

Beaumont ACO

A Physician/Health System Partnership

Dear Beaumont ACO Members and Employees:

RE: Code of Conduct

As we continue to move forward in implementing our organization and fulfill our mission and vision, it is important that we all understand and adhere to a Code of Conduct which is a critical component of our Compliance Plan.

The Beaumont ACO Code of Conduct provides guidelines to ensure all who work on behalf of our patients—including employees, physicians, volunteers and vendors—know what is expected to provide an honest, safe and fair workplace. The Code helps us protect the privacy of our patients and coworkers. It also enables us to do our jobs with integrity, and it provides resources when questions arise.

You are required to review our Code of Conduct thoroughly and be well-versed in its specific requirements and its overall spirit. If you ever have a question, or if you see a situation that just doesn't look right, please bring it to the attention of one the ACO Directors. You are also encouraged to reach out to the Beaumont ACO confidential compliance hotline which is always available at 800.805.2283.

Thank you for your commitment to your patients, to each other, and the Beaumont ACO.

Sincerely,

A handwritten signature in black ink, appearing to read 'Walter Lorang', with a stylized flourish at the end.

Walter Lorang

Oakwood Accountable Care Organization, LLC. d/b/a Beaumont ACO
Executive Director & Chief Operating Officer

Beaumont ACO Mission and Vision

Mission (Why we exist)

To provide services, tools and knowledge management to position Beaumont ACO members to maximize clinical value, payer contracts and incentive opportunities.

Vision (Where we want to be)

To be the preferred means of alignment between the physicians, Beaumont Health and other community partners to become the leader in clinical integration, care management and payer/purchaser contracting in Michigan.

PURPOSE OF OUR CODE OF CONDUCT

Our Code of Conduct provides guidance to all Beaumont ACO employees and physician members and assists us in carrying out our daily activities with appropriate ethical and legal standards. The requirements apply to our relationships with patients, physicians, third-party payers, subcontractors, independent contractors, vendors, consultants, volunteers, and each other.

The Code is a critical component of our overall Ethics and Compliance Program. We have developed the Code to ensure we meet our ethical standards and comply with applicable laws and regulations.

This Code is intended to be comprehensive and easily understood. In some instances, the Code deals fully with the subject covered. In many cases, however, the subject requires additional guidance for those directly involved with the particular area to have sufficient direction. In concert with this Code, we have developed a comprehensive set of compliance policies and procedures which may be accessed within the Corporate Administrative Policy and Procedure manual on our Intranet. Those policies expand upon or supplement many of the principles found within this Code.

This overarching Code does not replace professional codes; code of ethics; or other statements of similar context. Its intended use is to compliment these existing codes.

The standards set forth in this Code apply to all Beaumont ACO offices, divisions, physicians, volunteers, employees and contracted staff. The standards are mandatory and must be followed.

CODE OF ETHICS FOR LEADERSHIP

The Executive Director and all leadership are bound by all provisions of this Code of Conduct, particularly those relating to ethical conduct, conflicts of interest, compliance with law, and internal reporting of violations of the Code. The obligations of this leadership group include, but are not limited to, any information concerning significant deficiencies in the design or operation of internal controls which could adversely affect in a material way the company's internal or external financial reports or controls, and any action or inaction on the part of members of the leadership group that may result in the violation of any provision of the Code; or any fraud, whether or not material, that involves management or other employees who have a significant role in the Company's financial reporting, disclosures or internal controls.

The Board of Managers shall determine appropriate actions to be taken in the event of violations of the Code by the executive and leadership group. Such actions shall be reasonably designed to deter wrongdoing and to promote accountability for adherence to the Code. In determining what action is appropriate in a particular case, the Board of Managers shall take into account all relevant information, including:

- the nature and severity of the violation,
- whether the violation appears to have been intentional or inadvertent,
- whether the individual in question had been advised prior to the violation as to the proper course of action, and
- whether or not the individual in question had committed other violations in the past.

Any amendments to the Code of Ethics for leadership must be approved by the Board of Managers.

LEADERSHIP AND EMPLOYEE RESPONSIBILITIES

While all Beaumont ACO employees and physician members are obligated to follow our Code, we expect our leaders to set the example, to be in every respect a model of ethical behavior. We expect everyone in the organization with supervisory responsibility to exercise that responsibility in a manner that is consistent with our values. We expect each supervisor to create an environment where all team members are encouraged to raise concerns and propose ideas. We also ask that non-management employees consider themselves to be informal leaders when it comes to demonstrating ethical behavior.

We also expect that leaders will ensure those on their team have sufficient information to comply with laws, regulations, and policies, as well as resources to resolve ethical dilemmas. They must help to create a culture within the Beaumont ACO which promotes the highest standards of ethics and compliance. This culture must encourage everyone in the organization to share concerns when they arise. We must never sacrifice ethical and compliant behavior in the pursuit of business objectives.

Specific policies and procedures regarding everyone's responsibilities under our compliance program can be found in the Beaumont ACO policy and procedure. Leaders at all levels should use these policies as guidance to most effectively incorporate ethics and compliance into all aspects of our organization.

In addition, all leaders should be mindful that Beaumont ACO supports and utilizes various training mechanisms to ensure excellent managerial skills. The foundational principles in such tools reflect the basic concepts of our Ethics and Compliance Program. We expect that those in our organization will lead by example, will confront problems directly and candidly, will be inclusive in making decisions as to who should participate in the decision-making process, will try to give the maximum responsibility to those who work with them, and will emphasize effective team-building.

PATIENTS

Quality of Care and Patient Safety

The Beaumont ACO's mission is exemplified within the Quality and Utilization Committee charge.

The committee integrates the Beaumont ACO's commitment to deliver safe, high quality care for all patients. We deliver that care utilizing our industry's evidence-based best practices, utilizing innovative technologies to promote and support optimal outcomes to each individual served. The foundational elements of the Beaumont ACO's quality philosophy are resource management techniques that standardize reliable processes of care, enhance communication and focus efforts to support the care.

Our quality measures and benchmarks for care processes and patient care outcomes are based on national standard setting organizations including the National Quality Forum, the Agency for Healthcare Research and Quality, the Centers for Medicare and Medicaid Services (CMS), the Joint Commission and Thomson Reuters' 100 Top benchmarks for care and outcomes.

The Beaumont ACO strives to meet these measures by delivering safe, quality care and it is the duty and expectation of all Beaumont ACO employees and partners. This commitment to quality and patient safety is an obligation of everyone at the Beaumont ACO.

In accordance with the Beaumont ACO's quality philosophy, we ascribe to a "stop the line mentality." Thus, in any circumstance where a member of the Beaumont ACO care team has a question or feels that the care and safety of the patient does not meet the Beaumont ACO's commitment to quality, that team member is obligated to raise his or her concern utilizing chain of command to resolve any potential safety and or quality concerns.

