



RESPONSIBILITY. INTEGRITY. RESPECT.
BUSINESS CODE OF CONDUCT

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THE BUSINESS CODE OF CONDUCT

ABOUT OUR CODE

The RBO c/o Altura Management Services’ (Altura) mission is to elevate quality outcomes for patients, by incorporating value-based care objectives throughout our health care networks.

The Business Code of Conduct (“the Code”) is a vital part of how we achieve our mission and vision and maintain our core values. It sets forth the operational procedures for ethical conduct (including, but not limited to, disclosure and management/mitigation of conflicts of interest, reporting of concerns, disciplinary actions for non-compliance with the Code), with which all employees, agents, and board members must comply. It will periodically be updated to support changes in the company, laws and regulations, and/or other requirements.

WHO DOES IT APPLY TO?

The Code applies to employees, physicians, health care professionals, trainees, agents, board members, volunteers, representatives, contractors, vendors, and other persons or companies working with Altura to provide products or services to, or on behalf of, the RBO.

The Code requires each of us to follow all applicable laws, regulations, and internal policies related to the work we do for Altura. This includes maintaining a healthy, learning, professional environment staffed by individuals who are committed to integrity and ethical conduct. The Code also:

- Affirms Altura’s commitment to integrity and ethical behavior, as a leading community-based provider of quality health care and human services.
- Provides standards of conduct that bind all employees, agents, and board members to certain ethical requirements.
- Includes disciplinary actions for noncompliance as needed.

QUESTIONS ABOUT OUR CODE

There may be situations where requirements differ from the standards outlined in this Code. If you come across such a case, or have questions about laws, regulations, policies, or the Business Code of Conduct, please discuss the matter with your supervisor or reach out to the Office of Compliance at Altura MSO.

OUR SHARED RESPONSIBILITIES

Taking personal responsibility and accountability for our actions is critical to the success of our company. We each own accountability at a professional and personal level at all times. This means:

- Doing what we say we will do.
- Demonstrating accountability and performance-based behavior.
- Supporting each other’s work.
- Being transparent, honest, and direct.
- Knowing the rules that apply to your work and seeking advice when needed.
- Proactively seeking to resolve problems and addressing issues when they come up.

REPORTING CONCERNS

Altura expects everyone to do their part to protect our reputation, our company, and our customers. If you come across something that you suspect to be a violation of this Code, of Altura policies, or other laws and requirements, you have a duty to report it right away. Failure to report the concern may result in disciplinary actions, which may include termination of employment or affiliation.

Do not investigate and confirm issues before reporting them. Whenever possible, use the chain-of-command to address a potential violation. However, if, for any reason, you are uncomfortable letting your supervisors know about your concern, report it directly to the Office of Compliance (“OC”) confidentially or anonymously using any of the following methods:

Call the 24-Hour Toll-Free Compliance Hotline

1. For LaSalle Medical Associates: Call 888-279-2449, use ID AMSO
2. For AltaMed Health Services: Call 888-418-1398 use ID ALTA
3. Write to the Compliance Officer at Altura MSO
4. or submit online at: www.MyComplianceReport.com

Q

If I anonymously report a concern through the Hotline, how do I know it is being addressed by the OCE?

A

Every person using the Hotline is given a code for online checks and updates, letting you know how the matter is being handled. Please keep in mind that certain details will continue to remain confidential, but you will receive general updates and information about your concern.

OUR SHARED RESPONSIBILITIES, cont.

RESPONSE TO VIOLATIONS

When an internal review substantiates a reported violation, Altura is committed to:

- As immediately as possible, stopping the non-compliant conduct or practice.
- Initiating corrective action, which may include, but is not limited to, process improvement, disciplinary actions (such as oral admonishment, written reprimand, re-assignment, demotion), suspension or termination of employment or affiliation (which, for board members, may include removal from the Board of Directors), and/or requiring contractors to arrange for prompt restitution, as appropriate.
- Notifying the appropriate governmental agencies and/or health plans.
- Implementing systemic changes to prevent a similar violation from recurring.

