



Code of Conduct

Commitment

GlobalHealth, Inc. (“GlobalHealth”) and its affiliated entities* are committed to doing business in compliance with all applicable Federal and State laws and regulations. This Code of Conduct has been approved by senior management and the board of directors and is designed to promote honest, ethical, and lawful conduct by all employees, officers, and directors of Global and any subsidiaries, parties, or entities controlled by Global.

*Includes Momentum Health, LLC, Oklahoma City Clinic, PC, Global Health Provider Networks (“GHPN”), and Medical Center ASC, Inc.

The Code of Conduct communicates (1) the basic principles and standards of behavior expected in our work environment; (2) our commitment to comply with laws, regulations, standards of care and ethical business practices; and (3) the responsibility we all share for keeping Global in compliance with applicable laws, regulations, and policies. The actions of every employee, officer, director, and agent or representative of Global affects our reputation and integrity. That is why it is essential for you to read the Code of Conduct thoroughly and abide by its content.

→ All GlobalHealth employees must read the Code of Conduct and sign a Compliance Certification form.

Compliance Program

GlobalHealth maintains a comprehensive Compliance Program to assure continued compliance with applicable Federal and State laws and regulations, including regulations and policies pertaining to Federal Health Care Programs (e.g., Medicare) if applicable. The Compliance Program includes, at a minimum, the seven (7) elements provided in the Office of the Inspector General (“OIG”) published guidance documents and the Federal Sentencing Guidelines.

These elements include: (1) a designated Compliance Officer; (2) Code of Conduct; (3) written policies and procedures; (4) auditing and monitoring; (5) education and training; (6) methods for reporting compliance concerns; and (7) disciplinary or remedial action when compliance concerns are identified.

→ All GlobalHealth employees must receive training on the Compliance Program upon employment and annually thereafter.

Fraud & Abuse Prevention and Detection

GlobalHealth employees, affiliates, and associates are required to participate in the prevention, detection and reporting of fraud, waste, abuse, or violation of company policy. If an individual has reason to believe that a representative of GlobalHealth is committing fraud or other illegal act, violating company policy, or acting unethically, he or she should notify a member of administration or contact the GlobalHealth Compliance Officer.

Reporting Compliance Violations

Reports may be made to the Compliance Officer anonymously. All reports concerning a potential compliance violation are investigated by the Compliance Officer and held in the strictest confidence possible depending on the nature of the report. Anyone who in good faith reports a violation, or assists in an investigation of a possible violation, will not be retaliated against in the terms and conditions of their employment or contractual relationship as a result.

→ Methods for contacting the Compliance Officer

Phone: (405) 280-5711
Toll-free: 1-877-280-5852 (anonymous hotline)
Email: complianceofficer@globalhealth.com

Address: ATTN: Compliance Officer
GlobalHealth, Inc.
701 NE 10th
Suite 300
Oklahoma City, OK 73104-5403

The Federal False Claims Act

The Federal False Claims Act (“FCA”), 31 U.S.C. §§3729-3733, 3801-3812, and similar state laws, prohibit the knowing presentation of false or fraudulent claims to the Federal or State governments. Fraudulent and abusive activities may include knowingly (1) billing for services not provided; (2) including incorrect codes or charges on bills to receive higher reimbursement; (3) forging, altering or destroying documents to secure payment; or (4) making or using, or causing to be made or used, a false record or statement to have a false claim paid.

No specific intent to defraud is required. A person or entity acts “knowingly” if he/she/it has actual knowledge that the act is fraudulent, or acts in deliberate ignorance or reckless disregard of the truth. An example of deliberate ignorance might be where someone suspects that a coworker is committing fraud but looks the other way and ignores it. An example of reckless disregard might be where someone takes an action that he/she believes may be incorrect, or is uncertain it is correct, and fails to review the policy or procedure or ask for guidance.

Violations of the FCA include fines of up to three (3) times the dollar amount claimed (“treble damages”) and civil monetary penalties (“CMP”) between \$5,500 and \$11,000 for the filing of each false claim.

Failure to meet the requirements of the FCA may also result in forfeiture of participation from the Federal health care programs.

Individuals who believe that Federal health care program billing requirements have been knowingly violated may also pursue alternative administrative or legal remedies under the FCA or State law and cannot be retaliated against for reporting such a violation. Individuals with knowledge of fraudulent billing may file a lawsuit on behalf of the United States and receive a percentage of any fraud recoveries.

→ GlobalHealth is committed to complying with the FCA and similar state laws. If you believe there may be a potential FCA violation, report it immediately to the GlobalHealth Compliance Officer.

Anti-Kickback Statute

The Anti-Kickback Statute (“AKS”), 42 U.S.C. §1320a-7b(b), provides penalties against anyone who knowingly and willfully solicits, receives, offers, or pays remuneration, in cash or in kind, to induce or in return for (1) referring an individual to a person or an entity for the furnishing or arranging for the furnishing, of any item or service payable under the Federal health care programs or (2) purchasing, leasing, ordering, or arranging for or recommending the purchasing, leasing, or ordering of goods, facilities, services, or item payable under the Federal health care programs

Individuals and entities that engage in unlawful referral or kickback schemes may be subject to criminal penalties, civil monetary penalties, or exclusion from participation in Federal health care programs.

