expected to pay for the entrance fee or ticket.

“BUSINESS MEALS” are meals in which Conifer Health and its services are discussed.

In dealing with vendors and suppliers, base your decisions on the quality of their goods and services and do not accept anything of value that could be seen as impacting or influencing our purchasing or services decisions. This includes paid attendance at vendor-sponsored events.

Similarly, in dealing with commercial clients never give or offer any benefit or anything of value to improperly influence their decisions on whether or not to award us business. Many of our services are sold to governmental or quasi-governmental entities, such as municipal or county hospitals. Sales to such entities and dealings with their employees are subject to strict local, state and federal contracting rules and ethical guidelines. All team members must be particularly diligent to ensure that nothing in their business practices could be interpreted as attempts to provide an improper benefit to any employee of a governmental agency or entity for the purpose of influencing that person’s decisions regarding the purchase or use of our services.

Lastly, in dealing with colleagues and supervisors, we should limit gift giving to avoid any perception of preferential treatment.

Giving or receiving gifts and entertainment as part of business practices is acceptable, but with limitations. Generally, gifts given or received from Conifer Health, our clients, vendors and team members should be limited to \$50 per gift, and no more than \$100 worth of gifts from a given client, vendor or team member in the course of a year. Cash or its equivalent (e.g., Visa, American Express gift cards) cannot be exchanged. Questions or exceptions to this policy must be reviewed by Conifer Health’s Legal department in conjunction with Ethics and Compliance.

Q: Our policy on gifts and entertainment prohibits the exchange of cash or cash equivalents. Does that mean that gift cards cannot be given or received?

A: Not necessarily. If the gift card is for a specific store, then it is permitted. Gift cards that can be used almost anywhere, like cash, are not permitted. This includes any type of credit card gift cards (e.g., Visa, MasterCard, American Express, Discover).

Antitrust Laws

Antitrust laws exist to promote fair competition within the marketplace. These laws can be violated by discussing Conifer Health’s business with a competitor, such as how prices are set, or disclosing the terms of client relationships. Team members must be mindful during external meetings to not participate in discussions regarding prohibited topics including pricing, labor costs, etc. If you have questions about your obligations to comply with these regulations, please contact Ethics and Compliance.

Government Investigations and Search Warrants

Conifer Health will cooperate fully with government investigations and other government requests for information. If a government investigator contacts you regarding your work, or affiliation and/or knowledge of Conifer Health and/or its clients, do not feel pressured to talk without first contacting your supervisor and Ethics and Compliance.

Gifts and Entertainment Examples

GIFTS

✓	Purchased or reimbursed by Conifer Health for a team member	EXAMPLE: A team member's family member passes away and his/her supervisor wishes to send flowers on behalf of the department.
✓	Purchased personally by a team member for another team member	EXAMPLE: A department director may give a Starbucks gift card to a team member who has really worked hard on a project.
✓	Purchased by a team member for a patient with a retail value that does not exceed \$10 per item and \$50 in total per year per family and is not cash or its equivalent. Contact Ethics and Compliance before proceeding.	EXAMPLE: Conifer Health may give a patient a Conifer Health-branded pen.
✓	Purchased by Conifer Health for a vendor or client	EXAMPLE: Conifer Health may purchase a \$50 commemorative item for a client.
✓	Received by a team member from a client	EXAMPLE: A client wishes to provide all team members with \$25 gift cards to a local grocery store as a holiday gift.
✗	Cash	EXAMPLE: A client wants to give everyone on the Patient Access team \$50 because they had great numbers for the month.

ENTERTAINMENT

✓	Purchased by Conifer Health for team members	EXAMPLE: Conifer Health may provide free tickets to a Texas Rangers game to any interested team members working in the Dallas area.
✓	Purchased by Conifer Health for a vendor or non-governmental client, or received from a vendor or non-governmental client, as long as the cost paid per team member does not exceed \$300 per vendor or customer in total per year, and the vendor or client attends the event with the team member to discuss business	EXAMPLE: A vendor may take a leader and his/her spouse to a museum event with a ticket price of \$150 each or \$300 total.
✗	Vendor sponsorship for attendance at a conference	EXAMPLE: A software vendor wants to pay to have two Conifer Health team members attend an industry event in Las Vegas.
✗	Sporting event or show tickets that exceed \$50 in value	EXAMPLE: A vendor offers three \$150 Dallas Cowboys tickets to executive team members.
✗	Gifts for physicians at client sites	EXAMPLE: The Conifer Health Patient Access director at a client site wants to purchase a bottle of wine for the emergency department medical director because he helps to make her job easier.

BUSINESS MEALS

✓	Purchased by Conifer Health for team members	EXAMPLE: A department leader may take his team out for a celebratory meal after the completion of a big project.
✓	Purchased by Conifer Health for a vendor or non-governmental client or received from a vendor or non-governmental client	EXAMPLE: A computer hardware vendor may take the Information Services director to lunch to discuss the performance of the hardware, provided that the lunch is of reasonable value.