The Beaumont ACO has both formal and informal mechanisms to assure that Patients Come First when it comes to safety. Formal channels include the Beaumont ACO's internal incident reporting database, direct access to facility and corporate patient safety officers, risk managers and compliance officers and the compliance hot line. Beaumont ACO employees and physician members are also provided with external resources and guidance through The Joint Commission, state survey agencies and the Michigan Quality Improvement Organization channels for reporting.

Patient Rights

The Beaumont ACO's policy on patient rights provides that the rights of patients may be exercised by patients; by guardians, patient advocates and/or other surrogate decision makers of patients who are unable to exercise their own rights; and by family members and others when the patient directs or consents.

In the event that exercise of any rights is medically contraindicated, it will be documented by the attending physician in the medical records.

Listed below are guidelines for a patient's general rights and responsibilities. Some exceptions or modifications may be required, depending upon the patient's circumstances or condition.

These guidelines are not intended to expand or diminish rights or responsibilities otherwise provided by law, such as:

- Non-discrimination
- Respect
- Information and Participation in Care
- Interpretive Services
- Information about Facility Rules Affecting Care
- Informed Consent
- Treatment Choices and Refusal of Treatment
- Experimental Procedures
- Privacy and Dignity
- Confidentiality
- Access to Records
- Consultation on Social Service Needs
- Spiritual and Pastoral Care Consultation
- Patient Advocates and Advance Directives
- Pain and Symptom Management
- Ethics Committee Consultation
- Access to Protective Services
- Safety and Security
- Billing Information
- Insurance Information
- Complaint Resolution
- Right to Exercise Civil and Religious Liberties
- Right to Associate with Others
- Freedom from Abuse and Restraints
- Freedom from Performing Services

Patient Information

Accurate and specific patient information is key to providing safe, quality care. We are committed to maintaining the confidentiality and security of personal information obtained throughout the course of the patient's treatment. All patient information is confidential and only obtained, used or disclosed as necessary to perform job duties including reporting as required. We do not tolerate breaches in confidential information and proactively safeguard patient information in keeping with The Health Insurance Portability and Accountability Act (HIPAA) requirements. Beaumont ACO employees must never use or disclose confidential patient information that violates the privacy rights of our patients.

PHYSICIANS

The Beaumont ACO reflects a positive collaboration between physicians and the Beaumont ACO. As in any collaboration, each party has important roles and responsibilities.

The Beaumont ACO is committed to providing an excellent environment for physicians and other privileged practitioners who practice in our Beaumont ACO model. Beaumont ACO managers and members shall interact in a respectful and supportive way for the benefit of Beaumont ACO patients. We expect our members to be familiar with this Code of Conduct. There are many portions of this Code of Conduct that pertains to ethical or legal obligations of physicians and this document is likely to be a helpful summary of those obligations for our physician members.

Interactions with Physicians

Federal and state laws and regulations govern relationships with referring physicians. The applicable federal laws include the Anti-Kickback Law and the Stark Law. It is important that employees who interact with physicians regarding making payments to physicians for services rendered, providing space or services to physicians, recruiting physicians to the Beaumont ACO, and arranging for physicians to serve in leadership positions, are aware of the requirements of the laws, regulations, and policies that address these relationships.

Relationships with physicians that are properly structured but not diligently administered may result in violation of the law. Any arrangement with a physician must be structured to ensure compliance with legal requirements, our policies and procedures, and any operational guidance that has been issued. Most arrangements must be in writing and approved by our legal services. Failure to meet all requirements of these laws and regulations can result in serious consequences for all involved.

Keeping in mind that it is essential to be familiar with the laws, regulations, and policies that govern our interactions with physicians, two overarching principles govern our interactions with physicians:

1. **We do not pay for referrals.** We accept patient referrals and admissions based solely on our patient's medical needs and our ability to render needed services. We do not pay or offer to pay anyone – employees, physicians, or other persons or entities – for referral of patients.
2. **We do not accept payments for referrals we make.** No Beaumont ACO employee or physician member or any other person acting on behalf of the Beaumont ACO is permitted to solicit or receive anything of value, directly or indirectly, in exchange for the referral of patients. Similarly, when deciding where to refer a patient for care outside the Beaumont ACO, we do not take into account the volume or value of referrals that the provider has made or may make to us.

LEGAL AND REGULATORY COMPLIANCE

The Beaumont ACO services are provided in compliance with applicable federal, state, and local laws and regulations, and other conditions of participation in federal health care programs. Such laws, regulations, and conditions of participation may include, but are not limited to, subjects such as licenses, permits, access to treatment, consent to treatment, medical record-keeping, access to medical records and confidentiality, patients' rights, clinical research, end-of-life care decision-making, and Medicare and Medicaid program requirements. The organization is subject to numerous other laws in addition to these health care laws, regulations, and conditions. We have developed policies and procedures to address many legal and regulatory requirements.

However, it is impractical to develop policies and procedures that encompass the full body of applicable law, standards, conditions and regulation. Obviously, those laws, standards, conditions and regulations not covered in organization policies and procedures must be followed. There is a range of expertise within the organization, including legal counsel and functional experts, who should be consulted for advice concerning human resources, legal, accreditation, and regulatory requirements.

Anyone aware of violations or suspected violations of laws, regulations, and other requirements or Beaumont ACO policies and procedures must report them immediately to a member of management, a legal services associate, our business practices & compliance or risk management representative, or the Beaumont ACO's contract compliance officer. There are two confidential ways to report concerns: the independent external Compliance Hotline at 800.805.2283 and online at www.trustline.alertline.com

REGULATORY DATA, VISITS AND SURVEYS

In preparation for, during and after regulatory visits and surveys, Beaumont ACO employees and physician members must deal with all external agency survey bodies in a direct, open and honest manner. No action should ever be taken in relationships with external agency survey bodies that would mislead the external agency survey teams, either directly or indirectly. The scope of matters related to external agency survey is extremely significant and broader than the scope of this Code of Conduct. If the Beaumont ACO is required by federal and state laws and regulations to submit certain reports, we comply with federal and state laws, regulations, and guidelines associated with the data submission.

External agency survey entities may address issues broadly or take a more focused, specific interest and approach. Government agencies and other entities conduct surveys in our associated facilities. We respond with openness and accurate information. In preparation for or during a survey or inspection, Beaumont ACO employees and physician members must never conceal, destroy or alter any documents, lie, or make misleading statements to the agency representative. Beaumont ACO employees and physician members also must never attempt to cause another employee or physician member to fail to provide accurate information or obstruct, mislead or delay the communication of information or records relating to a possible violation of law.

