



ALLIANCE

FAMILY OF COMPANIES

Introduction to the Alliance Code of Conduct

The *Alliance Family of Companies Code of Conduct (Code)* is designed to clarify the standards that define our workforce and business operations. It clarifies the Company's mission, vision and values of the company. This Code, our Compliance Officer and Senior Leadership are here to answer any questions and to explain our Company's compliance expectations.

You are encouraged by the Company to ask questions. You are required to report any good faith suspicion of illegal or unethical actions or behaviors of which you have knowledge.

When in doubt as to your own actions or behaviors, ask yourself the following questions:

- *Am I doing the right thing?*
- *Would I be proud of my actions and comfortable discussing them with my supervisor or manager? My friends? My family?*
- *How would it look if it was reported in tomorrow's paper?*
- *Is my action or one I note a violation of our Code or the law?*

Red flag answers to such situations are typically answered as follows:

- *Nobody will find out.*
- *Just this once.*
- *Everybody does it.*
- *No one gets hurt.*
- *Why should I care, not my responsibility?*

If you are unsure whether an activity or behavior is wrong, contact your supervisor, manager, the Compliance Officer or our *Compliance Hotline*.

Compliance Hotline Number: 1 -855-252-7606



ALLIANCE

FAMILY OF COMPANIES

Our Mission, Vision and Values

Mission: We strive for excellence as we provide innovative, convenient and accessible neuro diagnostic, cardiac and sleep diagnostic testing services in the privacy and comfort of the patient's home. We have the audacious goal of innovating the delivery of healthcare services that enable physicians to create treatment plans and improve our patients' quality of life. Such testing reduces the patient care cycle and improves clinical outcomes.

Vision: To work in tandem with health care providers to make diagnostic testing services available in a timely manner, at an affordable cost, to all patients.

Values: Our core values are defined below,

Selfless - We seek what is best for our patients, doctors and healthcare overall.

Ethical - Honest relationships and trust are essential for long-term success. Our integrity must never be compromised.

Resilient - We welcome challenge and change in our relentless pursuit of illuminating complex and unknown life-altering conditions.

Visionary - We are not bound by tradition. We encourage originality, invention and creativity.

Innovative - Our passion is to innovate the delivery of healthcare services with reverence for the entrepreneurial spirit.

Compassionate - We are patient advocates who believe every patient deserves answers and a better quality of life free of anxiety and fear regarding their health.

Employees - Our people are the company's most valuable asset. We know working as a team allows us to realize our full potential.



ALLIANCE

FAMILY OF COMPANIES

Responsibilities Under the Code

Alliance Family of Companies, LLC (AFC) is recognized as one of the fastest growing companies in healthcare and the largest provider of neurological, cardiological and sleep diagnostic services in the United States. Together, we have the tremendous goal of innovating the delivery of healthcare services that enable doctors to create treatment plans and improve our patients' quality of life. We understand that high quality care is also compliant care. We are all responsible under the Code to ensure that we conduct our business in a compliant manner.

Who must comply with the AFC's Code of Conduct?

AFC's Code of Conduct (Code) is the foundation of our Compliance Program and applies to the Board of Directors, employees and contractors of AFC. The main purpose of a Compliance Program is to **prevent, detect and correct** fraud and abuse.

Responsibility of Employees

All employees are expected to follow laws, regulations, policies and procedures and the *Code of Conduct*. Anyone who knows about or suspects a violation must report this information. If you do not report a violation, you may be subject to disciplinary action even if you were not directly involved. Reporting does not protect you from disciplinary action regarding your own performance or conduct, but your honesty will be considered.

Responsibility of Supervisors and Managers

Supervisors and managers are considered leaders and must demonstrate and promote a commitment to ethical and legal behavior that is consistent with AFC's mission, vision and values. Supervisors and managers are responsible for maintaining a workplace environment that stresses commitment to compliance with the *Code*, all applicable laws and regulations. Further, they are charged with preventing retaliation or discrimination against employees who report actual or suspected violations.

Supervisors and managers are obligated to promote a positive work environment and ensure employees under their supervision:

- Receive, read and understand the *Code*;
- Understand their affirmative duty to report actual or suspected *Code* violations;
- Know about and follow all laws, regulations and policies within the scope of their responsibilities;
- Know the procedures for reporting suspected or actual violations; and
- Encourage others to ask questions and to report actual or suspected violations.

