



# CODE OF CONDUCT & ETHICS HANDBOOK

# A MESSAGE FROM KEVIN

Dear Colleagues,

Millennium Healthcare is driven by its commitment to deliver the highest quality care and the best patient experience. That commitment is what raises us above the competition and makes our team stronger. As part of Millennium Healthcare, you are the connection between that pledge and our patients. Every workday is an opportunity to show our patients we are deserving of the trust they place in us.

Authentic connection inspires right action. We honor the trust our patients and partners place in us by setting and maintaining the highest standards of competence and integrity in all our interactions. Our goal in “Doing the Right thing” in each situation is driven by the values set forth in this handbook. While Millennium Healthcare’s Code of Conduct & Ethics cannot prepare us for every possible situation, it reflects our organization’s behavioral expectations, our core values and is a guide for ethical decision making. It is the measure by which we hold ourselves accountable for our actions and carry out our obligations to our patients, our teammates, our partners, and our communities.

Everyone at Millennium Healthcare, regardless of position, is responsible for honoring the commitments outlined in our Code of Conduct & Ethics and for abiding by legal and regulatory compliance policies. As a member of the Millennium Healthcare team, you are expected to act with integrity and to make ethical decisions inspired by our core values. If you have any questions about the Code of Conduct & Ethics, or concerns regarding any situation arising at Millennium Healthcare, please contact the Compliance, Ethics & Risk Department, your supervisor, your department or practice manager, or the Human Resources Department.

Thank you for familiarizing yourself with the Millennium Healthcare’s Code of Conduct & Ethics and for helping us connect the best doctors, service, and quality to every patient, every time.

Sincerely,



Kevin Kearns  
Chief Executive Officer



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# OUR STORY

## MISSION & VISION



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## Our Story:

Since the beginning, Millennium Healthcare has sought to empower physicians and advanced providers with the tools, resources, and support they need to deliver exceptional care, care that is patient-focused, value-based, and outcome driven. Inspired by the evolution of health care, we thrive on innovation and relentlessly pursue quality in everything we do.

We see the patient stories behind data and find opportunities to utilize technology to optimize workflows in order for our physicians and providers to meet our patients where they are, connecting them to the right care at the right time, every time.

At Millennium Healthcare, we celebrate diversity of thought, and we embrace big ideas. We believe everyone has something unique and meaningful to contribute to our vision and that our success depends on open and transparent communication.

Individually and as a team, we strive to earn and keep our patients' trust as partners on their health care journeys. There is no greater honor than to serve our communities by promoting and restoring good health.

We are a team that respects the contributions and hard work of others. We listen. We support. We celebrate the wins and work through the challenges...together.

## Our Mission:

Connecting the best doctors, service, and quality. Every patient, every time.

## Our Vision:

The best choice for patients, doctors, and care teams.



# OUR CORE VALUES

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CONNECT

## We believe authentic connection inspires right action.

By placing **CONNECTION** at the heart of everything we do, Millennium Healthcare delivers the highest quality care and exceptional patient experiences. We work as a team to make sure our patients receive the right care at the right time, in the right place.



SERVE

## We believe this is our calling.

We humbly **SERVE** our patients by providing care that is responsive to personal values and expressed preferences. We are inspired by our patients to do our best work and are committed to doing everything we can to support their success.



ENGAGE

## We believe together is better.

We invite our patients to fully **ENGAGE** with us in their wellness journey. We earn their trust by asking questions, listening closely, and setting shared goals. At Millennium Healthcare, we are committed to compassionate collaboration.



ADVOCATE

## We believe there is more to healthcare than medicine.

One of our most important responsibilities is to **ADVOCATE** for our patients by anticipating their unique wellness needs. We meet our patients where they are to support them with the care, education, and encouragement they need at every step of their healthcare journey.



RESPECT

## We believe actions speak louder than words.

We **RESPECT** what each person brings to the table. We celebrate diversity, welcome new ideas, and treat our patients and each other with dignity. We honor the trust placed in us by setting and maintaining standards of competence and integrity in all we do.



# OUR RESPONSIBILITIES TO OUR PATIENTS & EACH OTHER

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# OUR RESPONSIBILITIES TO OUR PATIENTS & EACH OTHER

We honor the trust our patients and team members place in us by setting and maintaining standards of competence and integrity in all our interactions. Our core values are the basis of Millennium Healthcare’s culture and the measure by which we hold ourselves accountable for our actions and carry out our responsibilities to our teammates and our patients.

The Code of Conduct & Ethics requires that all facilities, business areas and functional areas of Millennium Healthcare, including all employees within those areas, exercise due diligence to prevent, detect, and report unlawful or improper conduct or conduct in violation of Millennium Healthcare’s policies. It is the responsibility of every employee to be familiar with all policies and procedures relevant to their job functions. We uphold our core values with this set of expected behaviors and the desired accountability for each of us to follow.

The following guidelines summarize Millennium Healthcare’s basic standards and expectations for employee conduct. Many of the laws and policies discussed in Millennium Healthcare’s Code of Conduct & Ethics Handbook (hereinafter “Code of Conduct & Ethics”) are complex and many of the concepts are developed in case-by-case determinations. In addition, the Code of Conduct & Ethics can deal only generally with some of the more important legal principles and compliance policies.

These guidelines are not intended to minimize the importance of other applicable laws, regulations, professional standards, or ethical principles which may be covered in more detail under other compliance documents and policies.

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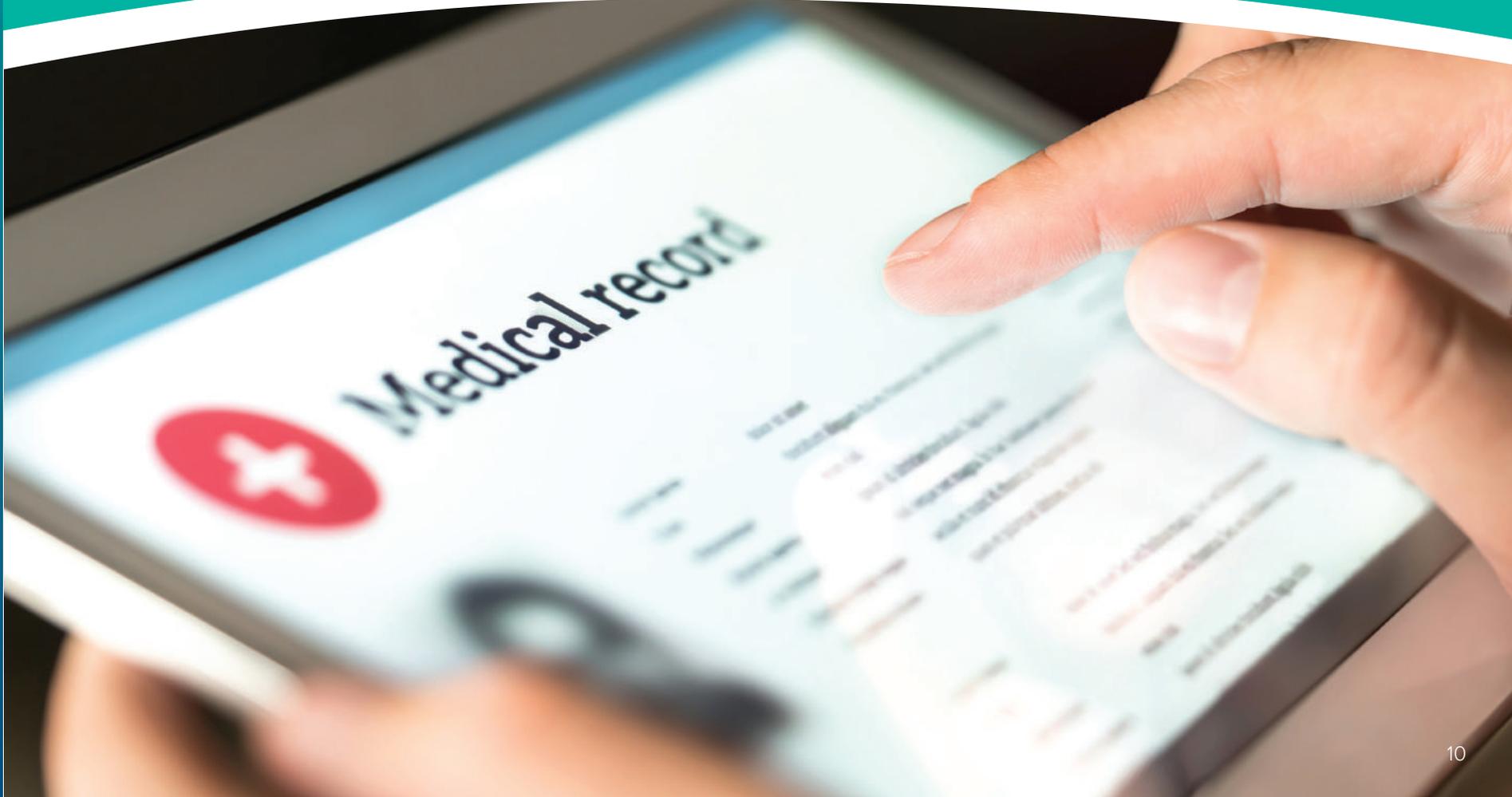
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# DECISION MAKING FRAMEWORK

