



# Code of Conduct

Empowering Excellence: Every Choice, Every Day

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# Introduction

- ▶ Letter from Our Chief Executive Officer
- ▶ Our Mission, Vision, and Values

At OnePeak Medical, our patients are provided with a unique wellness experience that redefines primary care through innovative, integrated health practices and services geared towards optimal health and well-being.

## Letter from Our Chief Executive Officer

Dear Colleagues,

At OnePeak Medical our commitment to exceptional healthcare goes beyond the transformative care we deliver in our communities. It encompasses a steadfast dedication to integrity, best practices, and ethical conduct that resonates with both our patients and employees.

Embedded within OnePeak Medical's Mission and Values is a culture of empowerment—a culture that empowers each of us to consistently make the right decisions, no matter the circumstance.

We are united in our pursuit of sharing and empowering ourselves and our patients with the information necessary to make informed choices. Every decision made by a member of our team carries the potential to profoundly influence our patients, our community, and the entirety of our organization. **We firmly believe that even the smallest decision presents an opportunity to drive positive change and leave a lasting impact.**

It is with great pleasure that we introduce OnePeak Medical's Code of Conduct. This document serves as a compass, providing us with the resources and guidance needed to navigate both straightforward and complex decision-making scenarios. We invite you to familiarize yourself with our Code of Conduct and to utilize it as a tool to inform your actions.

Thank you for your dedication to upholding the principles of integrity, best practices, and ethical conduct that define OnePeak Medical. Together, we will continue to elevate the standard of healthcare delivery and positively impact the lives of those we serve.

*James Porcyrá*  
Chief Executive Officer  
OnePeak Medical



# Mission & Vision



## Mission

To provide our patients a unique wellness experience that redefines primary care through innovative, integrated health practices and services geared towards optimal health and well-being.

## Vision

A healthcare system which believes in, accepts, and values all evidence-informed practices and identifies the relationship between health, mind, body, and spirit.



# T.R.I.B.E Values



## Teamwork

Collaborating to create a meaningful experience.

## Respect

Listening without judgment and communicating positive intent.

## Informed

Communicating, educating, and owning essential information.

## Balance

Celebrating an environment that is diverse, inclusive, and encourages a healthy mind, body, and spirit.

## Excellence

Boldly expecting the best and being empowered to deliver.

## Thoughts from Nisha

**Nisha Jackson, Ph.D., MS, NP, HHP**  
Founder of OnePeak Medical

OnePeak Medical stands as a beacon of comprehensive healthcare, dedicated to optimizing vitality, preventing disease, and restoring balance. I founded this organization because I have witnessed firsthand the transformative impact personalized care has on individuals' lives, and my personal mission is to make this level of healthcare accessible to all.

Our Code of Conduct is a reflection of my unwavering dedication to integrity, compassion, and innovation in healthcare. Every aspect of our practice, from patient interactions to treatment protocols, is rooted in these principles. Together, we embark on a journey toward optimal well-being, guided by compassion, expertise, and a shared commitment to excellence.



# Empowered by Integrity

- ▶ Why We Have a Code of Conduct
- ▶ How the Code of Conduct Can Empower You
- ▶ Who is Covered Under the Code of Conduct
- ▶ How to Make Good Decisions
- ▶ Responsibility to Report
- ▶ What Happens When You Report a Code of Conduct Concern
- ▶ Our Compliance Program

At OnePeak Medical, integrity is a shared responsibility that applies to every member of our team. Upholding the highest ethical standards is essential to creating an environment built on trust, empathy, and excellence in patient care. Each team member plays a crucial role in prioritizing patient well-being, embracing transparency, and consistently adhering to the principles of medical ethics. Being empowered by integrity means making decisions guided by a commitment to the greater good and fostering a culture where honesty and ethical conduct are fundamental expectations. By collectively embracing integrity, we inspire confidence among our peers and patients, creating a workplace where ethical behavior is a cornerstone of our shared values and professional identity.

## Why We Have a Code of Conduct

The integrity of our actions and how we conduct our business lays the foundation of trust in the OnePeak Medical name. Integrity inspires our decisions and strengthens our reputation as a healthcare organization that does extraordinary things and always does what is right. **Integrity is the key component to our success.**

There may be times when you will be faced with a situation where the right thing to do is not obvious. That is where our Code of Conduct can help. It is always here as your guide to help you utilize your best judgment. While the Code of Conduct cannot answer every question, it can show you where to go for guidance on the right course of action.

### How the Code of Conduct Can Empower You

The Code of Conduct helps you to...

- ☑ Conduct yourself honestly and ethically.
- ☑ Uphold our values and maintain patient trust.
- ☑ Understand what OnePeak Medical expects from you.
- ☑ Make good decisions every day.
- ☑ Confidently adhere to laws, regulation and standards that apply to OnePeak Medical.
- ☑ Understand where to go for assistance or guidance if you have questions.

## Who is Covered Under the Code of Conduct



All persons employed by or who conducts business through OnePeak Medical are responsible to uphold the Code of Conduct. That includes full-time or part-time employees at every level of the Company and the Board of Directors. No one is exempt from adherence to the Code of Conduct. All employees, and any others subject to the Code of Conduct, must acknowledge that they have read and agree to uphold the Code of Conduct.

Furthermore, anyone representing OnePeak Medical in business dealings must align with our dedication to integrity. This entails abiding by the principles outlined in our Code of Conduct when delivering goods and services to OnePeak Medical or acting on behalf of the organization.



# How to Make Good Decisions

Each team member at OnePeak Medical plays an essential role. As you carry out your duties, keeping patient care a top priority and embracing integrity as our guiding principle is crucial. Follow our Code of Conduct, company policies, as well as local and Federal regulations. Be sure to complete any required trainings to stay well-informed and in sync with our shared goals and expectations.

If the right thing to do is not clear, ask yourself:

- Is it consistent with our Code of Conduct?
- Is it legal?
- Does it follow our policies?
- Does it benefit OnePeak Medical as a whole – not just a certain individual or group?
- Am I acting with integrity, being truthful and honest?
- Would I be comfortable if my actions were made public?

If you can answer “YES” to all these questions, the action is probably okay. But any “NO” or even “MAYBE” answers are a signal to stop and get advice or ask questions. After all, it is always better to ask before you act, especially when you are not sure.

Whenever you are in doubt, you have a team ready to help!

You can seek guidance from:

- Your Manager or Supervisor
- The Compliance Department
- People Operations

Thoughts from Jordan

## Jordan Blackwell, RN, MBA Chief Operating Officer

“In any moment of decision, the best thing you can do is the right thing, the next best thing is the wrong thing, and the worst thing you can do is nothing.” — *Theodore Roosevelt*

Previously, I held the belief that decisions gaining widespread approval signaled outstanding leadership. However, I’ve come to recognize the shortcomings of consensus-seeking, often resulting in diluted choices that fail to satisfy anyone. In my professional journey, I’ve often faced situations demanding quick decisions, and I’ve come to realize that these swift choices can be equally, if not more, effective than extensively deliberated ones. More often than not, you instinctively know the right course of action.

