



COMPLIANCE STANDARDS OF CONDUCT

2/5/2020 Revised & Adopted September 6, 2023

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People Inc. and its affiliates (collectively “the Agency”) is committed to operating in a manner that demonstrates strong business ethics and corporate accountability. To assist in this commitment, the Agency has adopted a Corporate Compliance Program (“the Compliance Program”). An important element of the Compliance Program is the Agency’s Compliance Standards of Conduct, which apply to all Agency employees, volunteers, CEO, senior managers, contractors, agents, subcontractors, independent contractors, corporate officers, and Board of Director members (collectively “Personnel”).¹ The Standards of Conduct are available to Personnel through the Employee Handbook, Department policy manuals, the Agency intranet, and upon request. All Personnel must comply with the following Standards of Conduct:

1. Personnel must adhere to all applicable State and Federal laws, rules, regulations, policies, and standards, the Agency’s Compliance Plan, policies, procedures, and the ethical and legal standards outlined in this Compliance Standards of Conduct.
2. Personnel involved in documenting and billing the government for health care or other services must ensure that they follow all applicable laws, rules, conditions of participation, and interpretive guidance relating to billing.
3. Personnel must be free from any undue influence that conflicts with, or appears to conflict with, their legal duties and responsibilities to the individuals receiving services and the Agency. Aside from the exception noted below, Personnel may not receive or accept any payment, gift, or other personal economic benefit of value from any person or entity that has, or seeks to have, a business relationship with the Agency. However, Personnel may accept gifts of nominal value (less than \$100 during a calendar year), meals, and social invitations, so long as doing so is consistent with good business ethics and practices, and does not obligate the recipient to take, or refrain from taking, any action or decision on behalf of the Agency. If possible, Personnel are encouraged to make gifts available to individuals receiving services, the Agency, and/or specific Agency departments. Monetary gifts may not be accepted by Personnel. If a monetary gift is offered, Personnel are to decline the offer and encourage the giver to donate directly to the People Inc. foundation. If Personnel have a question about whether a

¹ For purposes of the Agency’s Compliance Program, contractors, agents, subcontractors, and independent contractors (collectively, “contractors”) who are affected by the Agency’s compliance risk areas must comply with the Agency’s Compliance Program to the extent that the contractors are affected by the risk areas, and only within the scope of the contractors’ contracted authority and affected risk areas.

gift, payment, or other personal economic benefit may be accepted, they are instructed to contact the Corporate Compliance Officer (“CCO”) before accepting it.

4. Personnel must be completely honest in all dealings with government agencies and representatives. Misrepresentations, false bills, and false requests for payment are strictly prohibited regardless of the monetary value. Personnel may not alter, destroy, mutilate, conceal, cover-up, falsify, or make false entries in any record with the intent to impede, obstruct, or influence any governmental department or agency’s investigation. Personnel certifying to the correctness of records submitted to government agencies must have knowledge that the information is accurate and complete. Personnel shall cooperate fully with government investigations by directing all governmental inquiries or requests for information, documents, or interviews to the CCO. Personnel who participate in government interviews shall give answers that are truthful, complete, and unambiguous.
5. Personnel must not, in the name of or on behalf of the Agency, carry on propaganda or otherwise attempt to influence legislation (except as permitted by the Internal Revenue Code) or participate or intervene in any political campaign on behalf or in opposition of any candidate for public office. Personnel must not entertain government personnel in connection with Agency business. This, however, does not prevent personnel from engaging in political activity while acting in their individual capacity.
6. Personnel must not have any financial or other personal interest in a transaction between the Agency and a vendor, supplier, provider, or customer. Personnel must not engage in financial, business, or other activity which competes with the Agency’s business or which, actually or in appearances, interferes with the performance of the Personnel’s job duties.
7. All Personnel must notify the CCO of any contracts or agreement with physicians, health care businesses, patients, providers, third party payors, vendors, or suppliers to the Agency.
8. Personnel must maintain the confidentiality of the Agency’s business information and trade secrets, as well as the business information relating to the Agency’s vendors, suppliers, providers, customers, and individuals receiving services from the Agency.
9. Personnel must not engage in unfair competition or deceptive trade practices that misrepresent the Agency’s services or operations.
10. Personnel must comply with the Policy Manual specific to their department.

11. Personnel must comply with all antitrust laws and may not engage in discussions or agreements with competitors regarding pricing, prices paid to suppliers or providers, or joint actions or boycotts.

12. Personnel are responsible for following safe work practices and complying with all applicable safety standards and health regulations.

Reporting Violations. A failure to report a violation of any of the above is a violation of the Compliance Standards of Conduct for Personnel. Failure to report may result in discipline, up to and including termination of employment. Personnel may report violations or suspected violations by contacting the CCO through any of the following ways:

1. **Open Communication with the CCO.** Personnel may contact People Inc.'s CCO directly either in person or by telephone at (716) 817-9007. Please note that open communication with the CCO is not an anonymous form of communication.
2. **E-mail.** Personnel may also e-mail the CCO at tmtyr@people-inc.org. Please note that e-mail is not an anonymous form of communication.
3. **Anonymous Hotline.** People Inc. maintains a 24-hour, anonymous hotline for reporting complaints or asking questions about a compliance issue(s). The anonymous hotline number is **(716) 817-7299**. *The hotline is accessible only by the CCO and does not have caller-identification (i.d.) service.*
4. **Anonymous Mail.** People Inc. provides a "Doing It Right" form that Personnel may use to submit anonymous complaints or questions in writing. The "Doing It Right" form is available on the employee intranet and at all agency sites (with addressed, postage paid envelopes). "Doing It Right" forms go directly to the CCO.

In addition to reporting to the CCO, Personnel may also report violations or suspected violations to their supervisor directly. All compliance-related reports will be kept confidential, whether or not confidentiality is requested, unless the matter is subject to a disciplinary proceeding, referred to or under investigation by MFCU, OMIG, or law enforcement, or the disclosure is required during a legal proceeding.

It is the Agency's policy to investigate all reports of illegal, improper, or fraudulent activities. All Personnel must cooperate with internal investigations and must not prevent, hinder, or delay discovery of improper or illegal conduct or violations. Failure to comply with any of the above may result in corrective action

under the Agency's corrective action policy, up to and including termination of employment in the case of employees, the imposition of sanctions in the case of other Personnel including written admonition, financial penalties, and/or termination of an independent contractor's relationship with the Agency in accordance with the applicable contract or agreement, if any; and the imposition of sanctions of Board officers and directors, including written admonition and/or removal in accordance with applicable bylaws, laws, and regulations.