

# AFMC

# CODE OF CONDUCT



Healthy People. Healthy Businesses.  
Healthy Communities.

# A MESSAGE FROM LEADERSHIP

**Dear Friends,**

**A**s we reflect on the history of AFMC, there are many achievements and milestones during the past 40+ years. Earning the trust of our customers and stakeholders did not happen overnight. It happened over the course of many years of providing quality services.

Trust is one of our most valuable assets, but it's one of the most fragile — one incident, one news story, one careless comment, and the trust we've worked so hard to earn can be lost. That is why the way we conduct our business is as important as the services we provide.

AFMC's Code of Conduct provides us with the information we need to operate our business responsibly, to make ethical decisions, and to maintain trust. It is the responsibility of every employee to know and follow the Code. We encourage you to read it, understand it, ask questions, but most importantly, live it! Strive to do well in all that you do each day. Speak up if you have a concern or see something wrong and seek guidance from your manager or the Compliance Office anytime you are unsure about the right thing to do.

We are proud of all that we have accomplished together and humbled to lead this great company. We know that, together, we will continue to make a positive difference.

**John Selig, MPA, *President and Chief Executive Officer***

**Susie Moore, CCEP, *Chief Compliance Officer***



John Selig, MPA,  
President and CEO



Susie Moore, CCEP,  
CCO

# AFMC CODE OF CONDUCT

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# AFMC ETHICS AND COMPLIANCE PLAN AND CODE OF CONDUCT

## I. COMPLIANCE POLICY STATEMENT

AFMC is dedicated to maintaining excellence and integrity in all aspects of our operations and our professional and business conduct. Accordingly, AFMC is committed to abiding by high ethical standards and legal compliance with all governing laws and regulations in our business relationships. We expect all AFMC employees, temporary employees, board members, contractors, and consultants to honor this commitment in accordance with the terms of this Code, and related policies and procedures developed by AFMC in connection with the AFMC Compliance Program.

## II. AFMC VISION

AFMC is a leading quality improvement organization committed to improving health care throughout the state and nation. We are dedicated to educating Arkansans about their health and helping them get the care they need. In our efforts, we maintain superior ethics, business practices and corporate responsibility.

## III. AFMC MISSION

The mission of AFMC is to promote excellence in health and health care through education and evaluation.

## IV. AFMC CORPORATE VALUES

AFMC developed five corporate values that are the HEART of AFMC and have become an integral part of our corporate being. These values are the keystones of the AFMC Code of Conduct.

### **AFMC is committed to:**

- **Honesty:** Being truthful, open, trustworthy, sincere and fair in all we do.
- **Excellence:** Consistently surpassing expectations by going beyond standards in professional ethics, behavior and work, and fully complying with applicable federal and state laws, possessing the knowledge to be experts in our work.
- **Accountability:** Being fully responsible for everything we do.
- **Respect:** Showing honor and esteem for each other by being considerate and courteous.
- **Teamwork:** Demonstrating unity by willingly cooperating and collaborating with each other to reach our common goals. Building and maintaining relationships with our customers.

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# HONESTY

**A** FMC steadfastly adheres to moral and ethical principles reflected in honesty and consistency in how we think, speak and act because we're a company mindful of the critical nature of compliance. It is important in the course of all areas of business that employees are honest, accurate, and consistent with requirements and ethical standards.

- Do your job well and do it with integrity, which includes being timely, accurate, respectful and completing tasks to the best of your ability. Seeking management support when needed to provide the best quality possible.
- Never backdate documents, falsify signatures, or in any way tamper with records or documentation to create a false or misleading impression.
- Any misstatement knowingly made is grounds for discipline up to and including termination. This includes, but is not limited to documentation, billing, social interactions and professional relationships.



**Q** I'm worried that my co-worker may be violating a law, but I'm not sure, and I don't want to get him in trouble. What should I do?

