

CODE OF CONDUCT AND ETHICS HANDBOOK



A MESSAGE FROM OUR CEO AND CMO

Our Code of Conduct & Ethics Handbook ("Code") supports our promise to deliver the highest-quality care and world-class patient experiences. Every member of the Millennium team contributes to our ethical culture, serving as the connection between that promise and our patients.

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 to do the right thing in each situation is driven by our core values set forth in this handbook. While Millennium's Code cannot prepare us for every possible situation, it outlines our organization's behavioral expectations 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, regardless of position, is responsible for honoring the commitments outlined in our Code and for abiding by legal and regulatory compliance policies. As a member of the Millennium 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 or concerns regarding any situation arising at Millennium, please contact the Ethics, Compliance, & Risk Team; your leader; your department or practice manager; or the Human Resources Department.

Thank you for familiarizing yourself with the Millennium Code and for helping us connect the best doctors, service, and quality to every patient, every time.



Kevin Kearns

Kevin Kearns
Chief Executive Officer

A handwritten signature of Alejandro Perez-Trepichio, MD, enclosed in a circular stamp.

Alejandro Perez-Trepichio, MD
Chief Medical Officer

A MESSAGE FROM OUR CMCO

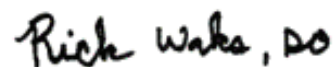
At Millennium, we believe the future of healthcare, and our world, is defined by the choices we make every day. When you chose to become part of Millennium, you chose to join a team committed to an **ethical** future, one we will achieve by caring for communities, our environment, and each other. Through our shared efforts to deliver quality healthcare that is sustainable and equitable, we inspire the trust of our stakeholders and create value for those we serve. What's more, when we celebrate the diversity of our communities and fellow team members, we position Millennium to be the employer of choice, attracting like-minded individuals whose expertise and leadership will make our positive impact even greater.

This Code outlines the core values and principles upon which our ethical future is founded. The Code is a guide you will refer to many times and a resource to help you navigate both the simple and sometimes difficult decisions our jobs require. In addition to this Code, the Millennium Ethics, Compliance, & Risk Team is here to help and support you every step of the way.

If you have questions about a decision you must make, or have questions about the decisions of others, we encourage you to speak up. Speaking up can protect Millennium's resources and, in some cases, can save lives. Further, speaking up gives you and your team members the opportunity to learn, communicate, improve, and grow together.

"Remember: Get the right answer, not just the easy answer."

Every Millennium team member has an obligation as part of their employment to uphold the core values in this Code and to help ensure our compliance efforts are a success. I encourage you to read and become familiar with the Code and talk to your supervisor or any member of the Ethics, Compliance, & Risk Team if you have questions. And never hesitate to use the *Incident and Complaint Reporting System (ICRS)* or *Ethics Connection Hotline* to seek guidance or to make a report (you may do so anonymously if you choose).



Rick Waks, DO
Chief Medical Compliance Officer





TABLE OF CONTENTS

A MESSAGE FROM OUR CEO AND CMO	2
--------------------------------------	---

A MESSAGE FROM OUR CMCO	3
-------------------------------	---

OUR STORY. OUR MILLENNIUM. 5

• We Believe in our Responsibilities.....	9
• We Take Pride in our Ethical Decisions	10
• Is it Ethical or Appropriate?	10
• Speaking Up and Reporting a Compliance Issue	11

OUR PEOPLE. OUR MILLENNIUM. 13

• We Win by Protecting our Team from Harassment and Discrimination...	14
• We Embrace Diversity, Equity, and Inclusion.....	16
• We are Proud of our Safe and Healthy Workplaces.....	18
• We Protect our Reputation.....	19
• We Avoid Conflicts of Interest	20

OUR PATIENTS. OUR MILLENNIUM. 22

• We Ensure Safety and Provide the Highest-Quality Care	23
• We Protect Patient Confidentiality.....	24
• We Take Care of Those We Serve	25

OUR BUSINESS. OUR MILLENNIUM. 27

• We Conduct Business Ethically	28
• We Engage in Trustworthy Relationships with Suppliers and Third Parties	29
• We Comply with Laws and Regulations.....	30
• We Know the Rules to Conduct Business with Governments	31
• We Prevent Bribery and Corruption	33
• We Safeguard our Data and Intellectual Property	34
• We Protect Financial Assets with Accurate Record Keeping	36
• We Avoid Insider Trading.....	37

OUR COMMUNITIES. OUR MILLENNIUM. 38

• We Protect Human Rights.....	39
• We Contribute to Our Communities	40
• We Protect the Environment	41
• We Participate Responsibly in the Political Process	42

OUR TEAM. OUR RESOURCES. 43

• Ethics and Compliance.....	44
• Resources.....	45
• Conclusion	45



Our Mission and Vision



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 Story. Our Millennium.

Since the beginning, Millennium Healthcare, LLC (“Millennium”) has sought to empower physicians and advanced providers with the tools, resources, and support they need to deliver exceptional care—care that is patient centered, quality based, and outcome driven. Inspired by the evolution of healthcare, we thrive on innovation and relentlessly pursue quality in everything we do.

We see the patient stories behind the data and find opportunities to utilize technology to optimize workflows. That enables 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, we embrace big ideas. We believe everyone has something unique and meaningful to contribute to our vision. Our success depends on open and transparent communication, with each other and with our patients.

Individually and as a team, we strive to earn, and keep, our patients’ trust as partners on a shared healthcare journey. 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 Core Values



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.

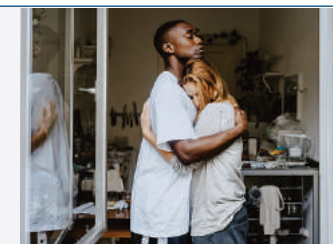
One of our most important responsibilities is to **ADVOCATE** for our patients by anticipating their unique wellness needs. We meet our patients where they are to support them with the care, education, and encouragement they need at every step of their healthcare journey.



RESPECT

We believe actions speak louder than words.

We **RESPECT** what each person brings to the table. We treat our patients and each other with dignity. We honor the trust placed in us by showing empathy and allowing freedom of expression.





How We Bring our Values to Life

Millennium is driven by its commitment to delivering the highest quality care and the best patient experiences. This commitment raises us above the competition and makes us stronger. As part of Millennium, every workday is an opportunity for you to show our patients we honor our commitments and are deserving of the trust they place in us.



INTERACTIVE

Click on the interactive buttons below to learn more about our CARES core values and how they impact everything we do at Millennium.



CONNECT

- Get to know each patient you care for.
- Deliver the highest-quality care and exceptional patient experiences to every patient.
- Work with your team to make sure patients receive the right care at the right time, in the right place.



RESPECT

- Celebrate diversity and welcome new ideas.
- Honor the trust of your teammates and patients by acting with integrity.
- Treat your patients and teammates with dignity.



SERVE

- Provide care that is responsive to personal values and expressed preferences.
- Commit to do everything you can to support each patient's success.
- Always give 100 percent to each patient.



ENGAGE

- Engage your patients in their wellness journeys.
- Earn trust by asking questions, listening closely, and setting shared goals.
- Commit to compassionate collaboration with patients.



ADVOCATE

- Meet patients where they are and support them with care, education, and encouragement.
- Anticipate each patient's unique wellness needs.
- Invite patients and their families to be actively involved in the decision-making process.



