

EPIC CODE OF CONDUCT

WHAT IS A CODE OF CONDUCT?

This Code of Conduct is a formal statement of EPIC's standards and rules of ethical business conduct and is a key part of EPIC's Compliance Program. Our Compliance Program:

- Informs personnel about existing and future laws, regulatory requirements governing Federal Health Care Programs (like Medicare and Medi-Cal), and EPIC's Compliance Program Policies;
- Emphasizes that compliance is the responsibility of all personnel, and seeks to create effective lines of communication for addressing compliance questions and concerns;
- Guides our investigation of compliance concerns, so we can take proactive action to stop misconduct or other noncompliance when it is discovered; and
- Protects the integrity of EPIC's business enterprise by helping to ensure that we operate with the utmost care and in full compliance with applicable laws and Federal Health Care Program requirements.

Consistent with EPIC's reputation for integrity, the Compliance Program and this Code of Conduct apply to all personnel, regardless of their position.

The Code of Conduct addresses the following areas:

1. Ethical Responsibilities of All EPIC Personnel
2. Compliance with Laws and Federal Health Care Program Requirements
3. Fraud and Abuse
4. Disclosure of Conflicts of Interest

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5. Personnel Rights and Obligations
6. Patient Rights
7. Antitrust
8. Safety, Health, and Environment
9. Confidentiality and Business Information
10. Financial Accounting and Records

The Code of Conduct cannot anticipate every circumstance that EPIC Personnel may encounter. If you have questions or need advice about a specific situation, talk to your supervisor, Human Resources, EPIC's Corporate Compliance Officer (Sherry Miller, 909-786-0821 or smiller@epiclp.com), or call the Compliance Hotline (909-335-4153).

ETHICAL RESPONSIBILITIES OF ALL EPIC PERSONNEL

ETHICAL PERFORMANCE

As EPIC Personnel, you have an obligation to be honest in all your dealings with colleagues, clients, patients, vendors, and third parties. You must know and comply with applicable laws, Federal Health Care Program requirements, and Compliance Program Policies. Claims of ignorance or good intentions will not be accepted as excuses for noncompliance with ethical standards. Remaining educated about ethical standards and abiding faithfully by this Code of Conduct is everyone's individual responsibility. If you have a question about your ethical responsibilities, you should ask. If you know of or suspect a compliance concern, you must report it!

ETHICAL LEADERSHIP

While all Personnel are obligated to abide by the Code of Conduct, EPIC's leaders are expected to set a personal example of high ethical standards in the performance of their jobs. It is up to you, as

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management and/or members of the Board, to set the tone for EPIC. Managers are responsible for making sure that employees in their department or area of supervision understand and apply the ethical standards set forth in this Code of Conduct. EPIC expects managers to ensure that their employees have sufficient information to comply with laws, Federal Health Care Program Requirements, and Compliance Program Policies, as well as adequate resources to resolve ethical dilemmas. EPIC also expects its managers to create a thoughtful and respectful environment where all employees are encouraged to ask questions and raise compliance concerns.

EPIC provides numerous avenues through which personnel may obtain guidance on an ethical issue or report compliance concerns. EPIC operates a **Compliance Hotline** for all personnel to report compliance concerns on an anonymous or confidential basis. Calls can be made to the following number 24 hours a day, 7 days a week: **909-335-4153**. Compliance concerns can be also reported directly to the Corporate Compliance Officer (Sherry Miller, 909-786-0821 or smiller@epiclp.com), or to a supervisor or EPIC's Human Resources Department.

EPIC affirms its commitment that all personnel will be protected from retaliation, retribution, or harassment for the reporting of compliance concerns.

COMPLIANCE WITH LAWS AND FEDERAL HEALTH CARE PROGRAM REQUIREMENTS

All personnel will comply with all appropriate federal, state, and local laws and Federal Health Care Program requirements that apply to EPIC's operations, business, and dealings.