BUSINESS AND FINANCIAL INFORMATION

Accuracy, Retention and Disposal of Documents and Records

Each Beaumont ACO employee and physician member is responsible for the integrity and accuracy of our organization's documents and records, not only to comply with regulatory and legal requirements, but also to ensure that records are available to support our business practices and actions. No one may alter or falsify information on any record or document. Records must never be destroyed in an effort to deny governmental authorities that which may be relevant to a governmental investigation or regulatory compliance.

Medical and business documents and records are retained in accordance with the law and our record retention policy, which includes comprehensive retention schedules. Medical and business documents include paper documents such as letters and memos, computer-based information such as e-mail or computer files on disc or tape, and any other medium that contains information about the organization or its business activities. It is important to retain and destroy records only according to our policy.

Beaumont ACO employees and physician members must not tamper with records. No one may remove or destroy records prior to the specified date without first obtaining permission as outlined in the company's record retention policy. Finally, under no circumstances may an Beaumont ACO employee or physician member use patient, employee, physician or any other individual's or entity's information to personally benefit (e.g., perpetrate identity theft).

Coding and Billing for Services

Beaumont ACO members, including physician members, maintain policies, procedures and systems to ensure accurate claims filing to government payers, commercial payers and patients. Policies and procedures are to be aligned with pertinent federal and state laws and regulations. In support of accurate billing, medical record documentation must provide reliable evidence of the services and treatment provided, medical necessity, and outcomes of care, including unanticipated outcomes. Policies, procedures and systems should facilitate the provision of accurate information and protect against inappropriate destruction of any information considered part of the legal medical record. Coding professionals are to adhere to the American Health Information Management's Code of Ethics prohibiting coding of diagnoses or procedures not present in the medical record documentation.

Physician members of the Beaumont ACO are expected to have the necessary skill, quality control processes, systems and appropriate procedures to ensure all activities performed comply with federal and state laws.

Beaumont ACO member and physician member billing practices are expected to align with national Patient Friendly Billing Standards of Excellence. The Standards assist the patient's understanding their financial liability prior to scheduled services and the provision of financial

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counseling services while hospitalized. We provide complaint resolution information to our patients and expect our billing professionals to resolve any billing concerns in a timely and respectful manner.

Confidential Information

Confidential information broadly covers any information related to the Beaumont ACO's operations that is not publicly known, such as: personnel data; clinical information; patient financial information including credit card and social security numbers; passwords; information relating to divestitures; affiliations, acquisitions and mergers; financial data; strategic plans; marketing strategies and techniques; supplier and subcontractor information; and proprietary computer software.

Protected health information collected to provide care for a patient is confidential. We enforce policies and procedures that protect confidential information from unauthorized use and disclosure. In emergency situations we will disclose confidential patient information without written consent from the patient or legal guardian.

We adhere to a "need-to-know" policy with all workforce members. This means Beaumont ACO members and employees may only utilize confidential information to perform their responsibilities and may not share confidential information unless it is required to perform their specific duties.

In order to maintain the confidentiality and integrity of protected health information and confidential information, we enforce security policies and standards when information is transmitted electronically outside of the corporation; stored on portable devices, such as laptop computers and portable digital assistance devices (PDAs); or transferred to CD or USB drive. A significant portion of our clinical and business information is generated and held within computer systems. It is therefore expected that each employee protect our electronically held information by not sharing passwords and adhering to our password and security protection policies.

Electronic Media and Security Requirements

Beaumont ACO's electronic communication systems are intended for business purposes and are designed to maintain the confidentiality, integrity, and availability of its information resources. Beaumont Healthcare, Inc. will monitor and/or control any access considered to be harmful to or inconsistent with Beaumont ACO business and will conduct routine audits of user access. Those authorized to access Beaumont ACO's electronic communication resources may not use their authorization to access confidential business or patient information for any other purpose.

Communication resources include but are not limited to: email, the Internet, voice mail, the telephone, computer-generated reports, remote access, and paging systems. This policy applies to all electronic resources that are owned or leased by Beaumont ACO or connect to Beaumont ACO resources. Devices may include those that are used to disseminate information such as laptops, tablets, telephones, smart phones or personal handheld devices, mass storage devices or other removable media, or other mobile computing devices. Messaging may include page message, voice mail message, or electronic mail.

There is an expectation that those individuals in a role requiring response to electronic communication will respond in a timely manner based on priority and emergent nature. Electronic messaging will be responded to within 24 business hours with an acknowledgement, status or action. Voicemail messages will be responded to within the same or next business day. Out of office tools will be used to indicate availability on electronic mail and voice mail. These measures acknowledge our role as patient care advocates and a sense of urgency to those needing a response.

Beaumont ACO provides these guidelines in support of openness, trust and integrity and to establish appropriate use of our communication resources. Our information technology service is committed to protecting Beaumont ACO's workforce, members and the company from illegal or damaging actions by individuals, either knowingly or unknowingly. Social networking sites, although an important emerging business tool, should be used with professionalism in support of the Beaumont ACO's mission and vision. Workforce and members are responsible for exercising good judgment regarding the reasonableness of personal informational technology use.

Beaumont ACO will encrypt all sensitive data in support of protecting electronic data in transit. Information Technology will abide by all current and future information protection guidelines as dictated by regulatory agencies including but not limited to the U.S. Office of Civil Rights in enforcement of HIPAA, and HITECH.

All Beaumont ACO members are expected to keep passwords secure and not share accounts. Authorized users are responsible for the security of their passwords and accounts. Strong passwords should be changed often and not use the last five selections. Account lockout will occur consistent with the Beaumont Health protocol.

Because information contained on portable computers is especially vulnerable, special care should be exercised to secure devices at all times, and report a loss or theft involving Beaumont ACO patient information immediately to the Beaumont Information Technology Help Desk (the Beaumont ACO information system service provider).

For those members connecting to the Beaumont ACO information system, the use of electronic messaging as a key communication tool recognizes that there are certain guidelines for acceptable use. Controlling unsolicited email requires users to 'just delete it' when they receive e-mail attachments from unknown senders.

The list below is by no means exhaustive, but it attempts to provide a framework for activities which fall into the category of unacceptable use:

- Compromising the privacy of users and their personal data
- Damaging the integrity of a computer system or the data or programs stored on a computer system
- Disrupting the intended use of a system or network resources
- Using or copying proprietary software when not authorized to do so
- Using a computer system as a conduit for unauthorized access attempts on other computer systems
- Use of Beaumont ACO electronic communication resources as a platform for non-Beaumont ACO activity
- Unauthorized use that results in the uploading, downloading, modification, or removal of files where such action is not authorized.

A formal exception may be made to the Beaumont ACO to request a variance to any items stated in this policy including access to sites that may be restricted based on content.

