

Policy

Code of Conduct and Compliance Policies

Purpose

The purpose of this policy is to ensure that Excelin Health, LLC (EH) maintains and distributes its Code of Conduct (COC) and compliance policies to all employees at least annually and upon hire.

Definitions

Employee - Within this document, the term “employee” refers to all permanent, temporary, full-time, part-time, and volunteer employees who: 1) have primary job duties related to EH operations; and/or 2) For purposes of this policy and EH's use and disclosure procedures, the workforce includes employees, volunteers, interns, contractors, and other persons whose work performance is under the direct control of EH, whether or not they are paid by EH. The term “employee” includes all these types of workers.

Major revision - anything that changes the meaning or intent of an existing policy.

Policy

EH maintains and publicizes a COC and compliance policies.

EH's COC and compliance policies:

- **Articulate** EH's commitment to comply with all applicable federal and state standards
- Describe the compliance expectations as embodied in the COC and compliance policies
- Implement the operation of the compliance program
- Provide guidance to employees and others on dealing with suspected, detected, or reported compliance issues
- Identify how to communicate compliance issues to appropriate compliance personnel
- Describe how suspected, detected, or reported compliance issues are investigated and resolved by EH
- Include a policy of non-retaliation for good faith participation in the compliance program, including, but not limited to, reporting potential issues, investigating issues, conducting self-evaluations, audits, remedial actions, and reporting to appropriate officials.

Procedure

- I. EH's COC and compliance policies will be maintained by the Compliance Officer and Compliance Committee
- II. EH's COC and compliance policies will be reviewed, revised as needed, and approved by the Compliance Officer and the Compliance Committee at least annually.
- III. Development of new compliance policies and/or major revision of an existing policy must be sent to the Board of Directors for review and approval prior to implementation.
- IV. The COC and compliance policies, once approved, will be posted on the Excelin Employee SharePoint sites. Employees are notified by e-mail when these documents are revised.

Revision Tracker

Action (New, Major Revision, Minor Revision, Retired)	Date	Developer/ Responsible Party	Approval Date by Committee	Approval Date by Board	Comments
New	08/07/20	Mildred Anderson	08/18/20	09/09/20	Implementation date 01/01/21 Next review date 01/01/2022
Review	02/10/22	Mildred Anderson	n/a	n/a	Reviewed Without Change Next Review Date 01/01/2023
Review	08/17/22	MA	n/a	n/a	Name Change