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- Personnel are expected to have a practical, working knowledge of the laws and Federal Health Care Program requirements that affect their job responsibilities.
- All personnel must comply with both the spirit and letter of all laws and Federal Health Care Program requirements that apply to EPIC's operations, business, and dealings.
- Personnel must cooperate, within their area of responsibility, with government officials who administer and enforce such laws and/or Federal Health Care Program requirements and who are charged with monitoring and regulating EPIC's activities.
- If a representative of any government agency contacts you, you should immediately consult with your supervisor or the Corporate Compliance Officer for guidance to ensure that the government agency receives full cooperation.

FRAUD AND ABUSE

Federal Health Care Programs — including Medicare, Medi-Cal, and others — are subject to a host of federal and state laws designed to guard against program abuse. EPIC Personnel will not engage in any activities that are prohibited by federal law, state law, or Federal Health Care Program requirements, including, but not limited to, the following:

- Soliciting, receiving, offering, or paying any money, gifts, services, kickbacks, bribes, rebates, or other remuneration in exchange for patient referrals or other business for which payment may be made, in whole or in part, by a health care payor (including, but not limited to, a Federal Health Care Program);
- Falsely certifying that items or services were medically necessary;

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- Knowingly presenting or causing to be presented claims for payment or approval, which are false, fictitious, duplicative, or fraudulent; or
- Seeking to collect amounts in excess of the patient co-payment and/or deductible from a Medicare or Medi-Cal beneficiary who has assigned benefits.

All personnel will maintain accurate, complete, and timely records concerning the provision of health care items and services. Services rendered must be accurately, completely, and timely documented and coded to ensure both proper billing as well as the integrity of the medical record. Billing must comply with applicable health care payor requirements, including, but not limited to, Federal Health Care Program requirements.

When any payor agreement requires the collection of co-payments and/or deductible amounts, these amounts will be collected to the full extent of the agreement. A decision to waive any co-payment and/or deductible must be disclosed and implemented in accordance with applicable EPIC Patient Financial Services Department policies governing discounts offered to patients.

We expect all individuals and entities associated with EPIC to be appropriately credentialed, licensed, and otherwise qualified to perform their duties. EPIC does not do business with, employ, or bill for services rendered by individuals or entities that are excluded or ineligible to participate in Federal Health Care Programs. All EPIC personnel have a responsibility to report to their supervisor, Human Resources, or the Corporate Compliance Officer if they are excluded, debarred, or otherwise ineligible to participate in Federal Health Care Programs.

Personnel responsible for contracting must comply with EPIC's contracting requirements for arrangements that are subject to federal and state fraud and abuse laws, including, but not limited to, arrangements with institutional providers, physicians and/or other parties in a position to influence patient referrals.

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Personnel should refer to the following resources for more information:

- EPIC’s Contractual Arrangements with Referral Sources and DHS Entities Policy
- EPIC’s Gifts, Gratuities, Business Courtesies, and Other Non-Monetary Compensation Policy
- EPIC’s Patient Financial Services Department policies

DISCLOSURE OF CONFLICTS OF INTEREST

A conflict of interest arises when your personal activities and relationships interfere with — or may appear to interfere with — your ability to perform your work objectively and in the best interests of the organization and the people we serve. The standard for determining whether a conflict of interest exists is not whether you think it is a conflict of interest, but whether another, reasonable, and objective person would consider it a conflict.

EPIC’s Compliance Program policies require all personnel to disclose their own and their immediate family members’ financial interests and personal relationships or arrangements that could present an actual or potential conflict of interest, including, by way of example:

- Relationships with vendors, suppliers, competitors, and referral sources (e.g., ownership, investment, employment, or board positions);
- Involvement in clinical research activities;
- Holding of intellectual property rights;
- Receipt of gifts or entertainment;
- Receipt of consulting fees or honoraria; and
- Relationships with pharmaceutical or device manufacturers.

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Personnel should refer to the following resources for more information:

- EPIC’s Conflicts of Interest Policy
- EPIC’s Gifts, Gratuities, Business Courtesies, and Other Non-Monetary Compensation Policy

PERSONNEL RIGHTS AND OBLIGATIONS

All personnel will maintain a working environment free from harassment, discrimination, or abuse of any kind. EPIC expects all personnel to treat one another with dignity, respect, and courtesy.