Communication with the Media

It is the policy of the Beaumont ACO to refer all media contacts for information to its Executive Director or designee. The Beaumont ACO adheres to all applicable privacy rules, and when working with the media, it is imperative to control and coordinate the release of all Beaumont ACO information centrally. Unauthorized divulging of Beaumont ACO information to the media or third party without the approval of the Beaumont ACO Executive Director is prohibited and may result in corrective action, up to and including termination of members or employees relationship to the Beaumont ACO. "Media" includes persons associated with broadcast and cable television, radio, magazines, newspapers and the Internet. Nobody may speak with the media for the Beaumont ACO without prior approval from the Executive Director.

If the media or other third party contacts a Beaumont ACO member or employee for information, the request must be referred to the Executive Director at 947.522.0023. All requests for information will be reviewed for compliance with all state and federal laws, regulations, reasonableness and confidentiality concerns.

Financial Reporting and Controls

The Beaumont ACO's financial statements are presented in conformity with accounting principles generally accepted in the United States. These financial statements are the responsibility of the company's management. Therefore, we have established and maintain processes that provide for accurate and complete reporting of financial information. The Beaumont ACO maintains a system of internal controls to provide reasonable assurances that all transactions are executed in accordance with management's authorization and are appropriately reflected in the financial statements. Controls are in place to protect the organization's assets from misappropriation.

The Beaumont ACO's financial statements provide a basis for managing our business and are regularly shared with internal and external stakeholders of the organization. In response to compliance requirements and agreements with various third parties, the company's financial statements are audited by an independent audit firm on an annual basis. Regardless of the annual audit process, the Beaumont ACO seeks to comply with all relevant financial reporting and tax disclosure rules and regulations. Senior financial managers receive training and guidance regarding auditing, accounting and financial disclosure relevant to their responsibilities. They are also provided the opportunity to discuss issues of concern with the Beaumont ACO Board of Managers. Anyone having concerns regarding questionable accounting or auditing matters should report such matters to the Board of Managers by calling the Compliance Hotline.

Intellectual Property Rights and Obligations

Any work of authorship, invention, or other creation (“Development”) created by an employee or physician member during the scope of the individual’s employment/ membership with Beaumont ACO shall be considered the property of Beaumont ACO, including any patent, trademark, copyright, trade secret or other intellectual property right in the Development. Whether something is developed during the scope of employment/membership depends on a number of factors, including: the nature of the work; whether the Development is related to Beaumont ACO business; whether the employee/physician member was directed to produce the Development as part of their work; whether Beaumont ACO intellectual property or resources were utilized at least in part to make the Development; and whether the employee/physician member created the Development while being paid by Beaumont ACO. If any Development created is copyrightable or patentable, then it will be considered a “Work for Hire” under the United States Copyright Act, with Beaumont ACO being considered to be the author and owner of such work.

When creating Developments for Beaumont ACO, employees and physician members shall respect the intellectual property rights of others. Any works or inventions created by employees and physician members prior to employment/membership by Beaumont ACO shall be disclosed to Beaumont ACO upon commencement of employment/membership, and management and legal services approval shall be obtained prior to any use of these works or inventions in a Development for Beaumont ACO.

Beaumont ACO employees, members and staff will respect materials copyrighted by others including but not limited to text, images, video, and music. Beaumont ACO must not be put at risk by using these materials without express written permission of the copyright owner.

The Beaumont ACO employees and physician members specifically agree to be bound by these provisions of the Code of Conduct. As such, employment with Beaumont ACO serves as an assignment by the Beaumont ACO employee to Beaumont ACO of all right, title, and interest in all Developments created within the scope of employment. Beaumont ACO as the attorney-in-fact is authorized to execute documents on the Beaumont ACO employees’ behalf for the foregoing purposes. Employees shall assist Beaumont ACO in obtaining and enforcing intellectual property rights in their Developments, while employed by Beaumont ACO and after termination of employment.

WORKPLACE CONDUCT AND EMPLOYMENT PRACTICES

We discuss below in a general way the conduct expected of all Beaumont ACO staff and associates in the areas of conduct and employment practices. Many, if not all, of these topics are addressed in more detail in other Beaumont ACO policies and procedures. In the case of any difference between the description set forth in this Code of Conduct and that contained in the more-detailed policies and procedures in effect from time to time, the policies and procedures control.

Conflict of Interest

As Beaumont ACO staff members and associates, we have duties and obligations to the Beaumont ACO. Each of us is expected to perform objectively and effectively. Impropriety and appearances of impropriety are to be avoided. When external and personal activities or interests affect, influence or appear to impact decisions, a conflict of interest arises. These conflicts of interest can and sometimes do influence the ability to make objective decisions or reduce individual effectiveness often resulting in injury to the Beaumont ACO interests. Proper handling of conflicts of interests promotes the reputation of both the Beaumont ACO and the individual, and demonstrates respect for the communities we serve.

Conflicts of interest take many forms. Conflicts can be direct and indirect. Some examples include:

- A staff member with a significant financial investment in a company doing business with the Beaumont ACO is in a position to influence decisions related to the Beaumont ACO's business relationship with the company.
- A staff member's family member or significant other has a financial interest in a company bidding for Beaumont ACO work, and the staff member has the ability to influence bid award decisions.
- A staff member has a second job working for a home care agency on weekends and uses his or her position at Beaumont ACO to direct Beaumont ACO patients to the home care agency.
- A pharmacy and therapeutic committee member uses his or her position on the committee to promote a drug or device from a company with which the member has a financial or compensation relationship.

Beaumont ACO staff and associates are expected to remain free of conflicts and disclose potential conflicts as specified in Beaumont ACO policy. In the event of a conflict, Beaumont ACO staff and associates are to refrain from any deliberations and voting on the issue giving rise to the conflict. Conflicted staff may, however, present factual information that would be helpful to the decision-maker (person or committee).

Controlled Substances

The Beaumont ACO is committed to maintaining a culture of regulatory compliance and organizational excellence. Prescription drugs, especially controlled substances, are a common target for diversion, abuse and misuse.

Prescription medications will be prescribed only by those licensed within the State of Michigan to prescribe; dispensed by those licensed to dispense; and administered by those licensed to administer. Prescriptions are to be written only for those under the direct clinical care of the individual prescriber, and never for employees or other healthcare providers outside the direct care relationship.

Beaumont ACO utilized pharmacies have the responsibility to ensure proper medication storage, handling, use and security. Within individual offices, security and control are the responsibility of those who have contact with medications and/or controlled substances. Medications are never to be left unsupervised or unattended.

