



Code of Conduct

2019 – 2020

Team Members & Physicians



**Exceptional Experience.
Exceptionally Accurate Results.
*Peace of Mind for Everyone We Serve.***

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Overview

One goal of Solis is to promote ethical, compliant and legal behavior within the organization that encourages prevention, detection and resolution of conduct that does not conform to our standards. Federal and State Regulations provide that Healthcare Providers should have a Compliance Program based on guidance provided by the Department of Health and Human Services' Office of the Inspector General. The following seven elements form the core of the Program:

- Designation of a Compliance Officer
- Written Standards of Conduct
- Training & Education
- Monitoring and Auditing
- Enforcing Disciplinary Standards
- Open Lines of Communication
- Responding Appropriately to Detected Offenses & Developing Corrective Action

The Compliance Program's purpose is to codify the organizations' commitment to compliance and general conduct expectations and/or requirements of all team members and those acting on its behalf.

Code of Conduct

All team members of SOLIS are expected to act with honesty and integrity. This Code of Conduct is a guide to how we should all conduct ourselves when performing our jobs. The Code of Conduct encompasses our commitment to meeting ethical, professional and legal standards and helps us make the right decision when faced with difficult decisions.

These standards apply to all of us, regardless of position or classification. The Code of Conduct also applies to those who work on behalf of SOLIS which includes physicians,

vendors and other professionals affiliated with us or doing business in our centers. We must each take the time to read and understand them and incorporate them daily. Although these standards may not address every situation you face, we rely on our team members to exercise good judgment in carrying out their intent. It is everyone's responsibility to act in an ethical, professional and legal manner, so your adherence to the spirit, as well as specific provisions is critical.

If you have questions or concerns about the Code of Conduct Standards or any related company policy, or, if you observe or suspect that a violation of the Code of Conduct has occurred, you are encouraged to discuss this with your manager, Human Resources or our Compliance Officer. You may also access the Ethics Compliance Hotline. The Hotline is available for you to report concerns or raise questions in a confidential and anonymous (if preferred) manner. You may contact the Ethics Compliance Hotline at 855-252-7606.

Please be assured that there will be no retaliatory action taken for reporting a concern in good faith or participating in an investigation. Each of us has a personal obligation to uphold the ethical, professional and legal principles outlined in the Code of Conduct.



Q - Who is expected to adhere to Solis' Code of Conduct?

A - All Solis Board of Directors, Officers, Employees, Contractors, Vendors, Physicians, Business Associates, Students and Volunteers.

Delivery of Patient Care

SOLIS commits that all patients are treated with dignity, compassion and respect. We further commit to providing the highest level of quality care that is both necessary and appropriate. We do not discriminate in the access to services based on the patient's age, gender, disability, race, religion, citizenship or national origin.

During the process of providing care, information may be collected about a patient's medical condition, past treatment, family history or medication, which will always remain confidential. No patient information will be released or discussed unless it is necessary to serve the patient or as required by law.

Respect for Patient Rights

As the result of your relationship with SOLIS, you may acquire and have access to confidential information belonging to the Company. Misuse or unauthorized disclosures of such confidential information to persons or entities outside the Company is cause for disciplinary action, up to and including termination.

SOLIS complies with the Health Information Portability and Accountability Act (HIPAA) as related to our access, use, disclosure and processing patients' protected health information. Upon admission, patients will be notified of how their information may be used as well as their rights under HIPAA. Patients can be assured that policies and procedures to protect the confidentiality of protected health information (PHI) will be followed and protected regardless of form or medium (written, oral or electronic).

Protected Health Information will not be shared without patient permission except when authorized under HIPAA for purposes of treatment, payment, health care operations or as required by law. Team members are responsible for reading and understanding their responsibility to protect PHI as documented in the HIPAA and HITECH policies available in the SOLIS Policy and Procedure Manual.



Q – What is PHI?

A - Under HIPAA, protected health information is considered to be individually identifiable information relating to the past, present, or future health status of an individual that is created, collected, or transmitted, or maintained by a HIPAA-covered entity in relation to the provision of healthcare, payment for healthcare services, or use in healthcare operations. PHI is only considered PHI when an individual could be identified from the information.

