

Hamilton-Madison House, Inc.

COMMITMENT TO COMPLIANCE

At Hamilton-Madison House, Inc. (the "Agency"), we strive to earn the trust of our patients and the respect of the communities we serve. To help us do that, we have implemented a Compliance Program and Code of Conduct.

- ☐ **Who is responsible?** All persons who are affected by the Agency's "risk areas," including our employees, the chief executive and other senior administrators, managers, contractors, agents, subcontractors, independent contractors, and governing body and corporate officers.
- ☐ **What are the rules that must be followed?** The standards set forth in the Code of Conduct provide an overview of the rules that you are expected to follow. All Personnel are provided with a copy of the Code of Conduct and the Compliance Program Structure and Guidelines. We expect everyone to conduct themselves pursuant to the highest ethical, business, and legal standards. If you suspect that someone is doing anything that is illegal or unethical, you must report it.
- ☐ **Examples of what needs to be reported:**
 - Improper billing practices (e.g., selecting procedure or diagnosis codes on the basis of whether payment will be made rather than on the actual diagnosis or procedure provided; "up-coding;" billing for services not provided, etc.).
 - Giving or accepting something of value in exchange for referrals.
 - Improper marketing practices.
 - Any activity or business practice that could possibly be interpreted as unethical or illegal.

How to Report Compliance Violations:

- Contact the Compliance Officer, Cynthia Fan at (212) 720-4524 or by e-mail at CynthiaFan@hmhonline.org.
- Contact the "Compliance Hotline" anonymously at (877) 320-8293, by e-mail at hamiltonmadisonhouse@compliancehotline.com or via the online portal at <https://my.compliancehotline.com/report/HMH>. To report anonymously by online portal, check the box next to "Check this box if you want to report and remain anonymous".

- All reported compliance issues will be investigated.
- You may raise the issue anonymously if you wish. If you report through the Compliance Hotline your identity will be kept confidential unless the matter is subject to a disciplinary proceeding, referred to, or under investigation by, MFCU, OMIG or law enforcement, or disclosure is required during a legal proceeding.
- Be assured that intimidation or retaliation against anyone who in good faith raises a compliance issue or otherwise participates in the Agency's Compliance Program is strictly prohibited.