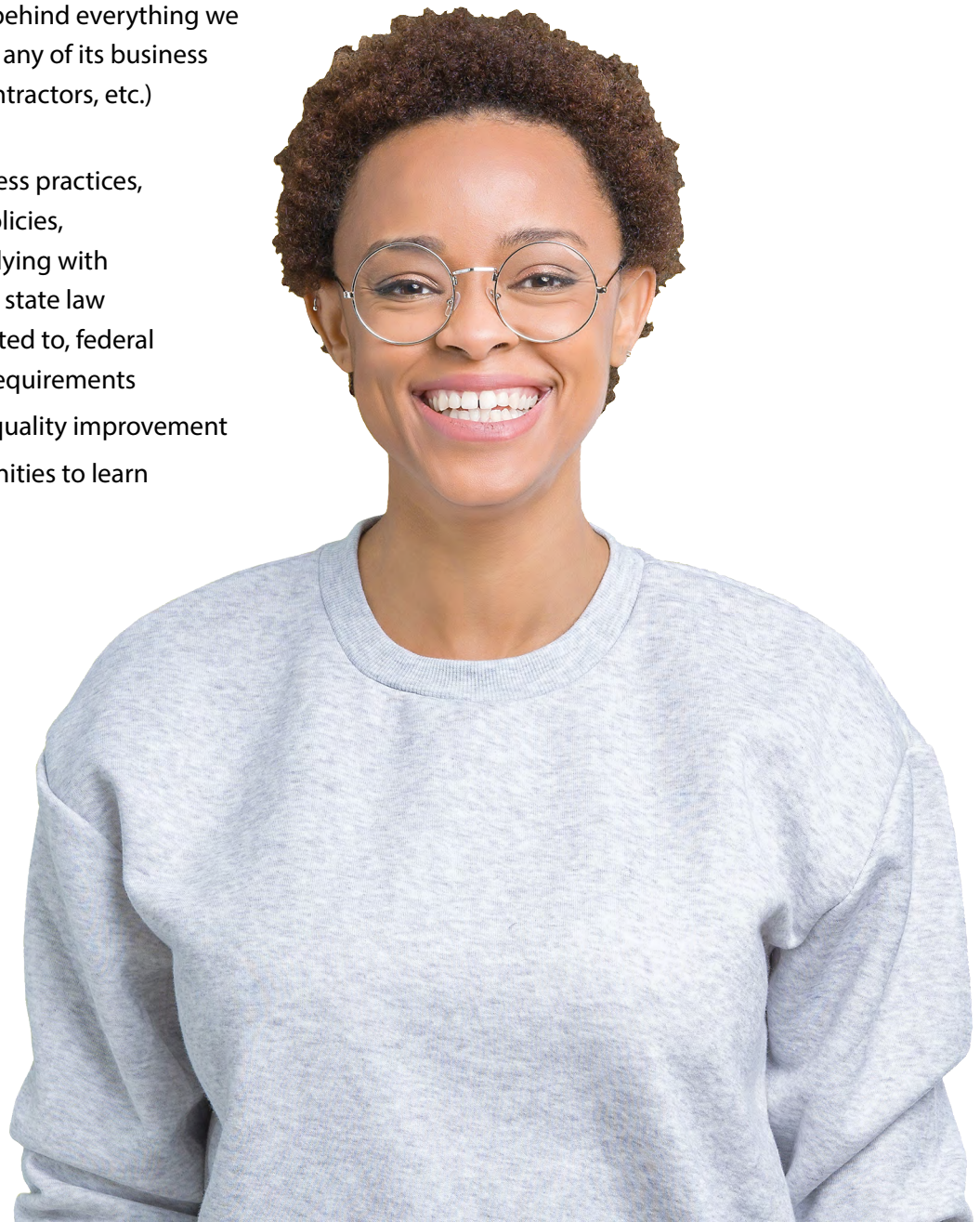
**A** If your co-worker is doing something wrong, it's better to find out now, rather than later.