Duty to Protect PHI

As a custodian of PHI, HIPAA requires that we ensure the confidentiality, integrity and availability of PHI. This means protecting it from being viewed by people who should not see it.

- PHI should not be kept in a place where others can see it, cover it or move it.
- Use screen protectors on your computer
- Change passwords at the intervals determined by IT protocols
- Do not remove files containing PHI from the office or center locations
- Shred PHI when documents or files are no longer needed.
- Lock PHI in a secure office or locking file cabinet when not in use.

- Never disclose PHI on social media channels
- Do not text about specific patients as well as share images or videos that could result in a patient being identified.
- PHI can only be included in social media posts if a patient has given their consent, in writing, to allow their PHI to be used and then only for the purpose specifically mentioned in the consent form.



Q – I realized that I entered the incorrect fax number and a patients' records were sent to the wrong doctor. What do I do?

A – The patient's health records are PHI and were sent to an unauthorized individual. A breach report must be filed in the RADAR system as soon as the error has been discovered. Look in the Playbook for instructions.

Q – What are some common social media HIPAA violations?



- A –
- Posting of images and videos of patients without written consent
 - Posting of gossip about patients
 - Posting of any information that could allow an individual to be identified
 - Sharing of photographs or images taken inside a healthcare facility in which patients or PHI are visible
 - Sharing of photos, videos, or text on social media platforms within a private group

PHI Breach and Duty to Report

A breach is, generally, an impermissible use or disclosure under the Privacy Rule that compromises the security or privacy of the protected health information. The HIPAA Breach Notification Rule, 45 CFR §§ 164.400-414, requires HIPAA covered entities and their business associates to provide notification following a breach of unsecured protected health information.

If you are aware that PHI has mistakenly been shared, please complete a report on the **RADAR** system. Please refer to the Playbook for instructions.

Use and Protection of Company Property

All team members should treat our SOLIS' property, whether material or intangible, with respect and care.

Solis discourages the inappropriate use of company property. Team members are trusted to act responsibly, reasonably and maturely, and to use good judgment in the use of all company-provided communications and computing devices, including but not limited to:

- The Internet
- All forms of printed and electronic media;
- Copying devices (scanners and copy machines);
- Telephones;
- Cell phones;
- Portable/wireless PDAs;
- Desktop and laptop computers; and
- Remote access/dial-up hardware and software devices.

Team members should not use the computer to transmit, store or download materials that are threatening, maliciously false or obscene.

Facilities, equipment, technology and resources are for business purposes.

Team members that are issued company equipment shall safeguard them from theft by reasonable means. Laptop computers when left in the office overnight are to be placed into a secure area out of view. If taken from the premises, laptops, company issued phones and other equipment shall be safeguarded from theft by reasonable means.

If company property is lost or stolen, please notify your manager and the Compliance Officer immediately.

All team members are to respect all kinds of intangible property which includes trademarks, copyright and other property (information, reports etc.) Team members should use them only to complete their job duties.

Team members should protect company facilities and other material property from damage and vandalism, whenever possible.



Q – Why do I need to secure my laptop in the office? Don't we have secured locks to get into our suite?

A – The suite is secure, yes. However, we do have visitors in our suite often during and after business hours.

You do not need to secure your laptop during office hours, but you **should** lock your computer screen when you walk away from your desk.

When you leave for the day, it is best to lock your computer in your desk. Theft can occur at any time and in any place.

Business Practices

Payor Relationships

We will provide government agencies and other payors truthful and accurate information

to include that which becomes part of the medical record. It is imperative that physicians and other health care professionals provide this information in a complete and timely manner. Any deviation from these standards will not be tolerated.

Financial Reporting

SOLIS uses standard and accepted accounting principles to maintain accurate financial statements and records and includes use of a financial reporting system reflecting actual financial transactions.