Please know that certain violations may carry extra consequences, like exclusion from participation in Medicare and Medicaid programs, fines, criminal prosecution, and jail time.



ANTI-RETALIATION POLICY

Having the courage to say and do what is right can sometimes be difficult. Because of this, Altura strictly prohibits any punishment, retaliation, or negative consequences for reporting concerns in good faith to management and/or the OC. If you feel you are being retaliated against for reporting, contact the OC for support. Any person who retaliates against another person for the reporting of (or his/her participation in addressing) potential noncompliance shall be subject to the disciplinary actions discussed above.

Take action when you believe our Code, Altura policies, or other laws and requirements may have been or may be violated. Raising problems before they become bigger issues is essential to operating with integrity and to protecting the RBO's communities.

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SUPPORTIVE WORKING ENVIRONMENT

SUPPORTIVE WORKING ENVIRONMENT

Altura is committed to providing a safe, healthful, and productive work environment. Each employee has a personal responsibility to report conditions and circumstances that undermine this environment.

NON-DISCRIMINATION

We provide equal opportunity in employment, care and services to our communities. No one shall experience discrimination at Altura because of race, color, religion, sex, gender (including gender identity), age, national origin, marital status, sexual orientation, veteran status, disability, genetic information, and/or any other statuses or conditions protected by applicable federal, state, or local laws, except where a bona fide occupational qualification applies.

PHYSICAL SAFETY

Altura is committed to and serious about providing and maintaining a safe and healthy work environment. It is everyone's responsibility to report safety concerns, such as:

- Injuries or other illnesses.
- Hazards, such as unsafe facility and equipment conditions or malfunctions.
- Security violations, criminal conduct, and/or suspicious persons or activity.
- Actual or threatened acts of violence or intimidation.

Know and follow Safety and Security policies and requirements when working at Altura and when using Altura facilities, equipment, and resources. Be sure you know how to recognize and report potential workplace risks and safety concerns by checking with your supervisor or the Safety Officer.

If you need training and/or a refresher to know how to do your job safely, let your manager know. Respectfully offer feedback to coworkers if they are not working safely, while accepting feedback when offered. Be a constructive example for others to follow.

Did you know . . .

There should be at least one Safety Coordinator at every site.

The Coordinator is a representative of the Corporate Safety Officer who provides information about safety policies, coordinates emergency drills, and promotes safety initiatives. Be sure you know who your Site Safety Coordinator is!

SUPPORTIVE WORKING ENVIRONMENT, cont.

ALCOHOL- AND DRUG-FREE WORKPLACE

Working under the influence of drugs or alcohol can create a safety hazard for you and others and can affect your judgment. That's why Altura expects and requires you to be free from the influence of these substances while working. All workers are prohibited from possessing, selling, manufacturing or distributing illegal drugs on Altura property and/or when working on behalf of Altura. The only exception is if senior management has specifically approved the possession and serving of alcoholic beverages for special events.

WAGE AND HOUR PRACTICES

Altura pays competitive wages and rates, as benchmarked with other leading companies. As such, Altura complies with all applicable wage and hour laws, rules, and regulations, including minimum wage, overtime, adherence to meal and rest breaks, and maximum hours. It is expected that all workers accurately record all hours worked. Report any discrepancies or concerns right away to your supervisor or contract manager. Timecard records should not be revised without a worker's written approval.

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FINANCIAL INTEGRITY

ACCURATE AND COMPLETE FINANCIAL RECORDS

We are all responsible for protecting the integrity of Altura's records. Our company may face serious penalties or consequences if we don't keep accurate records of financial transactions and company information. Accurate and complete records are vital to our decision-making processes and are required in our collection and reporting of financial, legal and regulatory data. This includes, but is not limited to:

- Reflecting actual services provided when submitting claims for reimbursement to payers, including Medicaid and Medicare.
- Accurately recording the dates of service, services provided, and diagnoses in health records to support accurate claim submissions.
- Billing only for reasonable and necessary supplies or services as supported by accurate and complete documentation.
- Compensation is supported by executed contracts, accurate timecards, and other documents to verify rendered services.

