



# The Integrity Guide

Fall 2022



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## Dear Specialty1 Partners & Colleagues,

Specialty1 Partners is a culture *“Inspired by Excellence and Rooted in Integrity.”* We are committed to the highest ethical standards at every level of our organization, and fully integrating the Integrity Guide into our business operations is a daily requirement. We must all be committed to conducting business ethically and in compliance with the applicable laws and regulations in the markets we operate.

Each of us play a critical role in helping Specialty1 Partners uphold this commitment. We have clear expectations of what is expected of all employees when it comes to acting with integrity and being accountable each and every day. Our Integrity Guide supports our mission to deliver exceptional service with the highest degree of ethical standards.

Your commitment to understanding and following The Guide is essential. If you have any questions or concerns about what is appropriate; or if you notice anything that appears to be in breach of The Guide de, please ask questions, and voice your concerns. Your concerns will be taken seriously and there will be no repercussions for asking questions or raising concerns in good faith.

We rely on you to uphold our values and abide by The Guide. Our values are the foundation of who we are as a company, how we must act in order to achieve our mission, and what we expect in being part of the Specialty1 Partners Family. This commitment goes well beyond our responsibility to conduct business in compliance with the letter and spirit of the law.

Thank you for your ongoing dedication to our patients, partners, and communities.

Sincerely,

Mark Haddad

Matthew Haddad

Daryl Dudum

Darron Rishwain

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## The Integrity Guide:

The SPECIALTY1 PARTNERS (“Specialty1” or the “Company”) <sup>(1)</sup> Integrity Guide (“The Guide”) provides the foundational principles by which the Company operates and outlines responsibilities expected of all who work in Specialty1. This Guide applies to all employees, independent contractors, suppliers, board members, consultants and other business partners of Specialty1.

Notwithstanding anything that could be perceived to the contrary in the Guide and consistent with the Company’s mission, The Specialty1 doctor partner offices shall retain their ownership and autonomy for their respective practices. This Guide shall be used in coordination with the Specialty1 Handbook which further applies to employees, contractors and consultants of the Company.

### Everyone’s Responsibility

Everyone plays an important role in supporting Specialty1’s Guide and is responsible to:

- Review and follow the principles in The Guide,
- Ask questions when you are not sure what to do
- Report concerns about people not following The Guide. Contact the Company’s Human Resources Department, Integrity and Compliance Department, General Counsel or please use the Company’s anonymous hotline 844-722-1800

While all employees and business partners have a responsibility to follow The Guide, those in supervisory and other leadership roles are held to a higher standard.

Specialty1 leaders should:

- Serve as a role model for supporting Specialty1’s Mission, Vision and Values.
- Promote a culture of honesty, transparency and respect
- Encourage others to ask questions and raise issues or concerns.

The Guide cannot address every possible issue that we encounter, but it is intended to provide guidance and serve as a resource when the right choice is not clear. The Guide should be referenced in addition to the Handbook which provides an additional resource.

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## Integrity Defined:

A common theme can be found in Specialty1's Mission, Vision and Core Values. Carrying out your work and conducting business with the utmost integrity is critical to the growth and success of Specialty1 and is how our Core Values are represented.

Webster's dictionary defines Integrity as "firm adherence to a code of especially moral or artistic values." Others describe Integrity as doing the right thing even when no one is looking. Acting with integrity is more than just following the rules; it is the root of our culture and embodiment of our Values. Integrity is:

- Treating your colleagues, supervisors, patients and visitors with dignity and respect.
- Being honest and transparent with everyone you interact with.
- Making decisions that are in the best interest of Specialty1, even if they conflict with your personal interests.
- Understanding the patient perspectives and providing the highest quality care available to everyone.
- Speaking up when you see a quality, safety or other issue and discuss mistakes so they can be prevented in the future.

How do you define Integrity?

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## Systems, Information and Reporting

### Employee and Patient Privacy:

Specialty1 collects and maintains sensitive information for a variety of business reasons. Patient information, also called Protected Health Information (PHI), is any information about a patient that is collected during the provision of healthcare. This information is strictly regulated by the Federal Health Insurance Portability and Accountability Act (HIPAA) and similar state laws. These laws require that we obtain the patient's authorization to use or disclose their health information unless it is for Treatment, Payment, Healthcare operations, or for a few other specific purposes. These same laws require healthcare providers to report instances where PHI is improperly used or disclosed to certain federal and state agencies. All of us should keep the following in mind:

- Only access or share patient information if you need the information to do your job.
- Never discuss or post anything that could be considered patient information in public areas or on any social media platform, whether you are at work or at home.
- Requests to release protected health information (requests for records from an attorney for example), must be accompanied by an authorization to release information signed by the patient.
- All patients must receive a HIPAA notice of privacy practices during their first visit and notice of privacy practices should be posted in your office.