It is not uncommon for us to come across situations where we aren't quite sure what to do or we feel that what is happening is not quite right. No Compliance, Ethics & Risk Program and no law or regulation can address all the situations that might occur in the healthcare environment.

Ultimately, it is up to each one of us to apply the general principles we have learned in our compliance training. If you are unsure about the legality or the appropriateness of an action or a proposed action, think of the following:



**Get the right answer, not just the easy answer.**

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# WE BELIEVE IN TRANSPARENCY

## Reporting a Compliance Issue

As an employee, you are obligated to report any issue or practice that you believe in good faith may constitute a violation of law or Millennium Healthcare's policies. Employees who are found to have engaged in unlawful conduct or conduct in violation of Millennium Healthcare's policies, or who have failed to detect, report and/or correct any offense, are subject to corrective action, up to and including termination of employment.

To report a compliance issue, follow the Four-Step Communication Process described in the Code of Conduct & Ethics. If you feel uncomfortable reporting a compliance issue to your supervisor or to any other Millennium Healthcare manager, you may call the **Ethics Connection Hotline 855-517-8676**.

## Resolving a Compliance Issue and Reporting – Speaking Up

We have many resources available to help you resolve compliance issues. The answers to many questions can be found in the various Millennium Healthcare Compliance Policies and Procedures. We encourage you to ask questions and raise issues without fear of retaliation. When you are in doubt, "speaking up" is highly recommended and desired by our leadership staff, executive staff, and Board. Speaking up immediately in serious situations could save lives, time, money, and reputation.



## The Four-Step Communication Process

For compliance questions or concerns that cannot be resolved by reviewing the various Millennium Healthcare policies and procedures, discuss the issue with your supervisor, manager, or another higher-level supervisory employee. Seek to resolve the problem promptly, constructively and at the lowest level possible by following these four steps:

- 1. Discuss the Issue with a Supervisor.**  
Supervisors are familiar with the workplace environment and its issues. Therefore, they should be given the first opportunity to resolve the matter.
- 2. Speak to the Department or Practice Manager.**  
If you and your supervisor cannot resolve the matter, if you feel that your concern is not getting the proper attention, or, if your supervisor is the issue, you should request a meeting with your Department Manager or Director to discuss the matter further.
- 3. Speak to the Human Resources Department and/or Your Regional Director or Chief Operating Officer.**  
If your Department Manager or Director is unable to resolve the matter to your satisfaction, you should contact the Human Resources Department, your Regional Director, the Chief Operating Officer, or alternatively, you may elect to bring the matter directly to your Chief Executive Officer or Senior Executive.
- 4. Bring the Matter to The Attention of The Chief Compliance, Ethics & Risk Officer or Department.**  
Matters that are not resolved at the facility level should be brought to the attention of the Compliance, Ethics & Risk Department. You can bypass Steps 1-3 if you feel uncomfortable.

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## Ethics Connection Hotline

Millennium Healthcare's Compliance Office has an **Ethics Connection Hotline** where anyone may call **855-517-8676**. Calls to the Ethics Connection Hotline are anonymous, cannot be traced, and will be treated confidentially.

The Ethics Connection Hotline is toll-free from anywhere in the United States. It is maintained by a third-party confidential reporting company. Its representatives will forward your suspected illegal or unethical compliance concerns to our Compliance, Risk, & Ethics Department for investigation. It is open 24 hours a day, seven days a week. The Compliance, Ethics & Risk Department reviews the messages Monday through Friday.

Although a call to the Ethics Connection Hotline satisfies the employees' obligation to report suspected illegal or unethical activity to the Chief Compliance, Ethics & Risk Officer, it is not intended to replace the local management team, or the Four-Step Communication Process outlined on the previous page. The Ethics Connection Hotline is intended to supplement existing internal communication channels. The Ethics Connection Hotline is available when employees feel they have exhausted all normal channels or are uncomfortable bringing an issue to their supervisors or managers.

## Some examples of potential suspected illegal or unethical compliance issues include, but are not limited to:

- Inappropriate coding
- Inappropriate charging/billing
- Inappropriate claims submission
- Overpayments
- Medical necessity issues
- Cost reporting issues
- False or fraudulent documentation issues
- HIPAA or Patient Privacy issues
- Failure to follow policies and procedures
- Failure to follow Code of Conduct & Ethics
- Drug diversion (illegal sale or redistribution of drugs)
- Physician relationship issues such as potential violations of the Stark law or Anti-Kickback statute
- Potential violations of the Anti-Kickback Statute related to vendors (e.g., inappropriate gifts)
- Provider or Supplier Excluded from the Federal or State Health Care Programs
- Potential Conflict of Interest
- Retaliation or Intimidation

## Our Investigation Process

When you file a report of suspected illegal or unethical activity, the Compliance, Ethics and Risk Department acts promptly to investigate by:

- Assigning an investigation team: Individuals with the right knowledge, objectivity, and discretion.
- Conducting an investigation: Determining facts through interviews and/or document reviews.
- Providing recommendations: Making recommendations, including corrective actions if appropriate, to applicable managers for implementation (if necessary).
- Providing feedback: Providing general feedback to the person who raised the concern (if appropriate).

To help our investigations run smoothly and ethically, all employees must provide truthful and complete information.



# WE BELIEVE IN TRANSPARENCY

## Non-Compliance

When we live our Code of Conduct & Ethics, we foster a culture where we can innovate and grow.

Failing to follow the Code of Conduct & Ethics or to participate in investigations and lawsuits damages that culture and holds us back. It harms our reputation and threatens our relationships with our stakeholders.

In some cases, non-compliance could also subject Millennium Healthcare to civil and/or criminal penalties. And it can result in personal consequences for all of us, up to and including termination of employment.

## Non-Retaliation

Employees may remain anonymous if they choose and to the extent allowed by law. No caller will be subject to retaliation for bringing forth a good faith concern. Anyone who attempts to retaliate against an employee who has in good faith made a call to the Ethics Connection Hotline will be subject to corrective action up to and including termination of employment.

[For further guidance, refer to Millennium Healthcare's Non-Retaliation Handbook](#)

## Misconduct that may result in disciplinary action includes:

- 01 VIOLATING** our Code of Conduct & Ethics or asking others to do so.
- 02 FAILING** to report a known or suspected violation of our Code of Conduct & Ethics
- 03 REFUSING** to cooperate fully in an investigation or legal proceeding.
- 04 PROVIDING** false or incomplete information intentionally or raising a concern in bad faith.
- 05 RETALIATING** against another employee for reporting concerns or participating in an investigation.