We Believe in our Responsibilities

This Code gives us the tools we need to fulfil our promise to deliver high-quality care and exceptional patient experience. It is our practical resource on how to do the right thing the Millennium way. We should read it carefully and refer to it often to guide our everyday decision-making.

The Code is divided into sections that explore risk areas we may encounter in our work. Each section has three subsections:

Principle statement

Our beliefs, approach, and commitment to the given topic.

Why it matters

What our approach means, how it aligns with our values, and why it supports the long-term health and success of Millennium.



Doing the right thing

How we apply our morals, values, and ethics through our behaviors and actions.



Compliance is a critical piece of our workplace to always help guide us in our behavior and to know that we must always do the right thing. The Compliance team is always there to support and guide us in any situation where any kind of ethical standard is being challenged as they help define a culture of expectations as to the treatment of our patients and our staff.

—Don McKee, Regional Market Director



Everyone's responsibilities

We are each responsible for following our Code and ensuring our work is ethical and compliant.

We do the right thing by:

- Upholding our core values and following the guidance outlined in our Code.
- Reading and regularly reviewing our Code and the policies and procedures that apply to our jobs.
- Participating in training programs to help us understand our obligations to ethics and compliance.
- Asking questions and seeking help when we are unsure of the right course of action.
- Using due diligence to prevent, detect, and report unlawful conduct and policy violations.
- Encouraging team members to speak to their leader if they may be in danger of violating the law.
- Supporting team members who report suspected violations of the Code.

These responsibilities apply equally to team members across all facilities, departments, service lines, business areas, and functional areas.

Leader's responsibilities

As leaders, Millennium managers and supervisors have special responsibilities. If you are a leader, you must:

- Consistently enforce and communicate our policies to your team.
- Act as role models for your team members.
- Encourage team members to speak up about questions and concerns with active listening.
- Create a positive environment where each team member feels comfortable being themselves and doing the right thing.

Who must follow the Code

The guidance in our Code and company policies applies to each of us—all company team members—as well as our subsidiaries and affiliated entities.



We Take Pride in our Ethical Decisions

No Ethics, Compliance, & 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.

Is it Ethical or Appropriate?

If you are unsure about the legality or the appropriateness of an action or a proposed action, think of the following and then click on a button and ask yourself these questions:

Feeling?

How would it make you feel if you did it?
How would you feel about yourself if you did it?

Unsure?

If you are not sure, ask. Keep asking until you get an answer that makes sense.

Comply?

Does it comply with the law and Millennium's compliance policies and procedures?
Does it require evaluation by other experts, legal, HR, or the Accounting Department?

Reflect?

Does it reflect our company values and ethics?

Appearance?

How would it look to your family and friends, your coworkers, or our patients and the community?

Respect?

Does it respect the rights of others? Whose rights are enabled and whose values are realized by this decision? Whose are not?

Affect?

Who is harmed by and/or benefits from this decision?
What kind of a person will I become if I make this decision?

Relationships?

What relationships will be strengthened or weakened by this decision?

Intention?

Why would I make this decision? Are there any improper motives or conflicts (of interest) for making the decision?



**Get the
RIGHT ANSWER,
not just the
easy answer.**



Speaking Up and Reporting a Compliance Issue

We all have a choice. We can keep quiet about a compliance issue and see what happens. Or we can speak up. Whether it's to voice a minor question or major concern, speaking up can be hard. We may fear repercussions, asking ourselves: What if I was doing something wrong, and now I'm speaking up about it too late? What if someone retaliates against me for revealing what they're doing? What if my team members make fun of me for trying to follow the procedures to a T?

The answer to each of these questions is simple. It's always better to speak up. If we wait on something, the situation will inevitably turn from bad to worse. Speaking up immediately in serious situations could save lives, time, money, and reputation. As team members of Millennium, we are obligated to report any issue or practice we think might violate a policy or law. If we violate a policy or *fail to report* a violation, we are subject to corrective action, up to and including termination.

To report a compliance issue, follow our Four-Step Communication Process. If we feel uncomfortable reporting an issue to our leader or any other leader, we should call the Ethics Connection Hotline.



The 4 Step Communication Process

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

1. Discuss the issue with a leader.

Leaders are familiar with the workplace environment and its issues. Therefore, they should be given the first opportunity to resolve the matter.

2. Speak to a higher-level supervisory team member.

If you and your leader cannot resolve the matter, if you feel your concern is not getting the proper attention, or if your leader is the issue, you should request a meeting with a higher-level supervisory team member 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, or the Chief Operating Officer. Alternatively, you may bring the matter directly to your Chief Executive Officer or Senior Executive.

4. Bring the matter to the attention of the Chief Ethics, Compliance, & Risk Officer or Team.

If you cannot resolve the matter at the facility level, you should bring it to the Ethics, Compliance, & Risk Team. **You can bypass Steps 1–3 if you feel uncomfortable.**



Ethics Connection Hotline

To make an anonymous and confidential report, we can call our **Ethics Connection Hotline: 855-517-8676**. It is open 24 hours a day, seven days a week. These calls are anonymous and untraceable, and will be treated confidentially. The hotline is maintained by a third-party confidential reporting company. Its representatives send concerns to the Ethics, Compliance, & Risk Team for investigation.

Although a call to the hotline satisfies our obligation to report, it should not replace our local management team or the Four-Step Communication Process. The hotline should supplement these existing communication channels. It is available when team members have exhausted all normal channels or are uncomfortable bringing an issue to their leaders.

When we file a report, the Ethics, Compliance, & Risk Team acts promptly to investigate. To help investigations run smoothly and ethically, team members must provide truthful and complete information.



The Investigation Process

- Assign investigation team: involve individuals with the right knowledge, objectivity, and discretion.
- Conduct investigation: determine facts through interviews and/or document reviews.
- Provide recommendations: make recommendations, including corrective actions if appropriate, to applicable leader for implementation (if necessary).
- Give feedback: provide general feedback to the person who raised the concern (if appropriate).

“

*I am grateful for the insight and guidance that our Ethics, Compliance, & Risk team has provided particularly when faced with complex situations. I know that this department is here to ensure **Millennium**, our teams, and patients can feel secure in the knowledge they are guiding our organization with the highest standards in healthcare.*

— Mary Haltigan, Director of Revenue Cycle

”



Zero tolerance for retaliation

At Millennium, we have a **zero-tolerance** policy for retaliation. Anyone who attempts to retaliate against a team member who has made a report in good faith will be subject to corrective action up to and including termination of employment.

Our Resources



[COM 067: Ethics Connection Hotline](#)

[COM 002: Non-Retaliation for Reporting a Violation](#)

[Non-Retaliation Handbook](#)



OUR PEOPLE.

OUR MILLENNIUM.



RESPECT:

We believe
actions speak
louder than
words.

- We win by protecting our team from harassment and discrimination...14
- We embrace Diversity, Equity, and Inclusion.....16
- We are proud of our safe and healthy workplaces18
- We protect our reputation.....19
- We avoid conflicts of interest..... 20



We Win by Protecting our Team from Harassment and Discrimination

We create a culture free of harassment and discrimination when we respect and constantly support one another.

