

## CODE OF CONDUCT

It is the expectation of Hutchinson Clinic, P.A. (the “Clinic”), that all employees and professional staff will comply fully with all federal, state and local laws and will conduct themselves in accordance with relevant ethical standards when acting on behalf of the Clinic. To achieve that end, the Clinic has created this Compliance Manual (the “Manual”) that describes our policies and procedures relating to compliance and the detection and prevention of fraud, waste and abuse with respect to federal and state health care programs. In addition to the policies and procedures, this Manual summarizes the federal and state laws relevant to the prevention of fraud, waste and abuse as well as advises all physicians, employees, contractors, vendors and agents of the Clinic about their rights and obligations as applicable to their individual areas of employment. The Clinic offers this Code of Conduct (the “Code”) to ensure that these expectations are understood and met. The basic principles of conduct are as follows:

*Be Honest and Ethical.* The Clinic expects every employee and agent to adhere to high ethical standards when acting on behalf of the Clinic. Employees and agents should never place consideration for the “bottom line” ahead of ethical conduct. All employees and agents are expected to avoid situations which could be viewed as a conflict of interest in which the individual’s position is used for personal gain. An example of a conflict of interest situation is having an ownership interest in a business that is a vendor of, or supplier for, the Clinic.

*Obey the Law.* There are many laws and regulations that govern the activities of the Clinic, particularly those relating to billing. The Clinic has developed policies set forth in the Manual and elsewhere to help explain these requirements. As a condition of employment or contracting with the Clinic, all employees and agents are expected to comply with applicable laws and regulations. All employees and agents of the Clinic must be committed to full compliance with all federal and state laws, regulations, and requirements related to billing. If you are not certain about what the law requires, you should ask the Compliance Committee for assistance.

*Report Information Truthfully.* We expect employees and agents to take particular care to ensure that all communications within the Clinic and with outside agencies (including government agencies) are truthful, accurate and complete.

*Confidentiality.* The Clinic expects all employees and agents to maintain the confidentiality of the Clinic's business information and information relating to the Clinic's vendors and suppliers. Employees and agents should not use any such confidential information except as is appropriate for carrying out business on behalf of the Clinic. It is expected that all patient information (including medical and billing records) will be kept strictly confidential and released only in accordance with applicable law and the terms of the privacy policies and procedures of the Clinic.

*Reporting Possible Violations.* Every employee and/or agent of the Clinic is required to report any activity he or she reasonably believes to be in violation of the law, or the Clinic's policies, to the Compliance Committee. Reports may be made without fear of retaliation and confidentiality will be protected to the full extent of the law.

*Disciplinary Action.* The failure to follow any of these principles of conduct may result in disciplinary action, including termination. There is also a range of penalties that can apply to individuals for violations of state and/or federal healthcare program regulations. Such penalties can include monetary fines, civil and criminal legal actions, and program exclusions.

While the Clinic cannot predict or anticipate every situation that might arise with respect to compliance matters, we have developed this Manual to address certain risk areas that have been identified as affecting physician practices such as that of the Clinic and to set forth procedures for monitoring compliance in those risk areas. If you have questions about other topics or issues not addressed in this Manual, please consult with the Compliance Committee for more information.