The Beaumont ACO is committed to meeting and exceeding all guidelines related to medication use and management by:

- Adopting a zero tolerance for medication/controlled substance theft and/or diversion for personal use
- Ensuring all requisite documentation for ordering, prescribing, storage, medication waste (including narcotics), and medication loss (theft, etc.) are complete and available for review. Such documentation is made available to the applicable regulatory authority, as appropriate
- Ensuring patient safety is maintained in every clinical interaction involving medications
- Immediately reporting any medication/controlled substance discrepancies to appropriate leadership and assisting with the subsequent investigation
- Reporting unusual behaviors or circumstances which may be suggestive of a medication issue

Diversity and Equal Employment Opportunity

The Beaumont ACO shall consistently strive to create an environment where individual differences can maximize our collective capabilities. We are committed to promoting the diversity of our workforce through recruiting and hiring practices that reflect the diverse communities we serve. The Beaumont ACO also recognizes that managing diversity initiatives includes providing culturally competent healthcare demonstrating sensitivity practices that improve health outcomes.

Appreciating that diversity involves collaboration and teamwork, Beaumont ACO will offer opportunities for our workforce to provide input into planning and decision-making within our organizational community. In addition, we will hold each other responsible for

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understanding differing perspectives and maintaining a workplace free from discrimination and harassment by building a culture of tolerance and sensitivity.

Although diversity practices are guided through legal principles and regulations, the Beaumont ACO will strive to exceed those requirements with initiatives that identify barriers to embracing our differences to build a culture of diverse alliances.

The Beaumont ACO supports and promotes the practice of providing an equal employment opportunity for all persons and believes that all employees have the right to work in an environment free from discrimination relating to the privileges of employment. The Beaumont ACO complies with applicable state and federal laws prohibiting discrimination in the workplace.

Harassment and Workplace Violence

Each Beaumont ACO employee has the right to work in an environment free of harassment and disruptive behavior. We are proud to have a workforce made up of diverse individuals. Therefore, unacceptable conduct, acts or behaviors that create an environment of hostility, threat, or coercion are prohibited. We will not tolerate harassment towards other employees based on characteristics or cultures that may differ from our own. For example, intimidating others through degrading behavior or humiliating jokes or slurs are not acceptable.

Sexual harassment is a form of sexual discrimination and will not be tolerated in our organization. It may be blatant or subtle and includes unwelcome sexual advances or requests for sexual favors. Each employee has a duty to respect the rights of his or her fellow employees.

Incidents of robbery, terrorism, hate crimes, property destruction, identity theft, stalking, physical violence or the threat of physical violence directed at individuals or the Beaumont ACO are all forms of workplace violence. All employees are prohibited from engaging in any act that might constitute workplace violence.

As part of the Beaumont ACO workforce each employee is responsible for demonstrating behavior consistent with our core values. In order to ensure that our organization is free from harassment, disruptive behavior and workplace violence, each employee must take ownership for their behavior and for reporting incidents.

Employees, who believe they may have been victims of harassment or workplace violence, or observed an act of harassment or workplace violence against another employee, should immediately report such incident to an appropriate Beaumont ACO supervisor or the human resources provider representative.

Health and Safety

Health and safety form an integral part of the work environment and the Beaumont ACO is committed to promoting the practice of a healthy and safe environment. Beaumont ACO's program of health and safety includes employee education and compliance with all local, state and federal laws, regulations, policies and ethical standards governing the professional practice of safety and health and related activities.

Employees are responsible for following appropriate health and safety procedures during the performance of professional duties in order to protect themselves, other employees, and the public from conditions where injury and damage are reasonably foreseeable. Employees should seek the assistance of their supervisor or the Beaumont ACO designated safety manager when they have questions or concerns. It is also important that you immediately advise your supervisor or department manager of any workplace injury, or a situation which presents a danger of injury so that appropriate corrective action can be taken to immediately resolve the issue.

Hiring of Former and Current Government and Fiscal Intermediary/Medicare Administrative Contractor Employees

The recruitment and employment of former or current US government employees may be impacted by regulations concerning conflicts of interest. Hiring employees directly from a fiscal intermediary or Medicare Administrative Contractor requires certain regulatory notifications. Beaumont ACO leaders and physician members should consult with the human resources provider representative or legal services representative regarding such recruitment and hiring.

Ineligible Persons

Beaumont ACO shall not employ, contract, or otherwise associate with a known ineligible person or entity identified as excluded or ineligible from participation in federally-funded healthcare programs.

Persons or entities associated with Beaumont ACO that are pending resolution of criminal charges associated with health care, felonies, or proposed debarment or exclusion from federally funded healthcare programs shall be removed from direct responsibility for or involvement with such federally-funded programs. Persons seeking to be associated with Beaumont ACO that are pending resolution of any criminal charges involving healthcare, any felony charges or proposed debarment or exclusion from federally funded healthcare programs shall not be considered for employment or other association. In the event resolution results in conviction, debarment or exclusion of the person or entity, Beaumont ACO shall immediately take action to separate itself from the person or entity.

License and Certification Renewals

Individuals who are employed in positions that require professional licensure, credentials or other certifications, including those who are deemed independent contractors, and privileged practitioners are responsible to maintain their licenses and credentials. They must at all times comply with state and federal requirements that are applicable to their disciplines. Beaumont ACO leaders are responsible for ensuring evidence of current credentials as appropriate to the discipline. The Beaumont ACO does not allow any individual to work or practice without valid, current licenses and credentials.

Personal Use of ACO Resources

The Beaumont ACO strives to make effective use of our organization's resources including time, materials, supplies, equipment, capital, space and information. As a general rule, the personal use of any Beaumont ACO resource is prohibited without prior management approval. Everyone is responsible to ensure that we do not improperly and unreasonably use documents, telephones, computers, copiers, equipment, for personal purposes. Any use of the organization resources for personal financial gain unrelated to the organization's business is prohibited.

Relationships Among Beaumont Employees

The Beaumont ACO prohibits the acceptance of or delivery of gifts to or from employees (excluding personal gifts), professionals, referral sources, vendors, suppliers and customers. The Beaumont ACO strongly discourages the appearance of impropriety in its business dealings and encourages staff not to accept even nominal gifts whenever there is concern that the acceptance of the gift may influence objective reasoning.

Relationships with Suppliers and Subcontractors

The Beaumont ACO takes a collaborative approach to achieve mutually beneficial goals with its suppliers and subcontractors. The Beaumont ACO conducts its affairs consistent with applicable law, regulations and with business integrity. Patient care is the priority for the Beaumont ACO. Suppliers and subcontractors are required to follow Beaumont Healthcare Inc. policies and code of conduct. Gifts and gratuities of any kind are subject to the Beaumont ACO Code of Conduct, and any violations of this could negatively impact future business, as well as, be subject to violation of federal, state or other laws.