Why it matters

We believe actions speak louder than words. That's why it's so important to think through each action and decision carefully to ensure we're respectful and considerate.

Harassment creates a hostile environment that affects everyone, not only the targeted individuals. Demeaning a team member for any aspect of their appearance, weight, habits, accent, background, or beliefs can count as harassment. We uphold our core value of respect by never discriminating against or harassing others. We respect and protect each other's rights by providing equal opportunity and treatment.

When we work together to cultivate a culture of mutual respect and trust, we win together. We are proud to be part of a company that puts our rights and well-being first.

We speak up and stand up against harassment

Workplace harassment is belittling or threatening behavior directed at an individual or a group. It can come from a boss, coworker, group of coworkers, supplier, or patient. It can include:

- Physical assaults, intimidation, gestures, or sexual harassment.
- Verbal threats, offensive jokes, nicknames, slurs, or name-calling.
- Visual imagery, such as pornographic pictures on a laptop, or offensive objects.
- Any behavior that mocks, puts down, disparages, or ridicules a team member.
- Interfering with a team member's ability to work.
- Any offensive and unwanted action that creates an intimidating, hostile, or abusive work environment.

Harassment goes against everything we stand for at Millennium. It is illegal and strictly prohibited. Under the law, we are protected from harassment based on:

- | | | |
|-------------------|--|-----------------------|
| • Age | • Sex (including gender identity and sexual orientation) | • Color |
| • Race | • Physical or mental disability | • Pregnancy |
| • Color | | • Genetic information |
| • Religion | | • Weight |
| • National origin | | • Veteran status |





A month ago, I reported my leader for discriminating against employment candidates for their gender. The report is under investigation, and in the meantime, we're still working together. Recently, he's been making me feel really uncomfortable. He's started calling me "baby girl" and "sweet cheeks" instead of using my name. And whenever I oppose something in a meeting, he starts making crying noises and saying things like, "Aw, you better do what Imani says or she'll cry about it." Everyone else finds this funny and laughs. Some people have even started offering me tissues at my desk! I'm not sure what to call this, but it's started to affect my work. I don't feel comfortable in the office anymore. I also don't talk as much because I don't want him to make fun of me. What should I do?



You should report your leader for harassment immediately. Any behavior that mocks or puts down a team member, creates a hostile work environment, or interferes with your ability to work counts as harassment. It also sounds like your leader could be harassing you in retaliation for making a report, which makes the offense even more serious. Make sure to inform the Ethics, Compliance, & Risk Team of the urgency of the situation. You deserve to work in a positive and supportive environment.



DOING THE RIGHT THING

We protect our team by:

- Treating each other with respect, fairness, honesty, and integrity.
- Providing equal employment opportunity to all qualified candidates.
- Speaking up right away when we see harassment in the workplace.
- Cooperating fully in any investigations into harassment or discrimination.
- Never retaliating against or **harassing** someone for making a report or cooperating in an investigation.

Our Resources



[HR 003: Anti-Harassment, Discrimination, and Retaliation](#)

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



We Embrace Diversity, Equity, and Inclusion

We respect what each person brings to the table. We celebrate diversity, welcome new ideas, and treat our patients and each other with dignity.

Why it matters

Diversity, Equity, and Inclusion (DEI) are critical to our ability to deliver quality care and exceptional experiences. When we celebrate diverse perspectives, we create an environment that enhances innovation and facilitates positive outcomes.

At Millennium, we recognize that DEI is a work in progress. It requires deliberate focus and action on the part of every team member and leader. Each of us can support DEI by welcoming every person, being inclusive, and treating one another equally. We believe together is better.

Defining Diversity, Equity, and Inclusion

Diversity: Recognizing and valuing the uniqueness that every employee brings

To achieve our organizational goals, we need all types of diversity, including diversity of race and ethnicity, gender, gender identity, generation, physical ability, sexual orientation, geography, national origin, and culture.

Equity: Ensuring all employees have a level playing field

Equity means *all* employees are treated fairly and are empowered to lead and make decisions. Everyone has the opportunity to advance based on their talent, contribution, and aspirations.

Inclusion: Creating an organizational culture that values, respects, and develops our diverse talent

Inclusion means our people's unique contributions are appreciated and recognized, and that they are empowered and unleashed to contribute fully as their true selves.



DOING THE RIGHT THING

We embrace diversity, equity, and inclusion by:

- Treating each other with dignity and respect.
- Listening and advocating for everyone's opinion to be heard.
- Recognizing that each one of us has value and a voice.
- Fostering an atmosphere of open, honest, and candid communication.
- Hiring, retaining, and promoting based on qualifications, skills, and professional achievements.
- Never discriminating.
- Knowing and complying with applicable employment laws and related company policies.
- Reporting instances of improper treatment or discrimination.





How Do We Show our Commitment to DEI?

Click the hand-shake icon to reveal the answer.



When we ask a question

We listen to everyone's input with equal consideration.



When we evaluate candidates for employment or promotion

We base all decisions on individual merit and give each candidate equal opportunity.



When we are part of a group discussion

We actively advocate for everyone's voice to be heard.



When someone does something well

We value them and show our appreciation by sharing their accomplishments with the group.



When we are assigning tasks

We make sure everyone is getting a chance to tackle different challenges and use their unique skills.

Our Resources



[HR 003: Anti-Harassment, Discrimination, and Retaliation](#)

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



We are Proud of our Safe and Healthy Workplaces

We foster workplaces where all people can thrive in a safe and healthy environment.

Why it matters

Creating and maintaining a safe and healthy work environment is the foundation of our mission. We do not use drugs or alcohol on the job. We protect each other by never bringing violence or weapons into work. We also consider the health of all people and our planet by reducing and recycling waste.

Creating a healthy workplace isn't only about protecting our physical well-being. It also means caring for our mental and emotional well-being. We take care of our Millennium family by treating each other with kindness, compassion, and respect. At Millennium, we take care of everyone—every time.



Earlier today, one of my coworkers got pricked by a needle when she was picking up a trash bag. She said it wasn't a big deal, but I'm concerned. Is she in any danger? What should I do?



Your coworker should seek medical attention immediately. Needlesticks can be very dangerous and lead to a number of diseases. But they can be prevented if needles are disposed of safely. Call Human Resources and report this incident in the Incident and Complaint Reporting System (ICRS) using the **"REPORT IT!"** icon on your desktop with as many details as possible so we can prevent it from happening again.



DOING THE RIGHT THING

We maintain safe and healthy workplaces by:

- Learning the procedures for handling and disposing of any hazardous materials used on the job.
- Knowing the safety **procedures** that apply to our job.
- Sharing ideas for improving safety and reducing waste with our leader.
- Using best efforts to ensure that actions are carried out in a safe and healthy way.
- Recycling or reusing waste whenever possible.
- Discarding waste that cannot be reused or recycled safely.

Our Resources



[ADM 027: Standard Precautions](#)

[ADM 007: Weapons Free Work Environment](#)

[HR 006: Drug-Free Workplace](#)

[Workers Comp Employee Guidelines Handbook](#)



We Protect our Reputation

We work as a team to communicate authentically and respectfully to our communities and to protect our reputation.

Why it matters

We believe authentic connection inspires right action. We engage with patients to connect them with the highest-quality care. We connect with our coworkers to achieve more for our patients. We uphold our reputation and values by ensuring each of these connections is authentic and reflects Millennium as a whole.