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# WE BELIEVE IN TAKING CARE OF THOSE WE SERVE

## Patient Rights, Relationships and Patient Care

Assuring each patient receives the highest quality care is the single most important responsibility of our employees. Each of us is expected to fully comply with the laws and standards applicable to our industry. Misconduct of any kind, including fabrication or falsification of any medical services or documents, masking incorrect services, or any other action which might compromise the quality and integrity of the patient's care, will not be tolerated.

## Freedom of Choice

Upon the patient's first appointment to a healthcare service, Millennium Healthcare must provide him/her with a written statement of patient's rights. This statement must include the rights of patients to make decisions regarding their medical care and it must conform to all applicable state and federal laws and regulations. Patients must be given the opportunity to be involved in all aspects of their care and Millennium Healthcare must obtain informed consent for treatment. As applicable, each patient or patient representative may be provided with a clear explanation of care including, but not limited to, diagnosis, plan of care, right to refuse or accept care, care decision dilemmas, advance directive options, and an explanation of the risks and benefit associated with available treatment options. Patients may be referred to specialty providers; the patients will be provided choices in this process as well.

## Confidential Information

Information about a patient's medical condition is highly sensitive and its confidentiality must be maintained.

No employee, physician or other healthcare provider has the right to any patient information other than what is necessary to perform his or her job. No employee should ever release or discuss patient-specific information with others unless it is necessary to provide appropriate medical care to the patient, it is with the patient's written consent, or it is required or permitted by law. No employee, physician or other healthcare provider has the right to access their own medical record or the medical records of their family members and friends. Finally, all employees are expected to maintain the confidentiality of protected health information ("PHI") as that term is defined by the Standards for Privacy of Individually Identifiable Health Information (commonly known as the "HIPAA Privacy Regulations").



# WE BELIEVE IN TAKING CARE OF THOSE WE SERVE

## Protected Health Information (PHI) | Personal Identifiable Information (PII)

Always remember to use and disclose the minimum necessary when handling a person's personal information.

When dealing with a person's personal information you must use and disclose only the minimum necessary amount of Protected Health Information (PHI) or Personal Identifiable Information (PII) to do the required work including:

- Using health information with all identifiers removed whenever possible
- Sharing PHI and PII with the minimum number of people
- Viewing only the minimum amount of information required
- Disclosing PHI or PII only with appropriate written authorization from the individual, unless the law authorizes or requires disclosure
- Never viewing patient, plan member or colleague personal information out of curiosity
- Appropriately disposing of unneeded copies of documents containing PHI or PII
- Keeping documents with confidential information out of sight in a locked file cabinet or desk drawer, and never leaving PHI or PII active on computers, sitting at a printer, in fax machines or other generally accessible areas
- Ensuring PHI and PII transmitted or transported outside the Company is encrypted. This includes not only emails but also PHI and PII stored on portable devices such as USB devices, disks, laptops, and mobile devices

The privacy and personal information of those we serve is central to what we do at Millennium Healthcare. Violating these or other privacy requirements will result in disciplinary action up to and including termination, even for a first offense.

### Compromised PHI or PII

If you see any of the following, immediately contact the Privacy Office:

- PHI or PII openly discussed or left unprotected
- Requests for more information than the minimum necessary to perform a job
- Unencrypted PHI or PII transmitted electronically outside Millennium Healthcare



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# WE BELIEVE IN DOING WHAT IS RIGHT

## Millennium Healthcare Privacy and Security Compliance Policies

Millennium Healthcare's Privacy and Security Compliance Policies are located on Millennium Healthcare's Compliance 360 Policy Module. This is a desktop icon accessible to all Millennium Healthcare employees. These policies provide guidance to Millennium Healthcare staff regarding the use and disclosure of patient information in the medical record, the electronic patient record, or in conversations. All newly hired employees are trained personally by the Privacy Officer and Security Officer. This important training gives employees the information they need to know to be compliant with privacy rules and regulations.

Maintaining secure private patient information is imperative to our organization. The community, stakeholders and members of our workforce depend on us to provide strict security measures and promise of privacy protections. It is paramount to our success to provide assurances to every person that we take the privacy and security of their information very seriously.

### Privacy and Security Support

To assist its employees in resolving Privacy compliance issues (privacy, security violations), Millennium Healthcare has a Certified Privacy Compliance Officer who serves as Millennium Healthcare's Privacy Officer. Millennium Healthcare uses the data driven platform Protenus (Patient Privacy Protection Software) to monitor every access of every medical record every time to ensure minimum necessary standards and legitimate access to protect the privacy of our patients. This function is additionally utilized in the identification of inappropriate access to protected health information and assists in the documentation of investigation activities. Millennium Healthcare has an appointed Security Officer as well as a Chief Information & Security Officer. Both work in conjunction with the Privacy Officer to facilitate electronic systems of security regulations. The Chief Information & Security Officer is responsible for the Security Risk Assessments and any identified risks associated with the assessments. The Privacy Officer will assist in any identified issues of risk regarding the Privacy Rule.

All employees and patients are encouraged to report any privacy-related issues to the Privacy Officer. The Privacy Officer maintains a strict duty to keep policies up to date and employees informed of their privacy responsibilities.

Millennium Healthcare maintains secure servers and encryption devices for all electronic hardware and software in its facilities. Millennium Healthcare meets the federal government's standards for protecting electronic personal health information by conducting training and awareness programs and by utilizing internal auditing and monitoring systems and a reporting system for any alleged violations.

### Responsibilities of the Millennium Healthcare Compliance, Ethics & Risk Program

As an organization committed to compliance, Millennium Healthcare has assumed certain responsibilities:

- Develop compliance documents to provide employees with guidance on matters of daily business conduct.
- Ensure that the Compliance documents are accessible to all employees, officers, and directors.
- Establish and maintain training programs to ensure familiarity with and understanding of compliance requirements.
- Advise employees, officers and directors on the proper interpretation and application of the Compliance, Ethics & Risk Program.
- Administer the Compliance, Ethics & Risk Program and its supporting policies in a fair and timely manner.
- Ensure a working atmosphere conducive to compliance and free of retaliation for the reporting of alleged violations of Compliance, Ethics & Risk Program.

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# WE BELIEVE IN DOING WHAT IS RIGHT

## Responsibilities of Millennium Healthcare Employees

Everyone has an obligation to ensure that the Compliance, Ethics & Risk Program is a success. Employees can help to achieve that success by doing the following:

- Read and regularly review Millennium Healthcare’s compliance documents to fully understand the compliance requirements that apply to his or her job.
- Participate in training programs and staff meetings designed to help him or her understand his or her obligations under the Compliance, Ethics & Risk Program.
- Abide by the requirements set forth in the Compliance, Ethics & Risk Program’s policies and procedures.
- Ask questions and seek assistance when uncertain about the proper course of action.
- Support employees who report suspected violations of the Compliance, Ethics & Risk Program. Recognize that retaliation against persons who report suspected violations is not permitted.
- Be alert to situations that could result in illegal or unethical conduct and encourage other employees to consult with their supervisors, their Chief Compliance Officer, or the Legal Counsel if it appears that they may be in danger of violating the law.
- Report suspected violations of the Compliance, Ethics & Risk Program.

## Confidential Information

Confidential business information is any information about a present or planned business matter that has not been released publicly by Millennium Healthcare. Specifically, employees are not allowed to release information without authorization regarding:

- Pricing
- Financial Data
- Marketing Programs
- Electronic Medical Record Techniques and Applications

Information such as this is the core of Millennium Healthcare’s business. It is also a key component of just about every topic discussed in this Code of Conduct & Ethics. For example, releasing this information can violate laws regarding:

- Conflict of Interest
- Antitrust
- Employment Matters
- Finances
- Intellectual Property
- Patient Confidentiality
- Trademarks

Employees should remember this pledge to keep business and patient medical information confidential and to respect the privacy of those Millennium Healthcare serves.

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**Q**

**Question:**  
What should I do if I see an email string containing PHI/PII going out to people who are unauthorized to receive it?

**A**

**Answer:**  
Remove the PHI/PII and send the email back, telling the offending sender(s) about the error and immediately enter the incident to the Privacy Incident & Complaint Reporting System through the “Report it” icon on your desktop.