Crafting a sound decision doesn’t always require consensus-seeking; instead, it involves considering diverse perspectives, consulting individuals closest to the issue for insights, and addressing root causes rather than symptoms. To empower your decision-making process, utilize this section of the Code of Conduct to gather relevant information, evaluate potential outcomes and their impacts, align them with your values and priorities, and navigate towards optimal solutions.



# Responsibility to Report

If you see or suspect anything unethical or illegal, it may be easier to look the other way or let someone else take care of it. But misconduct affects all of us. It is your responsibility to ask questions, raise concerns and voice your opinions when issues arise. No concern is too minor to report. Share your concerns promptly and cooperate fully and honestly in any internal investigation. Be aware that anyone who violates our Code of Conduct may face corrective action, up to and including termination of employment from OnePeak Medical.

If you are in a leadership position, you have an even greater responsibility. Lead by example. Ensure your team knows the Code of Conduct is a resource for them. Create the kind of workplace where employees feel empowered to come forward with questions or concerns and support them when they raise issues. Never retaliate against employees for sharing concerns in good-faith and prevent retaliation by others.

## Your Supervisor or Department Manager



In most cases, your immediate supervisor should be your first point of contact. Immediately contact your supervisor to report issues that require immediate attention such as:

- ✓ Workplace violence
- ✓ Patient or employee health and safety
- ✓ Safety issues

Your supervisor is also an excellent resource for guidance or concerns related to job-specific policies, work responsibilities, disputes, co-worker issues, compensation, promotion opportunities, and issues related to the work environment.

## Compliance Department or People Operations



For issues involving actual or potential Code of Conduct or legal violations, you should contact the Compliance or People Operations departments.

Some examples of these issues include:

- ✓ Financial accounting, auditing, or billing irregularities or misrepresentations
- ✓ Fraud, theft, bribery, kickbacks, or other corrupt business practices
- ✓ Discrimination or harassment
- ✓ Misuse of confidential information, patient records, IT systems, or other company assets
- ✓ Criminal or other illegal activity

## Anonymous Hotline



There may be times when reporting is intimidating, or you may feel more comfortable reporting anonymously. For times like this, our reporting line is available. It is run by a third party and is available 24-7 allowing you to remain anonymous, where permitted by law.

ComplyLine

Toll Free - (800) 928-0084

Online - [report.complyline.com](https://report.complyline.com)

Organization Pin - 255072

# What Happens When You Report a Code of Conduct Concern

- ✓ You may choose to remain anonymous, where permitted by law.
- ✓ If you do give your name, we will do all that we can to protect your identity consistent with conducting a thorough investigation.
- ✓ We take every report seriously and our Compliance Department will investigate it thoroughly and as confidentially as possible.
- ✓ We expect everyone involved to cooperate fully and honestly.

If the investigation finds that the Code of Conduct has been violated, fair and consistent disciplinary action will be taken in accordance with OnePeak Medical policies and applicable law.

## Retaliation is Prohibited

We know that it takes courage to come forward and share your concerns. Regardless of who you contact, you can be confident that you're doing the right thing. OnePeak Medical is committed to protecting the rights of individuals who report potential Code of Conduct or legal violations.

We strictly prohibit retaliation of any kind against any person who in good faith:

- ✓ Reports what he or she believes is a violation of our Code of Conduct, our policies or the law.
- ✓ Raises a compliance question or seeks advice about a particular business practice, decision, or action.
- ✓ Cooperates in an investigation of an actual or suspected violation.

## What is Retaliation?

OnePeak Medical defines retaliation as any action that would likely deter someone from reporting a Code of Conduct concern or participating in a Code of Conduct investigation. Examples might include demotion, firing, a reduced salary, job reassignment, threats, harassment, or any other action taken against someone because they raised a Code of Conduct concern or participated in an investigation. While we take the anti-retaliation provisions seriously, these provisions do not protect you from disciplinary action for your own misconduct, meaning you should not report a Code of Conduct concern simply to avoid discipline for your own violation of the Code of Conduct, policy, or law.

## No False Accusations

While honest reporting is encouraged, we do not tolerate knowingly false reports. Making a false accusation can divert resources away from credible good-faith concerns and damage morale. Never knowingly make a false accusation, lie to anyone involved in investigations, or refuse to cooperate in an investigation, as these actions may also violate our Code of Conduct.

# Our Compliance Program

OnePeak Medical has established a Compliance Program that will exercise due diligence to prevent and detect violations of law. This program also promotes an organizational culture that empowers a commitment to best practices and ethical principles.

## Our Compliance Program:

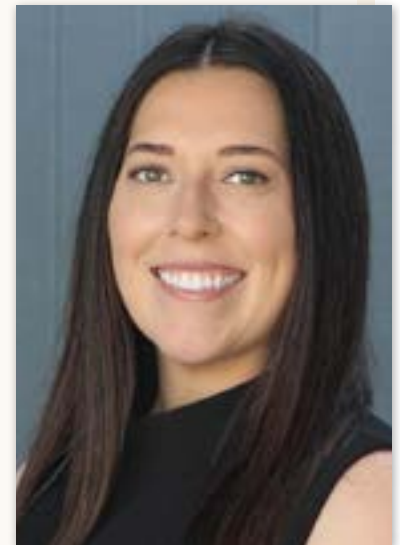
- ✓ Has a designated Compliance Officer
- ✓ Follows guidance from the U.S. Department of Health and Human Services – Office of Inspector General on General Compliance Programs
- ✓ Conducts investigations and, when appropriate, includes subject matter experts
- ✓ Coordinates internal compliance review and monitoring activities
- ✓ Initiates audits based on the OIG guidance, industry risk and other internal data analytics

*Thoughts from Ally*

### Ally Hatch, MHA, MBA Compliance Officer

A comprehensive compliance program is essential to elevating quality and driving value in healthcare. At the core of patient-centered care lies the assurance of ethical conduct and adherence to legal standards. A robust compliance program not only gives the security of meeting regulatory requirements, but also fosters an environment of integrity and trust, which are fundamental to patient well-being.

Our compliance program promotes teamwork and innovation by establishing clear guidelines and expectations that mitigate risks associated with fraud, waste, and abuse. It encourages collaboration across departments, fostering a culture where individuals are empowered to contribute their expertise in an environment of trust. It ensures that every action taken is in the best interests of those we serve.



# Empowered by Best Practices

- ▶ Commitment to Our Stakeholders
- ▶ Safe, Healthy, and Secure Workplace
- ▶ Caring for Patients with Dignity and Respect
- ▶ Providing the Highest Quality of Care
- ▶ Patient Rights to Privacy
- ▶ Safeguarding Assets
- ▶ Technology Safeguards

At OnePeak Medical, we are fueled by a commitment to best practices. Every day, we strive to do our best, aiming for the highest standards in everything we do. Excellence, coupled with best practices, is not just a goal; it's our driving force, pushing us to deliver outstanding care, provide top-notch service, and continuously improve. We firmly believe that by adhering to best practices, we go beyond meeting expectations – we exceed them. This commitment creates a positive and impactful work environment for everyone involved, fostering a culture where each task, regardless of its size, becomes an opportunity to showcase our unwavering dedication to excellence.

