

CODE OF CONDUCT

Introduction

LifePath Systems (the Center) is committed to conduct that adheres to high ethical standards. Common sense, good business judgment, ethical personal behavior, as well as compliance with applicable laws, policies and procedures are what the Center expects from all members of the LifePath Systems workforce including our employees, volunteers, clinicians, vendors, contractors, and others affiliated with or doing business on behalf of LifePath Systems, whether paid or unpaid.

The LifePath Systems Code of Conduct details the fundamental principles, values, and framework for action within LifePath Systems. It is intended to complement the Center's Mission Statement, and Values and promote:

- Honest and ethical conduct;
- Compliance with all applicable federal, state, local laws, and regulations; and,
- Prompt internal reporting of violations and compliance concerns.

The Code of Conduct applies anytime your actions or behavior could be associated with the Center. This includes on and off-Center premises, at any time regardless of your work schedule, and via any medium, including social media, such as (but not limited to) Facebook, YouTube, LinkedIn, Tik Tok, and Twitter. The Code of Conduct provides general guidance on acceptable behavior and is not intended to fully describe the laws and regulations that apply to members of the workforce or to detail LifePath Systems policies and procedures. However, members of the LifePath Systems workforce are expected to be sensitive to key laws, regulations, policies, and procedures, and to know how to access the LifePath Systems Policy and Procedure eBook for additional guidance related to this Code of Conduct.¹

Our Service Delivery

LifePath Systems is committed to providing high-quality services in the communities we serve and advocate for a responsive management style and a philosophy for those who receive our services based on integrity, competence, and excellence.

LifePath Systems treats those who receive our services with respect and dignity, providing high-quality, compassionate care in a clean, safe environment.

Health Care Professionals

In addition to the LifePath Systems Code of Conduct, health care professionals are expected to have and maintain all required licenses and follow the ethical and professional standards dictated by their respective professional organizations and licensing boards.

Leadership Responsibilities

We expect our leaders to set the example and to be in every respect a role model. Our leaders should help to create a culture that promotes the highest standards of conduct based on ethics and compliance. The Center must never sacrifice ethical and compliant behavior in the pursuit of business objectives.

¹ In the event of any inconsistency between the LifePath Systems Code of Conduct and the LifePath Systems Policy and Procedure eBook, the language in the LifePath Systems Policy and Procedure eBook shall prevail.

Compliance

LifePath Systems is committed to full compliance and expects its workforce members to obey all applicable federal, state, and local laws and regulations, and to comply with LifePath Systems Policies and Procedures. Compliance will be an important aspect of performance evaluations. A violation of LifePath Systems Code of Conduct, policies or procedures or any law or regulation will be handled through approved disciplinary procedures, and may lead to serious disciplinary action, up to and including immediate termination.

LifePath Systems Policies and Procedures

Members of our workforce are required to understand and follow all policies and procedures that apply to their work at LifePath Systems. This Code of Conduct is located in Section III of the LifePath Systems Policy and Procedure eBook. Any questions about the applicable legal, policy or procedural requirements, should be directed to your supervisor (or contract manager, if applicable) or the LifePath Systems Human Resources Department. The LifePath Systems Policy and Procedure eBook is available on the Center's Global (J) drive, or by contacting your supervisor or contract manager.

Conflicts of Interest

A conflict of interest exists when an individual's private interests interfere in any way with the interests of LifePath Systems. A conflict situation can arise when a member of our workforce takes an action or has interests that may make it difficult to perform their work objectively and efficiently. Conflicts may also arise when a member of our workforce or their family, receives improper personal benefits as a result of their position at LifePath Systems. Conflicts of interest may not always be clear-cut, so if you have a question you should notify your supervisor. It is your responsibility to report to your supervisor if you become aware of a conflict or potential conflict. Any exceptions to the Center's conflict-of-interest rules must be approved by our Chief Executive Officer.

Laws and Regulations

LifePath Systems workforce members are expected to perform their duties in good faith to the best of their ability and not engage in any illegal, unfair, or deceptive conduct relating to business practices. LifePath Systems expects its workforce members to fully comply with all applicable laws and regulations including federal, state, and local. Failure to comply with legal requirements can lead to serious disciplinary action, up to and including immediate termination. Key health care compliance laws which are also addressed in the LifePath Systems Biennial Compliance Program include (but are not limited to):

- Title XVIII of the Social Security Act.
- The physician self-referral law, known as the Stark law, which prohibits health care entities from submitting any claim for certain services called designated health services if the referral comes from a physician with whom the health care entity has a prohibited financial relationship.
- The federal anti-kickback statute and similar Texas statutes, which prohibit payments (direct or indirect), made to induce, or reward the referral or generation of government health care program business.
- The Emergency Medical Treatment and Labor Act (EMTALA), which contains requirements for the evaluation and treatment of emergency clients.