Only designated team members are authorized to talk to the media about Millennium. This helps us speak with a unified voice while presenting truthful information to the public.

Using social media responsibly

Social media is an incredible tool. It helps us engage with a wider community and make connections. But we must be careful to stay true to our values while using social media. We should not share false or hurtful opinions that could harm Millennium's reputation—even on our personal accounts. We should never communicate on behalf of Millennium unless authorized to do so.



DOING THE RIGHT THING

We protect our reputation by:

- Using our time on social media responsibly so it doesn't interfere with work.
- Never representing our personal views as those of Millennium.
- Identifying ourselves as employees if authorized to endorse Millennium.
- Directing all media inquiries to authorized team members.
- Never revealing confidential information in person or online.



Our Resources



[COMM 002: Social Media](#)



We Avoid Conflicts of Interest

Our vision is to be the best choice for patients, doctors, and care teams. We fulfill that vision by putting Millennium's interests before our own and avoiding conflicts of interest.

Why it matters

Patients rely on our expertise to connect them to highest quality care. We honor their trust by putting their interests—and Millennium's interests—before our own personal gain and by avoiding conflicts of interest.

A conflict of interest occurs when there are circumstances that might cause us to act in a way that benefits us instead of Millennium. A conflict, or even the appearance of a conflict, could give the impression of biased decision-making. Most conflicts of interest can be avoided or addressed if promptly disclosed and managed.

Examples of conflicts of interest

Conflicts of interest can arise in a variety of situations. Some examples include:

- **Personal workplace relationships and medical supervisory roles**
(e.g., hiring or supervising a closely related person)
- **External mandates**
(e.g., serving on the board of a customer, supplier, competitor, or business partner)
- **Medical directorships, outside employment**
(e.g., having a second job with a customer, supplier, or competitor)
- **Promoting personal financial interests**
(e.g., owning a substantial share of a supplier while in a position to steer Millennium business toward it)
- **Receiving gifts**
(e.g., accepting a valuable gift from a partner or customer that might affect our ability to make objective decisions)



I am an office manager and have an immediate family member who operates a pest control company. I feel his services are dependable and priced fairly. Can I hire that pest control company to provide services for Millennium?



Personal relationships with vendors can present a conflict of interest. Though your goal is to help Millennium, the fact that your family member is a prospective vendor makes your role as purchasing agent biased. In this situation, you should complete an online Conflict of Interest Disclosure Form and send it to the Compliance Legal Team or Ethics, Compliance, & Risk Team. A member of the Ethics, Compliance, & Risk Team will review and determine whether or not a conflict exists. If a conflict does exist, the Ethics, Compliance, & Risk Team will institute a Management Plan to ensure the conflict is mitigated. For further information, refer to policy ADM 038, Conflict of Interest.



Report any potential or actual conflict of interest using the REPORT IT! icon on your desktop or on the CARES Hub.



Gifts and entertainment

We must be very careful when a customer, competitor, or partner offers us a gift. Accepting gifts, fees, discounts, entertainment, or services could influence our decision-making and create a conflict of interest. When faced with a difficult choice, we should look to our values to guide us. Use the following questions to determine whether or not a gift upholds our values and Code. For each question, click Yes or No to find out more.

Could this gift be seen as an attempt to gain influence?	YES >	Do not accept the gift.	< NO
Does this gift create a sense of obligation or an expectation of something in return?	YES >	Do not accept the gift.	< NO
Is the gift unsolicited and of a nominal value (total value of \$100 or less)?	YES >	You may accept the gift.	< NO
Is the gift in cash or a cash equivalent (e.g., gift card, certificate, etc.)?	YES >	Do not accept the gift.	< NO
Would accepting the gift jeopardize our mission, vision, or the trust our patients place in us?	YES >	Do not accept the gift.	< NO

Still not sure?

Ask your supervisor, Compliance Conflict of Interest Office, and/or Compliance Legal Team.



DOING THE RIGHT THING

We avoid conflicts of interest by:

- Making objective decisions free from personal bias and in the best interest of Millennium.
- Ensuring our personal activities and relationships do not interfere with our work.
- Completing a conflict disclosure statement upon hire or annually.
- Disclosing potential conflicts of interest at any time to our leader, Compliance Conflict of Interest Office, and/or Compliance Legal Team.
- Seeking advice from our Millennium leader if we are unsure whether a conflict exists.
- Removing ourselves from the decision on how to resolve a conflict in which we are involved.
- Reading our Gifts, Gratuities, and Business Courtesies policy to see which events and activities are permitted.

Our Resources



[ADM 038: Conflict of Interest](#)

[COM 066: Gifts, Gratuities, and Business Courtesies](#)



OUR PATIENTS. OUR MILLENNIUM.



SERVE:

We believe
this is our
calling.

- We ensure safety and provide the highest-quality care23
- We protect patient confidentiality.....24
- We take care of those we serve 25



We Ensure Safety and Provide the Highest-Quality Care

Our mission is to connect patients with the best doctors, service, and quality. To do so, we must ensure safety.

Why it matters

High-quality care means care that is engaging, effective, and safe. As we work to provide high-quality care, we ensure every physician, supplier, and partner follows safety protocols and requirements.

Together, we serve our patients by committing to safety at each step of their wellness journey.



DOING THE RIGHT THING

We ensure safety and provide the highest-quality care by:

- Following our model of value-based care to deliver positive patient outcomes.
- Working with physicians, suppliers, and partners who uphold our high standards for safety and quality.
- Listening closely and responding fully to safety concerns voiced by our patients.
- Reporting safety violations immediately.



Our Resources



[Our Core Values](#)



We Protect Patient Confidentiality

The confidentiality of our patients' information is central to what we do at Millennium. We do the right thing by protecting patient confidentiality—every patient, every time.

Why it matters

Information that identifies our patients, their medical conditions, and their payment for the medical services they receive is highly sensitive and protected, not only by our Millennium policies, but by state and federal laws. It is all of our jobs to protect this information.



DOING THE RIGHT THING

We can protect patient confidentiality by:

- Knowing and following our Security and Privacy Compliance policies.
- Using only the minimum amount of PHI and PII necessary to do your work and sharing only the minimum amount of PHI or PII with others who need it to do their work.
- Never accessing, using, or disclosing PHI and PII when it is not directly related to your assigned job-related duties.
- Using and disclosing de-identified information whenever possible.
- Encrypting PHI and PII in emails by placing the phrase “[encrypt]” as the first word in the subject line of your emails, and never placing PHI or PII (e.g., patient name or MRN) in the subject line of your email.
- Using only Millennium issued or approved electronic devices to access, send, receive, or store PHI and PII.
- Only disclosing PHI or PII with written authorization from the patient unless the disclosure is required or permitted by law.
- Ensuring there is a business associate agreement in place when sharing PHI with vendors.
- Appropriately shredding or destroying unneeded documents or devices containing PHI or PII.
- Keeping confidential paper documents out of sight in a locked cabinet or drawer.
- Locking your computer screens before stepping away from your computer.
- Never leaving PHI or PII unattended on printers, fax machines, or in other publicly accessible areas.
- Reporting all known or suspected Privacy violations immediately.