# Commitment to Our Stakeholders

## To Our Patients

We are committed to providing innovative, integrated health services geared towards your optimal health and well-being. With the use of outcome-driven and evidence-informed practices, we care for our patients in health, mind, body, and spirit.

## To Our Communities

We are committed to increasing access to healthcare services and providing opportunities for all members of our community to access the unique and innovative services we provide.

## To Our Colleagues

We are committed to a work environment in which the T.R.I.B.E values (Teamwork, Respect, Informed, Balance, Excellence) guide our day-to-day decisions and interactions.

## To Our Third-Party Payers

We are committed to engaging with our third-party payers in a manner that showcases our commitment to contractual responsibilities and underscores our mutual focus on quality healthcare, efficiency, and cost-effectiveness. We advocate for our private third-party payers to establish their own set of ethical principles, mirroring our commitment to acknowledging obligations to patients and ensuring fairness in interactions with healthcare providers.

## To Our Regulators

We are committed to fostering an environment where adherence to rules, regulations, and ethical business practices is ingrained in our culture. We acknowledge the responsibility to proactively self-govern and closely monitor compliance with both legal requirements and our Code of Conduct.

## To Our Suppliers

We are committed to fostering fair competition among potential suppliers and embracing the responsibility expected from a responsible customer. We advocate for our suppliers to establish their own set of ethical principles that align with our commitment to integrity and fairness in business practices.

# Safe, Healthy and Secure Workplace

We all take responsibility for keeping ourselves, our patients and our communities safe, secure and healthy. Safety is a top priority. We always comply with OSHA and other government regulations that are in place to protect us. It is the right thing to do and allows us to better care for our patients.

## To keep everyone safe, we...

- ☑ Know and follow all health and safety policies and procedures
- ☑ Avoid unnecessary risks and discourage others from taking them
- ☑ Know what to do in case of injury or other workplace emergencies
- ☑ Participate in emergency drills
- ☑ Immediately report any unsafe conditions or behaviors
- ☑ Contact law enforcement in situations of imminent danger

We also take special precautions with hazardous materials, infectious diseases and other biomedical concerns by following all policies regarding personal hygiene, sanitation, sterilization and disposal of materials.

OnePeak Medical has a zero tolerance for violence.

Violence and threats of violence are unacceptable. **We...**

- ☑ Never bring a weapon, firearm, or explosive into a facility
- ☑ Never strike another person
- ☑ Never threaten another person
- ☑ Never stalk another person

## You should always speak fearlessly and raise a concern when...

- ☑ An unsafe condition or potential danger to yourself or others comes to your attention
- ☑ You are aware of inaccurate or misleading information being provided to regulatory authorities
- ☑ Previously reported unsafe tasks or issues have not been adequately addressed
- ☑ The task you consider unsafe is assigned to you
- ☑ A job you think you are not properly trained to perform and that may harm you or others is assigned to you
- ☑ Someone is performing a task that you believe is unsafe or that the person is not properly trained to perform
- ☑ A piece of equipment is not operating properly and may be unsafe

# Empowering Excellence:

## Every Choice, Every Day



Jane and Sam work together in the same clinic and have become friends. During their shift, Jane tells Sam that she sometimes drinks alcohol during breaks to calm her nerves.

Sam debates what to do with this information. On one hand, Sam and Jane are friends and Sam does not want to get Jane in trouble. Jane is not acting impaired; however, Sam knows it is against company policy to have alcohol in your system while at work.

Sam determines that even if Jane does not seem impaired, her judgment could still be affected, which could affect the quality of patient care. Sam decides to report to People Operations immediately.

### Prevent Abuse of Controlled Substances, Drugs and Alcohol at Work

We are committed to the highest standards of handling and dispensing controlled substances and strictly prohibit the possession or use of alcohol and illegal drugs.

The way we handle and dispense controlled substances is subject to Federal and state regulations. In addition, the use of illegal substances and alcohol poses a danger to the health of the user and of our patients. Violating our substance abuse policy will lead to disciplinary action. Anyone who is suspected of drug abuse could be asked to submit to a drug test.

### To ensure the highest standards, we...

- ☑ Follow all policies completely every time we handle controlled substances
- ☑ Never bring illegal drugs or other controlled substances on OnePeak Medical property
- ☑ Never consume or be under the influence of illegal drugs or alcohol while at work
- ☑ Talk to a manager if we see a colleague who may be under the influence of alcohol or drugs while at work



# Caring for Patients with Dignity and Respect

Each patient has certain rights, including the right to be treated with dignity and respect at all times. Patients also have the right to participate in, and make decisions about their health care, including the right to refuse medical treatment to the extent permitted by law.

## To help patients make an informed decision, we...

- ☑ We provide treatment without discrimination and without regard to gender identity, race, color, religion, national origin, ancestry, sex, political belief or affiliation, marital status, age, sexual orientation, physical or mental disability or association with a person with a disability, order of protection status, military status, or pregnancy.
- ☑ We inform patients and their families and others, when permission is given, about care, treatment, and service options, as well as therapeutic alternatives and the risks associated with the care they are receiving.
- ☑ We involve patients and families in decisions regarding care.
- ☑ We inform patients of the availability of financial assistance.
- ☑ We provide language interpretation services free of charge to assist all patients in understanding and participating in their care.
- ☑ We comply with laws that govern how we care.