- Laws authorizing the U.S. Department of Health and Human Services (HHS), Office of Inspector General (OIG), to exclude health care providers from participation in federal health care programs that provide unnecessary or substandard items or services provided to any individual receiving services.
- Privacy and security laws and regulations that protect client information, including protected health information (PHI) under the Health Insurance Portability and Accountability Act of 1996 (HIPAA), the Health Information Technology for Economic and Clinical Health (HITECH) Act of 2009, the Final Omnibus Rule, and the Texas Medical Records Privacy Act as amended by Texas H.B.300.
- Federal and Texas false claims statutes and whistleblower protections that serve a key role in preventing and detecting fraud, waste, and abuse in government funded health care programs.

Coding and Billing Integrity

All billing practices as well as the preparation and filing of cost reports must comply with federal and Texas laws and regulations as well as LifePath Systems Policies and Procedures. LifePath Systems management will assist applicable workforce members in identifying and appropriately resolving any coding or billing issues or concerns. LifePath Systems will refund overpayments made by a federal health care program or other payers in accordance with applicable law.

Relationships with Federal Health Care Beneficiaries

Federal fraud and abuse laws prohibit offering or providing inducements to beneficiaries in government health care programs and authorize the Office of Inspector General (OIG) to impose civil money penalties (CMPs) for these violations. Government health care programs include Medicare, Medicaid, Veterans Administration, and other programs. Members of our workforce may not offer valuable items or services to the employees or representatives of these programs to attract their business (including gifts, gratuities, certain cost-sharing waivers, and other things of value).

Fraud and Abuse, the False Claims Act and Whistleblower Protections

LifePath Systems will fully comply with the federal False Claims Act (FCA) and Texas laws that fight fraud and abuse in government health care programs. The FCA contains a qui tam or whistleblower provision, which permits a private person with knowledge of a false claim for reimbursement by a government agency to file a lawsuit on behalf of the U.S. government. In addition, there are Texas laws and regulations that may allow an individual who reports fraud or abuse in the Medicaid Program, to receive a portion of the recovery. Under both the FCA and similar Texas laws, there are protections against retaliation.

Ineligible Persons, Excluded Individuals, and Entities

LifePath Systems does not do business with, hire, or bill for services rendered by excluded or debarred individuals or entities. You are required to report to your supervisor, or the Human Resources Department immediately if you become excluded, debarred or ineligible to participate in any government health care program, or become aware that anyone doing business with or providing services for or on behalf of LifePath Systems has become excluded, debarred or ineligible.

Monitoring and Investigations

LifePath Systems is committed to monitoring and investigating compliance concerns relating to laws, regulations and/or LifePath Systems Policies and Procedures. When a violation is substantiated, LifePath

Systems will initiate corrective action including, as appropriate, resolving overpayments, making required notifications to government agencies, implementing systemic changes to prevent recurrences, and instituting disciplinary action.

Medical Records

LifePath Systems strives to ensure medical records are accurate and to provide information that documents the treatment provided and supports claims submitted. Tampering with or falsifying medical records, financial documents or other business records of LifePath Systems will not be tolerated. The confidentiality of protected health information must be maintained in accordance with privacy and security laws and regulations, including protected health information (PHI) under the Health Information Portability and Accountability (HIPAA) Act, the Health Information Technology for Economic and Clinical Health (HITECH) Act, and applicable Texas laws.

Employment

LifePath Systems promotes diversity and strives to provide a workplace environment that is in full compliance with all applicable employment-related laws as well as LifePath Systems Policies and Procedures. It is LifePath Systems policy to provide equal employment opportunities to all personnel, prospective and current, without regard to race, color, religion, sex, age, sexual orientation, national origin, marital status, disability, or veteran status, and LifePath Systems will do its best to make reasonable accommodations for known disabilities. LifePath Systems personnel who have questions concerning or are aware of any breach of the Equal Employment Opportunity (EEO) guidelines, should contact the LifePath Systems Human Resources Department. LifePath Systems prohibits workplace violence, threats of harm and harassment of its personnel of any kind.

Environment and Workplace Safety

LifePath Systems expects its workforce to obey all state, federal and local environmental and workplace safety laws, and regulations, including those promulgated by the Environmental Protection Agency and the Occupational Safety and Health Administration (OSHA).

Reporting Suspected Wrongdoing

Members of the LifePath Systems workforce have a responsibility to report if you have knowledge of, or in good faith, suspect any wrongdoings promptly, using one of the processes described below.

In most cases, concerns should be brought to the attention of your supervisor first. If this does not result in appropriate action, or if you are uncomfortable discussing these issues with your supervisor, you can use one or more of the following:

- Report to a program administrator, division director, Director of Human Resources, or Chief Compliance Officer.
- Use the LifePath Systems Employee Compliance Hotline (972.330.4301) — these reports may be made anonymously.
- Members of the LifePath Systems Workforce who are not employees may contact their LifePath Systems supervisor, LifePath Systems contract manager (if applicable), or the LifePath Systems Chief Compliance Officer.

Any workforce member who becomes aware of improper conduct but knowingly declines to report the improper conduct may be subject to disciplinary action up to and including immediate termination. Self-reporting is encouraged — anyone who reports their own wrongdoing or violation of law will be given due consideration in potential mitigation of any disciplinary action.



Retaliation in any form against anyone who makes a good faith report of actual or suspected wrongdoing or cooperates in an investigation is strictly prohibited. If you feel you have been retaliated against you should report immediately, using any of the methods described above.