During the application and credentialing process suppliers and subcontractors will acknowledge our policies, declare conflicts of interest and be subject to background checks. All representatives seeking to introduce products or services for consideration at Beaumont ACO will initially contact the Beaumont ACO Business Office. Beaumont ACO suppliers and vendors will make appointments prior to coming on site to meet with Beaumont ACO personnel. The representative is required to adhere to all Beaumont Healthcare, Inc. policies.

Representatives will wear identification badges printed at the sign in and out stations. All purchase of products and services must be approved by the appropriate Beaumont ACO leader and be supported by a valid purchase order. Products, equipment or services provided without prior approval or a valid purchase order will be considered a gift or donation to Beaumont ACO or may be returned at the supplier's expense. Agreements or contracts signed by a non-authorized Beaumont ACO agent will be considered non-binding. Protected health information is confidential. Beaumont ACO complies with contractual information and will not disclose vendor information unless authorized by the vendor or permitted in the contract. Protecting our environment makes good health and business sense. Beaumont ACO seeks suppliers and subcontractors whose products and services reduce packaging materials, energy and waste.

Research, Investigations and Clinical Trials

The Beaumont ACO supports the highest ethical standards in full compliance with federal and state laws and regulations in any research, investigations, and/or clinical trials conducted by Beaumont ACO members and professional staff. We do not tolerate research misconduct, which includes activities such as making up or changing results, copying results from other studies without performing the clinical investigation or research, failing to identify and deal appropriately with investigators or institutional conflicts of interest, and proceeding without Institutional Review Board (IRB) approval. Our first priority is always to protect the patients and human subjects and respect their rights during research, investigations, and clinical trials.

Beaumont ACO member physicians conducting clinical trials of investigational products and services are expected to fully inform all subjects of their rights and responsibilities of participating in the clinical trial. All potential subjects asked to participate in a clinical trial are given a full explanation of alternative services that may prove beneficial to them. They are also fully informed of potential discomforts and are given a full explanation of the risks, expected benefits, and alternatives. The subjects are fully informed of the procedures to be followed, especially those that are experimental in nature. A potential subject's refusal to participate in a research study or the voluntary withdrawal of his or her participation in an existing study will not compromise his or her access to services or other benefits to which he or she is otherwise entitled. A subject's voluntary informed consent to participate in a clinical trial is documented by the responsible researcher.

Any Beaumont ACO employee and physician member applying for or performing research of any type must follow all applicable research guidelines and privacy policies and maintain the highest standards of ethics and accuracy in any written or oral communications regarding the research project. As in all accounting and financial record-keeping, our policy is to submit only true, accurate, and complete costs related to research grants. Any Beaumont ACO employee or physician member engaging in human subject research must do so in conjunction with IRB approval and consistent with regulations regarding human subject research and IRB rules.

Substance Abuse and Mental Acuity

To protect the interests of our employees, physician members, and patients, we are committed to an alcohol and drug-free work environment. All employees must report for work free of the influence of alcohol and illegal drugs. Reporting to work under the influence of any illegal drug or alcohol, having an illegal drug in your system, or using, possessing, or selling illegal drugs while on Beaumont ACO work time or property may result in immediate termination. We may use drug testing as a means of enforcing this policy.

COMPETITIVE ACTIVITIES AND MARKETING PRACTICES

As we work in a highly competitive environment, it is important that our image in marketing and all forms of public media adhere to the highest standards of integrity and fairness as consistent with our Code of Conduct. The company is in compliance with all antitrust and all other laws concerning competitive fairness. This includes interactions with competitors, customers, suppliers and media.

Antitrust and Unfair Competition

The antitrust laws are designed to accomplish two broad goals: (1) to prevent anticompetitive collusion among actual or potential competitors; and (2) to prevent the unlawful creation or exercise of market power, i.e., monopolization. The rationale for these objectives is that the absence of competition may result in one hospital system (or more than one system acting together with another) having sufficient power to maintain charges above competitive levels or to depress wages below competitive levels.

Agreements between or among actual or potential competitors to fix prices, fix wages, rig bids, allocate customers or divide markets, boycott or collectively refuse to deal with third parties are known as per se offenses. Per se violations are considered so flagrantly anticompetitive that the mere occurrence of such conduct establishes a conclusive presumption of illegality without any detailed inquiry into whether such conduct actually injures competition.

Such activities could conceivably result in criminal prosecution of organizations and individual officers and employees by the government. They also are the basis for the great majority of antitrust lawsuits seeking treble damages and class action status. It is costly for any organization to become involved in antitrust litigation. The combination of damage exposure, expert witness fees, attorney fees and other expenses can cost so much as to threaten an organization's very viability.

It is Beaumont ACO's policy and the obligation of every member and manager, employee and representative to comply with the antitrust laws of the United States and the states where we do business.

No Beaumont ACO manager, member, director, officer or employee should:

- Share confidential price, wage or cost information with competitors, including market strategies, development strategies or other proprietary and sensitive business information;
- Disclose to non-Beaumont ACO entities Beaumont ACO's intent not to do business with another entity;
- Disclose Beaumont ACO bids, responses to requests for proposals, pricing proposals to a competitor;
- Require a patient to engage one service as a condition to obtaining another Beaumont ACO service.

The antitrust laws are complex and cover virtually every type of business activity, including relationships with competitors, customers and suppliers. When in doubt about the legality or propriety of an act, practice or communication, consult the Beaumont ACO legal services or the Beaumont ACO's compliance office before going forward.

Marketing, Advertising and Media

Consistent with laws and regulations that may govern such activities, we may use marketing, advertising and media relations activities to educate the public, provide information to the community, increase awareness of our services, and to recruit employees and physician members. We strive to present only truthful, fully informative, and non-deceptive information in these materials and announcements.

While it is permissible to compare and contrast our services and prices, it is against company policy to intentionally disparage other persons or businesses based on information that is untrue, or not known to be true, or to intentionally interfere with another business's contractual and business relationships through wrongful means. This does not prevent fair, non-deceptive competition for business from those who may also have business relationships with a competitor.

As related to communication that is shared with external audiences (this includes signage, patient education materials, letters, promotional materials, etc.), the Beaumont ACO brand, services and offerings will be aligned with approved Beaumont ACO strategic vision, mission, values and plan, including consistency with the corporate-approved campaign and style guidelines. These guidelines will be adhered to by all Beaumont ACO entities to communicate a consistent message and Beaumont ACO personality (look and feel) to all audiences.

ENVIRONMENTAL COMPLIANCE

It is our policy to comply with all environmental laws and regulations as they relate to our organization's operations. We act to preserve our natural resources to the full extent reasonably possible. We comply with all environmental laws and operate each of our facilities with the necessary permits, approvals, and controls. We diligently employ the proper procedures to prevent pollution and provide a healthy environment of care to prevent pollution.