→ GlobalHealth is committed to compliance with the AKS. Anyone who is aware of a potential AKS violation should immediately report it to the Compliance Officer.

Conflicts of Interest

A conflict of interest occurs when a relationship or private interest influences or impairs, or even gives the appearance of impairing, your ability to make objective and fair decisions in the performance of your job or is contrary to GlobalHealth’s business interests. Employees, and those acting on behalf of GlobalHealth, should avoid situations that might force choosing between personal interests and the interests of GlobalHealth.

It is not possible to describe or anticipate all circumstances and situations that involve a conflict of interest, but below are a few examples that might be a potential conflict.

- Solicitation of a gift or personal benefit from customers, suppliers, or others dealing with GlobalHealth, as a result of your position with the company
- Direct or indirect ownership of or substantial interest in, or in a consulting, managerial or employment relationship with, a company that is a competitor, customer, or a supplier of goods and services to GlobalHealth
- Acceptance, directly or indirectly, of gifts, payments, or services from those doing business or seeking to do business with GlobalHealth

- Serving on a Board of a not-for-profit or community organization that solicits charitable contributions from or has a significant relationship with GlobalHealth
- Serving on a Board of a for-profit business or government agency
- Seeking election or appointment to public office
- Employment in a second job by a competitor or other entity where the nature of that job places the employee in a conflict with GlobalHealth's interests
- Using information, property, or one's position with GlobalHealth for personal gain

→ If you are aware of a potential conflict of interest situation involving yourself or someone else, report this to the Compliance Officer.

Use of Company Assets

Assets belonging to GlobalHealth may only be used for legitimate, authorized business purposes. Employees, officers, and directors may not (1) take, use, or knowingly misappropriate company assets for personal use, or for use by another, or for an improper, unethical, or illegal purpose; (2) remove, dispose of, or destroy anything of value belonging to the company without the company's consent; (3) take for themselves personally any opportunities discovered through the use of the company's property, information, or position.

Additionally, no employee or officer should engage in the unauthorized use, copying, distribution, or alteration of computer software of any kind.

Competition and Antitrust

GlobalHealth complies with applicable antitrust and similar laws that regulate competition. Examples of conduct prohibited by antitrust laws include: (1) agreements to fix prices; (2) bid rigging; (3) collusion with competitors; (4) boycotts; (5) certain exclusive dealing; (6) price discrimination agreements; (&) unfair trade practices including bribery, misappropriation of trade secrets, deception, intimidation, and similar unfair practices. These behaviors and situations must be avoided.

Privacy and Security of Information

GlobalHealth complies with all Federal and State laws and regulations concerning the privacy and security of Protected Health Information ("PHI"), including the Health Insurance Portability and Accountability Act of 1996 ("HIPAA") and the Health Information Technology for Economic and Clinical Health ("HITECH") Act. Member health information is confidential and should not be released without proper authorization. Employees must take reasonable precautions to safeguard confidential member information. This includes, but is not limited to the following actions:

- (1) Read and follow all GlobalHealth policies pertaining to privacy and security of confidential information including the Notice of Privacy Practices (“NPP”).
- (2) Do not put confidential information in a regular trash can. Shred all documents containing PHI.
- (3) Log off computer screens when not in use.
- (4) Do not discuss confidential information with other employees unless necessary for business purposes.
- (5) Do not discuss confidential information with family and friends.
- (6) Always use an approved, completed FAX cover sheet when faxing confidential information.
- (7) Avoid sending PHI via email outside the secured network unless necessary. If sending a confidential email, make sure it is encrypted and include an approved privacy disclaimer.
- (8) Change your computer password often. Do not share your password or post it where others can see. Make sure your password is secure: an ideal password contains at least eight (8) characters with a combination of numbers, alpha, symbols, and upper and lower cases, and is not a word found in the dictionary.

→ Improper disclosures of PHI may result in fines and penalties under HIPAA. Breaches of unsecured PHI may result in fines, penalties, or sanctions under HITECH. If you have any question concerning a privacy or confidentiality matter or believe a HIPAA privacy violation may have occurred, contact the Compliance / Privacy Officer as soon as possible.

Network / Computer Use

All employees, contractors, and other agents who use the GlobalHealth computer network system must follow system use agreement requirements and policies. This includes safeguarding electronic information and mobile devices and taking all reasonable precautions to protect confidential information stored on computers. PHI must be secured in accordance with requirements established by HIPAA, HITECH, and other relevant statutory requirements and policies. Breaches of unsecured PHI may result in serious fines and penalties under HITECH. Additionally, HITECH has notification requirements when certain breaches of unsecured PHI occur; GlobalHealth may be required to report such breaches to the affected parties, the government, and the media.

→ If you are aware of an improper disclosure or breach of PHI, notify the Compliance / Privacy Officer immediately.

