



S P R I N G S T O N E[®]

Code of Conduct

Springstone Code of Conduct

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Introduction

Springstone is committed to providing healthcare services meeting the highest standards of ethical conduct. We have developed this Code of Conduct to underscore our commitment to these values. The Code of Conduct is intended to guide the behavior of our directors, officers, employees, physicians, contractors and agents. It is not a complete guide to all of our policies or to all of your responsibilities under the law. It provides general guidelines to help you resolve the ethical and legal issues you encounter in conducting our business.

Our Code of Conduct is reinforced by our Compliance Plan. The Compliance Plan provides an administrative framework for identifying and addressing the areas most likely to present a compliance risk for Springstone and sets forth specific, substantive policies and procedures that are intended to educate and inform employees of the organization's specific legal obligations with respect to those high risk areas. In all cases, those compliance policies are consistent with and guided by our Code of Conduct.

It is our goal to communicate to you as clearly as possible our expectations of ethical and professional conduct and further to ensure that you understand *how* we expect you to do your job in a way that is consistent with those standards. Two way communication is essential to this process. We will commit to providing you with the job description and job training you need to understand your job. We will be responsive to your questions. In turn, we ask that you bring to your supervisor or other personnel any questions or concerns you have about your job or how you are asked to perform it. If you are not satisfied with the feedback you receive from this process, you are encouraged to communicate with us through our toll-free Compliance Hotline (1-888-470-3470)

Please take the time to carefully read through this Code of Conduct. If you have any questions about any of the information contained in the Code of Conduct, please ask. We believe that our joint commitment to these standards will enable us to constructively and effectively work together to provide the highest standard of healthcare for our patients.

Code of Conduct Summary

1. **We Comply with all Laws.** We will operate strictly in accordance with all applicable laws, regulations and standards.
2. **We Provide Quality Care.** We are committed to providing the highest quality of service by meeting the needs of our patients with the utmost care and courtesy.
3. **We Avoid Conflicts of Interest.** In performing our duties, we will avoid any actions that may cause an actual or potential conflict of interest.
4. **We Provide a Safe Health Care Environment.** We will operate in an environment where the health, safety, privacy and comfort of our patients and employees come first.
5. **We Support Human Resource Development.** We support a culture that develops the full potential of employees and builds an environment that allows employees to feel appreciated, included and valued.
6. **We Respect Privacy and Confidentiality.** We respect the privacy of our patients and will actively work to protect that privacy.
7. **We Bill and Code with Integrity.** We are committed to full compliance with all rules and regulations of payors including Medicare, Medicaid and commercial insurance programs.
8. **We Support this Code of Conduct and Compliance Plan.** We understand that all employees are expected to know and comply fully with this Code of Conduct and the Compliance Plan.

1. Compliance with Laws and Regulations

We will operate strictly in accordance with all applicable laws, regulations and standards.

- Our communications will be accurate, complete and truthful.
- We will ensure that all reports required by any federal, state or local government agency are filed timely, accurately and in conformance with applicable laws and regulations.
- We will not engage, either directly or indirectly, in any corrupt business practice including bribery, kick-backs, or payoffs, intended to induce, influence, or reward favorable decisions of any customer, contractor, vendor, governmental personnel or anyone in a position to benefit us in any way.
- We will ensure that all contracts are in compliance with applicable laws, regulations and accreditation standards.
- We will not pay employees, physicians or other healthcare professionals, directly or indirectly, to refer patients to us.
- We will not tolerate false or misleading statements, written or oral, by employees to a government agency or other payor.
- Agreements with actual or potential referral sources will be in writing and approved by management. All forms of compensation paid to referral sources will be for the services provided and at the rates called for in the contract. Every payment will be supported by proper documentation.
- We will ensure that all drugs or other controlled substances used in the treatment of patients are maintained, dispensed and transported in conformance with all applicable laws and regulations.
- We will not hire or contract with any individual who is currently excluded, suspended, debarred or otherwise ineligible to participate in the federal health care programs.
- We will not sacrifice our professional standards, judgment or objectivity to anyone. Any individual with a difference of opinion will be referred to the appropriate member of management for resolution of the issue.

2. Quality of Care

We will provide the highest quality of service by meeting the needs of our patients with the utmost care and courtesy. We will perform our duties in a responsible, reliable, appropriate and cost effective manner.

- We will respect our patients' dignity, comfort and convenience and will treat each patient with consideration, courtesy and respect.
- We will seek to ensure that patients and their families are well informed about treatment alternatives and the various risk factors associated with each treatment.
- We will only use personnel possessing the proper license, credentials, experience and expertise in meeting the needs of our patients.
- We will provide equal access to high quality care to our patients without discrimination as to their age, gender, disability, race, creed, national origin or ability to pay.
- We will support and promote a continuous quality and performance improvement program throughout the company.

3. Conflicts of Interest

We will perform our duties on behalf of the company and our patients in a loyal manner, avoiding any actions that may be reasonably construed to cause an actual or potential conflict of interest.

- We will act in the best interest of the company whenever dealing with suppliers or governmental agencies, either with respect to acts arising from formalized written contracts or everyday business relationships.
- We will not become involved for personal gain with a company competitor, patient or supplier.
- We will not solicit personal gratuities or gifts from patients or vendors. We may accept non-monetary gratuities or gifts of a nominal value, such as cookies, flowers or candy, consistent with company policy, if the gift would not influence or appear to others to be capable of influencing our best judgment in performing our job.