# WE BELIEVE IN DOING WHAT IS RIGHT

## Conflict of Interest

A conflict of interest arises whenever an employee's interest, or that of an employee's immediate family, conflicts or appears to conflict with the interest of Millennium Healthcare. Everyone has a duty to avoid conflicts of interest, or even the appearance of conflicts of interest. The following discussion is not intended to intrude upon an employee's privacy, but to help employees avoid conflicts of interest. If an employee is faced with a personal transaction, decision, or situation which they think may create a conflict of interest, they must promptly report it their Supervisor, the Human Resources Director, and the Conflict of Interest Analyst, Compliance Legal Manager, or the Chief Compliance Ethics & Risk Officer.

In many situations, if there is no illegal or unethical conduct involved, Millennium Healthcare may consent to the proposed activity even though a conflict of interest may exist.

Millennium Healthcare's Code of Conduct & Ethics and Conflict of Interest Policy (refer to policy [ADM 038, Conflict of Interest Policy](#), for specifics) cannot describe all of the situations that may give rise to a conflict of interest (or the appearance of one), nor can it take the place of a personal commitment to do what is right.

- **Agents and Consultants:** Individuals who provide services to Millennium Healthcare as agents or consultants are required to observe the same standards of conduct as employees of Millennium Healthcare.

- **Business Opportunities:** Employees are prohibited from taking personal financial advantage of a business opportunity as a result of our association with Millennium Healthcare without first obtaining approval. Written approval must be obtained from the Millennium Healthcare CEO or designee. Examples of business opportunities include real estate deals, patents and purchasing options.
- **Competitors and Suppliers:** Employees may not invest in any company that is a supplier or competitor of Millennium Healthcare without first disclosing this in writing to the CEO.

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# WE BELIEVE IN DOING WHAT IS RIGHT

## Conflict of Interest (continued)

The following is a list of frequently encountered conflicts of interest:

- Ownership of a Business's Publicly Traded Securities:** Ownership of 5 percent or more of a business's publicly traded securities is a conflict of interest. Key employees or members of their immediate families may not work for, provide service to, or serve as officers or directors of a competitor or supplier of Millennium Healthcare without first disclosing it in writing to the CEO. Key employees are department heads and above.
- Self-Dealing:** An Employee may not engage in self-dealing, where an employee, through their role with Millennium Healthcare, steers the organization to do business with the employee in a personal capacity, the employee's business, or the employee's Immediate Family (as defined in Millennium Healthcare's Conflict of Interest Policy, ADM 038). Even if the transaction is for market value, it creates the appearance of impropriety to both the public and other Millennium Healthcare Employees and should be avoided unless specifically authorized.
- Confidential Information:** Sharing information between and among employees is encouraged where it supports our mission of improving health. However, the use of confidential, non-public information for personal advantage is prohibited. In addition, the release of confidential information is prohibited unless authorized. Examples of authorized releases include press releases, advertisements, or management announcements.
- Outside Employment:** Employment with non-Millennium Healthcare companies must not interfere or conflict with the performance of one's duties at Millennium Healthcare.
- Loans:** Employees and their immediate family members may not loan to or borrow from suppliers or customers. Dealings with banks and other financial companies which arise in the normal course of business are allowed.
- Property of Millennium Healthcare:** Employees may not use or permit others to use Millennium Healthcare property or its employees on duty for personal benefit or the gain of others.



# WE BELIEVE IN DOING WHAT IS RIGHT

## Conflict of Interest (continued)

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- **Gifts, Meals, and Entertainment:**

Employees should not solicit personal gifts, services, or entertainment of any kind from any patient, customer or company doing or seeking to do business with Millennium Healthcare.

Employees and members of their immediate family may accept non-monetary gifts or services from any company doing or seeking to do business with Millennium Healthcare as long as it is clear that no attempt is being made to influence any business decision.

If employees are offered and accept gifts or services, they should report it if it arises in the normal course of a business relationship. Examples of reasonable and customary entertainment include restaurant meals, tickets to sporting or cultural events or other outings. Employees should obtain written approval from their supervisor prior to accepting any offer of entertainment that is not reasonable and customary or does not arise in the normal course of a business relationship.

It is helpful to divide this issue into two general categories: (a) personal gifts and gratuities (money, merchandise, products, use of products, facilities, or equipment, etc.); and (b) personal entertainment (meals, sporting, or cultural events, etc.). Regardless of category, the Chief Compliance, Ethics & Risk Officer generally recommends that the employee first discuss the matter with his or her supervisor and obtain the supervisor's permission.

- **Referral Sources:**

Employees may extend a business courtesy (as defined below) to a potential referral source who is not a Foreign Official and his or her immediate family members under the following conditions:

- It is not cash or a cash equivalent, such as gift certificates, checks or stock instruments. Vouchers and gift cards are considered cash equivalents;
- It does not exceed \$429 in value or cause the total value of business courtesies extended to the same potential referral source and that potential referral source's immediate family members to exceed \$429 for the calendar year;
- It is not determined in any manner that takes into account the volume or value of referrals or other business generated by the referring physician; and
- It is not solicited by the potential referral source.

For purposes of this Code of Conduct & Ethics, business courtesies include gifts and entertainment. They include items of value given to another free of cost, as well as social events sponsored or hosted by the Company such as meals, sporting events, theatrical events and receptions.



# WE BELIEVE IN DOING WHAT IS RIGHT

## Conflict of Interest (continued)

- **Business or Personal Gifts and Gratuities**
  - Employees should not solicit personal gifts from patients, customers, companies doing business with Millennium Healthcare, or companies seeking to do business with Millennium Healthcare.
  - Employees are discouraged from accepting gifts in general.
  - Cash and cash equivalents may never be accepted. Cash and cash equivalents must either be returned to the gifting person or entity or, in the rare circumstances where this is not possible, must be surrendered to a Millennium Healthcare affiliated charitable foundation for its unrestricted use.
  - Employees may accept from outside entities or persons a non-monetary gift of nominal value which is a token of respect or friendship and is consistent with the following guidelines:
    - Nominal value means \$50 or less for any single gift, i.e., fruit basket, bottle of wine, etc.
    - All gifts accepted from a single person or entity during a rolling three-month period may not exceed \$50.
    - Employees may accept unsolicited non-monetary gifts if it is clear that the acceptance does not raise an obligation on the part of the recipient. In any event, the accepting of any gifts must follow Millennium Healthcare's Business Gift policy.
- **Personal Entertainment:**
  - Employees should not solicit personal entertainment from patients, customers, companies doing business with Millennium Healthcare or companies seeking to do business with Millennium Healthcare.
  - Employees may accept unsolicited offers of reasonable and customary entertainment if it is infrequent; it is in the ordinary course of the business relationship; and, the setting is reasonable, appropriate, and fitting.

## Conflict Disclosure Statement

Upon hire, and on an annual basis thereafter, a Conflict of Interest Attestation is completed by all employees of Millennium Healthcare, administrators, employed physicians, and other employees and individuals designated by their supervisor, the Chief Compliance, Ethics & Risk Officer, or the Chief Financial Officer. All potential Conflicts of Interest are to be described during the hiring process, included into any contract, and approved by the CEO. Required to be submitted annually, the Attestation affirms that the individual has received a copy of the Conflict of Interest policy; read and understands the policy; agreed to comply with the policy; and, fully, accurately, and completely responded to all questions in the disclosure form.

New disclosures, or disclosures covering changed circumstances related to matters previously disclosed, must be disclosed via the SAI Global COI Module (located on the CARES Hub), or via email/ in writing to the Conflict of Interest Analyst/Compliance Department, when the officer, director, or employee becomes aware of the new or changed circumstances. The Chief Compliance, Ethics & Risk Officer reports all such disclosures to the Corporate Compliance & Quality Board Committee.