## Thoughts from Dr. Ananyev

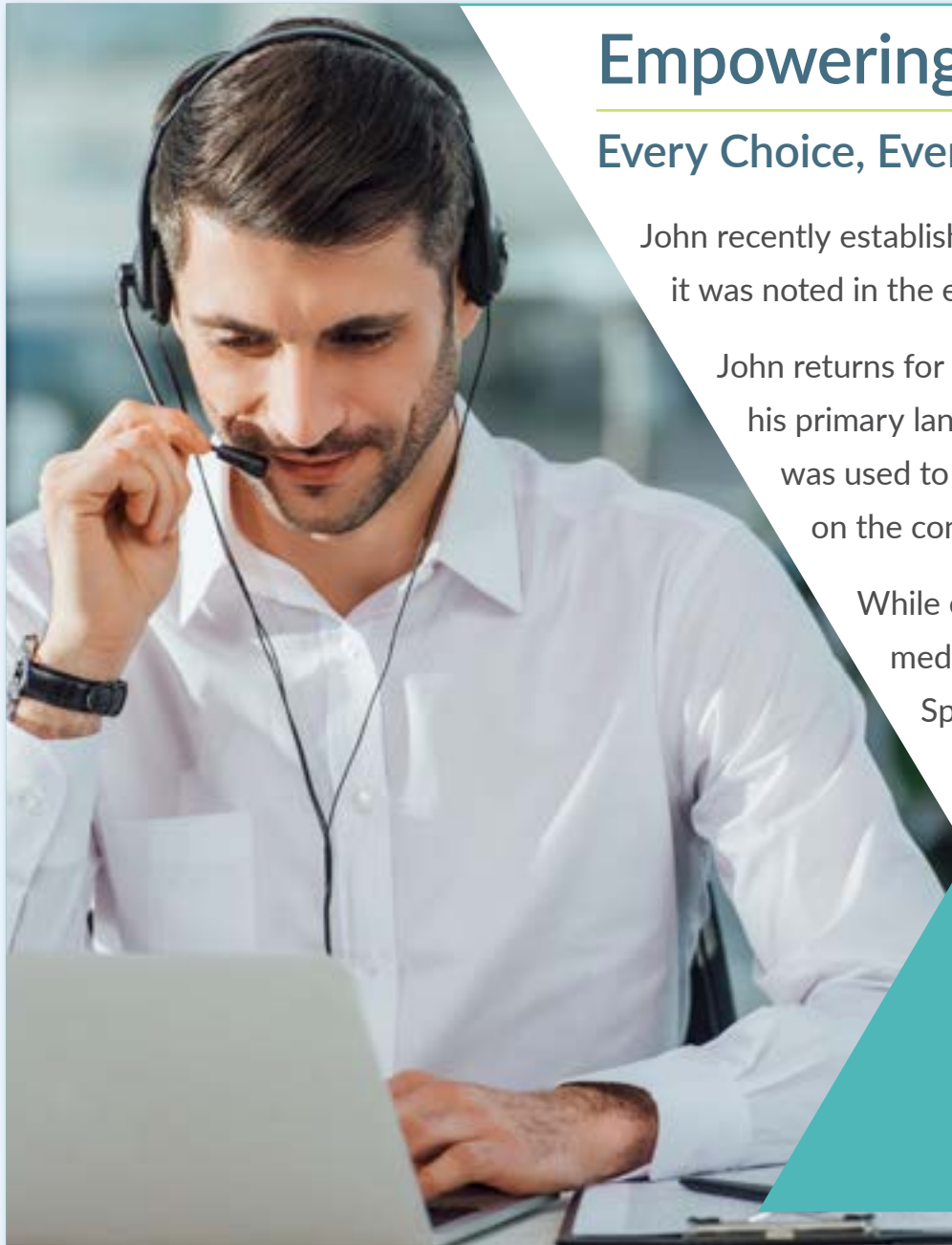
### Daniel Ananyev, D.O. Medical Director

I am often inspired by the words of Martin Luther King Jr., who stated, 'All labor that uplifts humanity has dignity and importance and should be undertaken with painstaking excellence.' At OnePeak, a patient's dignity is the very foundation upon which trust, empathy, and healing thrive.

Our mission extends beyond a clinical focus; it encompasses the fundamental principle of every interaction guided by the admiration of each patient's unique narrative. Our commitment to dignity is the cornerstone of our identity as healers and caregivers, guiding our every interaction, and fulfilling our purpose.

We strive for a culture where compassion is integral to our practice. Together, we embrace this philosophy in every aspect of our work, with the dignity of empathy, the warmth of understanding and the attention that each individual deserves.





## Empowering Excellence:

### Every Choice, Every Day

John recently established care at OnePeak Medical. During registrations, it was noted in the electronic record that his primary language is Spanish.

John returns for a pellet insertion appointment. Despite the note regarding his primary language, the medical record does not show that an interpreter was used to explain the procedure. In addition, there is no notation on the consent form that it was translated for the patient.

While ensuring all necessary paperwork has been obtained, the medical assistant, Sandra, notices that John is speaking only Spanish but was provided the consent form in English. Sandra becomes concerned that John may not understand what he is being told. She contacts Interpreter Services to have someone explain consent to John, see if he has questions and confirm that John consents to the procedure. Sandra documents these actions in the medical record, including the need for an interpreter.

## Providing the Highest Quality of Care

Continuous improvement in quality of care and patient safety is a top priority. We continuously seek ways to improve outcomes and raise the bar. To maintain the highest quality of care possible, we embrace best practices. OnePeak Medical investigates, evaluates, and incorporates recommendations from trusted government, academic and medical sources.

### To ensure the highest-quality care, we...

- ☑ Never bypass quality controls or take shortcuts that compromise the quality or safety of our products.
- ☑ Are mindful of quality in all we do.
- ☑ Keep our licenses and certifications current.
- ☑ Renew credentials on schedule and fulfill continuing educational credit requirements.
- ☑ Report quality concerns right away.

*Thoughts from Holley*

**Holley Moreno, MHA**  
Director of Operations

Quality care extends past medical treatment; it embodies a holistic commitment to the well-being and dignity of every individual under our care.

Quality care means advocating for patients' rights and ensuring they have the resources to be active participants in their own health. It's the foundation of trust, compassion, and healing that guides every interaction with integrity and respect. Continuous striving for excellence in quality care not only enhances patient satisfaction but also leads to improved health outcomes, fostering a healthier and more resilient community.



# Empowering Excellence:

## Every Choice, Every Day



Amanda, a coder, has recently obtained power of attorney for her mother's medical decisions. Unfortunately, her mother lives several hours away, so Amanda is always worried about her.

As a coder, Amanda has the ability to access her mother's health information within the electronic health record (EHR) system. Amanda knows her mother just had an office visit during which labs were completed. Amanda wants to know the results, but calling her mother to find out is a struggle. Before Amanda looks up her mother's information, she emails her supervisor to see if it is appropriate.

Her supervisor reminds Amanda that it would never be appropriate to access a family member's or friend's records through her access as a coder. Her supervisor suggests that Amanda register for patient portal access that is available to all patient-authorized family members.

## Patient Rights to Privacy

Patient information has privacy protections under state and Federal laws, including the Health Insurance Portability and Accountability Act (HIPAA), and we all have a duty to protect the confidentiality and security of that patient information. Our Notices of Privacy Practices describe how we use, access, and disclose the Protected Health Information (PHI) of our patients.

**To safeguard PHI, we must adhere to the following requirements:**

- ✓ Only access and use PHI that you need for the task at hand in the course of your official job duties, including your own medical charts and those of your family.
- ✓ Never share PHI with anyone that is not authorized to see or use it.
- ✓ Never post PHI or stories about patients on social media.
- ✓ Always get a patient's permission before sharing PHI or speaking about it in the presence of others, including the patient's family or friends.
- ✓ Never leave PHI out in the open where unauthorized people can see it, whether on paper, a computer screen, a whiteboard, or any other media.
- ✓ Be aware of your surroundings when discussing PHI with another authorized party to limit the chances of others overhearing. Avoid having such conversations in public areas such as the front desk or hallways.
- ✓ PHI should never be saved to unauthorized, personal electronic devices. Never remove PHI from your facility without prior approval.
- ✓ Immediately report the loss, misplacement, or theft of PHI to Compliance.