It is strictly prohibited to use inaccurate, disguised, and/or misleading financial, operational, or medical information to support regulatory reporting and/or to support eligibility for benefits.

Watch for and report signs of potential fraud, bribery, or money laundering activity. Contact the Office of Compliance and/ or use the Compliance Hotline for questions, concerns, or suspicious activity.

RECORDS MANAGEMENT

We manage our records properly and retain the records we need to support our tax, financial, and legal obligations. Always follow our record retention policies and securely dispose of records that are no longer needed. Remember to never dispose of any information that may be relevant to an investigation or subject to a litigation hold without first checking with General Counsel at Altura's headquarters.

Q

What do we do if a patient does not have the money to pay their co-pay when they show up at the clinic?

A

RBOs provides care and services regardless of the patient's ability to pay. But they are not a free clinics. So, when these situations come up, politely inform the patient that Altura will bill them and continue to serve them.

REFUND OF OVERPAYMENTS

Altura will adhere to the requirements for returning overpayments to third-party payers and/or government programs. If Altura determines that it has received an overpayment, Altura will promptly refund the payment to the proper party in accordance with appropriate regulations, policies, and procedures.

CO-PAYMENTS AND DISCOUNTS

Providers will not waive the collection of insurer co-payment obligations.

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DOING THE RIGHT THING

DOING THE RIGHT THING

MAKING ETHICAL DECISIONS

The Code and our policies cannot replace our own sense of integrity and good judgment. We are all responsible for doing what is right. Act with unquestionable ethics in all business matters. Never commit, or ask others to commit, unethical or illegal acts. Immediately report any request to commit an act you think may be illegal or unethical.

MEDICAL ETHICAL CONSULTATION

An ethics consultation may help whenever the health care team, a patient, or the patient’s family have an unresolved ethical concern. A consultation can offer recommendations that the members of the health care team, the patient, and/or the patient’s family may use in their decision-making. A few examples of this may include:

- Disagreements with end-of-life decisions.
- Concerns about decision-making capacity.
- Ethical obligations to be open about medical errors.

Employees can complete and submit an Ethics Consultation Request Form from Town Square when they come across these situations. Once submitted, the Ethics Consultation Team will receive your request directly and begin to review the presented information.

You have the option to remain anonymous when submitting the Ethics Consultation Request Form. However, this may make it difficult for the Ethics team to provide you with support and to identify those patients that need your help.

COOPERATION WITH GOVERNMENT AUDITS AND INVESTIGATIONS

Altura will be cooperative and truthful in its dealings with any governmental inquiry or request, including audits, surveys and certification reviews. If you receive a governmental request for information or if you are approached by a government investigator, contact your supervisor and

Q

How do I know if doing something may be unethical or violate the spirit of our Code?

A

When you face an ethical dilemma, ask yourself:

- Does it feel right?
- Do you believe it is consistent with our Code, our values, and our policies?
- ...or the interest of our customers, coworkers, company, and the community?
- Would you be willing to be held accountable for your actions?
- If your actions or involvement were made public, would you still feel okay about it?

If you answered “no” to any of these questions or still feel unsure, stop and seek ethical consultation from the Ethical Response Team by submitting an Ethics Consultation Request Form.

the Office of Compliance immediately so that Altura can follow proper procedures in responding. In fulfilling governmental requests, it is important to be responsive and provide requested documentation in a timely manner. Respect should be shown for government officials, and accurate and complete information should be provided. In no circumstance, should an investigation or government official be improperly influenced or impeded.