# WE BELIEVE IN DOING WHAT IS RIGHT

## Antitrust Matters

Antitrust laws forbid companies from doing business in a way that gives them too much control in the marketplace. The purpose of these laws is to preserve competition. These laws may affect employees' dealings with patients, doctors, payers, suppliers, and competitors of Millennium Healthcare. For purposes of the antitrust laws, members of Millennium Healthcare are not competitors of one another. Hospitals and healthcare providers who are not controlled by Millennium Healthcare should be considered competitors of Millennium Healthcare.

The antitrust laws are violated if competitors agree to:

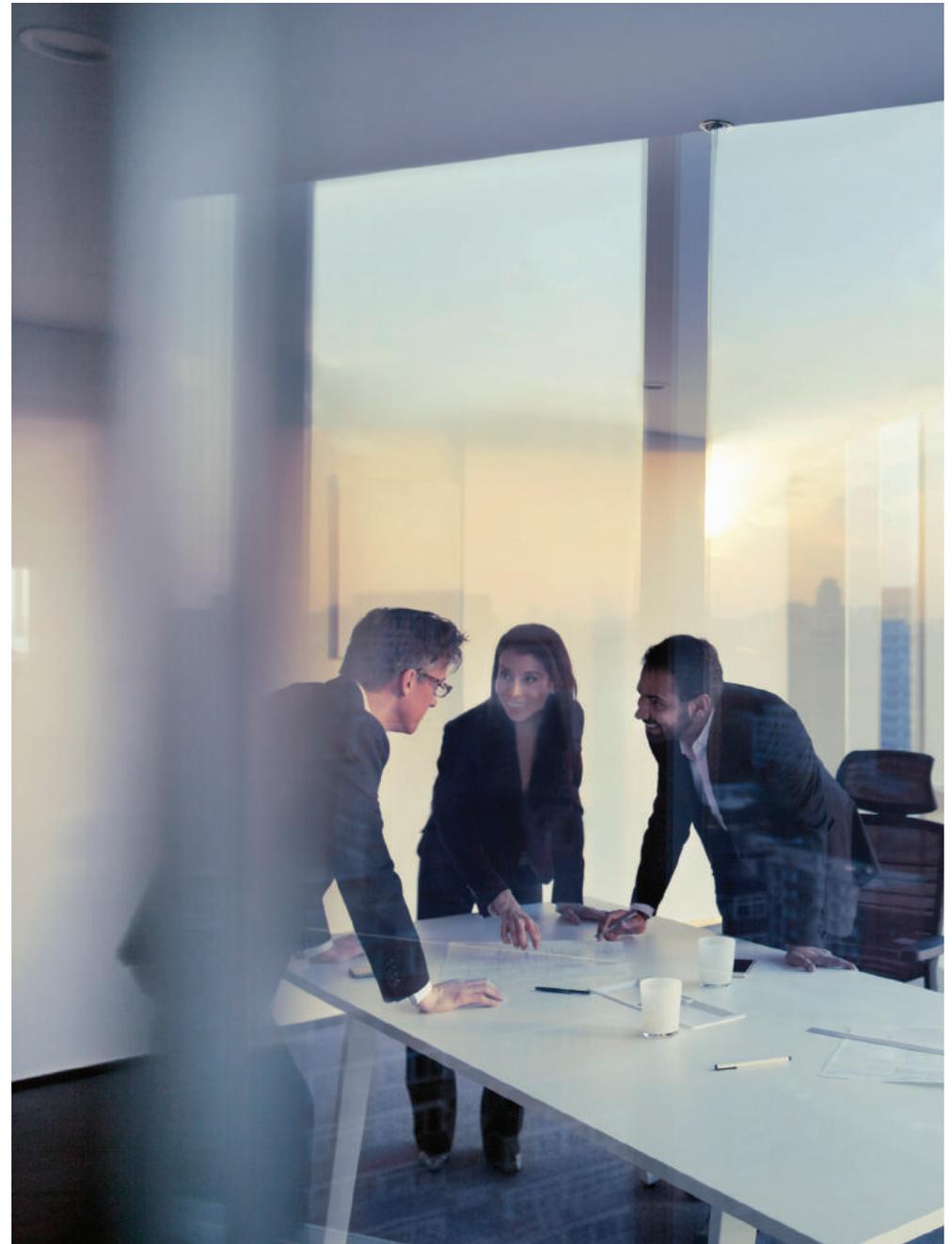
- Fix prices or pricing methods.
- Allocate patients, payer contracts or regions.
- Boycott or refuse to do business with a payer, physician, provider, or other party. Such refusals may include the denial or canceling of medical staff memberships or privileges.

Antitrust violations can occur even without a written or oral agreement. It is possible to conclude that a violation of the antitrust laws has occurred if two competitors have had an opportunity to consult with each other and appear to be cooperating to control the marketplace.

For this reason, employees should avoid discussions with our competitors concerning:

- Prices or payer rates;
- Our desire to deal with a particular payer or group of payers, or patient or group of patients; or
- The granting of memberships, privileges, or managed care participation status concerning any physician, healthcare provider or group of providers.

Refer to policy [COM 062, Antitrust and Fair Competition](#), for further guidance. Failure to comply with policy COM 062 may lead to disciplinary action up to and including termination of employment.



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## Employee Rights Protected

Employees' rights are best protected by open communication and a spirit of cooperation. Millennium Healthcare is committed to providing equal employment opportunities in the workplace. The Organization fosters a working environment free of discrimination or harassment on the grounds of race, color, religion, sex (including gender identity, sexual orientation, and pregnancy), age, physical or mental disability, national origin, genetic information, veteran status, or on any other basis or characteristics prohibited by any other legally prohibited factor.

Millennium Healthcare is expected to abide by all federal, state, and local laws dealing with employment matters.

## Diversity, Equity, and Inclusion

Diversity, Equity, and Inclusion (DEI) are critical to our success as an organization. Incorporating DEI into our business practices enhances innovation and ensures our best talent thrives in an environment where diverse perspectives are celebrated. This requires deliberate focus and action on the part of every Millennium Healthcare employee and leader. Each of us can support diversity, equity, and inclusion by seeking diverse points of view, advocating for each individual's opinion to be heard, treating all employees fairly, and basing employment decisions on individual merit. Millennium Healthcare holds diversity, equality, and inclusion as a work in progress. We understand how these elements in our makeup drive opportunities to welcome greater innovation, a greater work life environment, and wins for aligning our goals and values. We expect our workforce to embrace and take ownership of their own journey of DEI, knowing Millennium Healthcare will be ensuring this engagement activity is collaborative.



## Workplace Harassment

Workplace harassment is belittling or threatening behavior directed at an individual worker or a group of workers. Workplace harassment is unwelcome conduct from a boss, coworker, group of coworkers, vendor, or customer whose actions, communication, or behavior mocks, demeans, puts down, disparages, or ridicules an employee. Physical assaults, sexual harassment, threats, and intimidation are severe forms of harassment and bullying.

Harassment may also include offensive jokes, name-calling, offensive nicknames, pornographic images on a laptop, and offensive pictures or objects. Interfering with an employee's ability to do his or her work is also considered a form of harassment.

Demeaning an employee for any aspect of their parental status, appearance, weight, habits, accent, or beliefs can be considered harassment and can add to a claim about a hostile work environment.

Harassment creates a negative environment affecting not only the targeted individuals but also non-targeted employees.

Harassment, as a form of employment discrimination, violates Title VII of the Civil Rights Act of 1964, the Age Discrimination in Employment Act of 1967 (ADEA), and the Americans with Disabilities Act of 1990 (ADA). Depending on State laws, protected classifications of employees may include:

- Age
- Race
- Religion
- National Origin
- Sex (including gender identity and sexual orientation)
- Physical or Mental Disability
- Color
- Pregnancy
- Genetic Information
- Weight

# WE BELIEVE IN RESPECTING OUR EMPLOYEES

## Workplace Harassment (continued)

According to the US Equal Employment Opportunity Commission, harassment becomes illegal when putting up with offensive and unwanted actions, communication, or behavior becomes a condition of continued employment, or when the behavior is severe and pervasive enough to create a work environment that any reasonable individual would find intimidating, hostile, or abusive.