## Examples of Confidential Information

Confidential information is virtually anything related to OnePeak Medical's operations that is not publicly known such as:

- ✓ Personnel data
- ✓ Patient lists and clinical information
- ✓ Individually identifiable patient information and clinical quality data
- ✓ Patient financial information
- ✓ Passwords
- ✓ Pricing and cost data
- ✓ Information pertaining to acquisitions, divestitures, affiliations and mergers
- ✓ Financial data
- ✓ Details regarding Federal, state, and local tax examinations
- ✓ Strategic plans
- ✓ Marketing strategies and techniques
- ✓ Supplier and subcontractor information
- ✓ Proprietary computer software
- ✓ Photos and videos

# Safeguarding Assets

## Personal Use of OnePeak Medical Resources

It is the responsibility of each OnePeak Medical employee to preserve our organization's assets including time, materials, supplies, and information. Organization assets are to be maintained for business-related purposes. As a general rule, the personal use of any OnePeak Medical asset without prior supervisory approval is prohibited. The occasional use of items such as printers or telephones, where the cost to OnePeak Medical is insignificant, is permissible. Any community or charitable use of organization resources must be approved in advance. Any use of organization resources for personal financial gain unrelated to OnePeak Medical's business is prohibited.

## Confidential Information

OnePeak Medical defines confidential information or "sensitive information" as proprietary information about our organization's strategies and operations as well as patient information and third-party information. Confidential information is virtually anything related to OnePeak Medical's operations that is not publicly known. Improper use or disclosure of confidential information could violate legal and ethical obligations. Confidential information may only be used to perform job responsibilities. We are all responsible for due care and due diligence to maintain the confidentiality, availability, and integrity of information assets OnePeak Medical owns.

# Technology Safeguards

Safeguarding confidential and sensitive information is our shared responsibility. The IT department implements several layers of security, including firewalls, anti-virus software, intrusion detection systems, and incorporates the use of regular security audits. However, technology alone cannot guarantee security. Each of us must remain vigilant and proactive in protecting data.

## To ensure the safety of our technology and information we....

- ✓ Exercise caution when emailing sensitive information by using the encryption tools provided by our IT Department.
- ✓ Avoid using personal email accounts for work-related communications.
- ✓ Avoid using work computers for personal use.
- ✓ Rely on the patient portal to communicate with patients about details of their healthcare.
- ✓ Avoid clicking suspicious links and refrain from visiting unsecure websites that may increase the risk of phishing attempts.
- ✓ Check with the IT Department before using removable media like CDs or USB drives.
- ✓ Securely store removable media when not in use and never leave it unattended.
- ✓ Never disclose patient information on social media or any other digital platform.
- ✓ Report any potential information security concerns to the IT Department immediately.

*Thoughts from Jacob*

## Jacob Thompson Director of Information Technology

We live and work in an interconnected world, and it is our responsibility to ensure the safe handling of our patients' information. Even the simplest of tasks can make a big difference when it comes to IT safety. For example, just like washing your hands can prevent exposure to germs, keeping strong, unique passwords can prevent malicious entry into your accounts. While at times some security measures can feel like a nuisance, it is important to remember that our community's health extends to our practices of technological safety.

At OnePeak Medical, we are dedicated to offering our patients the best experience possible while maintaining a safe and secure environment. Best practices in IT start with each of us the moment we start the day, and if you ever have concerns, contact your IT department!



# Empowered by Ethical Principles

- ▶ Understanding the Federal Anti-Kickback Statute
- ▶ Gifts and Business Courtesies
- ▶ Avoiding Conflicts of Interest
- ▶ Understanding the Federal Physician Self-Referral (PSL) Law or “Stark Law”
- ▶ Accurate Billing and Coding Practices
- ▶ Understanding the False Claims Act (FCA)
- ▶ Abiding by the Exclusions Statute
- ▶ Accurate Marketing and Advertising Practices
- ▶ Cooperation with Government and Internal Investigations

As stewards of care, we have an ethical responsibility to prevent fraud, waste, and abuse of important healthcare resources. Understanding and adhering to specific fraud and abuse laws is crucial, not only because it is the right thing to do, but also because violations can result in repayment, criminal penalties, civil or administrative fines, and exclusion from Federal healthcare programs.



# Understanding the Federal Anti-Kickback Statute

The Federal Anti-Kickback Statute prohibits healthcare organizations like OnePeak Medical who participate in Federal health care programs, from engaging in certain practices that may be common in other businesses. This includes offering remuneration to reward referrals. The law makes it a criminal offense to knowingly and willfully provide, pay, ask for, or receive any form of remuneration to encourage or in exchange for referrals related to Federal health care programs.

The statute not only applies to referrals for services but also extends to remuneration related to the purchase, lease, or order of any goods, facilities, services, or items covered by a Federal health care program. It covers both direct and indirect activities, as well as overt and covert actions in all instances.

## What is “Remuneration”?

Remuneration includes anything of value, whether in cash, in kind, or other form.

### Examples may include:

- Cash
- Cash equivalents
- Cost-sharing waivers or subsidies
- Opportunity to earn a fee
- Items
- Space
- Equipment
- Services



# Does it Violate the Statute?

When attempting to identify problematic arrangements, some relevant questions to explore and consider can include the following:

## Nature of the relationship

- ☑ How much influence do the parties have on generating business from Federal health care programs for each other?

## Impact on Objectivity

- ☑ Would accepting the remuneration compromise professional objectivity?
- ☑ If related to information dissemination, is the information accurate and unbiased?

## Steering

- ☑ Does the arrangement raise concerns about steering patients or entities towards specific services or providers?

## Influence on Decision Making

- ☑ Could the arrangement interfere with clinical decision making?
- ☑ Does it raise concerns about patient safety or quality of care?
- ☑ Could the payment structure lead to bias in selecting patients?

## Selection Criteria

- ☑ Were parties chosen for the arrangement because of their past or expected referrals?

## Determination of Remuneration

- ☑ Does the remuneration consider the volume or value of generated business?
- ☑ Is it dependent on referrals or other business between the parties?
- ☑ Is the arrangement tied to the volume or value of Federal health care program business?

## Value Assessment

- ☑ Is the remuneration fair market value for legitimate, reasonable, and necessary services?
- ☑ Is there a risk of overpayment to a potential referral source?
- ☑ Is compensation linked to Federal health care program reimbursement?
- ☑ Is the fair market value determined using a reasonable and consistently applied methodology?

## Legitimacy of Services

- ☑ Are the provided items and services necessary, commercially reasonable, and vital for a legitimate business purpose?

## Federal Program Impact

- ☑ Could the remuneration affect costs for Federal health care programs or beneficiaries?
- ☑ Is there a risk of over utilization or inappropriate use due to the remuneration?

## Written Documentation

- ☑ Is the arrangement thoroughly and properly documented in writing?
- ☑ Are parties documenting the items and services provided?
- ☑ Are the entities monitoring and conducting arrangements as per written agreements (when required by law)?

## Gift Chart

Assuming the offer of a gift meets the restrictions discussed in this section:

**\$75**

Maximum total of gifts you can receive in a year from one person or entity without further approval.

Any gifts exceeding that amount must be approved by BOTH your supervisor and the Compliance Officer.

**\$75**

Maximum amount of a gift you can accept without further approval.

If any single gift has a face value more than \$75, it must be approved by BOTH your supervisor and the Compliance Officer.

**\$50**

A reasonable and acceptable amount of a gift card you can receive for a holiday or birthday or similar special event.

**\$15**

The maximum value of any gift you give to or receive from a patient.