Similar laws cover personal information collected by Specialty1 and relating to your employment, including medical and benefit information. Access to personal employment information is restricted solely to people with a need to know. If you believe employment or patient information is or was improperly used or disclosed, please contact the Integrity and Compliance department or the anonymous hotline 833-993-6361

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## Data Security:

Protecting the privacy of the information we collect includes ensuring the computer systems containing this information have the proper security settings to restrict unauthorized access. Properly installed firewalls, antivirus software and multifactor authentication are just a few systems in place at Specialty1 to ensure data is secure.

Tech savvy crooks are constantly creating new ways to defeat our security systems and access the sensitive information we maintain, so the tools meant to stop them are always just one step behind. For this reason, it is critical that all of us are on the lookout for questionable activity in the systems we use. If you experience the following, you need to report the situation to 844-722-1800 immediately.

- You have reason to believe your login credentials have been compromised
- You receive emails that contain strange looking hyperlinks. Do not click the hyperlink.
- You receive emails from unusual looking email addresses that contain attachments. Do not open the attachments.
- Your system(s) become inaccessible due to suspected malware, viruses or ransomware.
- The loss or theft of a computer or digital media such as a flash drive
- If your personal device may contain protected health information and is stolen or lost.

## Accurate Reporting of Information:

Information you create and report during the course of your work with Specialty1 should be accurate and timely. Any errors or mistakes should be brought to your supervisor's attention and promptly corrected.

Claims submitted to insurance companies for reimbursement should contain accurate information about the services rendered and be supported by detailed clinical documentation in patient records.

Making journal entries, reporting travel expenses, posting payments made by patients, recording or reporting work performed to your supervisor and keeping accurate time records is critical to the success and accuracy of financial reporting by Specialty1.

Inaccurate reporting of information and claims containing errors or omissions should be promptly corrected. If you suspect inaccurate recording or reporting of information or if you believe inaccurate claims are being submitted to insurance companies, you are encouraged to contact your supervisor or the Integrity and Compliance department. You can also use the anonymous hotline 844-722-1800 to report concerns.

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### Use of Specialty1 Property and Systems:

Specialty1 equipment, systems, facilities, and supplies must be used only for conducting company business or for purposes authorized by management.

Personal items, messages, or information that you consider private should not be placed or kept in telephone systems, computer systems or other office workspaces of Specialty1. Any software must be approved by the Information Services department prior to downloading.

Specialty1 has access permission to all company owned systems and property and is responsible to ensure only company owned information and approved software is retained in these systems. Specialty1. Specialty1 is not responsible for personal information stored company owned systems

You should not share your systems login information with anyone else, including coworkers and supervisors. You are responsible for all activity performed under your login. If you believe your login credentials have been compromised, contact your supervisor immediately.

### Use of Proprietary Information:

Similar to company owned equipment, you have access to company owned information, including proprietary business models, marketing data, contractual arrangements, forms, documents, software, network databases and other information created and/or stored by Specialty1. This information is the property of Specialty1 and should not be shared with anyone outside of the organization without prior authorization or used for personal gain.

Be aware of your surroundings when discussing proprietary company information in public spaces.

Company owned information, documents and other systems you create in the course of your employment are the property of Specialty1.

You are encouraged to report instances where you suspect company owned property or information is being improperly used or has been inadvertently disclosed to unauthorized people.

### Sharing Information with Competitors:

There are several federal laws that restrict communication with competitors. The general rule of thumb is to not share competitively sensitive topics such as business or marketing

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plans, pricing, negotiated contracted terms, conditions or rates, customer lists or other information that is not publicly available. You should politely decline requests for private information about Specialty1 and contact the General Counsel's office for guidance.

### **Use of Social Media:**

Exercise good judgement and personal responsibility when using social media such as Facebook, Twitter or LinkedIn. Please keep in mind the following:

Never post confidential or proprietary information about Specialty1, including photographs or other information about patients, colleagues, suppliers or other business partners or projects you are working on without prior approval.

Be respectful and professional when using a personal social media site that may either directly or indirectly identify you as a member of Specialty1.

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## Work Environment

### Workplace Safety:

Specialty1 is committed to providing safe work areas for all employees and complying with all government rules and regulations. Whether you are in a clinical or non-clinical work environment, you should become familiar with the workplace hazards in your area.

You should participate in all safety training that is required for your job and take the time to understand how the training applies to your specific job responsibilities.