If it's a simple mistake, it can be corrected retroactively, and future occurrences prevented. If you don't report it, the impact on AFMC and your co-worker could be much worse. And, if it's an intentional misdeed, do you really want someone to willfully put the AFMC mission at risk while you stand by silently? All AFMC employees have a responsibility to report suspected problems. In fact, you could expose yourself to risk by failing to report suspected violations. Report your concern to the Compliance Office or contact our anonymous hotline at <https://afmc.ethicspoint.com> or 1-844-927-4164.

# EXCELLENCE

**A** FMC strives to build on our accomplishments, in our professional journey, to be the best we can be and set new standards in our industry. We serve our customers through initiative, innovation, professionalism, continuous quality improvement and an intense focus on customer needs. Excellence is when we demand more of ourselves than our customers do. It is something that happens when we make the right choices over and over again, especially when no one is watching. Excellence in the little things adds up to excellence in the big things. Our continued success depends on exceeding the expectation of our customers and standing behind everything we do. AFMC employees and any of its business partners (i.e., vendors, contractors, etc.) shall be expected to:

- Adhere to good business practices, following company policies, procedures and complying with applicable federal and state law including, but not limited to, federal health care program requirements
- Strive for continuous quality improvement
- Look for new opportunities to learn and grow
- Strive to be known as thought leaders and innovators
- Set and achieve ambitious goals





# ACCOUNTABILITY

**A** FMC employees are personally accountable for their decisions and actions. AFMC employees must follow a course of conduct that preserves and enhances integrity and honesty. For this Code of Conduct to be effective, it is critical that all employees understand organization policies and apply those policies to their specific areas.

AFMC relies on the good judgment and values of its employees to implement the intent of these ethical principles when organizational policies do not address a specific situation. If any employee is not sure how to approach an ethical dilemma, the employee can request guidance from the Compliance Office.

In some cases, this Code of Conduct and other organizational policies may also apply to those doing work with or for AFMC, such as board members, contractors and consultants. When applicable, these individuals/entities will be notified in writing of this Code of Conduct and any other policies that will apply.

**Q** Someone in our department logs much more time to a contract than what he works. Should I say something?

**A** Yes, you should report this to your immediate supervisor, management, the Compliance Office, or anonymously and confidentially through the EthicsPoint hotline (*contact information on last page of this document*) so that AFMC may investigate and determine if any improper conduct occurred..

Also, an AFMC employee's failure to report violations of law or AFMC's policies will result in disciplinary action up to and including termination



# ACCOUNTABILITY (CONTINUED)

- Each person actively accepts the responsibility to conduct actions in a manner consistent with AFMC's mission and values.
- Managers and supervisors should be role models of integrity and accountable for ensuring that their employees act with integrity and have full knowledge of policies, regulations and quality standards that apply to the services they provide.
- AFMC employees must review, understand and abide by the laws, policies and standards applicable to our work.
- Not knowing the requirements is not an excuse or a defense for violations.
- AFMC employees are required to report suspected violations of law or AFMC policies, including an ethical or compliance concern. In this vein, it is everyone's obligation to report anything that is or may have the appearance of a violation of integrity or quality standards. While mistakes do happen, they must be reported in order to make sure they are corrected and appropriately resolved.
- AFMC employees must seek assistance from their supervisor, the Compliance Office, program documentation, and/or colleagues if there are questions about how policies are applied.
- AFMC employees must promptly report concerns regarding possible wrongdoing or violations of law or AFMC policies to AFMC by reporting it to management, the Compliance Office, or anonymously and confidentially through the EthicsPoint hotline (contact information on last page of this document).
- An AFMC employee's failure to report violations of law or AFMC's policies will result in disciplinary action up to and including termination. Evaluation of an employee's job performance will be tied to adherence to principles and values of this Code of Conduct.

# RESPECT

**A**FMC is successful today because of our remarkable people. We're one team, but we represent many ideas, experiences and backgrounds. We value each other's contributions and believe that everyone should have an equal chance to succeed — this is essential to advancing our goals and initiatives. AFMC employees must work to keep AFMC a diverse, inclusive and respectful workplace by promoting a positive environment, and recognizing the many strengths and talents our diverse colleagues bring to the workplace.

