

LIFEWORKS ADVANTAGE

This document represents LifeWorks Advantage Standards of Conduct. These Standards describe the overarching principles and values of our organization. Compliance with these Standards is the responsibility of all LWA employees, officers, associates and business associates.

*Standards of
Conduct*

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LifeWorks Advantage Mission

LifeWorks Advantage mission is to provide an effective, system-wide, measurable approach to continuously monitoring, evaluating and improving access and quality of care and services for enrolled members and to work with providers to ensure a quality health care experience for enrolled members using a cost-effective and efficient method.

LifeWorks Advantage Values

Dedication to our mission demonstrated by how well we treat members, families, staff and providers.

Overview

LifeWorks Advantage, LLC (LWA) Standards of Conduct is the embodiment of the Sponsors values as a Health Maintenance Organization (HMO) I-SNP Medicare Advantage plan designed to care for individuals who meet the definition of institutional level of care. The Standards of Conduct describes the overarching principles and values of the organization and our core beliefs that what we do is important and necessary in maintaining the health and well-being of our members. The principles outlined in the Standards of Conduct also set forth guidelines to establish policies in order to ensure compliance with state and federal laws and regulations.

The Standards of Conduct apply to all employees and associates, both full and part time student interns, contractors, vendors and First Tier, Downstream and Related Entities (FDRs) doing business for or on behalf of LWA. The Standards of Conduct are administered by the Compliance Officer who reports directly to the Chief Executive Officer (CEO) and Board of Directors. Everyone has the responsibility to read the Standards of Conduct, understand its importance in the culture of LWA, and question anything that may be unclear. The Standards of Conduct provides the framework for everyone to act professionally while maintaining a high ethical standard.

LWA is locally-managed by Medical Facilities of America LifeWorks, LLC an affiliated entity of Medical Facilities of America, Inc.

Business Ethics and Conduct

The successful business operation and reputation of LWA is built upon the principles of fair dealing and ethical conduct of our employees, officers and associates. Our reputation for integrity and excellence requires careful observance of the spirit and letter of all applicable laws and regulations, as well as a scrupulous regard for the highest standards and personal integrity.

LWA success is dependent upon our members' trust and we are dedicated to preserving that trust. Associates are expected to conduct themselves in a way that will merit the continued trust and confidence of our members. LWA will comply with all applicable state and federal laws and regulations. As such, associates are expected to conduct business in accordance with the letter, spirit, and intent of all relevant laws and to refrain from any illegal, dishonest, or unethical conduct.

An associate's actions under the Standards of Conduct are significant indications of the individual's judgment and competence. Accordingly, those actions constitute an important element in the evaluation of the associate for position assignments and promotion. Correspondingly, insensitivity to or disregard of the Standards of Conduct principles will be grounds for appropriate disciplinary action.

Compliance Program

LWA Compliance Program which includes a Medicare Advantage Plan (Part C) and Medicare Prescription Drug Plan (Part D), is administered by the Compliance Officer. The Program (*LifeWorks Advantage_H2185_Compliance Program_CY*) outlines LWA's commitment and strategy to comply with all applicable state and federal laws and regulations with an emphasis on Medicare health plan compliance. The Compliance Program further describes the LWA's commitment to ethical business practices and behavior.

The Compliance Program provides the framework to assure that employees, officers, managers, volunteers, interns, Board of Directors and FDRs (i.e. business associates, contractors, subcontractors) comply with LWA's Standards of Conduct and requirements to prevent, detect, and mitigate potential fraud, waste, and abuse (FWA).

The Compliance Program and its policies and procedures are reviewed and revised at least annually, and more frequently, as needed. LWA's Board of Directors reviews and approves the Compliance Program.

The Compliance Program includes, but is not limited to, the seven (7) compliance elements specified in 42 C.F.R. §§ 422.503(b)(vi) and 423.504(b)(4)(vi) and associated sub regulations.

Conflict of Interest

It is LWA's policy to protect its interest when it is contemplating entering into a transaction or arrangement that might benefit the private interest of a corporate officer, executive, medical and utilization review staff member, department director or provider. All associates have an obligation to conduct business within guidelines that prohibit actual or potential conflicts of interest.

An actual or potential conflict of interest occurs when an employee, officer or associate is in a position to influence a decision that may result in a personal gain for that individual or for a relative as a result of business dealings with LWA. For the purposes of the Standards

of Conduct, a relative is any person who is related by blood or marriage, or whose relationship with the employee, officer or associate is similar to that of persons who are related by blood or marriage. Transactions with outside firms, vendors and FDRs must be conducted within a framework established and controlled by the executive level of LWA. Business dealings with outside entities should not result in unusual gains for those firms. Unusual gains refer to bribes, product bonuses, special fringe benefits, unusual price breaks, and other windfalls designed to ultimately benefit the entity, employee, officer, associate, or all parties.