- EPIC is an equal opportunity employer. We prohibit discrimination on the basis of race, creed, gender, age, disability status, national origin, sexual orientation, gender identity, genetic information, veteran status, medical condition, or any other illegal basis.
- We strictly prohibit harassment, including sexual harassment. Sexual harassment includes unwelcome sexual advances, requests for sexual favors, or any offensive verbal, visual, or physical conduct of a sexual nature that creates an intimidating or hostile work environment.
- We do not tolerate harassment by anyone based on the diverse characteristics or cultural backgrounds of those who work with us. Degrading or humiliating jokes, slurs, intimidation, or other harassing conduct is not acceptable in our workplace.
- Prohibited harassment also includes incidents of workplace violence, including, by way of example, robbery and other commercial crimes, stalking, other forms of violence directed at colleagues or the employer, terrorism, and hate crimes.
- We are committed to providing an efficient and productive working environment. We must perform our job duties safely,

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competently, and efficiently in a manner that protects EPIC's interests and those of its personnel. Reporting to work under the influence of any illegal and/or mood-altering drug or alcohol is prohibited, and may result in corrective action, up to and including dismissal.

Personnel should refer to the following resources for more information:

- Equal Employment Opportunity Commission
- EPIC's Human Resources policies
- EPIC's Employee Handbook

PATIENT RIGHTS

All patients must receive quality care delivered in a considerate, respectful, and cost-effective manner. Patients have the right to make their own informed health care decisions after disclosure of all relevant information.

- We must treat all patients with dignity and respect at all times.
- We shall continue to seek new approaches to increase the quality of care delivered to our patients while ensuring that care is delivered in a cost-effective manner.
- Before we furnish items or services to patients, we must obtain appropriate, voluntary informed consent in accordance with California law. Questions concerning a patient's competence or the right of another person to act on a patient's behalf should be handled in accordance with EPIC's Risk Management Department policies.
- We must protect a patient's personal privacy and preserve the confidentiality of a patient's medical treatment program, including the patient's medical records. We must observe the highest standards of ethical and legal conduct with respect to such information.

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- We must comply with HIPAA regulations and California health care privacy laws that mandate how and when we may disclose patients' protected health information. These regulations also describe how a patient may request to limit the amount and the method by which protected health information is disclosed.

Personnel should refer to the following resources for more information:

- EPIC's Patient Rights notice
- EPIC's Notice of Privacy Practices
- EPIC's Privacy policies
- EPIC's Employee Handbook
- EPIC's Confidentiality and Security Agreement
- EPIC's Risk Management Department policies

ANTITRUST

All personnel will avoid activities that seek to or likely could control prices, allocate markets, reduce or eliminate competition, or exclude competitors.

- The purpose of antitrust and trade regulation laws is to promote competition, protect EPIC and other companies from unfair trade practices, and preserve the free enterprise system. The antitrust and trade regulation laws are premised on the belief that businesses and individuals should act independently in order to serve the economic good of all.
- We will negotiate and enter into contracts with competitors, potential competitors, contractors, or suppliers on a competitive basis based upon factors such as price, quality, and service. If you have responsibilities involving purchasing, planning, or marketing, ensure that appropriate review and approval are obtained prior to finalizing agreements.

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- We will not share with competitors any pricing information not normally available to the public. This could be perceived as an effort to fix fees or limit competition.
- For example, when attending trade shows, professional meetings and other gatherings, we will avoid subjects that affect competition including prices, pricing policy, profit margins, or credit and billing practices.
- Personnel should consult with their supervisors, the Corporate Compliance Officer, or legal counsel for guidance concerning competitive activities, laws, and policies relating to their areas of responsibility.

Personnel should refer to the following resources for more information:

- EPIC's Legal Guidelines and Responsibilities policies
- EPIC's Employee Handbook

SAFETY, HEALTH, AND ENVIRONMENT

All personnel will maintain a safe and healthy working environment.

- We have a responsibility to follow safe operating procedures, to safeguard our health as well as that of our co-workers and patients, and to maintain a safe and healthful workplace.
- All personnel must comply with federal, state, and local laws that promote workplace safety, health, and environmental protection. Personnel will become familiar with and understand how these laws apply to their specific job responsibilities and seek advice from their supervisor or the safety officer whenever they have a question or concern.
- It is important that personnel immediately advise their supervisor or safety officer of any serious workplace injury or any situation presenting a danger of injury so that timely corrective action may be taken to resolve the issue.