In helping Beaumont ACO comply with these laws and regulations, all Beaumont ACO employees and physician members must understand how job duties may impact the environment, adhere to all requirements for the proper handling of hazardous materials, and immediately alert supervisors to any situation regarding the discharge of a hazardous substance, improper disposal of hazardous and medical waste, or any situation which may be potentially damaging to the environment.

BUSINESS COURTESIES

General

This section of the Code of Conduct covers the receipt of business courtesy and the extension of business courtesy. It specifically addresses business courtesy between Beaumont ACO staff and associates and those outside the Beaumont ACO. Business courtesies include such things as invitations to events, gifts, meals and entertainment. It should not be read as an endorsement or encouragement to make or receive any type of business courtesy or gift. Discussion is in general, and Beaumont ACO staff and associates are reminded that specific rules apply to courtesies and gifts given to referral sources (see Code of Conduct section “Extending Business Courtesies and Tokens of Appreciation to Potential Referral Sources”). As always staff and associates must apply good judgment and avoid appearances of impropriety that may injure either Beaumont ACO’s reputation or that of the individuals involved.

This Code of Conduct statement does not include business courtesies involving potential or actual referral sources. For more information on this subject review the Code of Conduct section on Extending Business Courtesies and Tokens of Appreciation to Potential Referral Sources.

Receiving Business Courtesies

Events and Travel

Business relationships develop through positive experiences between client and the business partner. As relationships initiate or mature, it is acknowledged that Beaumont ACO staff and associates may be invited to a social event sponsored or at the expense of the business partner. Beaumont ACO policy allows staff and associates to accept such invitations provided:

- The invitation was made independent of any solicitation or encouragement by the Beaumont ACO staff or associate;
- The event is business-related including by way of example a seminar, exhibit, meeting or presentation;
- Cost of the event is reasonable and appropriate, typically well under \$300.00 per person;
- No overnight stay or travel costs are incurred (routine and reasonable mileage paid for by Beaumont ACO excepted); and
- Such events are infrequent.

Should the offer include overnight travel or stay, the Beaumont ACO staff or associate must have the approval of the individual’s supervisor and a senior level manager.

Gifts

Beaumont ACO staff and associates may accept gifts from business partners (individual or entity) provided total gifts do not exceed \$75.00 in any one year from a single business partner and do not exceed \$388.00 in annual total from all business partners. Physicians and other professionals practicing at Beaumont facilities are included as “business partners.” “Gifts” under \$5 in value bearing a business partners’ logo used in general distribution are excluded from the foregoing.

During holidays, it is not unusual for business partners to provide perishable or consumable items (e.g., bread baskets, fruit baskets). When perishable or consumable items are distributed to department or group members, the gift is not subject to the limits identified above but Beaumont ACO staff and associates are to use reasonable judgment when accepting such items.

Receipt of cash and cash equivalents by Beaumont ACO staff and associates is prohibited. The Beaumont Foundation may accept cash and cash equivalent gifts that are accounted for properly and used to benefit service to the community and patients.

Extending Business Courtesies to Non-referral Sources

Meals and Entertainment

Beaumont ACO staff and associates may want to extend a business courtesy to a business associate to build a relationship or to create opportunity for Beaumont ACO to augment service to the community. With advance approval from a senior level manager, Beaumont ACO staff and associates may invite a business associate to a social event or pay for a meal and modest entertainment at the expense of the Beaumont ACO, provided:

- The invitation was made independent of any solicitation or encouragement by the other party;
- The event is business related and involves discussion of business topics;
- Under no circumstance does the offer serve as a inducement/payment for the other party to engage in business with Beaumont ACO;
- Cost of the event is reasonable and appropriate, typically well under \$300.00 per person;
- No overnight stay or travel costs are incurred (routine and reasonable mileage paid for by Beaumont ACO excepted); and
- Such events are infrequent.

Gifts

Providing a gift to a business associate (non-referral source) is permitted provided it does not exceed \$75.00 per year per individual. The gift may not be used improperly to induce or encourage the other party to do an inappropriate act or serve as an incentive to improperly influence the business outcome. Much like other areas of concern, avoiding the appearance of

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impropriety when extending gifts is something Beaumont ACO staff and associates are to do. Cash and cash equivalent gifts are prohibited.

Government employees shall never be offered a gift or other business courtesy except as expressly permitted by the particular government agency employing the person. Refreshments and meals of modest value (under \$20.00 per person per day) may be offered in connection with business discussions. Beaumont ACO staff and associates shall, however, comply with the government employee's direction (accepting or rejecting) regarding offered refreshment or meal. Under no circumstance are such refreshments and/or meals to be used to inappropriately induce a favorable act. Logo items of no more than \$5.00 in value may be offered as well. This restriction also applies to federal contractors or agents such as fiscal intermediaries, carriers, and others.

Medicare and Medicaid patients may be provided a non-cash or cash equivalent gift provided it does not exceed \$10.00 per item with an annual cap of \$50.00. A \$10.00 gift card is acceptable and not considered a cash equivalent. This limitation does not apply to situations where payments are made as settlement of potential legal action.

GOVERNMENT RELATIONS AND POLITICAL ACTIVITIES

Beaumont ACO works closely with various forms of government—local, state and federal. The organization and its representatives comply with all applicable laws pertaining to political activities and governmental relations.

Beaumont ACO funds or resources are not contributed directly to individual candidates, campaigns, political parties or to other organizations that intend to use the funds for political campaigns. Beaumont ACO resources include financial and in-kind donations—such as the use of work time and telephone lines to solicit for candidates or campaigns or the use of Beaumont ACO property for functions that are part of such.

Of course, Beaumont ACO encourages all constituents to engage in the political process and to be good citizens. However, only in approved situations can an Beaumont ACO employee represent the interests of the Beaumont ACO to elected or administrative officials of local, regional, state or federal government or agencies.

The organization does not directly endorse any candidates or positions in election campaigns. Donations for the purpose of support of candidates and propositions that are thought to be beneficial to the business position of the corporation can be made by individual employees to the political action committees of MHA and AHA. Those organizations' associated PACs then make such endorsements and support by votes of their boards of directors. Beaumont ACO employees will not be reimbursed for personal contributions to any campaign.

Beaumont ACO engages in public policy debate as an organization only at the initiation of the Executive Director in consultation with the Beaumont ACO contracted government relations officer and only in instances where it has special expertise or knowledge that can help inform the public policy process. This can be done through our senior leadership, lobbying consultants or other staff only when approved in advance as noted just above. In articulating positions, Beaumont ACO is most interested in actions that are in the larger public interest as well as those that benefit our industry in a fair and ethical manner. We encourage trade associations that we are members to also do the same.