If an employee comes to a Supervisor/Manager with a question regarding compliance with a law, regulation or policy, they are responsible for:

- Taking steps to ensure the employee does not fear or experience retaliation;
- Maintaining the employee's confidentiality;



ALLIANCE

FAMILY OF COMPANIES

- Collecting accurate information regarding the employee's report;
- Pursuing the right process so that reports of violations or suspected violations can be further investigated; and
- Informing the employee that they have followed through on his or her report.

Responsibility of the Board

- Provide oversight and resources to implement an effective Compliance Program;
- Approve the Code and designate the Compliance Officer to lead the Compliance Program;
- Receive reports on the status of the effectiveness of the Compliance Program, including the management efforts; and
- Have active membership of at least one Board Member on the Executive Compliance Committee.



ALLIANCE

FAMILY OF COMPANIES

Quality of Care and Service

STANDARD OF CONDUCT

We are committed to providing outstanding quality care and services.

Our first responsibility is to our patients and customers we serve.

- We will be a leader in quality neurological, cardiac and sleep diagnostic services.
- We will maintain the highest standards of integrity and ethics while delivering on AFC's commitment to provide best-in-class services.
- We will monitor the clinical quality of our services and strive to improve the quality of the services provided.
- We will address deficiencies, errors or quality of care and service concerns by reporting it to a supervisor or manager who can assess the problem and take appropriate action.
- We will encourage employees to continually evaluate existing methods of delivering care and services and strive toward continuous quality improvement.
- We will effectively communicate to patients in a clear, professional, informed and understandable manner.
- We will treat all patients, co-workers and business partners, with courtesy, dignity, respect and professionalism.
- We will periodically assess and evaluate the goals and objectives established for medical care and related services provided to ensure delivery of our services are according to current standards of practice.
- We will ensure that care and services are medically appropriate and in accordance with all legal requirements.
- We will employ/contract with only fully licensed and properly credentialed providers and qualified technical staff with proper expertise and experience to care for patients.
- We will provide equal employment opportunities to all employees and applicants for employment without regard to race, color, religion, gender, sexual orientation, gender identity, national origin, age, disability, genetic information, marital status or status as a covered veteran in accordance with all applicable federal, state and local laws.
- We will not discriminate against any patient for any reason including race, color, sex, national origin, age, disability, religion or any other classification protected by law.



ALLIANCE

FAMILY OF COMPANIES

Compliance with Laws and Regulations

STANDARD OF CONDUCT

We are committed to professional ethics and integrity in conducting our business.

We will provide patient care and conduct business while following all applicable federal, state and local laws, regulations and AFC policies.

- We will promptly report to management, the Compliance Officer or *Compliance Hotline* when any possible violation of law, regulation or AFC policy has occurred.
- We will fulfill our duty to report suspected or actual compliance violations in good faith and understand that we can do so without fear of retaliation.
- We will not offer, provide, solicit or receive kickbacks, bribes, rebates or anything else of value to influence the referrals of patients or services payable by a federal health care program.
- We will accept patient referrals based on the patient's clinical needs and our capacity to provide the needed services.
- We will ensure that all physician arrangements and other compensation agreements, including but not limited to financial arrangements, with individuals or organizations that may be possible referral sources are in writing, undergo legal review, use fair market value and are approved by appropriate management prior to execution (consistent with the Anti-kickback statute and Stark laws).
- We will ensure the implementation of controls to prevent, detect and correct any violations of applicable laws and internal policies and procedures to provide the appropriate billings for all payors and patients.
- We shall ensure that information regarding AFC, both oral and written, provided to patients, physicians and others is clear, correct, non-deceptive, HIPAA compliant and consistent with our policies.
- We will maintain complete, accurate and secure medical records and comply with federal and state privacy and security laws, regulations and policies.
- We will ensure that protected patient information (PHI) is accessible only by health care personnel involved in the patient's care and billing and others authorized to review patient information.
- We will not engage individuals/entities sanctioned by the Office of Inspector General of the U.S. Department of Health and Human Services (OIG) or excluded from participating in state Medicaid programs.
- We will ensure that employees who provide direct patient care are competent and properly trained prior to providing any services.



ALLIANCE

FAMILY OF COMPANIES

Human Resources

STANDARD OF CONDUCT

We are committed to creating a work place where employees are treated with respect and fairness while being empowered to perform and excel at their duties.