HONEST DEALING WITH GOVERNMENT OFFICIALS

Altura will deal with government bodies and regulatory agencies in a direct, open, and honest manner. No Altura board member, physician, employee, agent, or contractor will attempt to improperly influence actions or decisions made by government bodies, officials, employees, or their representatives.

FRAUD, WASTE AND ABUSE

Altura recognizes the importance of preventing, detecting, and investigating fraud, waste, and abuse matters, and is committed to protecting and preserving the integrity and availability of health care resources. Fraud, waste, and abuse are not only harmful to Altura and our members, they are also harmful to our entire industry and health care system.

In general, fraud refers to any intentional, deceitful act or omission to obtain or deprive someone—individuals, companies, or the government—of money or property. Abuse is a broad concept that refers to an activity that is not consistent with generally accepted business, medical, or fiscal standard practices. Waste involves the unnecessary use and/or overuse of services and resources.

Examples may include but are not limited to:

- A provider who knowingly submits claims for medical services that were not provided and/or falsifying a diagnosis to qualify a patient for insurance or benefits.
- A company falsifies records to show compliance with certain contractual or regulatory requirements.
- Scheduling and seeing patients for doctor visits that aren’t medically necessary.
- Obtaining payment from the government by error and then falsifying statements or records to keep the payment.

Q

I think a patient is falsifying information to qualify for benefits. What do I do?

A

Report this right away to the OC or the Hotline. We’ll be sure to quickly review and address the matter. While not caused by us, Altura has a duty to protect public benefits and resources.

INAPPROPRIATE REFERRALS

The Stark Law, which is directed specifically at physicians, prohibits billing for referrals for certain health care services to a person or entity with which the referrer or the referrer’s family member have a financial relationship. The Anti-Kickback Statute, which applies to everyone, prohibits referrals of patients or other business to any individual or entity in exchange for a benefit. There are few exceptions to these rules against referrals for private financial gain or other benefits. Contact the Office of Compliance for additional details and/or guidance.

THE FALSE CLAIMS ACT

The state and federal False Claims Act (FCA) allows the government to recover money received through fraud, waste, or abuse, whether intentional or by deliberate ignorance/reckless disregard.

The FCA and Altura leadership prohibit retaliation against anyone who reports fraud, waste, and abuse in good faith. For additional information about the FCA and/or what constitutes fraud, waste, or abuse, please contact the Office of Compliance.

PENALTIES

If involved in FCA or referral violations, you may be individually liable for up to three times the loss to the government, plus civil fines for each occurrence for violating the FCA under the Civil Monetary Penalties Law (along with Altura and other involved persons or companies). Penalties for violations can also include exclusion from participation the Medicare/Medicaid programs (in other words, you will be ineligible to work with another company that receives directly or indirectly Medicare/Medicaid payments).

ADDITIONAL INFORMATION

Altura maintains a comprehensive compliance program to combat fraud, waste, and abuse. This program includes new hire and annual refresher training for all employees. Fraud, waste, abuse and/or criminal conduct involving our business operations are not allowed and will not be tolerated. For additional information or guidance, contact the Office of Compliance.

Q

What is deliberate ignorance?

A

Deliberate ignorance means intentionally ignoring a fact when you have every reason to believe the existence of it. In other words, it’s turning a blind eye to something that you know does not look right yet not reporting it because you and/or someone else could get in trouble or we could lose money.

It is the responsibility of each board member, employee, agent, and contractor to avoid conflicts of interest while carrying out responsibilities with Altura. This includes remaining free of outside activities where personal interests may influence or appear to influence the ability to make objective decisions.

It is also their responsibility to report or disclose any actual or potential conflict of interest to a supervisor and/or to the Office of Compliance (for employees, agents and contractors), to the Chairperson of the Board Directors (for board members and the Chief Executive Officer) or to the Vice-Chairperson (for the Chairperson) for review to determine if the relationship warrants an exception and/ or restriction, as indicated below.