Our Resources



[COM 001: Confidentiality and Security of Information](#)

[COM 009: Sanctions for Privacy Violations](#)

[COM 023: Minimum Necessary Access and Disclosure](#)



What information is protected?

Every team member and physician is responsible for maintaining the confidentiality of our patients' protected health information (PHI) as that term is defined by the Health Insurance Portability and Accountability Act (commonly known as HIPAA). We must also protect personally identifiable information (PII), as that term is defined by the Florida Information Protection Act, of others, such as our coworkers, vendors, business partners, and stakeholders.

Can I get in trouble for a violation?

What should I do if I am aware of a violation?

Violating privacy requirements can result in disciplinary action up to and including termination. You must contact the Privacy Office if you become aware of a privacy violation. You may contact the Privacy Office by reporting the violation through the Incident & Complaint Reporting icon on the CARES Hub, by calling the Privacy Office at 239-232-2950, emailing them at privacy@mpgus, or calling the Ethics Connection Hotline at 855-517-8676 24x7x365 (you may remain anonymous on hotline calls).

We Take Care of Those We Serve

We honor the trust patients place in us by devoting ourselves 100 percent to improving their care and well-being.

Why it matters

Assuring each patient receives the highest-quality care is our most important responsibility. Every time we interact with a patient, they should feel welcomed, heard, and understood. Then it is up to us to connect them with top-quality care to meet their individual needs. With a quality rating of 95+ percent, Millennium is leading the way in patient experience. We must continue to be role models. Each day, we should inspire better service everywhere while meeting and exceeding expectations.



If a friend or family member is a patient at Millennium, can I look at their records?



Accessing any medical record, no matter who the patient is, should be done only if your access to the record is directly related to your assigned job responsibilities. Accessing medical records for non-work-related purposes, or out of curiosity, is never permitted and will lead to disciplinary action, including termination of your employment.



Medical necessity

is defined as services or supplies that are needed to diagnose or treat a patient's medical condition and that meet accepted standards of medical practice. At Millennium, medical necessity ensures the care we provide is appropriate for our patients and reflective of accurate treatments to meet the patient's diagnosis.



DOING THE RIGHT THING

We take care of those we serve by:

- Treating each patient as an individual and connecting them with the highest-quality care.
- Providing care that is responsive to each patient's unique needs, personal values, and expressed preferences.
- Using value-based care to give each person exceptional treatment and continuity of care throughout their healthcare journey. Examples of the comprehensive care Millennium offers include:
 - Palliative Care Program
 - Patient Remote Monitoring
 - Telehealth Services
 - Preferred Provider Network
 - Transitional and Complex Care Management
 - Discharge Management
 - Patient Code of Conduct Contract
 - Patient Education/Outreach
 - Walk-In Appointments
 - Value-Based Pharmacy Resources
 - ER Assist Program
- Never doing anything that compromises the quality and integrity of a patient's care.
- Upholding the laws and standards required for patient care.
- Communicating honestly and openly with each patient.
- Never falsifying medical services or documents or masking incorrect services.

Our Resources



[COM 059: Patient Code of Conduct Contract \(Non-Pain Management\)](#)

[TIS 033: Tele-Medicine Video Conference and Virtual Care](#)

[PAL 02: Palliative Care: Continuity of Care for Discharged Patients](#)



OUR BUSINESS. OUR MILLENNIUM.

CONNECT:

We believe authentic
connection inspires
right action.

- We conduct business ethically 28
- We engage in trustworthy relationships with
suppliers and third parties 29
- We comply with laws and regulations 30
- We know the rules to conduct business with governments 31
- We prevent bribery and corruption 33
- We safeguard our data and intellectual property 34
- We protect financial assets with accurate record keeping 36
- We avoid insider trading 37



We Conduct Business Ethically

We thrive on the strength of our authentic, positive, and meaningful interactions with patients. They can rely on us to act with integrity and never engage in unfair market dealings.

Why it matters

Antitrust laws protect consumers by preserving competition and ensuring no business gains too much control in the marketplace. We serve our customers with integrity by upholding antitrust laws and supporting fair competition.

Antitrust laws may affect our work with patients, doctors, payers, suppliers, and competitors. Under these laws, members of Millennium are not competitors of one another. But hospitals and healthcare providers who are not controlled by Millennium are competitors. We cannot work with competitors to interfere with the market or prevent competition.



At a trade meeting the other day, I ran into an old colleague who now works for another healthcare provider in Georgia. He mentioned that his company is considering expanding into Florida. He asked if there are any regions where Millennium doesn't currently have providers. He said his company would be happy to fill the gap in those areas as long as Millennium isn't planning on expanding there as well. I'm not sure if this is a conversation we should be having. What should I do?



Your instinct is right! You should stop the conversation right away. Tell your former colleague that you cannot discuss sensitive information like that with a competitor. It sounds like he might also be suggesting making an agreement to allocate the market geographically. This is illegal. You should report it to the Ethics, Compliance, & Risk Team.



DOING THE RIGHT THING

We conduct business ethically by:

- Complying with our Antitrust and Fair Competition policy.
- Avoiding discussions with competitors about sensitive information such as prices, payer rates, and wages.
- Being conscious of our language when speaking to or about competitors.
- Never trying to engage in "secret" communication verbally or over email, text, or social media.
- Never engaging in price fixing, bid rigging, group boycotts, wage fixing, "no poach" agreements, market allocations, or any other unlawful agreements with competitors.
- Reporting attempts by competitors to have improper discussions or make illegal agreements.

Our Resources



[COM 062: Antitrust and Fair Competition](#)



We Engage in Trustworthy Relationships with Suppliers and Third Parties

We engage only suppliers who share our commitments to quality and integrity.

Why it matters

Suppliers, vendors, and other third parties are an essential part of what we do at Millennium. They help us connect patients to high-quality services. They provide the tools that enable our physicians to do meaningful work each day. Without them, we could not fulfill our mission.

As an extension of the Millennium family, suppliers must hold the same values we do. We are careful to build trustworthy relationships with suppliers who are committed to integrity. We work together in positive collaboration to connect our patients to healthier lives.



I signed a new medical supplies vendor a few months ago. So far, they've given me nothing but trouble. Their shipments are late and their products are usually faulty. I'm fed up with it! Tomorrow, I'm planning to fire them and start looking for a new supplier. Is that the right way to go?



Before you do anything, first ask yourself these questions:

1. Have you communicated openly and honestly with the supplier throughout your relationship?
2. Have you given them clear deadlines and expectations?
3. Have you told them about the faulty products and late shipments and given them a chance to improve?

Our relationships go both ways. Just as we expect our suppliers to be professional, we are also expected to treat them with respect and consideration. If you said yes to all the questions above, then it may be time to end our relationship with this supplier. Consult your leader to ensure you approach it in the best way possible.



DOING THE RIGHT THING

We engage in trustworthy relationships with suppliers and other third parties by:

- Treating our suppliers and other business partners fairly and with integrity.
- Connecting with suppliers who meet our needs and objectives and share our values.
- Basing our decisions on objective criteria, such as quality, service, and technical excellence.
- Conducting regular due diligence screenings on our vendors, suppliers, and third parties.
- Ensuring suppliers are committed to ethical practices and compliance with the law.
- Communicating honestly with our business partners and being constructive about finding solutions when issues arise.