Harassment against individuals is also prohibited in these specific situations.

- Filing a discrimination charge;
- Testifying, or participating in any way, in an investigation, proceeding, or lawsuit under these laws; or,
- Opposing employment practices that the employee reasonably believes discriminates against individuals in violation of these laws.

Millennium Healthcare expects staff to treat each other with respect, fairness, honesty, and integrity. Our goal and expectation is to consciously create a workplace culture free of harassment, with safe and confidential ways to report it if it does occur. We have a responsibility to recognize harassment, respond immediately and investigate, and remedy by initiating prevention, detection and to deter any possibility of future misconduct.

Refer to the following policies for guidance:

[HR 003, Anti-Harassment](#)

[HR 018, Employee Anti-Discrimination & Retaliation](#)

## Health, Safety, and the Environment

Employees are expected to:

- Learn the procedures for handling and disposal of any hazardous materials used on the job.
- Know the safety procedures that apply to our job.
- Share with supervisor ideas for improving safety and reducing waste.
- Use best efforts to ensure that actions are carried out in a safe and healthy manner.

Our commitment to health, safety and environmental protection can be seen in our efforts to reduce the generation of waste. Waste should be recycled or reused whenever possible. Waste that cannot be recycled or reused should be discarded in a safe manner.



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# WE BELIEVE IN ACTING WITH INTEGRITY

## Duties Concerning Financial Matters

Employees are required to maintain the financial records of Millennium Healthcare in an accurate and complete manner.

Accounting controls must be sufficient to provide reasonable assurance that:

- Financial contracts are carried out with management’s approval.
- All transactions are recorded to help prepare financial statements and to account for assets.
- Access to assets is permitted only with management’s approval.
- Recorded assets are periodically compared with existing assets and any differences reported to management.

The financial matters of Millennium Healthcare, its employees, physicians, and patients are very private and must not be revealed to outside parties.

## Duties Concerning Government-Funded Programs

Millennium Healthcare receives monies from government-funded programs. Contracts with the government require special care because of strict legal requirements and complex language. Failure to observe government rules and regulations can result in the loss of funds or grants and civil and criminal penalties. For example, it is a federal crime to make a false statement to a federal official.

Millennium Healthcare works with government funds, Medicare and Medicaid; therefore, employees must know the rules related to that work. Ignorance is not an excuse. Employees are to contact their supervisors or consult the Compliance, Ethics & Risk Department if they have any questions regarding these rules.

Occasionally, payments from research grants and other government contracts are based on costs. Only costs allowed by a contract may be billed to the government. Costs should be recorded in an accurate and consistent manner. If Millennium Healthcare is responsible for charging costs to a government contract or grant, or clinical trial, employees are expected to do so in a reasonable and honest manner.



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# WE BELIEVE IN ACTING WITH INTEGRITY

## Intellectual Property

Intellectual property includes patents, trademarks, service marks, trade secrets, copyrights, proprietary information and inventions or techniques. Intellectual property is protected by federal and state laws.

Employees must safeguard Millennium Healthcare’s confidential and proprietary business information and trade secrets. This includes information not generally disclosed to the public or information that is useful to Millennium Healthcare’s competitors. This could include, in some cases:

- Financial data
- Planned new projects
- Information about Millennium Healthcare’s expansion plans
- Employee information
- Capital investment plans
- Projected earnings
- Changes in Millennium Healthcare’s management or policies
- Unpublished research data.

Discuss proprietary information with others only on a need-to-know basis. Disclose proprietary information to persons outside of Millennium Healthcare only in consultation with the Legal Department, which can provide appropriate disclosure agreements. Do not inadvertently discuss confidential information or trade secrets in either social conversations or in routine business relations.

Violations of the intellectual property laws may result in personal civil damages or criminal charges. In addition, the entire Millennium Healthcare organization may be held responsible for the actions of individual employees who break intellectual property laws.

Inventions or techniques created by Millennium Healthcare employees during the course of their employment are the property of Millennium Healthcare, unless there is a written agreement with Millennium Healthcare stating differently. If Millennium Healthcare’s patents, techniques, publications, and trade secrets are used, employees must not disclose such information to others. Employees’ personal use of this information is prohibited.



## Intellectual Property Not Owned by Millennium Healthcare

During the course of employment, employees may have access to intellectual property owned by other businesses. This information is private and should not be disclosed to others. Licensed computer software is a good example of intellectual property owned by another business. Copying computer software or the materials that come with it violates copyright laws and Millennium Healthcare policy. The use of illegal copies of software on company hardware is prohibited.

The following activities also may violate the intellectual property laws:

- Installing software programs on more than one computer when it was sold for only one computer. Find out how many computers can use a multiple unit software package before ordering or installing software.
- Copying (by machine or hand) an entire issue of a journal, magazine, or newsletter. Unless permission from the publisher to make such copies has been obtained, the original should be circulated within a group or several subscriptions should be purchased.
- Copying (by machine or hand) articles from journals or magazines against the wishes of the publisher.

# WE BELIEVE IN ACTING WITH INTEGRITY

## Medicare and Medicaid Fraud and Abuse

Entities that receive monies for services provided under Medicare and Medicaid are subject to several laws and regulations designed to prevent fraud. These laws were created to ensure that the federal funds that finance Medicare and Medicaid are used only for those purposes. Failure to obey these laws can result in fines, jail or exclusion from Medicare and Medicaid programs. Some of the more important laws relating to fraud and abuse are discussed below:

### Billing and Claims

Honesty and accuracy in billing and in the making of claims for Medicare or Medicaid payment is vital. It is a federal felony to willfully make a false statement in connection with a claim for payment or an application for certification under Medicare and Medicaid.

## The Anti-Kickback Statute

The anti-kickback statute is a federal law prohibiting persons from willfully offering, paying, seeking, or receiving anything of value to bring about a referral for medical services or goods payable under Medicare or Medicaid. Failure to obey this law can result in fines, jail or exclusion from the Medicare and Medicaid programs. This law prohibits kickbacks and bribes. It also affects the way healthcare entities carry out a broad range of ordinary business deals.

The following activities are illegal under the anti-kickback statute:

- Routine waivers of co-insurance or deductibles for reasons other than real financial hardship.
- Offer or acceptance of payment other than at fair market value for healthcare services as a way of getting more business.
- Acceptance of prizes, gifts, cash payments, coupons or bonuses offered to physicians or purchasers for pushing certain products.
- Financial incentives given to physicians that are based on number of referrals or levels of billing.

The following activities must be carefully monitored to ensure compliance with the anti-kickback statute:

- Space and equipment leasing
- Discounts on goods and services
- Management and personal services contracts
- Physician practice purchases
- Physician recruitment and retention
- Employment relationships
- Managed care initiatives

In addition to the federal anti-kickback statute, there may be state anti-kickback laws that apply.



# WE BELIEVE IN ACTING WITH INTEGRITY

## Ban on Self-Referrals

Generally, a physician who receives payment directly or indirectly from, or has an investment interest in, a healthcare business should not refer patients to that business for services paid by Medicare or Medicaid. There are certain exceptions. In addition, under Florida statutes, the physician self-referral law may apply. Therefore, any potential relationship must be reviewed and approved by Millennium Healthcare's Chief Compliance Officer and/or Legal Counsel. Claims should not be submitted for services performed as a result of improper referrals.

In addition, providers can also be required to pay three times the amount of damages sustained by the U.S. government. If a provider is convicted of a FCA violation, the Office of the Inspector General may seek to exclude the provider from participating in federal healthcare programs.

The FCA includes a whistleblower provision, or a "qui tam." This provision allows any person, called a "relator," with actual knowledge of false claims activity to file a lawsuit on behalf of the U.S. government. To qualify as a whistleblower, individuals must meet certain conditions.

First, they must be the "original source" of the information reported to the federal government. If the matter is already the subject of an investigation, or if the healthcare provider has already disclosed the problem to the government, the whistleblower may be barred from recovery.