In the event an employee is injured while at work, the employee's supervisor should be contacted immediately. The injury event must be reported using the Workplace Injury Report form and submitted to the Specialty1 Human Resources and the Integrity and Compliance Department. In addition to promptly reporting workplace injuries, it is important to be on the lookout for unsafe conditions in your work area and report those to your supervisor. Unsafe conditions should be addressed promptly.

Your work environment must also be free from discrimination and harassment of any kind, including harassment based on race, color, religion, sex, sexual orientation, age, national origin, disability or veteran status.

Sexual advances, actions or comments, religious slurs, threats of violence, possession of weapons of any kind, possession of illegal drugs or other controlled substances, or any other conduct in the workplace that creates an intimidating, or otherwise offensive or unsafe environment are contrary to Specialty1's values, may violate local, state or federal laws and as such should be immediately reported.

If you believe that you are subject to such conduct, you should bring such activity to Specialty1's attention.

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### Controlled Substances:

You may have access to prescription drugs, controlled substances and other medical supplies which are governed or monitored by specific regulatory agencies and must be administered or prescribed by authorized healthcare professionals only. If you have concerns about how these drugs and supplies are being stored or administered, we encourage you to speak to your supervisor or contact one of the reporting resources on page 14.

For the safety and protection of our staff, patients visitors and others, Specialty1 is committed to an alcohol and drug-free work environment. Specialty1 employees and business partners must report to work free of the influence of alcohol and illegal drugs and may be subject to drug testing in accordance with applicable Specialty1 policies in the event there is suspicion of violation of this requirement. There may be instances where over the counter or prescription drugs you are taking could impair your judgement or other skills. We encourage you to talk to your supervisor about these concerns.

### Interactions with Patients and Visitors with Disabilities:

The Americans with Disabilities Act prohibits discrimination on the basis of disability by businesses that are generally open to the public. It is a violation of this law to deny or delay care or treatment to an individual due to their disability, including HIV status. This law includes the requirement to make facilities and services accessible to individuals with disabilities in the most integrated setting possible (for example, ensuring the office is wheelchair accessible; providing sign language interpreters or TTY services to hearing impaired patients) and prohibits denying access to facilities by individuals with service animals.

If a patient arrives with an animal, you may confirm that the animal is a service animal but cannot ask additional questions about the person's disability or about the tasks the service animal performs. Service animals are not pets; they are trained to perform specific tasks and must always be harnessed, leashed or otherwise under the control of the owner. You should contact the General Counsel's office or Integrity and Compliance department for additional guidance in these situations.

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### Gifts and Entertainment:

Vendors and others either doing business or seeking to do business with the Specialty1 Partners may provide gifts, promotional items, and/or entertainment and consider it to be part of its marketing activities. Similarly, there may be times when you want to provide reasonable business gifts, promotional items or entertainment as part of your marketing activities. Participation in these activities can be easily abused and carry the perception of improper influence; and these practices in the healthcare industry can carry substantial legal risks.

Neither you nor any member of your family may solicit, receive, offer, or pay any money or gift that is, or could be reasonably seen as a payment for referrals, influencing your business decision making, or intended to influence a patient's selection of healthcare provider. All business transactions with vendors, contractors, and other third parties must avoid even the appearance of undue influence.

In addition, the solicitation, offer or receiving of anything of value (remuneration) in exchange for patient referrals is strictly prohibited. You are encouraged to immediately report suspected violations of this policy to the Integrity and Compliance Department. Specialty1 does not pay for referrals or accept payment for referrals.

### Conflicts of Interest:

A conflict of interest may arise if you or your family members personally benefit from actions or decisions you make in the course of your employment with Specialty1.

For example, if you are in charge of recruiting for Specialty1 and your sibling owns a recruiting firm, you recommend to your supervisor that Specialty1 should use your sibling's company.

While your recommendation may further the interests of Specialty1, your family stands to personally gain from the situation, so there is a conflict of interest. In this case you should report the possible conflict of interest to your supervisor and excuse yourself from any decision making related to engaging outside recruiting firms.

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## Outside Employment and Business Interests:

While you are free to pursue personal business interests outside of your employment with Specialty1, it is important to keep those business interests completely separate from your responsibilities with Specialty1. You need to be careful to not use Specialty1 resources (time, equipment, materials, computer systems or proprietary information) while performing outside business activities. Specialty1 resources must only be used for Specialty1 business purposes.

If you have outside employment or business interests, you should disclose those interests to your supervisor.