Our Resources



[COM 025: Exclusion Screening](#)

[COM 060: Contract Management](#)

[TIS 024: Business Associate Agreement and Audit \(Risk Assessment\)](#)



We Comply with Laws and Regulations

We do business the right way by complying with all applicable laws and regulations.

Why it matters

The laws and regulations that apply to our jobs are there for a reason—to keep our communities safe. We follow the laws governing fraud, waste, and abuse as well as local and international trade and sanctions because it promotes safety and is the right thing to do. Our patients can count on us because we never compromise our commitment to the laws that protect their well-being.

Although our Code covers many areas, some jobs may involve specific legal rules not explained here. For example, additional laws may apply to pharmacy or accounts receivable team members.

Healthcare exclusion screenings

We want all of our team members to have the same commitment to our values and the law. That's why we run exclusion screenings. These help us identify any past penalties, suspensions, or disciplinary actions, such as:

- Patient neglect or abuse.
- Convictions of Medicare fraud or other financial misconduct.
- Convictions related to illegal distribution or prescription of controlled substances.

We must perform this due diligence on each incoming team member to protect our patients, communities, and Millennium.

Our Resources



[COM 025: Exclusion Screening](#)



DOING THE RIGHT THING

We comply with laws and regulations by:

- Knowing, understanding, and following the laws and regulations related to our work.
- Staying on alert for fraud, corruption, false insurance claims, and other illegal behavior.
- Never recruiting across international borders without knowing the regulatory implications.
- Never providing services to individuals on U.S. and European Union embargo or sanction lists.
- Complying with contractual or statutory restrictions on who can access patient information.
- Conducting due diligence checks on suppliers.
- Complying with the exclusion screening process for incoming team members, physicians, and vendors.
- Never engaging in money laundering, or the illegal concealment of criminal funds.
- Contacting our leader or the Ethics, Compliance, & Risk Team if we have questions.





We Know the Rules to Conduct Business with Governments

We know and follow the rules when working with government programs such as Medicare and Medicaid. Through authentic connection, we achieve more for our patients.

Why it matters

At Millennium, we receive money from government-funded programs, such as CMS (Centers for Medicare and Medicaid Services). These programs enable us to connect with our patients, delivering the right care at the right time.

We need to be especially careful with government contracts because of strict legal requirements and complex language. We must know the rules related to this work. Ignorance is not an excuse. We are responsible for making Medicare and Medicaid claims honestly and accurately. When we comply with the FCA, PFCRA, and any state false claim acts, we uphold our values and fulfill our patients' expectations.

The Federal False Claim Act (FCA)

The FCA imposes civil liability on anyone who knowingly submits a false claim for payment to the U.S. government. It covers fraud involving any federally funded contract or program. This includes Medicaid and Medicare. Healthcare providers who are convicted of violating the FCA can be subject to substantial monetary penalties. The government may also exclude them from participating in federal healthcare programs in the future.

Whistleblowers

The FCA allows any person with knowledge of false claims to file a lawsuit on behalf of the government. If you know about a false claim, speak up! If you experience any retaliation as a whistleblower, you will be reimbursed under the FCA.

The Program Fraud Civil Remedies Act of 1986 (PFCRA)

The PFCRA provides administrative remedies against any person who makes a false claim to various federal agencies. This includes the Department of Health and Human Services (HHS). Under the Act, anyone who knowingly submits a false claim can be forced to pay high monetary penalties.



DOING THE RIGHT THING

We follow the rules when conducting business with governments by:

- Observing the rules and regulations for government contracts.
- Never making a false statement to a federal official.
- Billing only costs allowed by a contract to the government.
- Charging costs to a government contract, grant, or clinical trial accurately and consistently.
- Following the laws and regulations around making claims and receiving funds from Medicare and Medicaid.
- Ensuring any self-referral claims are reviewed and approved by our Chief Ethics and Compliance Officer and/or Legal Counsel.
- Contacting our leader and Ethics, Compliance, & Risk Team immediately if approached by a government investigator.
- Consulting our leader or the Ethics, Compliance, & Risk Team if we have questions.



What should I do if approached by a government investigator?

Contact your leader and the Ethics, Compliance, & Risk Team immediately!
When speaking with government investigators:

- Always be polite.
- Obtain the identity of the investigator(s).
- Obtain the name of the agency the investigator represents.
- Inspect the investigator's credentials.
- Ask the reason for the inquiry or investigation.
- Ask the investigator to take a seat and discuss next steps with the Ethics, Compliance, & Risk Team.



An investigator just showed up at my house. She said she's with the government and has a search warrant. What should I do?



Contact your leader and the Ethics, Compliance, & Risk Team immediately! We comply fully with government investigations, but we must know how to respond appropriately so we can protect our legal rights as well as Millennium's. After contacting your leader and the Ethics, Compliance, & Risk Team, follow the procedure for speaking to government agents outlined in our COM 004 policy. Make sure you fully understand this policy so you know what to do in these situations.

Our Resources



[COM 004: Responding to Government Investigation](#)



We Prevent Bribery and Corruption

We win business based on the strength of our value-based care, high-quality services, and authentic connections. We never engage in bribery and corruption.

Why it matters

Every positive and authentic interaction we have helps us create a culture of trust with our community. In a culture of trust, we are able to collaborate more effectively and fulfill our vision to be the best choice for patients, doctors, and care teams. To continue growing our culture and honoring that trust, we must prevent and avoid bribery and corruption.

Corruption has no place in Millennium. We do not tolerate it in any form at any of our locations. We comply with all applicable anti-bribery laws, including the anti-kickback statute.

Bribes, kickbacks, and corruption

A **bribe** is an illegal payment that is given in exchange for something else. It may come in the form of cash or cash equivalents. If a team member gives their leader a box of chocolates for their birthday, it's not a bribe. But if a potential supplier sends an expensive basket of chocolates and wine to a team member reviewing their contract, it's a bribe.

A **kickback** is an illegal payment given to someone for facilitating a transaction. For instance, a provider may offer a physician an "incentive" for referring a patient to their business. In this scenario, the incentive is the kickback since the physician facilitated the referral.

Corruption refers to illegal behavior by individuals with influence or power, such as government officials. We strive to prevent corruption by acting with integrity and never exchanging bribes or kickbacks.



DOING THE RIGHT THING

We prevent bribery and corruption by:

- Complying with federal anti-kickback laws as well as any applicable state laws.
- Taking extra care when dealing with government officials to avoid the appearance of misconduct.
- Never giving waivers of co-insurance or deductibles for reasons other than real financial hardship.
- Never offering or accepting kickbacks or bribes.
- Never accepting prizes, gifts, cash payments, coupons, or bonuses in exchange for pushing certain products.
- Never giving physicians financial incentives based on number of referrals or levels of billing.
- Carefully monitoring the following activities for compliance with the anti-kickback statute:
 - o Space and equipment leasing
 - o Discounts on goods and services
 - o Management and personal services contracts
 - o Physician practice purchases
 - o Physician recruitment and retention
 - o Employment relationships
 - o Managed-care initiatives

Our Resources



[COM 066: Gifts, Gratuities, and Business Courtesies](#)



We Safeguard our Data and Intellectual Property

Our assets are integral to the work we do at Millennium. We protect them so we can continue to grow and deliver for our patients long into the future.