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Personnel should refer to the following resources for more information:

- EPIC’s Emergency/Safety/OSHA, Infection Control, Radiology, and Laboratory policies
- EPIC’s Employee Handbook
- EPIC’s Organized Plans of Operation Manual

CONFIDENTIALITY AND BUSINESS INFORMATION

All personnel must safeguard EPIC’s confidential information, including patient information and proprietary and trade secret information.

- The term “confidential information” refers to proprietary information about our organization’s strategies and operations, as well as patient information and third party information.
- Never disclose a patient’s confidential information to any unauthorized person or otherwise seek to discover confidential information about a patient that you do not need to know in order to do your job. It is never ethical or proper to access a patient’s confidential medical record unless it is required as part of your job.
- EPIC’s proprietary and trade secret information includes any information that is not generally disclosed to the public. This information generally describes proposed EPIC actions that would be useful or helpful to EPIC’s competitors. Examples of proprietary and trade secret information that personnel have an obligation to keep confidential include:
 - Financial data;

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- Information about planned new projects or about areas where EPIC intends to expand;
 - Personnel information (e.g., wage and salary data);
 - Capital investment plans and projected earnings; or
 - Information about changes in management or policies of EPIC.
- Personnel may only discuss confidential information with authorized individuals on a need-to-know basis. Be cautious about accidentally discussing confidential information in social conversations or during normal business relations.

Personnel should refer to the following resources for more information:

- EPIC's Medical Records policies
- EPIC's Employee Handbook
- EPIC's Confidentiality and Security Agreement

FINANCIAL ACCOUNTING AND RECORDS

All Personnel will maintain a high standard of accuracy and completeness in documenting, maintaining, and reporting financial information.

- EPIC relies on its business records in order to make business decisions; bill Federal Health Care programs, third-party payors, customers and patients; pay its vendors; and make representations to the government and others.
- EPIC Personnel must record all entries in EPIC's books and records accurately and completely so that these entries reflect the true nature and purposes of the transactions that are being recorded. "Off the books" transactions are not permitted.

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- Financial reports must fairly and consistently reflect performance and accurately disclose EPIC's financial conditions, results of operations, and cash flows. They must also comply with Generally Accepted Accounting Principles (GAAP), regulations of the Centers for Medicare & Medicaid Services (CMS), and other applicable laws and regulations.
- Medical records must include reliable, comprehensive documentation of services rendered, and medical necessity thereof, to support accurate billing and coding.

Ensuring the accuracy and completeness of EPIC's books and records begins with each personnel member. Whether the records are time cards, expense reports, general accounting records, purchasing records, or billing/coding entries, you have a personal responsibility to ensure that every document and entry is complete and accurate.

Personnel should refer to the following resources for more information:

- EPIC's Human Resources policies
- EPIC's Employee Handbook

CONCLUSION

This Code of Conduct sets forth many of EPIC's guidelines and expectations about proper job-related conduct. Additional EPIC Compliance Program policies and supplemental guidance materials are referenced throughout, which provide important additional information regarding personnel compliance-related duties and obligations. Personnel must review all Compliance Program policies (including, but not limited to, those referenced in this Code of Conduct). Even so, this Code of Conduct and the supplemental resources and policies referenced herein cannot anticipate every situation that you, as EPIC Personnel, may encounter.

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No concern is too small or unimportant if an EPIC personnel member thinks a situation may implicate EPIC's high ethical or legal standards. If this Code of Conduct, EPIC's Compliance Program policies, and related materials do not provide adequate direction or do not address your situation, or if you need help solving a problem, you should consult your supervisor, Human Resources, the Corporate Compliance Officer (Sherry Miller, 909-786-0821 or smiller@epiclp.com), or the Compliance Hotline (909-335-4153). Any questions about interpretations of the law or Federal Health Care Program requirements should be discussed with the Corporate Compliance Officer, who may, in turn, consult with legal counsel. By seeking guidance, a resolution can be found to address the concern consistent with this Code of Conduct and EPIC's Compliance Program policies.