No “presumption of guilt” is created by the mere existence of a relationship with outside entities. However, if employees, officers or associates have any influence on transactions involving purchases, contracts, or leases, it is imperative they disclose any such relationships to LWA management as soon as possible so that safeguards can be established to protect all parties. Personal gain may result not only in cases where an employee, officer, associate or relative has a significant ownership in an entity with which LWA does business, but also when an employee, officer, associate or relative receives any reward, bribe, substantial gift, or special consideration as a result of any transaction or business dealings involving LWA.

As appropriate, employees, officers and associates should seek further clarification through Compliance on issues related to potential conflicts of interest.

Patient Privacy and Confidentially

LWA members and associates have the right to expect that private information used and stored by LWA will be protected and kept confidential. When members choose LWA for their care, they provide us with sensitive personal information. This can include names, addresses, phone numbers, social security numbers, medical diagnosis, family illnesses, genetic information, prescription histories and other personal information. Employees and LWA business associates must protect patient privacy and personal health information as they perform their day-to-day work. Private information should always be safeguarded from unauthorized use and disclosure. The LWA HIPAA Privacy and Security Plan and other related health information policies provide additional guidance and details.

Political Contributions

LWA will not make any contribution to any political party or to any candidate for political office in support of such candidacy except as provided in these Standards of Conduct and as permitted by law.

In the United States, federal law strictly controls corporate involvement in the federal political process. Generally, federal law provides that no corporation may contribute anything of value to any political party or candidate in connection with any federal election.

While similar laws apply in some states and their political subdivisions, in many jurisdictions in the United States, corporate contributions to candidates and political parties in connection with state and local election campaigns are lawful.

This policy is not intended to prevent the communication of LWA views to legislators, governmental agencies, or to the general public with respect to existing or proposed legislation or governmental policies or practices affecting business operations. Moreover, under these Standards of Conduct, reasonable costs incurred by LWA to establish or administer political action committees or activities organized to solicit voluntary political contributions from individual associates are not regarded as contributions to political parties or candidates, where LWA may lawfully incur such costs.

State and Federal Regulations

LWA complies fully with all applicable laws and industry regulations, including the following:

False Claims Act (FCA)

The FCA and related state laws make it illegal to submit or cause the submission of false or fraudulent claims, records or statements to obtain payment from the government. This would also include accurate and consistent payment to our providers and reporting such as encounters to the Department of Medicare and Medicaid Services (CMS).

Associates and FDR's are expected to operate with honesty and transparency at all times. As a means to encourage employees to report suspected wrongdoing, the "whistleblower" provision of the FCA allows any person with actual knowledge of suspected false claims, who has first made a good faith effort to exhaust internal reporting procedures, to file a lawsuit on behalf of the government and potentially share in a percentage of the amount recovered.

Anti-Kickback Statute (AKS)

The AKS prohibits LWA from knowingly and willfully paying something of value to providers, members or potential members for a referral or in return for enrolling with the health plan. A violation of the AKS can result in both civil and criminal penalties. While certain nominal "gifts" are allowed by CMS, it is incumbent on associates, FDR's and Sales Agents to understand the requirements and limits of such gifts.

Civil Monetary Penalties Law

Civil Monetary Penalties regulations authorizes the Secretary of Health & Human Services to impose civil monetary penalties, an assessment, and program exclusion for various forms of fraud and abuse involving the Medicare and Medicaid programs. The Inspector General must only prove liability by a "preponderance of the evidence" rather than the more demanding "beyond a reasonable doubt" standard required in criminal actions. A health

care entity can be held liable based on its own actions, omissions and negligence and the actions, omissions and negligence of its employees.

Excluded Individuals and Entities

LWA is required to screen current and prospective associates, FDR's, participating providers and subcontractors against the Health and Human Services (HHS) – Office of Inspector General (OIG) List of Excluded Individuals and Entities (LEIE) and the General Services Administration (GSA) System Award Management (SAM) exclusions. It is LWA's policy to not employ or contract with anyone listed on the LEIE, or make payment to any provider listed on the OIG exclusion list or SAM list.

Reporting Potential or Detected Noncompliance or Fraud, Waste, and Abuse

LWA expects all employees, officers, associates and FDRs to conduct themselves in an ethical manner, and to report all instances of noncompliance FWA through appropriate mechanisms. The Standards of Conduct identifies how issues can be reported and that such reporting can be done anonymously and confidentially, and without fear of retaliation. To this extent, LWA maintains an anonymous, toll-free telephone hotline (1-844-317-9059) that can be accessed 24 hours/365 days a year. Reported issues will be addressed in a timely manner. In addition, compliance and ethics are valued at the highest levels of authority within the organization.