Why it matters

At Millennium, we operate using a variety of electronic, financial, and physical assets. Everything from the names, numbers, and data we transmit daily to the software, desks, and buildings we use are assets. The incredible work we accomplish depends on each of these important assets, and we must protect them.

As part of our jobs, we may have access to intangible assets. These include confidential business information, intellectual property, protected health information (PHI), and trade secrets. Releasing this information could have bad consequences for our business. We must be careful not to disclose it. Remember that safeguarding PHI is a critical component of our commitment to serving our patients and complying with cybersecurity regulations.



Intellectual property

Intellectual property is protected by federal and state laws. It includes:

- Patents and copyrights
- Trade secrets
- Trademarks and service marks
- Proprietary information
- Inventions or techniques

We must protect the intellectual property we use whether it belongs to Millennium or another company. Violations of intellectual property laws may result in personal civil damages or criminal charges. Examples of activities that may violate these laws include:

- Copying licensed computer software or the materials that come with it.
- Installing a software program on more than one computer when it was sold for only one.
- Copying (by machine or hand) an issue of a journal, magazine, or newsletter without permission from the publisher.

Confidential information

Confidential and proprietary business information is information that has not been disclosed to the public and that could be useful to competitors. It could include:

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

This information is the core of our business. It is also a key component of just about every topic discussed in our Code. Releasing it can violate laws regarding antitrust, finances, and patient confidentiality, to name a few.



Monitoring information assets and technology

Safeguarding protected health information (PHI) is a critical component of our commitment to serving our patients and ensuring Millennium remains compliant with multiple cybersecurity regulations.

Millennium reserves the right to, and does, monitor all data and information contained on an employee's office computer or electronic device; company-issued mobile device, tablet, or other technology; and any non-company-issued computer, electronic device, mobile device, tablet, or other technology that an employee chooses to use, per policy, to access Millennium's data and information.

What are Millennium's data assets?

- Millennium Files: Files on your desktop computer, laptop computer, etc.
- Millennium Vault: Critical data stored within our vault includes PHI and other data critical to operations and patient care.
- Millennium Servers: Specific computing hardware that provides functionality for our critical care programs and devices.

Millennium reserves the right to monitor all data and information contained on office computers, company-issued devices, and any personal device that we use to access Millennium's data and information.

DOING THE RIGHT THING

We safeguard our data and intellectual property by:

- Never releasing confidential data without authorization.
- Discussing proprietary information with others only on a need-to-know basis.
- Disclosing proprietary information to people outside of Millennium only in consultation with the Legal Department.
- Avoiding inadvertently discussing confidential information in casual conversations or business relations.
- Never using Millennium confidential and proprietary information or Millennium equipment for personal use.
- Never disclosing or copying intellectual property that belongs to others without permission.
- Never using unregistered personal devices, our personal email, or unsecure Wi-Fi networks to access Millennium data.
- Using complex passwords, encryption with transmitting data, and the Millennium VPN when working remotely.
- Never allowing anyone who isn't authorized to access our computer, either physically or remotely.
- Staying alert for phishing emails.
- Reporting potential information or technology breaches immediately.

Our Resources



[COM 001: Confidentiality and Security of Information](#)

[COM 009: Sanctions for Privacy Violations](#)

[COM 026: Copyright Infringement](#)

[TIS 014: Bring Your Own Device - BYOD](#)



We Protect Financial Assets with Accurate Record Keeping

Our records enable us to connect and reconnect with patients, partners, and other stakeholders. Protecting our financial assets and keeping accurate records prepares us for the next authentic connection.

Why it matters

To serve our patients, we commit to doing everything we can to support their success. In person, this means having positive interactions and connecting them to services they need. But behind the scenes, it means maintaining a lot of records to help us run our operations smoothly.

Think about all the financial records we use each day—receipts, claims, invoices, bank statements, and so on. Or we may handle medical records like lab results, QA data, logs, and pharmacy orders. Whatever our role, we are responsible for maintaining and protecting these records and financial assets.

We comply with annual audits

Millennium engages an outside entity to perform an annual financial audit review. This ensures we are keeping records properly and prepares us for tax and other financial matters. We prepare and comply with these audits by following accounting controls and keeping accurate records.



Our Resources



[COM 017: Document Retention](#)

[COM 060: Contract Management](#)



DOING THE RIGHT THING

We protect financial assets by:

- Keeping accurate and complete financial records.
- Ensuring the integrity of the documents and that they are maintained, preserved, and destroyed in accordance with the law and our Document Retention policy.
- Protecting documents from disclosure, damage, alteration, or destruction.
- Never revealing the private financial information of Millennium, team members, physicians, or patients.
- Maintaining our contract database, lease agreements, and asset purchase agreements.
- Following accounting controls to ensure that:
 - o Financial contracts are carried out with management's approval.
 - o Transactions are recorded to help prepare financial statements and account for assets.
 - o Access to assets is permitted only with management's approval.
 - o Recorded assets are periodically compared with existing assets. Any differences should be reported to management.



We Avoid Insider Trading

We uphold our high standards of competence and integrity by avoiding insider trading.

Why it matters

From time to time, we may come into possession of nonpublic information regarding publicly traded companies that have a business relationship with Millennium. Federal law and Millennium policy prohibit us, directly or indirectly, from purchasing or selling stocks, bonds, or securities of other companies while possessing material, nonpublic information about these companies. This is known as “insider trading.”

We may not share nonpublic information about other companies with anyone outside of Millennium. That includes family members even if they will not financially benefit from it. This is called “tipping.” The penalties for insider trading and tipping are severe, including fines and/or imprisonment.



DOING THE RIGHT THING

We avoid insider trading by:

- Never buying or selling shares in any publicly traded company with inside information.
- Never engaging in tipping.
- Never discussing sensitive information where others may overhear.
- Never disclosing confidential material information to another person who might purchase or sell securities using the information.
- Refraining from trading if we aren't sure whether we have material, nonpublic information.
- Making a report if we think material information was disclosed to the Chief Ethics and Compliance Officer.



OUR COMMUNITIES. OUR MILLENNIUM.



ENGAGE:

We believe
together is better.

- We protect human rights39
- We contribute to our communities 40
- We protect the environment 41
- We participate responsibly in the political process42



We Protect Human Rights

We engage with our communities with the goal of creating a healthier society. To achieve that goal, we commit to protecting the human rights, health, and wellness of all people.

Why it matters

To us, quality care means caring not only for the health of our patients but for that of all people. We know that even little things we do can have a ripple effect across the globe. With every decision we make, we must consider the greater whole.

Supporting the health of all people starts with defending human rights. We respect the human, cultural, and legal rights of individuals and communities. We protect human rights by making sure our locations and suppliers provide fair working conditions and treatment.

Possible signs of abuse, neglect, and/or human trafficking:

- Suspicious bruising or broken bones
- Avoidance of eye contact
- Poor or improper hygiene and grooming
- Malnourishment
- Fearful, anxious, depressed, submissive, tense, or paranoid appearance
- Signs of physical and/or sexual abuse, physical restraint, confinement, or torture

Our Resources



<https://humantraffickinghotline.org/>



DOING THE RIGHT THING

We protect human rights by:

- Treating each other with fairness, consideration, compassion, and respect.
- Providing proper working conditions, hours, and compensation to all team members.
- Ensuring our suppliers are committed to fair labor and sustainable sourcing practices.
- Never using or condoning child or prison labor, human trafficking, or slavery anywhere in the world.
- Posting human trafficking signs in office locations for awareness.
- Speaking up if we see or suspect human rights violations.