**\$0**

Generally speaking, no gifts to or from government representatives.

## Gifts and Business Courtesies

Gifts are never used to influence business decision.

Gifts have the potential to influence objectivity, or at least create the impression of doing so. However, we recognize that gift-giving is customary in many business practices, and that in certain settings, exchanging hospitality and gifts can build goodwill and strengthen business relationships. We follow appropriate gift guidelines that make sure our actions always reflect transparency and integrity.

### To avoid the appearance of improper conduct, we...

- ☑ Never ask for gifts.
- ☑ Never accept cash, gift cards or cash equivalents (exceptions listed in gift chart).
- ☑ Only accept gifts or hospitality that are low in value and given on an infrequent basis.
- ☑ Never accept any gifts or inappropriate hospitality from vendors if we are a member of the team evaluating a procurement in which the vendor is competing.

### Any gift we provide must:

- ☑ Be for a proper business purpose.
- ☑ Be legal and accurately documented.
- ☑ Be permitted by OnePeak Medical policies.
- ☑ Be permitted by the recipient's policies.
- ☑ Be reasonable in value and appropriate under the circumstances.
- ☑ Not be cash, gift certificates, or other cash equivalents (exceptions listed in gift chart).
- ☑ Not be intended to secure an improper advantage or otherwise influence the recipient inappropriately.

## ▶ Gifts and OnePeak Colleagues

As we work together on a daily basis, it is natural for interpersonal dynamics to come into play. While it is impossible to predict every situation that may arise, a few common ones should be addressed. Gift-giving among colleagues for special occasions should be voluntary, with no pressure to participate. Lavish gifts to supervisors are not appropriate. Similarly, fundraising efforts by individual colleagues and company-supported charities should be voluntary, without repercussions for non-participation.

## ▶ Gifts and Patients

It is a normal part of providing healthcare to develop bonds with our patients. However, any exchange of gifts can create the appearance of favoritism or improper incentive. Gifts to and from patients are generally prohibited but on an exceptional basis may be acceptable if they are:

- ☑ Small in value and not cash or a cash equivalent (generally, less than \$15)
- ☑ Homemade or perishable, such as flowers or cookies
- ☑ Consistent with the patient's clinical care

## ▶ Gifts and Pharmaceutical Companies and Medical Device Manufacturers

Medical suppliers are important partners in our services we provide. These vendors should follow the principles spelled out in the Pharmaceutical and Manufacturers Code on Interactions with Health Care Professionals or the Advanced Medical Technology Association Code of Ethics.

# Empowering Excellence:

## Every Choice, Every Day



Gillian, a medical assistant, has been instrumental in helping a patient with several complex referrals. Gillian's persistence and attention to detail helped the patient to receive timely care for a potential cancer concern. Ultimately, the patient was able to receive an early diagnosis and treatment is expected to be successful.

At the patient's next visit to the clinic, they hand Gillian an envelope. Gillian puts the envelope in her pocket and doesn't open it until the end of her shift, after the patient has left the clinic. The envelope contains \$100 cash with a thank-you note for her excellent care.

Gillian knows the Code of Conduct gives guidance regarding offers of cash or cash equivalent gifts from patients. She understands she cannot accept the money. She brings it to her manager, who writes a letter to the patient returning the money and explaining that employees are prohibited from accepting such gifts. The manager expresses appreciation for recognizing the employee's services and recommends submitting a G.E.M. The manager also commends Gillian for "doing the right thing" and reporting the gift.

### ▶ Gifts and Government Employees and Agencies

There are strict rules about giving gifts or entertaining government officials and employees of state-owned organizations. What might be okay for commercial customers might actually be against the law when it comes to dealing with the government. At OnePeak Medical, all employees are prohibited from giving gifts, meals, or anything valuable to government officials or their families unless they get written approval from the Compliance Officer or CEO beforehand.

### ▶ Gifts and Healthcare Providers

Gifts exchanged with providers and clinicians are generally prohibited. We would never want to give the impression that a provider has special permissions or preferential treatment because he or she gave us a gift. Gifts to physicians or their immediate family members are subject to strict requirements under the Stark Law. They must be tracked in a physician gift log and discussed with the Compliance Officer.

# Avoiding Conflicts of Interest

Conflicts of interest pose a significant risk to OnePeak Medical, potentially jeopardizing our reputation. Even the mere perception of a conflict could undermine the trust we've worked hard to establish as a top-tier and ethically driven medical practice. By ensuring fair and impartial decision-making, we safeguard the trust and confidence our patients and employees have in our organization.

## What is a Conflict of Interest?

A conflict of interest occurs when our personal interests interfere with OnePeak Medical's. These situations are a problem because they could keep us from making objective decisions and doing our best work.

## To act in the best interest of our patients at all times, we...

- ✓ Always put OnePeak Medical's interest ahead of our personal interests.
- ✓ Avoid even the appearance of a conflict of interest.
- ✓ Ask for help if we aren't sure whether a situation could be a conflict.
- ✓ Disclose any actual or possible conflicts of interest.
- ✓ Follow all guidance for managing actual or possible conflicts.

## Examples of Potential Conflicts of Interest

- ✓ Improper personal benefits we gain from working at OnePeak Medical
- ✓ Business opportunities
- ✓ Loans to employees or their families
- ✓ Business arrangements with OnePeak Medical
- ✓ Business relationships with family members
- ✓ Employer/employee relationships
- ✓ Outside employment with a competitor
- ✓ Personal investments with competitors, customers, or suppliers
- ✓ Charitable activities or connections to government officials
- ✓ Payment from pharmaceutical, medical device or other healthcare companies
- ✓ Family Members working in the healthcare industry

# Empowering Excellence:

## Every Choice, Every Day



Grant, the facilities manager, is friends with Bernice, the owner of a landscaping company. Grant's son works for Bernice. After one of OnePeak Medical's current landscaping services raises prices, Grant sends a request for proposals to several new companies – including Bernice's. Grant receives seven proposals. Bernice's company is the second highest bid.

Grant reviews the Conflict of Interest Policy and decides the best course of action is to remove himself from making the decision. He hands off the project to a colleague but doesn't disclose his relationship with Bernice. The colleague reviews all bids that offer the same level of service, and ultimately goes with the lowest bid.

While Grant was correct to remove himself, he should have also revealed the potential conflict of interest and notified his supervisor and Compliance.

## Managing Conflicts of Interest

Most conflicts can be managed as long as we disclose them properly.

### Remember:

- ☑ All employees, including executive leadership, must disclose conflicts of interest using the appropriate form.
- ☑ Conflicts will be reviewed by the Compliance Officer and/or Compliance Committee, who will:
  - Assess the nature and extent of the conflict.
  - Advise management on how to resolve the conflict.

# Understanding the Federal Physician Self-Referral (PSL) Law or “Stark Law”

The Federal physician self-referral law, commonly known as the “Stark law,” prevents a physician from referring patients for certain designated health services (DHS) covered by Medicare to an entity in which the physician or an immediate family member has a financial connection, unless specific conditions called exceptions are met. Financial relationships covered by the law include ownership, investments, and compensation arrangements.