✓ **Occasionally Permitted** (The \$50/gift and \$100/year limits apply in all scenarios cited)

✗ **Never Permitted**



Giving or receiving gifts and entertainment as part of business practices is acceptable, but with limitations.

As a team member, you have the right to:

- Speak with the investigator
- Request that the interview take place at a time and place that is convenient to you
- Have legal counsel present
- Terminate the interview at any time
- Refuse to answer any questions

If you do speak with an investigator, Conifer Health expects you to be truthful and to avoid any speculation in your responses. It is important to remember that interviews with government investigators have a substantial legal effect and may impact your legal rights and those of Conifer Health and our clients. You should always be polite and obtain the following information:

- The business cards of all investigators
- The reason for the visit
- Ask whether there is a subpoena or a search warrant

When presented with a subpoena, search warrant or court order, it is expected that you immediately notify your supervisor and Ethics and Compliance organization. Team members are to respond openly and with accurate information and must never conceal, destroy or alter any documents.

Use and Retention of Records

Conifer Health produces large numbers of records and documents every day. Examples include medical records, financial records, emails, etc. All records should be honestly and accurately documented. Further, all team members must follow Conifer Health's policy on retention of records. We are

We are all responsible for the integrity and accuracy of documents and records.

all responsible for the integrity and accuracy of documents and records. Records must never be destroyed to deny government authorities those records which are relevant to a government investigation.

Conifer Health has policies and procedures regarding the storage and destruction of records. All records are kept for the legally-required timeframe and may vary depending on the nature of the record and the state in which the record was produced, among other factors. Once the timeframe is complete, it is important to destroy the records in a timely and appropriate manner. For more details regarding retention periods and the destruction of records, contact the Legal department.

Asking for Guidance and Voicing Concerns

Conifer Health is committed to conducting business ethically. If you feel these standards have not been met, please ask for guidance or voice your concerns by contacting any of the following resources:

- Your supervisor or department leaders
- Your Human Resources representative
- Ethics and Compliance

Please use one of the methods below to reach Ethics and Compliance.

Ask for guidance or voice concerns via email at:

 ethics@coniferhealth.com

The Ethics Action Line is a toll-free phone number to ask questions or raise concerns anonymously. The Ethics Action Line is available 24 hours a day, seven days a week.

 1-800-8-ETHICS

Your concerns will be taken seriously and all information provided to the Ethics Action Line or email will be treated confidentially. Every reasonable effort will be made to protect the security of any personal data collected.

NON-RETALIATION POLICY: Conifer Health does not tolerate retaliation against or the victimization of any team member who raises concerns or questions regarding a potential violation of the Standards of Conduct or any policy that he or she reasonably believes to have occurred.

Frequently Asked Questions (FAQs)

Patient Access – EMTALA

Q: What does EMTALA stand for?

A: Emergency Medical Treatment and Active Labor Act

Q: It's a Saturday night and the Emergency Department is extremely busy. A family presents and requires a service that I know the hospital does not provide. Can I recommend that they go to the hospital down the street that does offer that service?

A: No. EMTALA requires that any patient who presents to the emergency room be provided with a medical screening exam and stabilized within the hospital's capabilities before that patient is transferred to another facility better equipped to care for that patient. Note: "Presenting to the emergency room" is defined by law as presenting anywhere on the hospital campus within 250 yards of the hospital's main buildings.

Q: What should I do if I am aware of a potential EMTALA violation?

A: Timing is critical in addressing EMTALA issues. Contact Ethics and Compliance at ethics@coniferhealth.com or the Ethics Action Line at 1-800-8-ETHICS if you believe a potential EMTALA violation occurred. The appropriate person will work with you to notify the client so that a proper investigation can be conducted.

Q: Getting payment information from patients upfront would really help the patient access team be more efficient. Can I ask a patient to give me his insurance information and credit card before a physician, nurse practitioner, or physician assistant (physician extender) sees that patient?

A: No. EMTALA exists so that all Emergency Department patients are treated equally regardless of their ability to pay. Because of this, a patient must receive his or her medical screening exam by a physician or physician extender before you ask for payment information.

Q: Does Conifer Health have an EMTALA policy that I must follow?

A: While certain policies govern what you must do to ensure you are following the EMTALA regulation, ultimately, as a Conifer Health team member at a client site, you are obligated to follow the EMTALA policy of the client. Contact Ethics and Compliance if you need assistance accessing your client site's EMTALA policy.

Q: Does EMTALA apply only to emergency department patients?

A: EMTALA applies to patients presenting to the emergency department until they are either discharged or admitted. Patients with inpatient or observation status are not covered by EMTALA. In addition, EMTALA applies to pregnant women who are medically determined to be in active labor.