In select circumstances, constituents of Beaumont ACO may be asked to show their support on certain issues that impact the healthcare industry or particular programs of interest. Requests for such will only be made by the Executive Director and communicated to the segment of the corporation targeted for the action. Actions may include email campaigns, phone calls to legislative and other elected officials or letter writing campaign. Participation in these activities is voluntary and it will not be held against those who do not choose to do so. It is part of the official role of some Beaumont ACO leaders to interface with elected officials—these activities should be regularly communicated to the contracted government relations officer.

ETHICS AND COMPLIANCE PROGRAM

Program Structure

Staff and associate interactions with any and all stakeholders present opportunities for each of us to demonstrate Beaumont ACO's Mission, Vision, Code of Conduct and that we are "Rooted in Integrity." Beaumont ACO's compliance program further demonstrates Beaumont ACO's commitment to service excellence and appropriate behavior. Each staff member and associate is to embrace Beaumont ACO's Mission, Vision, and Code of Conduct, and to act with integrity.

To assist staff and associates, Beaumont ACO's compliance program elements include:

- A Code of Conduct and Policies to guide thought and action;
- Communicating and educating on our performance requirements;
- Providing various means by which questions can be asked and issues can be brought forward anonymously;
- Monitoring and auditing performance; and
- Taking action as necessary.

Guiding and overseeing the compliance program is the Board of Managers. The Beaumont ACO purchases compliance services from Beaumont Healthcare Inc. whereby the Beaumont Senior Vice President Quality Services and Performance Excellence is the responsible executive leader and the Business Practices and Compliance Officer is accountable for the day-to-day activities of the compliance program. All levels of Beaumont ACO administration, management and supervision support the Beaumont ACO's compliance elements and efforts.

To implement the compliance program, the business practices and compliance office engages in policy development; creation of training programs, communication tools and responding to Compliance Hotline (800.805.2283) issues; program assessment and providing advice to Beaumont ACO staff and associates at all levels of the organization. Compliance is further supported by others in the organization who possess particular expertise and who are enlisted to lead policy and training development, conduct audits and monitoring and advice.

The Beaumont ACO's human resources service provider serves as another invaluable compliance resource. Being highly knowledgeable on labor and employment matters, human resources leaders are the most appropriate contacts to address specific concerns associated with a particular work situation or setting. The business practices and compliance office encourages Beaumont ACO employees to address and resolve these types of issues at the human resources level. Similarly, Compliance Hotline issues of a human resources nature are most often referred to human resources for review, investigation and action as necessary.

Standard Setting

Beaumont ACO's Mission, Vision, Code of Conduct and policies and procedures set the tone and requirements for staff and associates. The Business practices and compliance office is responsible for the Code of Conduct contents. Acting responsibly and consistent with these requirements is a component of accountability for every Beaumont ACO member and associate. Staff and associates are personally responsible for knowing and following these guidance documents as well as policy and procedure.

Education and Training

Beaumont ACO has available a comprehensive education and training catalog. This education begins with new employee orientation and continues while the person is a Beaumont ACO member or associate. Education includes corporate compliance and HIPAA Privacy and Security modules. All staff assigned learning are required to timely complete such learning and staff are held accountable through performance appraisals to demonstrate all learning modules have been completed successfully. In addition, the business practices and compliance office has developed and is available on request to provide live presentations. Staff and associates are expected to maintain competencies consistent with their job duties and assignments. In addition, the business practices and compliance office periodically supports and promotes audio conferences for the benefit of staff and other associates. The business practices and compliance office also conducts upon request issue research to assist managers and supervisors in carrying out their compliance responsibilities.

Guidance and Reporting Issues

Guidance on compliance issues can be obtained in several ways. Staff and associates are encouraged to discuss the question with their immediate supervisor but may go to any member of management, human resources or the business practices and compliance office. For human resources concerns, staff and associates are encouraged to go their site human resources representative. If the staff member or associate is uncomfortable discussing an issue with management or human resources, the staff is free to use the external Compliance Hotline at 800.805.2283. Callers may be anonymous and should know that reports made in good faith are protected by Board of Managers policy and there shall not be disciplinary action for reporting a concern or issue. Deliberately false allegations made to harm another are not protected under the good faith reporting policy.

Obligation to Report

Our reputation is everything. Failure to raise issues and concerns related to our compliance with law and regulation on a timely basis exposes the Beaumont ACO to serious and often significant regulatory fines and penalties, not to mention potential loss of participating status, with federal health programs such as Medicare and Medicaid. It

is every staff members and associate's responsibility to report activity that may violate law and/or regulation. This includes by way of example suspected acts by vendors, other staff, subcontractors, and other healthcare providers. Reportable concerns include improper medical necessity, patient safety, general safety issues and quality of care concerns. Staff and associates should seek resolution at the local site level but may utilize the Compliance Hotline to bring issues forth anonymously. The good faith reporting policy applies to each of these issues raised in good faith.

Compliance Reviews and Investigations

Each issue brought to the business practices and compliance office are reviewed. If the matter remains of concern, it will be investigated by the accountable department with oversight by the business practices and compliance office. Such reviews and investigations are frequently coordinated by the business practices and compliance office and summary responses are provided to the reporter if requested. Staff and associates are obligated to cooperate with reviews and investigations. Where the accountable department is alleged to be source of the compliance concern, independent reviews and investigations are managed by the business practices and compliance office.

Corrective Action and Discipline

When an issue proves to have merit and there is substantiation of the issue, the business practices and compliance team may recommend disciplinary action and other corrective action to be taken. Corrective action recommendations can include anything from mandatory education and training to making a voluntary disclosure to regulatory authorities to changing policy or process to reduce recurrence of the issue due to systemic inadequacies.

Staff and associates are subject to discipline for violating policy, procedure and/or the Code of Conduct. Action taken will vary based on the nature and seriousness of the infraction. Possible disciplinary action is as provided in applicable handbooks and policy. Subject to such handbooks and policies, a partial list of disciplinary options includes counseling, warnings, suspension and discharge.

Measuring Effectiveness

Beaumont ACO uses various mechanisms to assess compliance initiatives and effectiveness. These include monitoring external review agency findings and citations, complaints and citations for privacy or security concerns, number of Hotline calls made and resolved, frequency and outcome of enforcement activity, and ongoing evaluation of billing and coding issues as well as rejections. In addition, the business practices and compliance office routinely seeks or receives feedback from audit functions following evaluation of staff and associate compliance with law, rules and policy in particular audit areas. Beaumont ACO also measures effectiveness by review of external audit findings and management's timely corrective response by specific area. Organizational compliance effectiveness is everyone's responsibility and is rooted in our Code of Conduct.