## Fraud and Abuse Laws:

There are many federal and state laws designed to protect government healthcare programs, such as Medicare and Medicaid, as well as commercial insurance and other third parties that pay for the healthcare services we deliver. These Fraud and Abuse Laws generally prohibit the following:

- Submitting inaccurate or misleading claims for services rendered
- Submitting claims for services not provided
- Submitting claims for medically unnecessary services or services not covered by the payer
- Making false statements or representations to obtain payment for services or to acquire participation in a healthcare program
- Concealing or improperly avoiding an obligation to repay a healthcare program
- Offering to pay or receiving money, goods or anything else of value to encourage or reward the referral of patients to a healthcare provider.

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## The False Claims Act:

The False Claims Act (FCA) is a federal law that makes it a crime for any person or organization to knowingly make a false record or file a false claim to a federal health care program. “Knowingly” includes having actual knowledge that a claim or record is false or acting with “reckless disregard” as to whether a claim is false. In addition to the federal law, most states have adopted similar state false claims laws.

The FCA and similar state laws allow individuals with original information concerning fraudulent activities involving government programs to file a lawsuit on behalf of the government and, if successful, to receive a portion of the recoveries received by the government

Penalties for violating the False Claims Act are significant. Financial penalties can be as much as three times the total amount of claims plus fines from \$11,000-\$22,000 per claim. Courts can also impose criminal penalties against individuals and organizations for willful violations of the False Claims Act. The False Claims Act and similar state laws protect employees, contractors and agents from being fired, demoted, threatened or harassed by an employer for filing a False Claims Act lawsuit.

To the extent Specialty1 participates in government programs or contracts, Specialty1 prohibits employees, agents or contractors from knowingly presenting or causing to be presented claims for payment which are false, fictitious or fraudulent.

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## Reporting Resources:

**Your supervisor:** You should always consider speaking to your supervisor to get answers to your questions or to report concerns. Your supervisor is most familiar with your day-to-day work and likely already has the information you need or can quickly direct you to the right resource.

**Human Resources:** Your Human Resources contact can likely answer many of your questions and assist you with addressing workplace issues or concerns

**Integrity and Compliance Department:** Specialty1's Integrity and Compliance Department is responsible for the organization's compliance program, which includes management of the following mechanisms for getting answers to your questions or for reporting concerns. The Integrity and Compliance Department has a duty to investigate all concerns reported in good faith and where reports are made anonymously, make every effort to protect the anonymity of the reporter.

You can contact Specialty1's compliance officer directly at:

[tmanderschied@speicalty1partners.com](mailto:tmanderschied@speicalty1partners.com).

You can email the Integrity and Compliance Department's general email at:

[compliance@specialty1partners.com](mailto:compliance@specialty1partners.com)

You can call the Anonymous Hotline: 844-722-1800. If you choose this route and leave a message, please make sure to include a return phone number or other way for us to return your call.

Specialty1 promotes an environment that encourages everyone to seek answers to questions they have and to report concerns. Everyone covered by this Code; employees, independent contractors, suppliers, board members, consultants and other business partners of Specialty1, has a duty to report any activity they believe may violate applicable laws, regulations, professional standards of practice or principles described here.

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## Non-Retaliation Policy:

Specialty1 has a policy of zero tolerance for any form of perceived or actual retaliation against individuals who report issues or concerns made in good faith. This zero-tolerance policy include direct retaliation, indirect or perceived retaliation or threats of action of any kind, from anyone.

Retaliation is subject to discipline up to and including dismissal from employment, suspension of privileges or termination of business relationships with Specialty1.

## Acknowledgement Process:

Specialty1 employees, independent contractors, suppliers, board members, consultants and other business partners are required to acknowledge their receipt and review of The Guide and confirm they understand the principles, policies and obligations described in it.

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## Code of Conduct Acknowledgment and Certification

I acknowledge that I received a copy of Specialty1's Code of Conduct and I agree to read it completely. I also agree to discuss any questions or concerns I have with my supervisor, higher level manager or with other reporting resources described in The Guide.

I certify that I will comply with The Guide and other policies established by Specialty1. I understand it is my responsibility and obligation to report any concerns regarding violations of The Guide or policies and to seek answers to questions I have. I also understand that Specialty1 will not retaliate against me for making good faith reports of concerns or policy violations.

I understand The Guide contains standards of behavior I am expected to follow as a condition of my employment, and this is not an employment contract. I acknowledge that these standards may be amended or clarified from time to time and that I will receive periodic updates as they occur.

Printed Name: \_\_\_\_\_

Organization: \_\_\_\_\_

Department: \_\_\_\_\_

Signature: \_\_\_\_\_

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