- Treat customers, business associates, co-workers, and any other stakeholders with respect and dignity, and in a manner that reflects AFMC's core values
- Respect the rights and privacy of others, as well as the confidentiality requirements of your position
- Respect yourself and the credentials that you worked hard to achieve by meeting your continuing education requirements and challenging yourself to go beyond the minimum standards
- Respect others by completing your assignments on time
- Respect company property and the property of co-workers



# TEAMWORK

**A** FMC encourages a collaborative environment where individuals combine energy and expertise to achieve a common goal. We believe excellence is a result of acknowledging individual contributions, valuing positive conflict, building consensus and producing results.

- We are one company, all working together for a common purpose, with one mission that unites us. Remember that all contributions are valuable and challenge us to reflect on why we do what we do. Every decision, every interaction has an impact on those around us. Nobody operates in a vacuum.
- Maintain open communication with employees, the chain of command, co-workers and customers.
- Be courteous in all dealings with all employees, co-workers, customers, business associates and the general public.

**Q** There is an employee in another department who I must interact with regularly. This person is extremely rude and disrespectful. What can I do?

**A** This person's behavior does not comply with AFMC's policy on professionalism, located in the AFMC Employee Handbook. You should report this to your immediate supervisor, management, human resources, the Compliance Office, or anonymously and confidentially through the EthicsPoint hotline (*contact information on last page of this document*).



# STANDARDS OF CONDUCT

**A** FMC is committed to conducting its business in a lawful and ethical manner. AFMC's employees are required to comply with all applicable laws, regulations, contract terms and policies affecting the operations of AFMC, including but not limited to:

- Only billing for items or services actually performed
- Proper documentation practices
- Only billing for necessary services
- Providing enough documentation; and
- Disclosing conflicts of interest

## Management's Responsibility

Managers should lead by example, by modeling ethical and legally compliant decision-making.

Managers should:

- Promote a culture of ethics and legal compliance
- Make every effort to ensure that employees understand their responsibilities under the Code and other AFMC policies
- Talk to your team about ethics and integrity and be clear that you expect work to be done ethically
- Create an environment where employees feel comfortable raising concerns without fear of retaliation
- Develop and implement proactive processes to monitor employees and deliverables for which you are responsible
- Communicate openly, fostering knowledge of applicable policies, laws and regulations
- Make sure your team knows that you will listen, even if they have something difficult to say

Managers and supervisors will be subject to discipline for failing to adequately instruct staff about, or for failing to detect, noncompliance with applicable contracts, policies and legal requirements.

## Compliance as an Element of Performance Evaluations and Responsibility to Report Violations

All employees who fail to comply with the rules and procedures as set forth in this Code of Conduct or the laws, contracts and regulations governing AFMC will be subject to disciplinary action. Compliance will also be a factor in performance evaluations, both positive and negative. AFMC employees are responsible for reporting violations or suspected violations of any law, regulation, contractual requirement or AFMC policy/standard. Employees must also report any unethical, unprofessional, or illegal behavior or activity.

- All employees have the option of reporting suspected violations to AFMC by reporting to management, to the Compliance Office, or anonymously and confidentially through the EthicsPoint hotline (contact information on last page of the document). When the EthicsPoint hotline is used, the identity of those reporting will be protected to the extent allowable by law. Each report is evaluated confidentially, with specific follow-up determined based on the nature of the allegation(s). Corrective actions are taken, as necessary. Retaliation of any kind against any reporter is strictly prohibited.
- AFMC management must report any suspected violations to the Compliance Office.

## Business Relations

AFMC's efforts to expand or maintain services must be conducted with integrity. AFMC employees are never to attempt to influence business activities in any way other than through an honest representation of facts.

AFMC employees must not offer or give any form of bribe, gift or thing of value to any person or entity with whom AFMC is seeking a business or regulatory relationship, except for gifts of nominal value which are given in the normal course of business.