## Designated Health Services (DHS) Are:

- ✓ Clinical laboratory services
- ✓ Physical therapy, occupational therapy, and outpatient speech-language pathology services
- ✓ Radiology and certain other imaging services
- ✓ Radiation therapy services and supplies
- ✓ Durable medical equipment and supplies
- ✓ Parenteral and enteral nutrients, equipment, and supplies
- ✓ Prosthetics, orthotics, and prosthetic devices and supplies
- ✓ Home health services
- ✓ Outpatient prescription drugs
- ✓ Inpatient and outpatient hospital services

## Six Elements of PSL

Where all six elements exist, the PSL prohibits a physician from making a referral for designated health services:

- |                                  |   |
|----------------------------------|---|
| 1 A physician                    | 6 With which the physician (or an immediate family member) or the physician organization in whose shoes the physician stands has a financial relationship (which could be a direct or indirect ownership or investment interest in the entity or a compensation arrangement with the entity). |
| 2 Makes a referral               |   |
| 3 For designated health services |   |
| 4 Payable by Medicare            |   |
| 5 To an entity                   |   |
|                                  |   |

### Example of a Referral Prohibited under the PSL:

Dr. Johnson works in a physician practice located in a major city. Dr. Johnson’s sister owns a freestanding laboratory located in the same city.

Dr. Johnson refers all orders for clinical laboratory tests on Medicare patients to the sister’s free-standing laboratory.

# Accurate Billing and Coding Practices

We are reimbursed for our services by a number of payors. The government, insurance companies and individuals all pay a portion of our revenues. It's our job to fully comply with all regulations and to provide our stakeholders with accurate, complete, and timely billing information.

OnePeak Medical ensures the integrity of our billing process and guards against any false, fictitious, or fraudulent claims through:

- ☑ **Employee Training** – Ongoing training ensures that we maintain our standards to consistently reinforce the high level of quality we expect in all financial matters.
- ☑ **Billing Controls** – OnePeak Medical has built internal controls into our billing systems. If our job includes coding or billing activities, we follow all applicable policies.
- ☑ **Cost Reports** – Detailed analyses of charges by department are required in Medicare and Medicaid reimbursement. They often include statistical data on patient numbers and provider reports that give our company additional insight into the financial health of our facilities and services.
- ☑ **Audits** – Routine billing and coding audits spot-check our systems. Government agencies and other payors may also verify accounts with audits. We cooperate fully with audits.
- ☑ **Investigations** – We proactively seek the truth when there is a report or suspicion of inappropriate activity. Outside agencies and companies may also request our assistance with an investigation. We cooperate fully with lawful investigations.
- ☑ **Destruction** – We will not obstruct or interfere with an audit or investigation by destroying requested documentation such as email, reports, handwritten notes, etc. At all times, we will provide accurate and timely information.

*Thoughts from Karissa*

**Karissa Stults**

**Vice President of Billing and Contracting**

Ethical billing and coding aren't just about following rules; they represent the moral compass guiding healthcare practices. They encompass integrity, ensuring honesty and accuracy in financial transactions. Transparency is equally essential, fostering trust by providing clear explanations of charges and procedures to patients. Ultimately, ethical billing and coding uphold respect for both patients and the healthcare system, promoting fairness and accountability. It's about doing what's morally right, not just what's legally mandated.





# Empowering Excellence:

## Every Choice, Every Day



Ben works in the billing department and notices that several claims may lack sufficient documentation. He questions whether some of the billed services were properly coded. However, because of poor revenue performance during the last quarter, Ben feels compelled to help the organization and submits these claims to the government for payment.

One of Ben's coworkers learns of Ben's behavior and files an anonymous complaint through the anonymous hotline alleging that Ben has placed the organization at risk for potential violations under billing regulations.

Here, Ben had a duty to ensure that the clinic billed for services provided, the claims were properly documented, and the clinic used accurate billing codes. If he wasn't sure, he should have called the Compliance department.

# Understanding the False Claims Act (FCA)

The civil False Claims Act provides a way for the Government to recover money when an individual or entity knowingly submits false or fraudulent claims for payment to the Government. The False Claims Act prohibits:

- ☑ Knowingly submitting or causing the submission of a false or fraudulent claim for payment or approval to the Federal Government.
- ☑ Knowingly creating or using false records or statements to get the Government to pay or approve a false or fraudulent claim. Violations of the Physician Self-Referral Law (PSL) may lead to violations of the False Claims Act (FCA).
- ☑ Knowingly creating or using false records or statements to hide, evade, or reduce an obligation to pay money or transmit property to the Government.

## “Knowing” and “Knowingly”

The False Claims Act defines “knowing” and “knowingly” to include not only actual knowledge but also instances in which the person acted in deliberate ignorance or reckless disregard of the truth or falsity of the information. This means individuals and entities cannot avoid liability by deliberately ignoring inaccuracies in their claims.

### What is a False Claim?

Potential examples of false claims include:

- ☑ Billing for services that were not provided at all
- ☑ Billing for services that were provided but were not medically necessary
- ☑ Submitting inaccurate or misleading claims about the types of services provided

## Abiding by the Exclusion Statute

The government has strict rules on who is allowed to bill, directly or indirectly, for health care services to Federal health care programs. The Office of the Inspector General (OIG) prohibits organizations like OnePeak Medical from billing to Medicare or Medicaid if any services were provided by a person or entity sanctioned or excluded from Federal health care programs.

OnePeak Medical does not contract with, employ, or bill for services rendered by an individual or entity that is excluded or ineligible to participate in Federal health care programs. We regularly screen all employees and vendors to ensure adherence to exclusion requirements.

### Examples of Exclusions

- ✓ Medicare or Medicaid Fraud
- ✓ Patient abuse or neglect
- ✓ Felony convictions for other healthcare-related fraud, theft or other financial misconduct
- ✓ Felony convictions for unlawful manufacture, distribution, prescription, or dispensing of controlled substances
- ✓ Other grounds including misdemeanor convictions related to health care fraud
- ✓ Other grounds including suspension, revocation, or surrender of a license to provide health care for reasons veering on professional competence, professional performance, or financial integrity
- ✓ Provision of unnecessary or substandard services
- ✓ Submission of false or fraudulent claims to a Federal health care program
- ✓ Engaging in unlawful kickback arrangements
- ✓ Defaulting on health education loan or scholarship obligations

## Accurate Marketing and Advertising Practices

We portray ourselves with honesty and integrity in all marketing and advertising. We work hard to help the public understand our commitment to communities, our partnerships with talented healthcare providers and staff, our compassion for patients and the quality of our services. Honest advertising and marketing help us protect and promote that image.

### Our Marketing and Advertising Materials:

- ✓ Substantiate quality claims with factual evidence.
- ✓ Clearly articulate our services to prevent confusion.
- ✓ Demonstrate respect for our competitors by refraining from degrading or defaming other healthcare providers.
- ✓ Truthfully represent the actual charges for our services when applicable.
- ✓ Obtain approval from Marketing.
- ✓ Adhere to all state and Federal advertising laws.

No advertising or promotional material may use the OnePeak Medical logo without a review by Marketing and/or administration.