LWA is committed to complying with all applicable federal and state laws, including but not limited to those addressing noncompliance and FWA. Associates are expected to immediately report any potential false, inaccurate, or questionable issues to their supervisors and/or the Compliance Officer in accordance with LWA policies. Any associate who is requested to engage in any activity which is or may be contrary to the intent and spirit of the Standards of Conduct must promptly report such information to his or her supervisor and to the Compliance Officer. Likewise, any associate who acquires information that gives the associate reason to believe that any other associate or FDR is engaged in conduct forbidden by the Standards of Conduct must promptly report such information to his or her supervisor and to the Compliance Officer.

LWA employees, officers and associates and FDRs should use the following information to submit questions and concerns related to business ethics, compliance or reports of suspected or detected noncompliance or potential FWA.

Methods for Reporting Potential and Detected Noncompliance and Fraud, Waste, and Abuse (FWA)	
Anonymous Hotline	1-844-317-9059
Confidential E-mail	compliance@lifeworksadvantage.com
Mailing Address	LifeWorks Advantage P.O. Box 29600 Roanoke, VA 24018-0796

Through contractual delegation, all FDRs have an obligation to report incidents of FWA to the Compliance Officer or the Plan sponsor, as incidents are identified.

Non-Retaliation Policy

LWA maintains a strict policy of non-retaliation and non-retribution for reporting violations of the Standards of Conduct in good faith. Associates at all levels are prohibited from engaging in any form of retaliation, retribution or any form of harassment against another employee for reporting wrongdoing. The same non-retaliation policy applies to members and providers who report an associate violating the Standards of Conduct.

LWA is prohibited by law from retaliating in any way against any associate or contractor who in good faith reports a perceived problem, concern, or issue involving noncompliance or FWA, and will not take punitive action against an associate who reports such information.

Training and Education Activities

To assist associates with understanding potential issues and to comply with Centers for Medicare and Medicaid Services (CMS) requirements, certain training and education activities are required to be administered upon hire and annually, thereafter.

Fraud, Waste, and Abuse

Combating FWA is everyone’s responsibility! As an individual who provides health or administrative services for Medicare enrollees, every action you take potentially affects Medicare enrollees, the Medicare Program, or the Medicare Trust Fund.

LWA is committed to the responsible stewardship of our resources, and maintaining a comprehensive plan for detecting, preventing, and correcting FWA. To that end and as required by CMS, LWA provides FWA training to associates, upon hire and annually, thereafter and is available to FDR’s.

General Compliance

General compliance training addresses preventing, detecting, and correcting noncompliance issues, a description of the compliance program, and methods for reporting potential issues of noncompliance that ensure confidentiality and anonymity. Moreover, such training efforts will highlight that LWA adheres to a standard of non-retaliation for compliance-related questions or reports of potential noncompliance or FWA. LWA provides general compliance training to associates, upon hire and annually, thereafter and is made available to FDR's.

Protecting Individual's Health Information

The Health Insurance Portability and Accountability Act of 1996 (HIPAA) creates a framework to protect the privacy and security of patients' and health plan members' health information. LWA supports the goals of HIPAA and through training and education documents its commitment to comply with these laws in *HIPAA Privacy and Security Plan* policy.

Violations of the Standards of Conduct

Violations of these Standards of Conduct are grounds for disciplinary action up to and including discharge, adapted to the circumstances of the particular violation and having as a primary objective furtherance of LWA interest in preventing violations and making clear that violations are neither tolerated nor condoned.

Disciplinary action will be taken, not only against individuals who authorize or participate directly in a violation of these Standards of Conduct, but also against:

- Any associate who may have deliberately failed to report a violation of these Standards;
- Any associate who may have deliberately withheld relevant and material information concerning a violation of these Standards of Conduct; and
- The violator's managerial superiors, to the extent that the circumstances of the violation reflect knowledge, inadequate leadership and/or lack of diligence.

LifeWorks Advantage Compliance Officer Contact Information

Compliance Officer	Jeremy Allen
Phone	1-540-776-7538
E-mail	compliance@lifeworksadvantage.com
Mailing Address	Compliance Officer LifeWorks Advantage P.O. Box 29600 Roanoke, VA 24018-0796

Attestation to Comply with Standards of Conduct

I have received and read the LifeWorks Advantage Standards of Conduct. I understand that it is my responsibility to comply with the Standards of Conduct and ALL LifeWorks Advantage policies and procedures. I understand that I should consult with the Chief Compliance Officer regarding questions I have about the LifeWorks Advantage Standards of Conduct, policies, and procedures.

I understand that there are additional LifeWorks Advantage policies, procedures, and rules; and it is my responsibility to read and comply with ALL policies and revisions made to them.

Because the information within these policies may change, I acknowledge that revisions to policies may occur at any time, with or without prior notice, and in the sole discretion of LifeWorks Advantage management. I understand that revised information may supersede, modify, or eliminate existing policies.

Printed Name

Date

Signature

Date

Please provide a signed copy of this attestation to Compliance at:

Compliance Officer
LifeWorks Advantage
P.O. Box 29600
Roanoke, VA 24018-0796

or

Compliance@lifeworksadvantage.com