- We will strive to employ individuals who have a personal commitment to our Missions, Vision and Values.
- We will treat everyone with fairness, consistency, dignity and respect, regardless of status or position.
- We will strive to provide a work environment for all employees free from harassment and intimidation or hostile interaction. We will not tolerate verbal or physical harassment (including degrading or humiliating jokes, slurs and sexual harassment).
- We will review and evaluate each employee's performance periodically in an objective, consistent and uniform manner.
- We will continually strive to build confidence and professionalism in every employee.
- We will work to maintain open lines of communication so that the views of each employee may be considered, and their opinions given proper respect.
- We will maintain and protect the confidentiality of personal employee information in accordance with laws and regulations.
- We will apply the *Code* and HR policies and procedures equally to all employees regardless of position.
- We will provide reasonable training opportunities to assist employees to build and maintain professional skills.
- We will provide equal employment opportunities and ensure that our employees are hired, trained, promoted and compensated on the basis of personal competence and potential for advancement without regard for race, color, sex, national origin, age, religion, marital status or disability, as well as any other classifications as required by law.
- We will encourage employees to continually evaluate existing methods of delivering services in order to discover more effective ways of allocating the resources for patient care and support services.
- We will make promotion decisions based on employee performance, skill and abilities.
- We will discourage fraternization between supervisory personnel and employees and prohibit managers from dating or having romantic or sexual relationships with employees who report directly or indirectly to them.
- We will comply with all licensing and registration/certification requirements applicable to the specific job



ALLIANCE

FAMILY OF COMPANIES

position. Employees with direct client/patient care are responsible to maintain their credentials in good standing and provide necessary documentation without delay, prior to their renewal/expiration date [license, registrations/certifications, TB screenings, CPR, etc.].

- We will not use our work hours for any political activities.



ALLIANCE

FAMILY OF COMPANIES

Billing and Coding

STANDARD OF CONDUCT

We are committed to accurate billing and coding that is in accordance with all applicable Federal and state laws, rules, regulations and guidelines, payor rules, as well as AFC's policies and procedures.

- We will bill only for services or items that are medically necessary, actually provided and documented in the patient's medical records.
- We will not knowingly submit for payment or reimbursement a claim we know to be false, fraudulent or fictitious.
- We will assign diagnostic, procedural and billing codes that accurately reflect the services and items that were provided.
- We will not up code, unbundle, double bill or use any other means of artificially enhancing reimbursement and understand that this is unlawful and strictly prohibited.
- We will periodically perform reviews of billing and coding policies and systems, including software edits and quality assurance measures to ensure all applicable federal, state and commercial payor rules and requirements are followed.
- We will stay up to date on eligibility, coverage and payment rules of government and commercial health insurers.
- We will determine root cause and extent of identified problems based on our internal reviews and implement corrective action plans and timely remediation.
- We will ensure that the corrective action is taken by following up on problems with appropriate monitors.
- We will regularly review our records for credit balances and promptly report and refund any identified overpayments.
- We will not routinely waive insurance co-payments or deductibles.
- We will ensure that claims for services submitted to Medicare, Medicaid, other federally funded health care programs as well as commercial insurers are accurate and correctly identify the services ordered and performed.
- We will maintain health records securely for the time required by law. The premature destruction or alteration of any document in response to or in anticipation of, a request for those documents by any government agency or court is strictly prohibited.



ALLIANCE

FAMILY OF COMPANIES

- We will conduct general collection/credit procedures according to the Fair Debt Collection Practices Act to the extent applicable.
- We will respond to patient questions and complaints related to their bill in a direct and honest manner.



ALLIANCE

FAMILY OF COMPANIES

Federal and State False Claims Acts

STANDARD OF CONDUCT

We are committed to maintaining accurate billing processes and procedures in accordance with the Federal False Claims Act and State False Claims Act.