If an actual, perceived, or potential conflict of interest exists, Altura may take whatever action it deems appropriate according to the circumstances to address the actual or potential conflict, which may include but is not limited to, transfer of position(s) or separation of employment. Altura reserves the right to determine if other relationships, engagements, or activities not covered specifically under the Code represent actual or potential conflicts of interest under applicable standards.

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CONFLICTS OF INTEREST

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CONFLICT OF INTEREST — PERSONAL FINANCIAL INTERESTS

No board member, physician, employee, agent, or contractor may participate in the selection, award or administration of a contract that uses government funds where they or their immediate family or partner has a real or apparent financial (or other type) of conflict of interest involved.

You may not refer customers, members, beneficiaries or those who do business with Altura to an entity in which you or a family member has a financial or other material interest. Some unique situations may qualify as an exception to this policy.

A person has an “interest” if they have, directly or indirectly through a family member or business partner:

- A business relationship (e.g., an actual or forthcoming compensation arrangement whether by contract or employment) with: (1) Altura; (2) an entity with which Altura has entered (or is negotiating to enter) a transaction or arrangement; or (3) an entity that is a competitor or potential competitor of Altura;
- A financial relationship (e.g., a controlling or material ownership, or investment interest, employment relationship or other relationship that a reasonable person would deem significant) with or a tangible personal benefit from: (1) an entity with which Altura has entered (or is negotiating to enter) a transaction or arrangement; or (2) an entity that is a competitor or potential competitor of Altura;
- A fiduciary relationship (e.g., Board member or trustee) with: (1) an entity with which Altura has entered (or is negotiating to enter) a transaction or arrangement; (2) an entity that is a competitor or potential competitor of Altura; or
- A personal relationship with an individual who has a business, financial or fiduciary relationship as defined above. A personal relationship means a relationship based on family, business partnership, friendship or romance.

Any interest in a company through publicly-traded stocks, bonds, or mutual funds available to the general public shall not constitute an interest, provided the ownership or investment interest is not deemed a “significant financial interest,” as defined below.

Q I have an outside business selling fitness products. Can I use company bulletin boards or interoffice mail to advertise these products to other patients, employees, or vendors?

A No. Products and services not offered by the client should not be promoted during working hours or on the property, nor should you use Altura’s name to sell non-Altura services or products. However, you are free to engage in outside business which does not pose a conflict of interest with Altura, on your own time, off company premises.

CONFLICTS OF INTEREST, cont.

In general, a “significant financial interest” is ownership by you and/or an immediate family member of more than one percent of the outstanding securities/capital value of a business entity, or that represents more than five percent of your total assets and/or those of an immediate family member.

A “conflict of interest” arises whenever the interest of a person competes with or has the potential to compete with the best interests of Altura. A conflict of interest is presumed to exist if a person with an interest is involved in any way in the transaction or arrangement in which they have such Interest.

DISCLOSURE, DETERMINATION AND MANAGEMENT OF CONFLICTS OF INTEREST

Altura requires that all board members, employees, agents, and contractors disclose in writing (and update at least annually): (1) all interests that may create an actual or potential conflict of interest, and (2) where applicable, provide a statement suggesting how such conflict of interest could be avoided or mitigated. In order to facilitate such full disclosure, Altura requires that such persons annually complete the disclosure form attached as Exhibit A.

Completion of a disclosure form does not relieve individuals of the obligation to disclose interests that may occur after the annual filing of the Disclosure Form (e.g., with respect to a particular transaction). Altura requires all board members, employees, agents, and contractors that have or suspect an interest that arises after the annual filing of the disclosure form to disclose such interest to their manager and/or the Office of Compliance (for employees, agents, and contractors), to the Chairperson of the Board Directors (for board members and the Chief Executive Officer), or to the Vice-Chairperson (for the Chairperson).