Creating false or misleading entries into any financial records is prohibited. All funds and assets must be properly recorded. Team members are expected to cooperate with any external or internal audit and should be aware that any attempt to obstruct or mislead an auditor is a violation of the Code of Conduct.

If you have a concern about any billing, coding or financial reporting issues, call the Ethics Compliance Hotline at 855-252-7606.

Referrals and Obtaining Business

Excluding the Solis Employee Referral program, SOLIS will not provide financial incentives (monetary or in-kind) to anyone to direct referrals. All referrals will be made based only on what is best for the individual seeking services and in accordance with appropriate regulations.

We will not make any illegal or unethical payments, which would cause anyone to use our services. You should not accept or make a payment that would embarrass the organization if disclosed. If someone requests an unethical or illegal payment from you, you should notify your manager as well as the Compliance Officer.

Business Information

Each team member is responsible for protecting confidential information. Many team members have access to this information in the course of performing the functions of their job. However, unless there is a legitimate need to know, this information should not be shared with anyone. Further, if there is a legitimate need to know, there must be an acknowledgement that the information is to remain confidential. If you are no longer employed by SOLIS, you are still expected to maintain the confidentiality of information you obtained during your employment.

No information about SOLIS should be used for your personal benefit. Business information should be disclosed only as required to perform your job duties or as authorized by SOLIS. Team members who violate this policy may be held personally liable for any benefit gained from improper use of information and may also face disciplinary action, up to and including termination.

Information Systems

All communication systems, including phone systems, voice mail, Internet access and email are company property and are to be used primarily for business purposes. Team members should be aware that internal communication systems, as well as the equipment and data stored, are, and always remain, the property of SOLIS. Accordingly, all messages and files created sent, received or stored within the system should be business related and are and will remain the property of SOLIS.

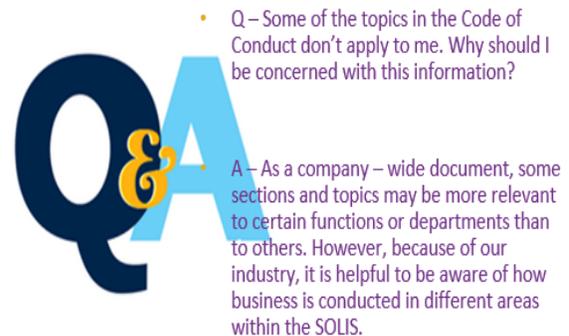
SOLIS reserves the right to retrieve and review any message or file composed sent or received. It should be noted that, although a message or file is deleted or erased, it is still possible to recreate the message. Therefore,

ultimate privacy of messages cannot be assured to anyone.

Marketing and Advertising

SOLIS will not use advertising or marketing strategies that may result in confusion between our services and those of competitors nor will we degrade their business or operations.

Specific claims about the quality of services provided by SOLIS must be supported by evidence.



Documents and Records

We are all responsible for the accuracy of our documents. Falsifying, altering or destroying a document that is known or should be known to be relative to any business transaction, investigation or audit is a violation of the Code of Conduct. SOLIS will retain and protect medical and business documents and records, including letters, memos, electronic information or files, emails, databases and other forms of correspondence in accordance with applicable laws.

Government Investigations

We will comply with all state and federal laws and regulations and cooperate with any reasonable request for information from a government entity. We will, however, insist that team members' legal rights and the legal rights of the company are protected. If you receive a subpoena, search warrant, or any other legal document from a government agency in relation to SOLIS business, whether at home or at the workplace, you should immediately verify the agent's credentials and notify your manager, the Legal Department and the Compliance Officer before acting upon the agent's request.

You are encouraged to cooperate with governmental authorities conducting an investigation; no adverse action will be taken against you for any lawful cooperation.

Q – What does the government consider to be fraud and abuse in healthcare?



A – Billing for items and services that are not necessary, falsifying documentation or documentation to maximize reimbursement, employing persons excluded from participation in Federal Healthcare Programs, duplicate billing.