It is critical that AFMC employees make all decisions and take all actions on legal and ethical bases. No AFMC employee or representative is to permit inappropriate personal relationships, monetary gain, or gifts to influence decisions or actions. As a rule, anything that could improperly influence decisions, actions or create the appearance of inappropriate influence, must be avoided. AFMC employees should be open and honest about any of their business relationships with other AFMC employees, vendors, contractors or consultants. The failure to deliver information that is known or thought to be necessary, or the provision of information that is known or thought to be inaccurate, misleading or incomplete, is unacceptable.

AFMC employees are not permitted to accept a bribe or payment, nor any gift, item, or thing of more than nominal value from any person or entity with whom AFMC has or is seeking any business relationship, including AFMC's business partners and their families.

# STANDARDS OF CONDUCT (CONTINUED)

## Business Records

All AFMC books, records and transactions must be kept in accordance with AFMC management's directives, contractual requirements, generally accepted accounting standards and other applicable legal standards. All AFMC claims for reimbursement must be submitted accurately in accordance with all applicable federal, state, and local laws, regulations and requirements.

In accordance with the AFMC record retention policy located in the employee handbook, all business records shall be created, maintained, retained, and destroyed in accordance with AFMC Record Retention Requirements Policy and federal and state law.

AFMC requires honesty and accuracy in all activities pertaining to medical, clerical, service, billing and accounting records. The medium for the record (paper, electronic, verbal) does not matter, nor does its intended use. All official records must be maintained properly. AFMC has established a record retention and retrieval policy based on legal requirements and industry best practices, which must be followed.

AFMC requires that we bill properly, timely, and only for services that were provided and consistent with applicable legal, regulatory and service description requirements. AFMC employees are required to document properly and maintain all documentation as specified in regulation and policy. No employee or representative may back-date a document or tamper with records in any way to create a false or misleading impression. AFMC employees are prohibited from falsifying any signature including those of other employees, including supervisors.

Depending on the situation, one or more of the following tools may be helpful in ensuring that records are properly created and maintained:

- Quality callbacks to monitor off-site service delivery
- Regular auditing of clinical, billing or HR/credentialing records
- Pre-billing reviews; or
- Disposing of confidential information in a proper manner

Under no circumstance may documents relating to a pending investigation or inquiry regarding a report of possible error or an incident of fraud and abuse be destroyed without permission of the Compliance Office and approval of legal counsel.

# STANDARDS OF CONDUCT (CONTINUED)

## Confidentiality

In accordance with the AFMC confidentiality policy located in the employee handbook, AFMC employees must maintain the confidentiality of all employee/client/representative information and all AFMC business information. Upon hiring or appointment to the Board, each AFMC employee and Board member shall sign a confidentiality statement.

The privacy of information is of the utmost importance in health care. Every AFMC employee and representative must safeguard the privacy of information related to what we do, whether that information is clinical, personnel or billing/business related. Individually identifiable health care information may not be provided to anyone without a properly executed and timely release. The Health Insurance Portability and Accountability Act (HIPAA) places great emphasis on the security and privacy of health care information in every form and for every person. Everyone has the right to expect that information be used only for its intended purpose.

AFMC expects confidentiality for its business information as well. Information that has not been placed in the public domain should not be publicly revealed or used inappropriately for personal gain.

## Equal Employment and Equal Opportunities

AFMC employees must support and ensure a work environment that is free of discrimination or harassment due to age, race, gender, color, religion, national origin, disability, sexual orientation, covered veteran status, and any other legally protected status. Any form of harassment or retaliation, including the creation of a hostile working environment, is completely prohibited.

The Human Resource (HR) department at AFMC will guide managers and employees in the proper way to supervise, interact and resolve problems. AFMC has created an employee handbook to inform all employees of its expectations and of their rights and obligations. Enforcement of all AFMC policies and requirements is through the corrective action/disciplinary process managed by the HR department. Managers are expected to utilize the HR department as appropriate and necessary. Employees who have problems or grievances should address them through the proper chain of command.

## Training, Disclosure, Investigations and Nonretaliation

AFMC believes that continuing education for its staff promotes professional excellence and regulatory compliance.

All employees will receive ethics, compliance, and conflict of interest training, upon hire and annually thereafter.