The whistleblower must also file the lawsuit in a federal court. The suit is kept "under seal," meaning that it is kept confidential while the government reviews the case and decides whether or not to join in the case. If the government decides to join ("intervene"), the prosecution is directed by the Department of Justice. If the government decides not to intervene, the whistleblower can continue with the lawsuit on their own.

If the lawsuit is successful, the relator may receive an award ranging from 15 to 30 percent of the amount recovered by the government. The whistleblower may also be entitled to reasonable expenses including attorney's fees and costs for bringing the lawsuit.

Under the federal False Claims Act, if an employee initiates a qui tam claim and is then demoted, suspended, threatened, harassed or in any other manner discriminated against because he or she filed the claim, he/she may be entitled to double back pay, interest on the back pay, plus special damages including litigation costs and reasonable attorneys' fees.

## Federal and State False Claims Acts

The Federal False Claim Act ("FCA") was originally enacted by President Lincoln in 1863 to combat contractor fraud against the Union Army during the Civil War. It imposes civil liability on any person or entity that knowingly submits, or causes to be submitted, a false or fraudulent claim for payment to the U.S. government. It also penalizes anyone who knowingly uses, or causes to be used, a false record or statement to conceal, avoid, or decrease an obligation to pay money or transmit property to the U.S. government. The FCA covers fraud involving any federally funded contract or program such as Medicaid and Medicare. The term "knowingly" is defined to mean that a person:

- has actual knowledge of the falsity of the information,
- acts in deliberate ignorance of the truth or falsity of the information, or
- acts in reckless disregard of the truth or falsity of the information

For purposes of the FCA, a "claim" includes any request or demand for money that is submitted to the U.S. government or its contractors (Fiscal Intermediaries or Carriers). Healthcare providers who are convicted of violating the FCA can be subject to civil monetary penalties ranging from \$11,803 and \$23,607 per claim. In addition to these civil penalties, the government is entitled to recover treble damages, or triple the amount of any money it may have lost due to a false claim.

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## Federal and State False Claims Acts (continued)

The Program Fraud Civil Remedies Act of 1986 “PFCRA,” provides administrative remedies against any person who makes, or causes to be made, a false claim or written statement to various federal agencies, including the Department of Health and Human Services “HHS.” The PFCRA generally applies to lower dollar fraud, usually bills or claims under \$150,000 or less. Under the Act, anyone who submits or causes to be submitted a claim that he or she knows or should know is false, fictitious, or fraudulent can be forced to pay civil money penalties of up to \$11,181 to \$22,363 per false claim. The HHS Office of the Inspector General investigates these violations and enforcement actions must be approved by the Attorney General.

Enforcement can begin with an administrative law judge hearing and penalties can be recovered by offsetting the penalty amount against “clean” claims.

States may also have their own False Claims Acts. The Deficit Reduction Act of 2005 (“DRA”) is designed to encourage states to enact legislation that is comparable to the federal False Claims Act to have consistent enforcement throughout the country. Under the DRA, states may keep an additional 10% of any recoveries obtained if they have a state law that:

- Establishes liability for the same type of false claims prohibited under the federal False Claims Act;
- Contains incentives that are at least equal to the federal whistleblower incentives;
- Provides for qui tam lawsuits to be filed under seal; and
- Provides for civil penalties at least as high as the federal penalties.

## Physician Recruitment and Retention

Entities that operate on a for-profit basis are subject to additional rules relating to the recruitment and retention of physicians. For example, these rules prohibit private inurement. Private inurement occurs when a for-profit business pays an individual or group of individuals above market price for services provided to the business. In some cases, the rules governing recruitment and retention also may require that the community benefit from the decision to hire a physician or buy a physician’s practice.

Keeping a written record of community benefit is an important part of all physician recruitment activities.

The anti-kickback statute and the self-referral ban are subject to numerous exceptions. These exceptions, as well as the proper application of these laws, can best be handled by the Compliance Department who consults with outside counsel. If an employee’s job involves these issues and the employee has questions concerning them, employee should consult the Chief Compliance Officer, Compliance Legal Manager or Conflict of Interest Analyst.



# WE BELIEVE IN ACTING WITH INTEGRITY

## Political Activity

Employees are encouraged to take part in community and political activities and to vote in elections.

Employees who participate in such activities must make it clear that they are acting as private citizens and not as a representative of Millennium Healthcare.

## Campaign Contributions

Generally, not-for-profit businesses may not make political contributions of any sort. However, Millennium Healthcare can make political contributions with a few exceptions, although advance approval from the Board and CEO are required for any such activity.

When taking part in political activities as a representative of Millennium Healthcare we should:

- Comply with all laws relating to political activities.
- Conduct all relationships with public officials, candidates, and government employees in an ethical and honest manner.
- Provide complete and correct information to government agencies.
- Avoid using his/her position with Millennium Healthcare to gain any personal benefit or to benefit Millennium Healthcare.

## Other Laws and Millennium Healthcare Policies and Procedures

Although this Code of Conduct & Ethics covers many areas, some jobs may involve specific legal rules not explained here. For example, additional laws may apply to pharmacy employees or to accounts receivable personnel. Questions or concerns not specifically addressed in the Code of Conduct & Ethics may be resolved by examining the other compliance documents or by contacting your supervisor, the Chief Compliance Officer, Compliance Legal Manager or Conflict of Interest Analyst.

The guidelines set forth in this Code of Conduct & Ethics are intended to reaffirm Millennium Healthcare’s longstanding commitment to compliance. They are not intended to replace other Millennium Healthcare policies and procedures. We must all comply with the applicable Millennium Healthcare facility and departmental policies and procedures, as well as the guidelines stated in the Code of Conduct & Ethics.



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## Compliance, Ethics & Risk Program Overview

Millennium Healthcare is committed to possessing and demonstrating the reliability, honesty, trustworthiness, and high degree of integrity expected of a leading healthcare organization and a participant in federally funded healthcare programs. To help strengthen this commitment, Millennium Healthcare has implemented its Compliance, Ethics & Risk Program. Millennium Healthcare is committed to the prevention, detection and control of Fraud, Waste and Abuse activity within its organization. This plan indicates the structures and activities through which the physician group practices achieve these goals. Compliance with the principles, policies and procedures while improving operational quality and ensuring high quality healthcare, as well as other policies and procedures of this organization, is a condition of employment.

### Failing to Act in Accordance with the Compliance, Ethics & Risk Program

The Compliance, Ethics & Risk Program helps ensure that Millennium Healthcare follows applicable laws, regulations, and Millennium Healthcare's compliance policies. Therefore, the consequences of not acting in accordance with the Compliance, Ethics & Risk Program are significant for the employee as well as Millennium Healthcare. Millennium Healthcare, its member organizations and the employee may be subject to criminal and/or civil prosecution resulting in payment of fines and/or imprisonment. In addition, Millennium Healthcare, its member organizations and the individual may be excluded or suspended from participation in any federal or state government healthcare program. Finally, any employee who fails to adhere to the Compliance, Ethics & Risk Program will be subject to corrective action, such as a verbal or written reprimand, paid or unpaid suspension or even termination of employment.