Whether an interest is disclosed on the annual disclosure form or in the interim as indicated above, the person(s) to whom the disclosure is made shall evaluate the situation to determine whether a conflict of interest exists, and if so, how to manage such a conflict of interest, including (1) whether Altura can obtain an equivalent or more advantageous alternative transaction or arrangement from a person or entity that would not give rise to a conflict of interest alternative

Q My supervisor is looking to to contract with a food vendor for our meetings. My wife owns a catering business. Would it be a conflict of interest if I recommended my wife’s company?

A You may raise the option to your supervisor so long as a) you do not give the impression that you are attempting to influence an Altura purchasing decision in favor of a family member, and b) you and your wife stay out of the purchasing decision, disclose the relationship, and allow Altura to reach an objective decision.

CONFLICTS OF INTEREST, cont.

arrangements; and (2) if such alternative arrangement is not available, whether the transaction/arrangement is in the best interests of Altura(notwithstanding the conflict) and is fair, reasonable and, as applicable, consistent with the procurement standards in 45 CFR Part 75.

FAILURE TO DISCLOSE

If there is reasonable cause to believe that a person has failed to disclose an interest, the person shall be informed of the basis for such belief and afforded an opportunity to explain the alleged failure to disclose. If, after hearing the response of the individual who failed to disclose an interest, and making such further investigation as may be warranted in the circumstances, Altura determines that the individual has in fact failed to disclose an interest in accordance with this Code of Conduct, appropriate corrective and/or disciplinary action shall be taken, consistent with the section on Response to Violations under the “Our Shared Responsibilities” section of this Code.

DISCLOSURE TO FEDERAL FUNDING AGENCIES

For all actual and potential conflicts of interest involving federal funds, the Chief Executive Officer shall make disclosures to the appropriate federal awarding agency within thirty (30) calendar days of discovery of the potential conflict of interest and in accordance with the terms and conditions of the applicable federal award. Such disclosures shall be in writing and sent by email communication and adhere to the following template:

- Email format: To [Insert Name of Federal Awarding Agency Project Officer or Grants Management Specialist];
- Insert in subject line: Conflict of Interest Disclosures for Award # _____;
- Extension request for disclosure of conflict of interest: Yes____ or No ____;
- Revised requested submission date _____ or N/A;
- Description of the actual or potential conflict of interest; and
- Description of Altura’s plan to eliminate, mitigate, or otherwise resolve the conflict of interest.

FAMILY AND PERSONAL RELATIONSHIP EMPLOYMENT

A personal or family relationship with a co-worker is prohibited when it results in a supervisory associate/subordinate relationship and/or the appearance of a potential or actual conflict of interest. In these situations, immediately disclose the matter to your manager and/or Human Resources to evaluate each situation and take appropriate action.

EMPLOYMENT OBLIGATIONS

Your primary employment obligation is to Altura. Any activities, such as but not limited to a second job, serving on an external board of directors, or a personal business, must not conflict with your obligations to Altura.

CONFLICTS OF INTEREST, cont.

To ensure you avoid a potential conflict, notify your manager and/or Human Resources of outside employment arrangements. Evaluate each situation and address potential conflicts with your Altura duties. In most cases, we can develop a mitigation plan to help prevent any actual or perceived conflicts.

In addition, you may not use company time, name, assets or the services of other associates for any outside activities unless authorized by Altura leadership.

HONORARIA

Employees, agents, or contractors, with permission from their supervisor, are encouraged to participate as faculty and speakers at education programs and functions. However, any honorarium in excess of \$100 shall be turned over to Altura unless the employee, agent, or contractor requests paid or unpaid time off to attend the program or that portion of the program for which the honorarium is paid.

GIFTS/GRATUITIES

Board members, employees, agents, and contractors may not solicit or accept gratuities, favors, or anything of value from contractors or potential contractors or vendors of Altura, or actual or potential parties to sub-agreements with Altura, in exchange for referrals, clientele, Medicare or Medicaid services or other monetary benefit (including benefit for private financial gain).