All AFMC employees must report any known or suspected deficiencies or violations of law or ethics and cooperate with all internal and external investigations and corrective actions. Failure to report as required and/or failure to comply with laws, regulations and AFMC requirements will subject the employee to the AFMC disciplinary process, up to and including termination. AFMC will maintain confidentiality of all reports as appropriate and allowed by law. Retaliation of any kind against a reporting employee is absolutely prohibited.



# STANDARDS OF CONDUCT (CONTINUED)

It is the responsibility of every AFMC employee or representative to comply with all applicable laws, regulations, service descriptions and other requirements. It is also the employee's obligation to report anything that is or may have the appearance of a violation. It is not the employee's obligation to investigate to determine if the violation is founded. They must simply make a report in good faith to the Compliance Office.

While mistakes do happen, they must be reported, corrected and appropriately resolved. Deliberate violations will result in disciplinary actions. Employees have the option to report suspicions to management or to the Compliance Office or the EthicsPoint hotline (see last page of this document). Managers must report their suspicions or any other reports of concerns to the Compliance Office. Employees must not permit personal relationships, fear of reprisal, fear of getting someone else in trouble or simple apathy to deter them from fulfilling their mandate to report.

In response to a report, the Compliance Office will consult with legal counsel as well as the CEO to determine an appropriate response. The Compliance Office may decide to conduct a further investigation. Any investigation should be conducted under the auspices of legal counsel. If such investigation reveals a significant problem or a material violation, AFMC is obligated to take corrective action.

Every AFMC employee must cooperate with these activities. Compliance Office investigations typically focus on determining the facts surrounding events or actions and are not intended to be investigations of an employee or his/her character. Employees and contractors may be suspended while an investigation is conducted, and any disciplinary action is determined.

AFMC appreciates the cooperation of employees, supervisors and managers who report to the Compliance Office. Anyone found to have retaliated against a reporter to Compliance Office will be subject to immediate discipline, up to and including termination.

The Compliance Office will report its work, including investigations, audits, and any other concerns, to the CEO and the Board.

## Suicide Intervention

AFMC believes everybody should know how to recognize the warning signs for suicide and know the steps for intervention. Suicide is the leading cause of violent death in Arkansas. Not every journey is easy; for some, it may be difficult to talk about their feelings, thoughts about suicide, or how to get help. Most people who are suicidal give some warning signs indicating they are in crisis. By working together to recognize the signs, raise awareness of suicide and open the conversation with each other, we can make a difference and save Arkansans' lives.

To learn more about these warning signs [CLICK HERE](#).

## Auditing and Monitoring

AFMC is committed to ensuring that this Code of Conduct is properly implemented through a system of periodic monitoring and auditing the AFMC's business activities. The principal activities of concern include billing, documentation, contacts, joint ventures, investments and the like. While the Board or the Compliance Office will be ultimately responsible for coordinating formal audits, the audits themselves may be performed by internal or external auditors with expertise in federal and state health care statutes, regulations and policies. The audit must be independent with a purpose to detect failure to follow this Code of Conduct and any signs of fraud. The Compliance Office shall be responsible for investigating incidents or systemic errors or reports of suspected noncompliance. The results of any audit process must be communicated to and discussed with legal counsel to determine whether any corrective action is required.

AFMC will conduct an internal "baseline" audit of its contracts shortly after the establishment of this plan. The purpose of this audit is to identify and subsequently correct any existing problems in AFMC's business practices. The baseline audit involves the selection of a representative sample of submissions to our contractors and reports.

AFMC will also conduct internal "spot check" audits at regular intervals to ensure ongoing accuracy and compliance with any new rule or regulation implemented since the last audit. Periodic audits should focus on problems discovered in the baseline audit or in previous audits. If any issues are discovered, prompt corrective action will be taken.

The Compliance Office or auditors should also review whether the requirements of the Compliance Program are being followed. The review should determine whether the program standards have been adequately disseminated, whether appropriate training has been conducted, and whether the disciplinary process is working properly. The reviewers should also determine whether appropriate records are being kept and that other documentation requirements are being satisfied. Where it is determined that the Code of Conduct is not being followed, corrective action should be taken.

