

## CODE OF CONDUCT ATTESTATION

Fabian Insurance and its affiliated Network Entities (individually and collectively called “FABIAN INSURANCE” herein) abide by a system-wide Code of Conduct. The Code of Conduct is the cornerstone of our corporate culture and a key element of our Compliance Program. The Code of Conduct outlines behavior expected of our employees, management, vendors, volunteers and others who interact with FABIAN INSURANCE.

The purpose of the Code of Conduct is to reinforce FABIAN INSURANCE’s institutional values and to serve as a guide for moral, ethical, and legal behavior. Adherence to the Code of Conduct promotes FABIAN INSURANCE’s reputation for integrity and honesty in the community and also ensures that FABIAN INSURANCE is compliant with applicable laws, rules, and regulations.

### Attestation

1. I confirm that I have received a copy of CMS distribution requirement of the Code of Conduct/Compliance policy and procedure in form of email or instructed to refer to Fabianinsurance.com
2. I understand that it is my responsibility to read Business Code of Conduct, policies & procedures, and the Compliance Program are distributed to employees within 90 days of hire, when there are updates, and annually thereafter via email or instructed to refer to Fabianinsurance.com
3. I also understand that any knowledge provided to me by Fabian Insurance from 1.-Business Code of Conduct, 2.-Fabian Insurance Code of Conduct along with the attestation, 3.- Compliance Program, 4.- FWA and can be clarified by my supervisor or Compliance Officer.
4. I confirm I will carry out my day-to-day work within the spirit and letter of the Code of Conduct.
5. I understand that I have a personal duty to bring all (real or suspected) violations of the Code of Conduct to the attention of my supervisor and/or Compliance Officer. Concerns may also be submitted to the Hotline. (1-863-274-5555 or <http://fabianinsurance.com> )
6. I understand that it is against FABIAN INSURANCE policy to be punished or retaliated against for upholding the Code of Conduct and for obeying the laws and regulations that apply to my job. Retaliation should be reported immediately.

**I agree that I have read, understand and will comply with the terms of this Code of Conduct Attestation and all applicable policies and procedures. I understand that my failure to comply with the Code of Conduct may result in disciplinary action, up to and including termination of employment or student status, or loss of FABIAN INSURANCE privileges or contractual or affiliation rights.**

Name: \_\_\_\_\_ Email address: \_\_\_\_\_ (please print)

Affiliation:  Employee  Temporary Employee  Contractor  Student  Volunteer  Vendor

Other (specify): \_\_\_\_\_

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

## FABIAN INSURANCE CODE OF CONDUCT

Fabian Insurance Code of Conduct along with the attestation, Business Code of Conduct, policies & procedures, and the Compliance Program are distributed to employees within 90 days of hire, when there are updates, and annually thereafter via email or instructed to refer to [Fabianinsurance.com](http://Fabianinsurance.com).

Fabian Insurance has adopted the following standards and explanations as its system-wide Code of Conduct:

### 1. Demonstrate Honesty, Integrity, and Professionalism at All Times

We display and promote the highest standards of professional and ethical conduct. We act with the competence, skill, and integrity expected of our professions. We behave with dignity and courtesy toward our customers, clients, coworkers, and others in business-related activities. We are honest, fair, reasonable, and objective in our professional relationships.

### 2. Abide by the Code of Conduct and Applicable Laws, Regulations, Policies, and Procedures

Providing healthcare to a large community is an enormous responsibility. If each of us abides by this Code of Conduct and the laws, rules, regulations, policies, and procedures that apply to us, we will do our part to see that Fabian Insurance operates with integrity. If you have questions about the legality or appropriateness of a situation, ask your supervisor or the Compliance Office for clarification.

### 3. Preserve Confidentiality and Information Security

Protecting confidential information is a Fabian Insurance priority. Confidential information includes health information about our customers, information in employee records, and proprietary information about Fabian Insurance business. We access confidential information and share it with others only when authorized to do so and for the purpose of doing our job. We follow applicable laws and policies when releasing confidential information and report concerns to appropriate parties. We investigate and report breaches of patient information and take steps to secure our systems from unauthorized access and comply with information security policies.

### 4. Use Social Media and Technology Responsibly

Fabian Insurance encourages an online and social media culture that complies with the law, internal policies, procedures, and ethical values. Fabian Insurance employees may not disclose confidential or proprietary information about Fabian Insurance, its customers, or its employees on social media (including, but not limited to, communications over the Internet, on personal websites or web pages, or in online communities). We do not take or transmit photographs or recordings of customers, visitors or staff in the workplace except as permitted by our policies. Any questions concerning the

appropriate use of social media and technology should be directed, as applicable, to the Privacy Office or the Public Affairs and Marketing department.

## **5. Support Diversity and Inclusion**

Fabian Insurance supports a culture of diversity and inclusion. We treat everyone with respect. We do not tolerate illegal discrimination against anyone at Fabian Insurance, including visitors, customers and fellow employees. We do not tolerate conduct that is disrespectful, hostile, intimidating, or harassing.

## **6. Work Safety**

The health and safety of our customers and employees is a Fabian Insurance priority. We comply with workplace health and safety laws and report safety concerns. We follow Fabian Insurance policies for handling and disposing of hazardous materials and equipment. We only access, handle or prescribe controlled substances in accordance with Fabian Insurance policy. We comply with fitness for duty policies. We maintain a work environment free from violence and disruptive behavior.