## Cooperation with Government and Internal Investigations

OnePeak Medical cooperates with local, state and Federal agencies on any investigations, audits or lawful requests for information. Our cooperations extends to a wide range of government agencies from local law enforcement to state and Federal departments of health and human services.

### When we work with the government, we will:

- ✓ Stay informed and comply with applicable laws, regulations, policies and procedures.
- ✓ Communicate truthfully and transparently.
- ✓ Respond promptly, comprehensively, and accurately to all law requests for information.
- ✓ Promptly notify your Supervisor, Manager, the Compliance Department or People Operations Department if OnePeak Medical receives a request from a Federal or state government agency.

# Empowered by Our TRIBE

- ▶ Non-Discrimination
- ▶ Anti-Harassment

At OnePeak Medical, we draw strength from our TRIBE – a powerful alliance founded on our fundamental values. Together, we unite through seamless collaboration, embracing a rich tapestry of perspectives and inclusive approaches to craft experiences that resonate deeply. We practice active listening and communicate with genuine positivity, ensuring that every voice is not just heard but honored. We cultivate an environment that thrives on diversity and inclusivity, nurturing the well-being of each individual. Empowered by our TRIBE, we deliver excellence in every endeavor.

## Non-Discrimination

Diverse talents, perspectives and backgrounds make us who we are. By being inclusive and ensuring everyone feels able to contribute, we can draw on these diverse characteristics to make better decisions, solve problems with creativity and work more efficiently. It allows us to be better equipped to care for the diversity of our patients and communities.

### To embrace diversity and inclusion, we...

- ☑ Treat each other fairly.
- ☑ Build our teams with diversity in mind.
- ☑ Seek out and listen to the points of view of others with courtesy and respect.
- ☑ Speak out if we feel our views or those of others are being disrespected.
- ☑ Refuse to accept any excuse for discrimination – there are none!

*Thoughts from Melissa*

**Melissa Rogers**

Vice President of People Operations

I am proud to underscore OnePeak Medical's commitment to fostering an inclusive environment where every member of our TRIBE feels valued, respected, and supported. Maya Angelou once said, "We all should know that diversity makes for a rich tapestry, and we must understand that all the threads of the tapestry are equal in value no matter their color."

Our TRIBE is composed of individuals with diverse backgrounds, experiences, and perspectives. It is this diversity that enhances our collective efforts and enables us to deliver exceptional care to our patients. It is imperative that we uphold a culture grounded in mutual respect, where every member feels empowered to flourish both personally and professionally.

Remember that each of us plays a crucial role in championing inclusivity. Let us stand together, united in our commitment to creating a workplace where everyone is treated with dignity and respect.



### We do not discriminate based on:

- |  |   |
|--|---|
| <input checked="" type="checkbox"/> Age                | <input checked="" type="checkbox"/> Religion                          |
| <input checked="" type="checkbox"/> Sex                | <input checked="" type="checkbox"/> Marital status                    |
| <input checked="" type="checkbox"/> Gender identity    | <input checked="" type="checkbox"/> Pregnancy                         |
| <input checked="" type="checkbox"/> Sexual orientation | <input checked="" type="checkbox"/> HIV status                        |
| <input checked="" type="checkbox"/> Race               | <input checked="" type="checkbox"/> Military service or affiliation   |
| <input checked="" type="checkbox"/> Color              | <input checked="" type="checkbox"/> Genetic information               |
| <input checked="" type="checkbox"/> National origin    | <input checked="" type="checkbox"/> Bankruptcy                        |
| <input checked="" type="checkbox"/> Citizenship        | <input checked="" type="checkbox"/> Any other status protected by law |
| <input checked="" type="checkbox"/> Ethnicity          |   |
| <input checked="" type="checkbox"/> Disability         |   |

### Non-discrimination applies to:

- |   |   |
|---|---|
| <input checked="" type="checkbox"/> Recruiting              | <input checked="" type="checkbox"/> Demotions                   |
| <input checked="" type="checkbox"/> Hiring                  | <input checked="" type="checkbox"/> Transfers                   |
| <input checked="" type="checkbox"/> Compensation            | <input checked="" type="checkbox"/> Disciplinary action         |
| <input checked="" type="checkbox"/> Benefits                | <input checked="" type="checkbox"/> Terminations                |
| <input checked="" type="checkbox"/> Performance evaluations | <input checked="" type="checkbox"/> Staff reductions or layoffs |
| <input checked="" type="checkbox"/> Promotions              |   |

## Anti-Harassment

Our Code of Conduct prohibits harassment of any kind in the workplace or any other offensive or disrespectful conduct. You must never engage in workplace harassment, which includes unwelcome verbal, visual, physical, or other conduct of any kind that causes others to feel uncomfortable or creates an intimidating, offensive or hostile work environment.

OnePeak Medical considers the following non-exhaustive list to be unacceptable behavior:

- Sexual harassment
- Offensive language, jokes or degrading comments
- Racial, ethnic, gender or religious slurs
- Intimidating or threatening behavior

Remember that harassment, sexual or otherwise, is determined by your actions and how they impact others, regardless of your intentions. If you or someone else is the subject of discrimination or harassment, speak up and report it.

# Empowering Excellence:

## Every Choice, Every Day



Molly and Jessica have worked together for over two years. They often confide in each other regarding personal and work matters. In one such conversation, Molly tells Jessica she is fearful of a male employee who shows up at her desk several times a day. He also shows up at her car late at night when she leaves work. She feels uncomfortable with his behavior and says she feels she is being stalked. She is concerned the issue may escalate.

Jessica is not sure what to do. She worries about retaliation if she reports the employee. But because of her concern for Molly, she decides to contact People Operations to report the issue.

## What is Sexual Harassment

Sexual harassment may consist of verbal, visual or physical conduct of a sexual nature that is unwelcome and that a reasonable person would find offensive. It can take many forms, such as:

- ☑ Sexual advances, requests for sexual favors or unwelcome demands for dates.
- ☑ Sexually oriented jokes, pictures, texts or email messages.
- ☑ Explicit or degrading comments about appearance.
- ☑ Display of sexually suggestive pictures or pornography.



# Conclusion

We hold a profound commitment to one another, our patients, our industry, legal standards, our company, and the communities we serve. Our dedication to ethical and professional conduct is our top priority. The principles outlined in our Code of Conduct, along with our values and policies, serve as guiding forces, shaping our actions to uphold these commitments each day.

**Be empowered to embrace excellence in every choice, every day.**

# Resources

## ComplyLine Anonymous Hotline



Toll Free - (800) 928-0084

Online - [report.complyline.com](https://report.complyline.com)

Organization Pin - 255072

## Compliance Department Contact



Phone: (541) 930-8526

Email:  
[Compliance@peakmanagementgroups.com](mailto:Compliance@peakmanagementgroups.com)

## Billing Hotline



Phone: (541) 210-8721

Email:  
[Billing@peakmanagementgroups.com](mailto:Billing@peakmanagementgroups.com)

## People Operations Contact



Email:  
[HR@peakmanagementgroups.com](mailto:HR@peakmanagementgroups.com)