- We will safeguard, protect and use wisely those company assets and resources entrusted to us.
- We will not engage in outside employment or activity which conflicts with the company's interests or which reduces our effectiveness in performing our duties.
- We will not take for ourselves personally opportunities that are discovered through the use of company property, information or position.
- We will provide full disclosure and obtain clearance from a facility CEO before engaging in any transaction involving the facility where we or our family members receive any benefit, directly or indirectly.

4. Maintaining a Safe Health Care Environment

We will operate in an environment where the health, safety, privacy and comfort of our patients and employees come first.

- We will comply with all of the safety rules, regulations and procedures that we have created to protect the well-being of our patients, employees and business, including those safety laws promulgated by the EPA and OSHA.
- Patient safety is specifically considered and is given the highest priority throughout the organization when patient processes or services are designed or developed.
- We support an alcohol and drug-free workplace and therefore will not tolerate on the premises the possession, use, or distribution of alcohol or illegal drugs or other inappropriate substances.
- We will comply with all laws and regulations concerning the handling and disposal of hazardous waste as well as all other applicable environmental laws and regulations.
- We will provide medical services and products to patients that are appropriate and considered safe for intended use and in compliance with all applicable laws, regulations and professional standards.
- We will immediately report any practice or condition that might impact on the health and safety of the facility health environment.

5. Human Resource Development

We support a culture that develops the full potential of employees and builds an environment that allows employees to feel appreciated, included and valued.

- We will offer equal employment opportunities and will not discriminate in hiring, transfers or promotions because of age, gender, disability, race, creed or national origin.
- We will maintain a working environment free from all forms of harassment. Any and all forms of harassment, including those based on age, gender, disability, race, creed or national origin, by co-workers, supervisors, physicians, vendors, volunteers or patients will not be tolerated. Harassment may consist of offensive comments, jokes, innuendoes or other verbal, graphic or physical conduct relating to an individual's age, gender, disability, race, creed or national origin.
- We will conform to the standards of our professions and exercise judgment and objectivity in the performance of our duties. Any differences of opinion in professional judgment will be referred to appropriate management levels for resolution in accordance with standard grievance procedures.
- We will show courtesy and consideration to all company employees and personnel, without regard to position or status. We recognize the value of a diverse workforce and will remain open to new viewpoints, ideas and talents.
- We will not engage in retaliation or reprisal against anyone who properly reports violations of law, regulations or company policies
- We will devote our working time to responsibly performing our duties.
- We will work to eliminate perceived or real barriers to diversity in operational, governance, and leadership positions.

6. Privacy and Confidentiality

We respect the privacy of our patient and colleagues and will actively work to protect that privacy.

- We take reasonable steps to limit the use of, disclosure of and requests for health information to the minimum necessary to accomplish the intended purpose, unless otherwise permitted by law. Such confidential health information may include information related to course of treatment, medical history or current health status.

- We will maintain the confidentiality of patient records in accordance with privacy and security laws and regulations that protect patient information, including protected health information (PHI) under HIPAA and HITECH and applicable state laws.
- We will not discuss patient information in a public area, including elevators, hallways and dining area.
- We will not reveal medical, clinical or business information unless such release is supported by a legitimate clinical or business purpose, patient authorization or acknowledgement of receipt of privacy notice, or court or agency order and is in compliance with applicable laws, rules, regulations, as well as our policies and procedures.
- We will maintain computer passwords and access codes in a confidential and responsible manner.
- We will only disclose business information as required in the performance of our job or as expressly authorized to do so. Such confidential business information may include information regarding the company's competitive position or business strategies, payment and reimbursement information and information relating to negotiations with employees or other organization.
- We will treat individual salary, benefits, payroll, personnel files and information on disciplinary matters as confidential information.

7. Billing and Coding Integrity

We are committed to full compliance with all rules and regulations of government healthcare programs, including Medicare and Medicaid. We also fully comply with the rules and requirements of all commercial insurance programs.

- We will only bill for eligible services that are actually rendered, appropriately documented, and consistent with medical necessity guidelines.
- We will take every reasonable precaution to ensure that our billing and coding work is accurate, timely and in compliance with our policies and federal and state laws and regulations.
- We will not tolerate the submission of any claims which contain any kind of false, fraudulent or inaccurate statement.

- To ensure accurate coding and billing, we will train all staff, clinicians, coders and billers on proper coding, charge capture and billing.
- We expect employees involved in billing and coding to be knowledgeable about all aspects of current laws and regulations affecting their duties.
- We will promptly report any concerns regarding potentially erroneous billing or coding practices to our supervisor or to management through the company hotline.
- As part of our commitment to full compliance with billing standards, we specifically do not misrepresent the type or level of service rendered; bill for non-covered services, inappropriately unbundle services; bill for services rendered by other providers; or misrepresent a diagnosis in order to obtain higher payment.

8. Compliance with the Code of Conduct

We understand that all employees are expected to know and comply fully with this Code of Conduct and well as all other applicable laws, rules and regulations. Diligence on our part will help us ensure that we are operating in a way to meet our ethical standards.

- We will periodically review the Code of Conduct to ensure that our understanding is up to date.
- We will report any concerns about actual or suspected violations by employees of applicable laws, rules, regulations or the Code of Conduct.
- We will typically report such concerns to our immediate supervisor, consistent with company policies and procedures.
- If standard reporting standards do not seem appropriate or effective, or if anonymity is preferred, we will report our concerns through our Compliance Hotline. (1-888-470-3470).
- We understand that retaliation is not permitted against individuals who report a perceived or potential violation of the Code of Conduct, company policies and procedures, laws or regulations, or who participate in an investigation of an alleged violation.