The Compliance Office will assure that the findings of any audit are reported to the CEO and the Board. If violations are discovered, thus necessitating corrective action, the advice of legal counsel will be sought. Legal counsel will advise on matters of attorney/client privilege, disclosure, and whether AFMC has any affirmative duties to report any violations or proceed in any other manner required by law.

# STANDARDS OF CONDUCT (CONTINUED)

## Diversity

Our culture at AFMC is to embrace the differences that make us unique. It is extremely important that all employees of AFMC support and assure a work environment that is free of discrimination or harassment due to age, race, gender, color, religion, national origin, disability, sexual orientation, covered veteran status or any protected class. Any form of harassment, including the creation of a hostile working environment, is completely prohibited.

- AFMC does not tolerate discrimination in hiring or promoting practices nor in any other activity of the company, any form of subtle or indirect discrimination, or harassment of any kind toward anyone for any reason.
- AFMC conducts its employment practices based on merit, experience and other work-related criteria, without regard to race, color, religion, national origin, sex (including gender identity, sexual orientation, and pregnancy), age, genetic information, disability, veteran status, or other protected class.
- Freedom from harassment specifically includes freedom from intimidating, hostile and offensive activities, including unwelcome sexual advances, requests for sexual favors, or other verbal, graphic or physical conduct of a sexual nature.
- As part of providing high quality services with integrity, AFMC expects employees to treat everyone — including co-workers, customers, visitors from external organizations and the general public — with respect, dignity and courtesy.



**Q** I was not given the opportunity to apply for an AFMC position that I was well-qualified for. I think it is because of my age. What can I do?

**A** You should report this to your immediate supervisor, management, the Compliance Office, or anonymously and confidentially through the EthicsPoint hotline (*contact information on last page of this document*). AFMC does not tolerate discrimination in hiring or promoting practices nor in any other activity of the company, any form of subtle or indirect discrimination, or harassment of any kind toward anyone for any reason. AFMC conducts its employment practices based on merit, experience and other work-related criteria, without regard to race, color, religion, national origin, sex (including gender identity, sexual orientation, and pregnancy), age, genetic information, disability, veteran status, or other protected class.

## Conflict of Interest

AFMC employees must avoid any relationship or activity that might impair, or even appear to impair, our ability to make objective and fair decisions when performing our jobs. At times, we may be faced with situations where the business actions we take on behalf AFMC may conflict with our own personal or family interests. We owe a duty to AFMC to advance its legitimate interests when the opportunity to do so arises. We must never use AFMC property or information for personal gain or personally take for ourselves any opportunity that is discovered through our position with the Company.

Here are some other ways in which a conflict of interest may arise:

- Owning, being employed by, or acting as a consultant to, a competitor or potential competitor, supplier or contractor, regardless of the nature of the employment, while you are employed with AFMC
- Doing business or competing with companies for which a friend or family member works or has an ownership interest
- Hiring or supervising friends, family members or closely related persons
- Serving as a board member for an outside company or organization
- Accepting gifts, discounts, favors, or services from a customer/potential customer, competitor, or supplier, unless equally available to all AFMC employees
- Using company equipment (i.e. telephones, computers, copies, fax machines, or personal digital assistants) or office supplies for more than limited or incidental personal use

Determining whether a conflict of interest exists is not always easy to do. Employees with a conflict of interest question should seek advice from management. In the event a manager/director is uncertain as to the appropriateness of disclosing a matter, they should consult with the Compliance Office, who in turn, may elect to consult with the compliance committee. Such information, as well as information provided on any annual disclosure form, will be held in confidence except when the governing committee determines, after consultation with the interested person, that it is in AFMC's best interests to disclose.

### 1. Disclosure

Each employee and board member shall make prompt and full disclosure in writing to the Compliance Office of any potential situation which may involve a conflict of interest. The best way to avoid a conflict of interest is to disclose any relationships others might misinterpret. This includes any relationships with other employees, customers, suppliers and competitors. You should raise questions about possible conflicts of interest and disclose these kinds of situations to the Compliance Office as they arise. Violation of this policy may lead to disciplinary action, up to and including termination.