- We will implement policies for all employees (including management) and any contractor or agent of AFC, pertaining to the Federal False Claims Act (FCA), including the administrative remedies for false claims and statements, any State laws pertaining to civil or criminal penalties for false claims and statements and whistleblower protections under such laws.
- We will not knowingly present or cause to be submitted a false or fraudulent claim to the government. “**Knowingly**” is broadly defined:
 - Actually knowing that a claim is false;
 - Deliberately ignoring whether the claim is true or false; or
 - Recklessly disregarding whether the claim is true or false.
- We will not knowingly make or use a false record or statement to obtain payment by the government of a false claim.
- We will not engage in a conspiracy to defraud the government by the improper submission of a false claim for payment.
- We will not knowingly make, use or cause to be made or used false records or statements to conceal, avoid or decrease an obligation to pay or transmit money or property to the Government.
- We understand that damages and penalties for violating the FCA are significant and have a minimum per-claim penalty \$10,957. The maximum per claim penalty is \$21,916.
- We understand that *Qui Tam* Provisions (whistleblower rights) of the FCA allow a person to bring an action under the FCA on behalf of the Federal Government and share in any recovered amount by the government.
- We will train all employees on these false claims policies, as well as for preventing, detecting and reporting fraud, waste and abuse.
- We will not retaliate against employees exercising their rights under the FCA.
- We will not violate the Texas False Claims Act (Texas Medicaid Fraud Prevention Act) that also allows whistleblowers to bring suit in the name of the State of Texas and is substantially similar to the Federal FCA and imposes serious criminal and civil penalties for violations.



ALLIANCE

FAMILY OF COMPANIES

Protection and Use of Information, Property and Assets

STANDARD OF CONDUCT

We are committed to protecting AFC's property, information and assets against loss, theft, destruction and misuse.

- We will honor the privacy of patients and not reveal or discuss patient-related information except with health care personnel involved in their care, payors and others authorized by law to review patient information.
- We will release patient records in accordance with AFC's policies and all applicable federal and state laws and regulations.
- We will maintain the confidentiality of quality assurance, peer review and health care services information in accordance with laws and regulations.
- We will maintain all medical and business records in accordance with laws and our record retention policies. We will not alter or falsify information on any record or document.
- We will correctly use and care for all property, equipment and materials entrusted to us.
- We will protect confidential AFC information and not use or reveal such information except in the proper performance of duties and in accordance with the Texas Public Information Act.
- We will maintain inventory and keep all supplies secure.
- We will dispose of surplus or obsolete property and equipment according to established procedures.
- We will not permit making unauthorized copies of computer software or using personal software on AFC's computer equipment or use software without appropriate licensing agreements.
- We will not knowingly communicate or transfer any information or documents to any unauthorized persons or using unauthorized transmission channels.
- We will not use AFC owned vehicles, equipment, materials or other AFC owned property for personal gain, convenience or financial benefit.
- We will not use computers, mobile phones and devices, e-mail, facsimile machines and other technology to communicate information to unauthorized individuals or entities. Using technology to send offensive, discriminatory or harassing messages is prohibited.
- We will use computers, the e-mail system, the Internet, local network and other technology primarily for work-related purposes. We understand all information sent, received or stored in the e-mail system is the property of AFC.
- We will safeguard the use and disclosure of protected health information (PHI), including information related to treatment, payment for treatment, health operations and other information contained in patient records, in accordance with HIPAA privacy and security regulations, state law and our policies and procedures.



ALLIANCE

FAMILY OF COMPANIES

Conflicts of Interest

STANDARD OF CONDUCT

We are committed to acting in good faith in all aspects of our work. We will avoid conflicts of interest or the appearance of conflicts between the private interests of any employee and his or her work duties.

- We will not offer, accept or provide gifts or favors, such as meals, transportation or entertainment that might be interpreted as a conflict of interest.
- All AFC Board members and senior management shall comply with all applicable laws, rules and regulations governing the ethical conduct of public officials, including the disclosure of conflicts of interest.
- We will avoid instances where the actions or activities of an individual acting on behalf of or with AFC involve: obtaining an improper personal gain or advantage by such individual or a member of his or her family; or a potentially adverse effect on AFC's interests.
- We will avoid any actual or perceived conflict of interest.
- In order to avoid any actual or perceived conflict of interest it is AFC policy not to employ relatives of current employees. Relatives would be defined as: parents, children, spouses, in-laws, grandparents, cousins, uncles, aunts, brothers or sisters.
- We will not hire a family member to be supervised by or to supervise another family member.
- We will maintain unbiased relationships with actual and potential vendors and contractors.
- We will exercise good faith and fair dealing in all transactions that involve our responsibilities to AFC.
- We will not misuse our position with AFC for personal gain.
- We will not accept outside employment that conflicts with our position with AFC.
- We are required to report actual or potential conflicts of interest to a supervisor or manager.
- We will not directly or indirectly solicit or accept personal fees or commissions in connection with AFC business. Employees may not solicit gifts or gratuities from our patients, suppliers or anyone else doing business with AFC. Occasional gifts of a modest or nominal value (no more than \$50) maybe acceptable if there is no conceivable connection between the gift and any transaction with AFC. All gifts must be reported to the Compliance Officer upon receipt.
- We will never accept cash or money of any kind from patients or their families, vendors, suppliers or others.
- Medical Directors and physicians should avoid conflicts of interest related to their Medical Director and physician duties. Unavoidable conflicts should be disclosed and the Medical Director or physician should not participate in any discussion, decision or activity connected with the conflict.