Gifts and Business Courtesies

Gifts should never be given or accepted in exchange for or as a reward for business, including referrals, to our centers. Cash or equivalent gifts should not be given or accepted; instead they should be reasonable and consistent with normal business courtesy. For example, the gift of a meal at a restaurant for the purpose of furthering or developing a business relationship is typically

considered an appropriate business courtesy. See policy CMP 06.01 Business Courtesies to Potential Referral Sources for additional information.

Gifts from patients are inappropriate because they may give patients not giving gifts the impression that the care, they receive is less than the patient who does. However, unsolicited gifts may be accepted if they are of very little value, for example, handmade items with little marketable value or perishable items such as flowers or homemade baked goods may be accepted.

Gifts of nominal value to patients are allowed in limited situations due to service shortfalls or to promote screening services. Gifts must not be valued at more than \$10. Gift cards must not exceed \$10, cannot be redeemable for cash, cannot be redeemable for items or services that SOLIS provides, and must be redeemable from vendors that do not sell items or services paid for by Federal health care programs. SOLIS has a system for tracking the issuance of cards to ensure that a patient does not receive multiple cards that have an aggregate value in excess of \$50 in one year. Notify the Compliance Officer prior to a promotion offering gifts or when a gift card is given to a patient.

Avoidance of Conflicts of Interest

We have a duty to place the interest of SOLIS ahead of our own personal interests by avoiding both financial and clinical conflicts of interests.

Vendor Relationships

It is an expectation that any interaction or transaction with outside vendors or suppliers be conducted in a reputable, professional and legal manner. Products and services are selected based solely on criteria such as

quality, price, availability, service and maintenance. No purchasing decision should be made based on a personal relationship or compensation paid to the team member or associate making the selection. You should not accept anything of value from suppliers or potential suppliers if acceptance may raise the appearance of improper influence.



Q – One of the vendors competing to sell us software offered me four (4) tickets to the Ranger’s game. The face value of the tickets is \$75 each. Can I accept the tickets?

A – No. This is not an acceptable gift. You must avoid the appearance that your decision to accept the tickets may be improperly influenced for future business with the vendor. The face value of each ticket exceeds the nominal value of any permissible gift from the vendor.

EMPLOYMENT PRACTICES and EXPECTATIONS

Team member responsibilities

SOLIS will provide you with the training and education you need to be knowledgeable about our ethics, privacy and compliance initiatives. In return, the company relies on you to help ensure that those initiatives remain a priority. This involves upholding all the standards outlined in this Code of Conduct, as well as reporting any suspected violations of those standards.

If you observe potential violations of law or the company code of ethics, you should not hesitate to report such issues; failure to do so could pose a risk to SOLIS or, in the case of illegal activities or regulatory violations, a risk to you, co-workers or members.

Equal Employment Opportunity

It is the policy of SOLIS to ensure that all team members are treated fairly and according to all applicable laws. SOLIS is an equal employment opportunity employer and does not discriminate against team members or job applicants based on race, religion, color, sex, pregnancy, age, national origin, mental or physical disability, veteran, military, or family status, sexual orientation, gender identity/expression, genetic information/family medical history, or any other status or condition protected by applicable federal, state, or local laws, except where a bona fide occupational qualification applies. This includes all personnel policies and procedures, including, but not limited to recruitment, employment, training, transfers, promotions, demotions, disciplinary actions, terminations and benefits.

SOLIS will attempt to make reasonable accommodations for essential job functions to those who are disabled and to work with our team members for necessary job modifications. The team members should discuss needs with his/her manager. *For more information, see the Team Member Handbook.*

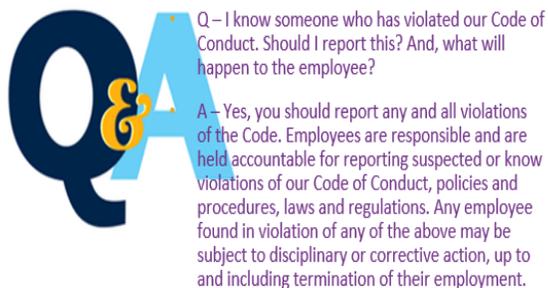
Background and Verification Checks

SOLIS conducts criminal conviction checks on all team members as part of the employment process and may continue to do so throughout employment with SOLIS.

