



Code of Conduct

2018-2019

MISSION STATEMENT

Our mission is comprised of our purpose, promise, beliefs, and values as follows:

OUR PROMISE

OUR PROMISE
An Exceptional Experience,
and PEACE OF MIND
for EVERYONE we serve.

WARM & WELCOMING
Behaving in a friendly way
in any interaction, so
people feel valued
and accepted

EASY & EFFICIENT
Making ourselves and our
services accessible and
convenient, doing things
right the first time,
without wasting time
or energy

OUR PURPOSE
To be the NATIONAL LEADER
in Mammography and
Imaging Services
HELPING PATIENTS achieve
and maintain optimal health.

OUR VALUES

COMPASSION
Listening | Be understanding

ACCOUNTABILITY
Ownership of action | Do what you say you will do | Avoid blame

RESPECT
Treat others with dignity | Be honest | Value others

INTEGRITY
Do the right thing | Sign your name every day

TRUST
Trust in positive intent | Avoid judgment | Keep your word

CARING & COMPASSIONATE
Feeling and exhibiting concern
and empathy for others

SOLIS

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 on a daily basis. 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.

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 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 remain confidential at all times. No patient information will be released or discussed unless it is necessary to serve the patient or as required by law.

Confidentiality and Patient Rights

As the result of your employment at 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.

BUSINESS PRACTICES

Billing and Coding

Solis will accurately bill for services provided. Billing (or submitting a claim) for any service, supply or equipment not medically necessary, not provided as stated or any other billing that is false, misleading or inaccurate is strictly prohibited.

In order to ensure appropriate billing and coding processed and procedures, SOLIS will provide team member orientation and training as well as enforce related policies, audit procedures and billing controls to ensure accuracy and verify the organization is only billing for services, supplies and equipment rendered.

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

Solis will not provide financial (monetary or in-kind) to anyone in an effort 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 the course of 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 remain at all times, 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.

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.

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 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.

EMPLOYMENT PRACTICES and EXPECTATIONS

Equal Employment Opportunity

It is the policy of SOLIS to ensure that all team members are treated fairly and according to all applicable laws. All employment actions are made without regard to race, color, religion, national origin, sex, disability, citizenship or age. 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.

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.

Gifts

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 that 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.

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 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 our 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.

Solis
15601 Dallas Parkway, Suite 500
Addison, TX 75001



ACKNOWLEDGEMENT

Code of Conduct

I have read Solis Mammography's Code of Conduct. I understand that it is a general guide to Solis Mammography's 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 Mammography. 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