Sales and Marketing

GlobalHealth’s advertising must be truthful and not misleading. Claims about GlobalHealth products or services must be supported by evidence to substantiate the claim. Further, GlobalHealth must comply with specific marketing rules that pertain to Medicare plans. Anyone responsible for sales or marketing of Medicare products must complete approved specialized training each year.

Workplace Behavior

GlobalHealth is committed to a work environment that respects the rights, dignity, and cultural differences of its work force. GlobalHealth expects that all employees and associates will conduct themselves in a professional manner both in the work place and at any time or location while representing GlobalHealth.

GlobalHealth does not tolerate harassing behaviors in the work place. Harassment occurs when conduct creates an intimidating, offensive, or hostile environment that interferes with work performance. Harassing behavior can include the following: inappropriate verbal conduct, such as racial epithets or sexual innuendos; display of inappropriate materials; use of inappropriate gestures; transmitting sexually suggestive, derogatory, or offensive materials via GlobalHealth computers or accessing such information while at work; assault; unwanted physical contact, coerced sexual conduct, touching, patting, or pinching; and threats or demands to submit to sexual requests. Harassment or any other form of physical, mental, or verbal abuse or disruptive behavior is inappropriate and will not be tolerated. Anyone who believes he or she has been unlawfully harassed should promptly report this to his or her supervisor or to the Compliance Officer

Any involvement with illegal drugs or consumption of alcohol in the work place is prohibited. Additionally, GlobalHealth maintains a smoke-free environment.

Accounting and Recordkeeping

All GlobalHealth records are prepared accurately, reliably, honestly, and in accordance with established finance and accounting procedures. Entries of cost, financial or other business information shall be made only to the regularly maintained books and records. GlobalHealth has a system of administrative and accounting controls to (1) safeguard its assets; (2) check the accuracy and reliability of its accounting data; (3) promote operational efficiency; and (4) comply with laws and regulations.

All records must be stored in a secure location for the period of time required by law or by policy, whichever is longer. Records should be organized in a manner that permits prompt retrieval. Records that are no longer needed, either in paper or electronic form, must be properly disposed of, or purged, in accordance with applicable document retention policies. A record should never be destroyed in anticipation of, or in response to, a request for those documents by any government agency, court, or litigation hold.

→ Know and follow the record retention policies that apply to your area. If you are not sure, ask.

Hiring or Contracting with Ineligible or Excluded Individuals or Entities

GlobalHealth will not hire or contract with individuals or entities that: (1) have been excluded within the last five years from any Federal health care program (e.g., Medicare, Medicaid, CHAMPUS); (2) are owned or controlled by individuals who have been convicted, sanctioned, and/or excluded from a Federal program; (3) have been convicted of a criminal offense that would trigger exclusion from a Federal program; or (4) are proposed for sanction by a program. All individuals employed by or under

contract with GlobalHealth must notify GlobalHealth of the occurrence of any of the above listed actions.

GlobalHealth conducts pre-employment screening of all new employees against the Office of the Inspector General (“OIG”) list of excluded individuals and entities at www.oig.gov and the GSA list of sanctioned parties at www.arnet.epls.gov. Follow-up screenings are done on a regular basis.

Claims Processing and Determinations

GlobalHealth complies with all applicable Federal and State laws and regulations pertaining to payment of claims for services, including those from The Centers for Medicare & Medicaid Services (“CMS”) as applicable. We will take every reasonable measure and precaution to ensure that claim determinations are made accurately and timely. Employees who work in claims areas are expected to understand and comply with all applicable Federal health care program requirements, contractual agreements, and GlobalHealth policies related to claims adjudication and payment.

Standard clinical admissions criteria that include medical necessity guidelines are used to determine whether or not reimbursement may be made for inpatient care. Authorization determinations are made based on established criteria and are made without discrimination, prejudice, or bias.

→ Employees are responsible for seeking guidance from management if a policy is unclear or a unique situation arises where the employee is uncertain how to proceed.

Customer Service to Members

GlobalHealth is committed to delivering high-quality products and services to its members in a professional, respectful and efficient manner. GlobalHealth will provide members with information concerning their rights and responsibilities and will strive to protect those rights.

Examples:

- Members are entitled to fair, nondiscriminatory treatment
- Members are entitled to timely and courteous responses to their questions
- Members are entitled to receive accurate information regarding their benefits, access to care, and medical coverage
- Members are entitled to have their complaints resolved in a timely manner
- Members are entitled to confidentiality of their information in compliance with law



Code of Conduct Compliance Certification

I have read the GlobalHealth Code of Conduct and will abide by its contents.* I understand that it is my responsibility as a GlobalHealth employee to bring known or potential violations of the Code of Conduct, applicable laws or regulations, or company policy to the attention of the Compliance Officer. I understand that I will not be retaliated against or punished for my good faith report or inquiry.

Print Name _____ Title _____

Signature _____ Date _____

*Please state below any conflict of interest or any situation that would prevent you from fully complying with the Code of Conduct, Compliance Program, or policies.
