



**ANTHONY L. JORDAN HEALTH CORPORATION
CODE OF CONDUCT**

**JORDAN HEALTH STAFF MEMBERS MUST CONDUCT THEMSELVES IN ACCORDANCE
WITH THIS CODE OF CONDUCT**

It is the policy of Jordan Health to operate according to the highest standards of business and professional ethics. This means complying with all applicable laws, regulations, and program requirements, as well as avoiding even the appearance of impropriety, in all areas of governance and operations, including clinical services, billing and reimbursement, business dealings and operational practices.

Jordan Health bills only for services that we actually render. Jordan Health codes accurately. Jordan Health documents medical necessity and appropriateness and the nature of the services provided. Jordan Health adheres to all payor contracts and program requirements. Therefore, Jordan Health expects all Staff to refrain from conduct (including a failure to act) which may violate the laws regulating payment for our health care services (the "Fraud and Abuse Laws"). The Fraud and Abuse Laws prohibit, among other things: (1) direct, indirect or disguised payments in exchange for the referral of patients; (2) the submission of false, fraudulent or misleading claims to any government entity or third-party payor, including claims for services not rendered, or claims which do not otherwise comply with applicable program or contractual requirements; and (3) making false representations to any person or entity in order to gain or retain participation in a program or to obtain payment for any service.

Because the laws governing the health care industry are numerous and complex, Jordan Health has in place an internal compliance program (the "Compliance Program"), which has the objectives of: (1) ensuring that Jordan Health consistently complies with Fraud and Abuse Laws and any other laws or program requirements that apply to Jordan Health; (2) preventing the occurrence of criminal or unethical conduct under the Fraud and Abuse Laws and other applicable laws; and (3) detecting any such conduct which still may occur. Conduct (including a failure to act) that does not comply with the Compliance Program, the Fraud and Abuse Laws or other applicable laws, and/or this Code of Conduct, is not authorized by Jordan Health and outside the scope of employment and/or contract with Jordan Health.

Compliance is a term and condition of every Staff¹ member's employment and/or contract. Therefore, Jordan Health expects each Staff member to promote compliance and to adhere to our Compliance Program. Compliance efforts are an element of the performance evaluation of each Staff member, and, compliance violations (of the law, the Compliance Program or deviation from proper ethical standards) will subject Staff members to disciplinary action.

If, at any time, a Staff member or contractor becomes aware of any conduct or event that potentially violates legal or compliance requirements, they *must* report it to the Chief Compliance Officer. The report can be made in person or anonymously, orally or in writing, but it must be made if the Staff member or contractor, in good faith, believes that there is a compliance error or fraud. For confidential, anonymous reporting, Jordan Health maintains an anonymous hotline operated by Lighthouse. Although Jordan Health will strive to keep the reporting Staff member/contractor's identity confidential, it may become necessary to disclose it at some future point where warranted by the circumstances. Intimidation of, and retaliation or retribution against good faith reporters are strictly prohibited by Jordan Health. If a Staff member or contractor is aware of potential compliance issue or violation and does not report it, they may be subject to disciplinary action, up to and including termination of employment or contract.

¹ "Staff" includes employees, contractors, consultants, volunteers and others who act on behalf of Jordan Health.