A gift means anything offered directly by or on behalf of an actual or potential contractor or vendor, or an actual or potential party to sub-agreement, other than promotional materials of little or nominal value, such as a pen, calendar or other items intended for wide distribution. Gifts include, but are not limited to, personal gifts, such as sporting goods; household furnishings and liquor; social entertainment or tickets to sporting events; personal loans, or privileges to obtain discounted merchandise and the like.

Any board member, physician, employee, agent, or contractor shall decline or return any gift and notify the Compliance Officer of such a gift.

Q

A company vendor gave me a \$25 gift card to my favorite restaurant as a thank you for helping them meet a project deadline. Can I accept the gift card?

A

Yes, you can accept the gift card. The amount is nominal the gift was not in exchange for referrals, clientele, or Medicare or Medicaid services. If unsure of what to do when presented with a gift, contact the Office of Compliance & Ethics for guidance.

FREE BUSINESS COMPETITION

It is an Altura policy to purchase supplies and services in a manner that fosters competition among sellers in an open marketplace, giving Altura and its consumers — both individuals and businesses — the benefits of lower prices, higher quality products and services, more choices, and greater innovation. This spirit of free business competition includes conducting all transactions in a manner that supports transparency and maximum practicality in accordance with Altura’s procurement policy and procedure.

Altura will be sensitive to, and seek to avoid, organizational conflicts of interest and non-compliance practices among contractors. Organizational conflicts of interest mean that because of relationships with a parent company, affiliate, or subsidiary organization, Altura is or appears to be unable to be impartial in conducting a procurement action involving such entity. Altura may mitigate organizational conflicts of interest in the following manner:

- In planning and conducting procurements, no parent company, affiliate, or subsidiary organization will be permitted access to non-public information related to the procurement transaction. To the extent that such non-public information is already in possession of the parent company, affiliate, or subsidiary, such non-public information will be (to the extent not otherwise commercially sensitive) incorporated into the solicitation.
- In evaluating offers and awarding contracts, Altura will not give preferential consideration to any parent company, affiliate, or subsidiary organization.
- In the event that an organizational conflict of interest, including the appearance of impropriety, cannot be sufficiently mitigated through the above methods, the parent company, affiliate, or subsidiary organization may be barred from competing.

Should any situations arise where Altura appears to be unable to be impartial in conducting a procurement action involving a related organization, Altura will obtain legal advice and counsel before proceeding with one or more of the aforementioned approaches.

Consultants who want to bid for a contract with Altura are prohibited from drafting the contract's specifications, request for proposals and the like. Award will be made to the bidder whose bid is responsive to the solicitation and most advantageous to Altura, budget requirements, and other factors. Altura always retains the right to reject any and all bids when it is in Altura’s best interest to do so.

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CONFLICTS OF INTEREST

PROTECTED HEALTH INFORMATION (PHI)

Altura collects information about patient medical and behavioral conditions, history, treatments, and more, known as protected health information (PHI). Altura realizes the sensitive nature of PHI and is committed to maintaining its confidentiality and integrity.

All board members, physicians, employees, agents, contractors, and all other representatives of the organization are expected to adhere to Federal, State, and Altura privacy and security laws and requirements, such as those outlined in the Health Information Portability and Accountability Act (HIPAA).

This includes not:

- Releasing or discussing PHI with others unless they have a need to know the information in order to care for our patients, process payment for services, and/or manage our health care operations.
- Disclosing confidential information that violates the privacy rights of our patients unless required by law or regulatory agencies.

Physicians, employees, agents, and contractors should always:

- Access the minimum amount of information necessary to do your job.
- Know and follow all laws, policies, and procedures that apply to your job, including restrictions that apply to you accessing your, your family member's, or your friend's PHI.
- Keep electronic devices password protected and secure.
- Make sure doors to restricted areas where sensitive information is kept are locked.
- Promptly pick up PHI from fax machines and printers.
- Use a privacy screen on your computer monitor if the screen is visible and readable by others.
- Log off of a shared computer or lock your computer before walking away from it so that others cannot use it with your user identification.