ALLIANCE

FAMILY OF COMPANIES

Health and Safety

STANDARD OF CONDUCT

We are committed to maintaining a work environment that protects the health and safety of our patients and employees.

- We will continue our longstanding commitment to provide a safe and productive work environment.
- We will comply with all applicable environmental, health and safety requirements whether established by management, federal, state or local laws, licensing and accrediting bodies.
- We will take all reasonable precautions and follow all safety rules and regulations to maintain a safe environment for our patients, employees, physicians and visitors.
- We will strive to provide an environment that is free from violence. Illegal weapons of any kind are prohibited.
- We will follow all laws and regulations regarding the disposal of medical waste and hazardous material.
- We will promptly report to a supervisor/manager any accidents involving injury to a patient, employee, physician or visitor.
- We will provide training to promote safe work practices to reduce hazards to the health and safety of employees and others.
- Supervisors/Managers are responsible for inspecting the work area under their control for health and safety risks, eliminating or reporting risks to management, being familiar with health and safety procedures and training their employees in health and safety precautions.
- We will follow all laws and policies regarding the manufacture, sale, possession, distribution or use of illegal drugs or alcohol, which are strictly prohibited. Reporting to work while under the influence of illegal drugs or alcohol will not be tolerated.



ALLIANCE

FAMILY OF COMPANIES

Reporting and Non-Retaliation

4-Step Process

If you have a question or concern about an activity or behavior being unethical or illegal, use the following 4-step reporting process to answer questions and report concerns. All employees, Medical Directors and agents of AFC have an affirmative duty to report any violations. Throughout this process, your identity will be kept confidential to the extent possible.

1. Talk to your supervisor or manager.
2. If you are not comfortable contacting your supervisor or manager and if you feel you did not receive an adequate response, talk to another member of the management team.
3. If you still have questions, contact our Compliance Officer at (469)-995-8416 ext. 1064
4. If for any reason you feel you cannot follow the above steps or prefer to remain anonymous, call AFC's confidential Compliance Hotline at **1-855-252-7606**. AFC's Compliance Officer will review and address all reports to the *Compliance Hotline*.

Compliance Hotline

We recognize that there are times when questions or problems cannot be addressed through the normal communication and reporting process. When this happens, you should use the confidential *Compliance Hotline*. We have hired an outside professional hotline service company to take Hotline calls, so callers who do not wish to give their names can remain anonymous.

The confidential *Compliance Hotline* is available 24 hours a day at **1-855-252-7606**.

You will remain anonymous, unless you choose to identify yourself. If you do give your name, your identity will be protected to the extent allowed by law. No disciplinary action or retaliation will be taken against you for calling the *Compliance Hotline* in good faith.

All calls made to the Compliance Hotline will be reviewed by AFC's Compliance Officer and will be responded to fairly. All calls will be investigated before any action is taken. The rights of all staff, including anyone who is the subject of a Compliance Hotline call, will be respected and protected. Actions taken will not be made public.

Non-Retaliation Policy

AFC is committed to protecting employees and others who report problems and concerns in good faith from retaliation and retribution. ***No disciplinary action or retaliation will be taken against you when you report a perceived issue, problem, concern or violation to management, Human Resources, Compliance Office or the Compliance Hotline "in good faith" or act as a whistleblower pursuant to the Federal False Claims Act or other law.***

The "good faith" requirement means you actually believe or perceive to be true the information reported. We value and respect the dignity of the individual; therefore, you have the right to be treated fairly and with respect and AFC will ensure you are treated that way.