Applicants for employment will have a criminal record, OIG, GSA and state Medicaid sanction checks conducted as part of the employment process. The checks will be made through, a consumer reporting agency, and, when required by state law, through designated

government agencies. In addition, OIG and GSA checks will be performed on all team members routinely as recommended by the OIG to verify no team member has been excluded from Federal or State health care programs. As a provider that receives reimbursement from Federal and State health care programs, Solis cannot employ or contract with individuals who are excluded from participation in government programs.

In general, convictions involving crimes against persons, theft, those of a sexual or violent nature, or those involving drugs will disqualify an applicant for employment or result in a team member's termination of employment. Discharge or disqualification for these purposes is due to the nature of our business and our responsibility to our patients.



Duty to Report

Failure to report actual or suspected compliance violations may place the organization at risk for irreversible damage; and, may prevent the immediate implementation of measures to resolve a violation or to prevent the escalation of a

small issue into a major problem for the organization.

Discipline

Violation of the Code of Conduct or any other company policy, federal, state or local law, including activities that may not technically violate policies or laws, but give the appearance of impropriety or show lack of ethical judgment may result in disciplinary action, up to and including termination. In addition, criminal activity may be subject to prosecution.

ETHICS and COMPLIANCE HOTLINE

We are all responsible for helping foster a culture that promotes honest communication. If we observe or suspect conduct that may be illegal or unethical, or may otherwise violate the Code of Conduct, we have an obligation to report it.

There are various avenues available for reporting these concerns:

- Speak with your manager.
- Contact Human Resources.
- Contact the Compliance Officer.
- Report using the Ethics & Compliance Hotline by phone at 855-252-7606 or via the web at www.hotline-services.com. The hotline is managed by a third party making it a safe, secure and available anytime, day or night. You may remain anonymous if preferred.

SOLIS will promptly and thoroughly investigate any potential violation and will coordinate appropriate follow-up action and

resolution. All investigations will be conducted following established procedures regarding confidentiality.

Where to find answers to your questions

This publication is a living document and is subject to change as we refine our policies and procedures and as government agencies and regulators modify their rules.

If you need more information, or if you have an ethics, privacy or compliance-related question or concern, the best thing to do is talk with your manager, the Legal Department or Compliance Officer.

These are the best sources when you need help understanding the laws, regulations and practices that affect your work. Calling the Compliance Hotline is also an option if you wish to seek information on a specific company policy or standard.

In addition, team members are encouraged to explore the following resources:

- **SOLIS' Team Member Handbook:** The handbook covers various topics, including employment, benefits, performance reviews, wage and salary, and employee relations subjects such as dress code, workplace conduct, counseling, and health and safety issues.
- **SOLIS' Playbook:** This site contains extensive information on company policies job aides, procedures and other company standards that affect your work activities.

The guidelines set forth in this Code of Conduct apply equally to everyone and are mandatory.



ACKNOWLEDGEMENT

Code of Conduct

I have read Solis' Code of Conduct. I understand that it is a general guide to Solis' current conduct policies and that these policies may change from time to time with or without notice. It is my responsibility to remain informed of current policies. I understand that I am expected to follow all guidelines set forth, and I agree to do so.

Initial here: _____

Confidentiality Agreement

I agree to protect the privacy and security of confidential information at Solis, including, without limitation, information relating to Solis's customers and business partners, at all times, both during and after my term at Solis. I understand that Federal and State laws govern the confidentiality and security of PHI and that unauthorized disclosure of PHI is a violation of law and may result in civil and criminal penalties. **Initial here:** _____

Compliance Attestation

I understand my obligation to report actual or suspected misconduct at Solis that may violate laws, regulations, the Code of Conduct and/or Compliance Guidelines. I acknowledge that I am not aware of any current misconduct. If I become aware of actual or suspected misconduct at Solis, I agree to report immediately via the compliance hotline. **Initial here:** _____

Team Member Name

Date

Signature