Q Local law enforcement called and asked me to give a statement regarding Altura's treatment of a particular patient. Should I provide the statement upon request?

A No. We have a responsibility to protect patient confidentiality. Do not provide confidential patient information to the person who identifies as a member of law enforcement until you have spoken with the Privacy Officer and/or Altura's Legal Department.

If you violate privacy and security laws, policies, or requirements, you may be individually exposed to federal or state criminal prosecution, fines and penalties, etc., in addition to disciplinary measures.

CONFIDENTIAL BUSINESS INFORMATION

We have many types of information that are vital to conducting our business. This includes material and nonpublic information as well as other confidential and proprietary information about our:

- Governance, operations, strategies, products, processes, services and financials.
- Members, providers, associates, vendors, agents, business partners and government contracts.
- Any other information deemed "confidential" by the Board of Directors or the Chief Executive Officer.

We must never disclose our confidential and proprietary information to anyone unless authorized to do so by leadership, company policy, and/or contract when a legitimate business need exists. In addition, we must never use nonpublic, material, or confidential and proprietary information about external entities we may have learned in the course of doing business with them for personal gain or for the benefit of a third party, and without proper authorization and approvals.



Q I have a friend in the managed care department of one of our competitors. She has been asked by her company to survey managed care costs in the region. Can I give her information about our costs and pricing?

A No. Any sharing with competitors of cost and pricing information *not normally available to the public* could be perceived as, or be legally treated as, an effort to fix fees or limit competition.

INTELLECTUAL PROPERTY

Altura’s intellectual property assets contribute to our effective and competitive ability to conduct our business, grow our company, and achieve our business objectives. These assets include the ideas, inventions, the “know-how,” designs, software, business information, financial data, trademarks, copyrights, patents, apps, and all other proprietary information made for Altura or made by Altura employees. We respect our intellectual property and that of other companies. Know that anything you create within the scope of your employment with Altura may be considered company intellectual property.

USE OF COMPANY ASSETS AND RESOURCES

We should only use company funds, equipment, and other assets to conduct business, or for other reasons approved by your manager. Company assets, such as telephone and email, are to be used in a professional, productive, ethical, and lawful manner. We must not use, sell, or dispose of company assets unless allowed by policy.

Limited personal use of company equipment is allowed as long as your manager approves it and your personal use:

- Does not affect productivity.
- Does not result in a direct, material cost to the company.
- Follows applicable company policies and the law.

Always keep valuable assets, such as laptops and mobile devices, physically and electronically secure.

- Use company vehicles only as authorized by your supervisor and ensure all policies are followed.
- Let your supervisor know if any of our assets are damaged or in need of repair.

Q

A coworker who developed training materials for Alturais now marketing these materials on his own time to other companies. He intends to keep the proceeds for his training services. Is this ethical?

A

Generally, Altura owns all proprietary information, including “intellectual property” (computer programs, training materials, processes, marketing strategies) created by employees while on the job or while using Altura resources. This is a complex area and you should raise this issue with your supervisor or the Office of Compliance & Ethics. Altura propriety information may not be used for personal gain.

USING TECHNOLOGY RESPONSIBLY

Use technology responsibly and in accordance with our policies. While your manager may allow reasonable personal use of our technology resources, use good judgment. Keep in mind that anything you create, store, download, send, or receive using Altura systems is company property and can be reviewed by us at any time, as permitted by applicable law and may be disclosed to those who have a need to know, including management, law enforcement, or government agencies, without your knowledge or permission.

When using our technology:

- Never access, store, or transmit anything that’s intimidating, obscene, or discriminatory.
- Use strong passwords and keep passwords safe.
- Never share passwords or access codes with anyone.
- Lock your workstation when stepping away.
- Install security software and updates as directed by Altura; do not interfere with automatic updates.

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