## **7. Compete Fairly**

Fabian Insurance is committed to antitrust compliance and fair competition. We do not make unlawful agreements with competitors about prices or charges, services that we provide, or who to buy from. We do not discuss related matters, such as pricing policies, purchasing practices, costs, salaries, marketing plans, or surveys with those outside of Fabian Insurance. We comply with marketing policies and laws related to truth in advertising.

## **8. Record and Report Information Accurately**

We keep accurate records about our customers, our employees, our physicians, clinical procedures, research trials, and financial transactions. It is the responsibility of each of us, when engaged in recordkeeping on behalf of Fabian Insurance (including employee time cards, medical records, and patient bills), to be accurate and honest. For example:

- We do not sign another person's name to documents or share each other's passwords.
- We amend the medical record only in accordance with Fabian Insurance policy and applicable law.
- We do not fabricate, falsify or plagiarize when proposing, conducting or reporting research.
- Our financial records conform to applicable accounting principles.

We retain documents for the length of time described in our document retention policies.

If you become aware of inaccuracies, notify your supervisor so that the error can be corrected. If you see problems with claims that are not being corrected, contact the Compliance Office or Compliance Hotline.

## **9. Do Not Do Business with Excluded Individuals or Entities**

We expect all individuals and entities associated with Fabian Insurance to be appropriately credentialed, licensed and otherwise qualified to perform their duties. Fabian Insurance does not do business with, employ, or bill for services rendered by individuals or entities that are excluded or ineligible to participate in federal healthcare programs. Fabian Insurance personnel and vendors have a responsibility to report to their supervisor, Human Resources, Credentialing, or Purchasing (as applicable) if they are excluded, debarred, or otherwise ineligible to participate in healthcare programs.

## **10. Cooperate with Inquiries, Audits, and Investigations**

We cooperate with government inquiries, as well as internal and external audits and investigations. When receiving non-routine requests, we consult with the Legal Department or Compliance Office to ensure that requests are handled properly. We do not alter or destroy records in violation of the law or Fabian Insurance policy.

## **11. Use Resources Responsibly**

We use Fabian Insurance resources responsibly for Fabian Insurance business purposes, not for personal gain. We spend Fabian Insurance funds wisely, eliminate waste, and control operational costs without compromising patient care. We use physical assets like computers, vehicles, machinery, and work space for Fabian Insurance business, and we protect those assets from loss, damage, and theft. We don't waste supplies, equipment, space, or time. We protect intellectual property and respect patents, software licensing, copyright, and other IP agreements.

## **12. Conduct Political Activity and Fundraising Appropriately**

Fabian Insurance respects employees' rights to participate in or refrain from political and fundraising activities on personal time. Employees must follow applicable policies relating to use of Fabian Insurance resources for political activity, engagement in political activity while on work time, and similar issues. Employees may not inappropriately force, direct or encourage coworkers to support or contribute to a political cause, candidate, or party in violation of the law or applicable policies.

## **13. Disclose and Appropriately Manage Conflicts of Interest**

We disclose and appropriately manage conflicts of interest. Employees must report any actual or

potential conflict of interest. Conflicts of interest are situations in which personal considerations may affect, or have the appearance of affecting, our loyalty and ability to fulfill our responsibilities to Fabian Insurance. Depending on the circumstances, a “conflict of interest” might include: employment outside of Fabian Insurance with a competitor or in violation of our policies, supervising a close relative, purchasing stocks based on confidential information, accepting gifts from a vendor, patient, or fellow provider, or causing Fabian Insurance to contract with vendors with whom you have a personal or financial interest. If you have questions about what might be a conflict of interest, review Fabian Insurance policies and speak with your supervisor or the Compliance Office.

#### **14. Prohibit Bribes, Kickbacks, or Payment for Referrals**

We do not offer or accept bribes or kickbacks. Bribes and kickbacks are money, gifts, or special treatment given to someone in exchange for a favor. The favor may be many things, from a promise to make patient referrals to a promise to use a particular vendor’s product.

We also do not offer or accept “something of value” for patient referrals. “Something of value” includes money, services, gifts, entertainment, or anything else of value to the recipient.

As this is a highly complex area of the law, employees must take special care and promptly refer any questions to the Compliance Office or the Legal Department.

#### **15. Report Compliance Concerns Without Fear of Retaliation**

Employees are encouraged to contact the Compliance Office whenever they need clarification or direction regarding Compliance issues (including this Code of Conduct). Employees are required to report suspected violations of the Code of Conduct, policies, procedures, the law, and regulations to a supervisor, the Compliance Office, or the confidential Compliance Hotline. Retaliation is not permitted against anyone who seeks advice, raises a concern, or reports misconduct in good faith. Such retaliation should be reported immediately to the Compliance Office.

16. The HIPAA Privacy Rule establishes national standards to protect individuals’ medical records and other personal health information

<https://compliance-group.com/hipaa-policies-and-procedures/>

17. "Sponsors are accountable for maintaining records for a period of 10 years. This pertains to both employee documents (i.e. exclusion screening, training, etc) and delegated function documents.

<https://www.govinfo.gov/content/pkg/CFR-2006-title42-vol3/pdf/CFR-2006-title42-vol3-sec422-504.pdf>