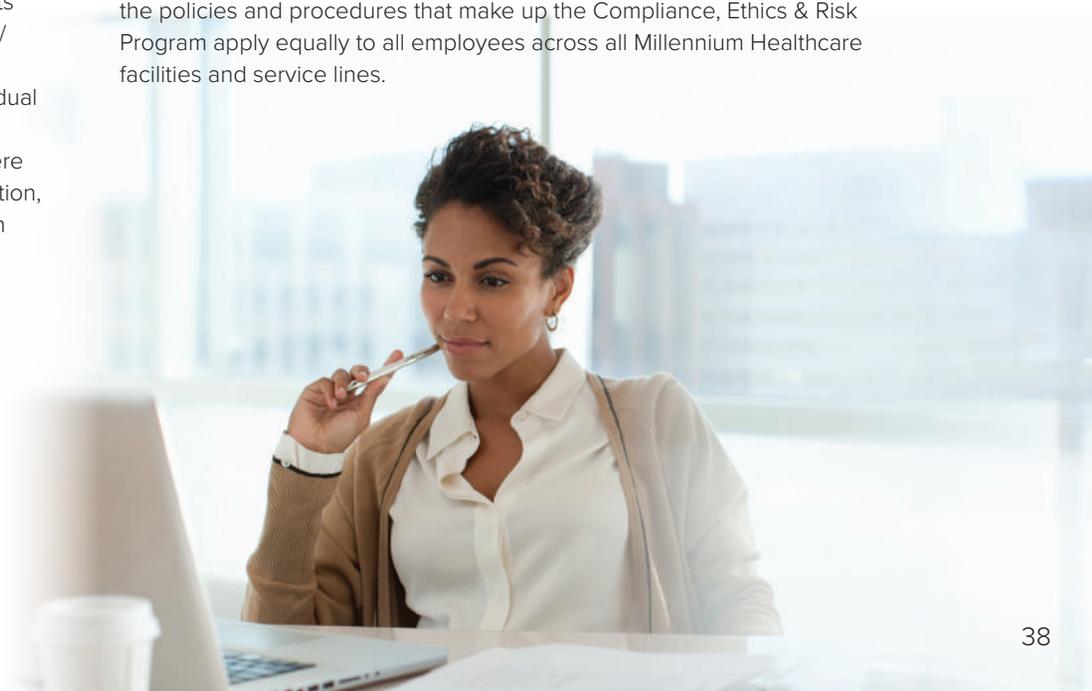
## Purpose

The Millennium Healthcare Compliance, Ethics & Risk Program clarifies the organization's expectation that all employees will adhere to applicable laws governing their behavior. It also provides examples of how the organization will do business in certain situations.

The Millennium Healthcare Compliance, Ethics & Risk Program ensures the organization meets the requirements of the Federal Sentencing Guidelines for Organizational Defendants and the advice of the Office of the Inspector General of the United States Department of Health and Human Services.

The Compliance, Ethics & Risk Program also ensures Millennium Healthcare can seek reimbursement for services provided to Medicare and Medicaid participants. The government acts as a trustee by distributing money designated to fund the healthcare expenses of Medicare and Medicaid participants. Like any trustee, the government takes great care to ensure that these funds are distributed appropriately and that the healthcare providers, who seek reimbursement from Medicare and Medicaid, do so in accordance with the law.

Finally, the Compliance, Ethics & Risk Program helps ensure uniformity across Millennium Healthcare. The Compliance, Ethics & Risk Program and the policies and procedures that make up the Compliance, Ethics & Risk Program apply equally to all employees across all Millennium Healthcare facilities and service lines.



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## Management of the Millennium Healthcare Compliance, Ethics & Risk Program

The Compliance, Ethics & Risk Program was created at the direction of Millennium Healthcare’s Board of Directors. The Board Committee oversees the operation of the Compliance, Ethics & Risk Program and receives regular reports from Millennium Healthcare’s Chief Compliance, Ethics & Risk Officer. All Millennium Healthcare leaders, from the Board Chairman to the Senior Leadership in every Millennium Healthcare Facility, are important to Millennium Healthcare’s compliance efforts.

The Compliance, Ethics & Risk Program is essential to Millennium Healthcare’s future success. Therefore, all employees, as well as all persons and entities retained and authorized to act on behalf of Millennium Healthcare (“Workforce Members”), are responsible for understanding and following the compliance policies that make up the Compliance, Ethics & Risk Program.

Managers and supervisors must consistently enforce and communicate Millennium Healthcare’s Compliance Policies to all Workforce Members within their business areas. Finally, every Workforce Member is responsible for detecting, resolving, and reporting to Millennium Healthcare management unlawful conduct that may violate the Compliance, Ethics & Risk Program or Millennium Healthcare’s Compliance Policies.

Certain persons and departments within Millennium Healthcare have been charged with management of the Compliance, Ethics & Risk Program. These persons and departments serve as resources to all employees to ensure that the Compliance, Ethics & Risk Program and Millennium Healthcare’s Compliance Policies are implemented and enforced consistently. The designated persons/departments are as follows:

- Chief Compliance, Ethics & Risk Officer
  - Chief Medical Compliance Officer
  - Corporate Compliance and Quality Committee
  - Compliance Audit Committee
  - Compliance Data Analyst
  - Compliance, Privacy, and Drug Diversion Investigators and Coordinators
  - Compliance Directors, Deputies and Managers
  - Contract Administrator
  - Policy & Procedure Administrator
  - Compliance Coding and Auditing Team
  - Compliance Legal Team
  - Privacy Officer
  - Chief Innovation Officer
  - Information Technology Security Officer
  - Cornelius Compliance and Patty Privacy
- (They help share messages and training to our staff look for them in the Millennium Healthcare Minute and Emails!)



Tina and some of her team members – Crystal, Rachel, Beth and Wayne (left to right)

The Chief Compliance, Ethics & Risk Officer acts as Millennium Healthcare’s Chief Compliance & Risk Officer and is responsible for overseeing Millennium Healthcare’s compliance activities.

The Chief Compliance, Ethics & Risk Officer leads the Compliance, Ethics & Risk Office. This Office is responsible for the day-to-day management and administration of the Compliance, Ethics & Risk Program, such as: developing ethics and compliance policies, procedures, and training; managing the Ethics Connection Hotline; reporting, auditing, and monitoring compliance issues; and verifying corrective action plans for areas of non-compliance. The Compliance Office contact information is as follows:

**Millennium Healthcare, LLC**  
**Compliance, Ethics & Risk Department**  
**2675 Winkler Avenue, Suite 490**  
**Fort Myers, FL 33901**  
**Tel: 239-232-2950 Fax: 239-599-2847**  
**E-mail: Compliance@mpgus.com**  
**Ethics Connection Hotline 855-517-8676.**

# WE BELIEVE IN HOLDING OURSELVES ACCOUNTABLE

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## Corporate Compliance & Quality Committee

The Corporate Compliance & Quality Committee (“Committee”) assists the board of directors of the Corporation (the “Board”) with overseeing the Corporation’s activities in the areas of compliance with laws and regulations applicable to its business.

The Committee provides advice, oversight and guidance to the Chief Compliance, Ethics & Risk Officer on matters relating to Millennium Healthcare’s Compliance & Risk Program. This Committee meets quarterly to review and discuss compliance activities.

The Committee’s primary objective is to facilitate the effective operation of Millennium Healthcare’s Compliance, Ethics & Risk Program. This will be accomplished through a combination of creating a culture within the organization and the oversight of implementation of the core components of the Compliance, Ethics & Risk Program.

The Chief Compliance, Ethics & Risk Officer shall provide quarterly dashboard reports to the Board containing the activities relating to the Seven (7) Elements of the Compliance, Ethics & Risk Program, a Privacy Report and additional Incident and Complaint reporting. Each January, the Chief Compliance, Ethics & Risk Officer shall provide the Compliance, Ethics & Risk Program Annual Report for the previous year in combination with the next year’s Compliance, Ethics & Risk Work Plan.

## CONCLUSION

Each employee is expected to know and understand Millennium Healthcare’s Compliance Policies and the basic laws and regulations that affect his or her job. Knowledge is the most powerful weapon used to prevent compliance mistakes. If you are not knowledgeable about Millennium Healthcare’s compliance policies and the basic laws and regulations that affect your job, you must educate yourself.

### Start by reading the Code of Conduct & Ethics Handbook

and any other compliance documents that contain the policies that most directly impact your job. Study those policies and talk to your supervisor if you do not understand how they apply to your job. If your supervisor cannot resolve your problem, follow the “Four Step Communication Process”, and keep asking your questions until you get an answer that makes sense to you.

With the assistance of every employee, Millennium Healthcare will fulfill its commitment to provide medical services of the highest quality to its patients in full compliance with all applicable laws and regulations.

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“Everyone always has a choice. Compliance is a choice. Doing the right thing is our choice.”

- Tina

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