We Contribute to Our Communities

We go above and beyond to serve our patients by always looking for ways to contribute to our communities.

Why it matters

From national nonprofit organizations to communitywide initiatives to neighborhood clubs, Millennium is proud to support the communities we serve. Whether participating in a walk or run, volunteering at events, sponsoring a soccer team, or forming a foursome, we are honored to be directly involved in the communities we call home. In fact, community involvement is part of Millennium leaders' annual goals, with a vast majority of our leaders curating these community connections.

Millennium has sponsored and participated in events for the American Cancer Society, American Heart Association, and National Alliance on Mental Illness, as well as Partners for Breast Cancer Care, Hope Hospice, the Melanoma Research Foundation, the Lee County Coalition for a Drug-Free Southwest Florida, the Alvin A. Dubin Alzheimer's Resource Center, the Harry Chapin Food Bank, and the Lee County Red Sox Scholarship Fund, just to name a few. We are proud to connect with local organizations, standing together in our shared mission to improve the health and well-being of the community as a whole.



DOING THE RIGHT THING

We contribute to our communities by:

- Looking for opportunities to help and support others in our neighborhoods.
- Volunteering and participating in charitable activities in our communities.
- Ensuring that outside activities do not interfere with our work or create a conflict of interest.
- Never pressuring others to contribute to charitable organizations or other activities.
- Obtaining proper approval before donating Millennium funds.





We Protect the Environment

We advocate for the health of all people and our planet by protecting the environment.

Why it matters

We believe there is more to healthcare than medicine. That's why we work with each patient to support them with the care, education, and encouragement they need at every step of their healthcare journey. And it's also why we prioritize efforts to protect the environment.

Caring for the health of our communities means caring for the health of our planet. It's simple. To be healthier people, we need a healthier planet. We depend on our environment for all the things that keep us healthy. We prioritize sustainability and incorporate sustainable business practices in our offices and supplier and partner relationships. We demonstrate our commitment to the environment to investors through our Environmental, Social, and Governance (ESG) strategies.



DOING THE RIGHT THING

We protect the environment by:

- Complying with all applicable environmental laws and Millennium policies.
- Following Millennium procedures for waste management and recycling.
- Choosing suppliers who share our commitment to sustainable solutions.
- Taking small, practical steps each day to reduce our use of water, fuel, and electricity. For instance, we can turn off unwanted lights, use eco-friendly light bulbs and reusable cups, and ride a bike to work instead of driving.

Building a sustainable healthcare future

The prosperity and endurance of a healthcare organization is intimately linked to the health of the communities it serves, today and in the future. Millennium's ESG initiatives provide a framework and vocabulary to fully articulate our efforts to build an **ethical** future, one we will achieve by caring for communities, our environment, and each other. We embrace resource stewardship as an essential duty and are committed to preserving and protecting the environment.



We Participate Responsibly in the Political Process

We are passionate about advocating for the wellness of our communities through the political process. When we participate, we do so with integrity and on our own time.

Why it matters

We believe each of us can make a positive difference in our communities. We support every team member's right to express personal beliefs and participate in the political process. Together and as individuals, we can advocate for our values in society.

When we take part in political affiliations, we must make it clear we are acting as private citizens. We can't give the impression we are acting for Millennium. If we are authorized to represent Millennium, we must act with integrity and follow all applicable laws.



I am a volunteer for a political campaign. Because traffic can be so bad after work, can I stay in and use my computer to work on some campaign materials?



No. While we support everyone's right to participate in the political process, we act with integrity by using our own resources and time for personal political activities.



DOING THE RIGHT THING

We participate responsibly in the political process by:

- Making it clear that our political views and actions are our own.
- Taking part in political activities on our own time and at our own expense.
- Informing our leader if we decide to run for political office.

If we are representing Millennium when taking part in political activities, we best participate by:

- Complying with laws relating to political activities, including those on lobbying.
- Engaging with government officials and candidates in an ethical and honest manner.
- Providing complete and correct information to government agencies.
- Never using our position for personal gain or to benefit Millennium.
- Ensuring political contributions made by Millennium have advance approval from the Board and CEO.

Our Resources



[MAR 005: Company Endorsements](#)



OUR TEAM.

OUR RESOURCES.



ADVOCATE:
We believe
there is more to
healthcare than
medicine.

- * Ethics and compliance44
- Resources.....45
- Conclusion45



Ethics and Compliance

At Millennium, we take ethics and compliance very seriously. It is a key part of our core values and business strategy and is essential to our future success. Our Ethics, Compliance, & Risk Program helps us lead the way in integrity. The Ethics, Compliance, & Risk Team oversees the management and administration of ethics and compliance by:

- Developing ethics and compliance policies, procedures, and training.
- Managing the Ethics Connection Hotline.
- Reporting, auditing, and monitoring compliance issues.
- Verifying corrective action plans for areas of noncompliance.

The Ethics, Compliance, & Risk Team is our chief resource to help us live our values, Code, and policies. We can contact the office at any time.

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





Resources

At Millennium, there are many resources to help us do the right thing. Raising a concern should be as easy as possible. That's why there are a variety of ways to tell us when something's wrong. Choose whichever reporting option you are most comfortable using. Whichever option you choose, your confidentiality will be protected.



Report It!

- Confidential
- Anonymous

ICRS (Report It!)



Ethics Connection Hotline

- Confidential
- Anonymous

855-517-8676



Email

- Confidential
- NOT Anonymous

compliance@mpgus.com



Call

- Confidential
- NOT Anonymous

239-232-2950

Conclusion

This Code outlines the core values and principles upon which our ethical future is founded. The Code is a guide you will refer to many times and a resource to help you navigate both the simple and sometimes difficult decisions our jobs require. In addition to this Code, the Millennium Ethics, Compliance, & Risk Team is here to help and support you every step of the way.

Every Millennium team member has an obligation as part of their employment to read and attest that they understand and will uphold the core values in this Code.

Living our Code each day comes down to knowledge. All we need to do to deliver for our patients in the best way is to know our policies and the laws that affect our jobs. It's that simple. Knowledge is the most powerful weapon we can use to prevent compliance mistakes. If we are not knowledgeable about our policies and applicable laws, we must educate ourselves.

We can start by reading and rereading our Code. Then we should study any policies that directly impact our job, and talk to our leader if we don't understand how they apply. We encourage you to "Speak Up." Speaking up can protect Millennium's resources and, in some cases, save lives. If we have a concern and our leader can't resolve our problem, we should follow the "Four-Step Communication Process." **Remember—keep asking questions until you get an answer that makes sense to you.**

Together, we can fulfill our mission to connect the best doctors, service, and quality in full compliance with the law. Every patient, every time.

Millennium Healthcare, LLC
www.millenniumphysician.com

Effective Date: September 6, 2022
Reviewed/Revised Dates: November 1, 2021; April 30, 2023