# STANDARDS OF CONDUCT (CONTINUED)

## 2. Disclosure Statement

Upon hiring or appointment to the Board, each AFMC employee and Board member shall sign a disclosure statement. This disclosure statement shall also list all outside employment. Each AFMC employee and Board member is required to update this statement as outside involvement changes, but at least yearly.

## 3. Procedures for Determining a Conflict of Interest

The Compliance Office will:

- Review information to determine if a potential or actual conflict of interest exists and should be disclosed
- Consult with the internal compliance committee and/or management, or
- Utilize a third-party person to investigate alternatives

Once a potential or actual conflict of interest is reported, the Compliance Office and the internal compliance committee and/or management will determine whether the conflict is material and, if so, whether remedial actions will be taken or whether the conflict will be waived.

## 4. Work Outside of AFMC

AFMC employees are expected to devote their work activities primarily to functions of AFMC. They may, however, engage in extramural activities on their own time, provided that such activities do not detract from the performance of their duties and responsibilities to AFMC. Extramural activity is defined as any work not performed as an AFMC employee, whether compensated or not. Employees who want to perform outside work during their scheduled work time will be required to take accrued vacation and/or leave without pay. Extramural activities performed during AFMC work time may result in termination. Example: An employee who has rental properties should not perform any duties related to that business while on AFMC time.

## 5. Board Memberships for Other Companies

You may serve as a board member of another organization if your role does not affect your ability to perform your job for AFMC. If the other company has a business relationship with AFMC, you must be completely removed from any decisions made that would involve AFMC and the other business. To make sure such activities do not cause a conflict of interest or other problem with your position at AFMC, you should disclose this information to the AFMC Compliance Office.

# STANDARDS OF CONDUCT (CONTINUED)

## 6. Gifts and Solicitation

AFMC's gift policy embraces a "rule of reason." As a general rule:

- You may accept gifts of nominal value (under \$100), such as promotional items (pens, notepads, mugs) given in the regular course of business. But you should not accept small gifts on a regular or continual basis.
- When possible, share gifts with others within the company or recycle for future needs.
- Do not accept gifts of money or cash equivalents.
- When giving gifts, make sure they do not appear to be attempts to obligate or influence the recipient.
- Do not offer any gift, favor, travel, or entertainment if it is against the policy of the recipient's organization. Many companies have policies that do not allow any gifts.
- Offering or taking bribes, kickbacks, payoffs, or other unusual or improper payments to obtain or keep business is unethical, illegal and strictly forbidden.
- When in doubt, check with the AFMC Compliance Office.

## 7. Honorariums

Employees may be asked to speak at outside organizations on behalf of AFMC, during AFMC work hours. If so, any honorariums or other compensation received for these speaking engagements are to be submitted to AFMC.

Employees who are speaking to an outside organization on their own time, may accept honorariums if it is not in conjunction with their position at AFMC.

## 8. Charitable Activities

If you take part in community activities not sponsored by AFMC, you must make it clear that your views and actions are your own. Also, your activities outside the workplace should not interfere with your work at AFMC.

Employees may place pamphlets or sign-up sheets in the kitchen or break areas for charitable event fundraising purposes but must not approach or pressure a fellow employee to participate.

AFMC may permit employees to schedule breaks to allow participation in events such as blood drives. In some instances, AFMC may sponsor collection of money for charities or for cases of particular hardship. An employee has the right to choose not to participate in AFMC-sponsored charities.

## 9. Political Activities

No employee may contribute on behalf of AFMC or use AFMC's name, funds, people, property, or services to support political parties or candidates unless allowed by law and approved in advance by AFMC.

You must not ask a fellow employee to express a political view that goes against his or her personal view. You also must not ask a fellow employee to contribute to a political action committee, political party or candidate.

# STANDARDS OF CONDUCT (CONTINUED)

## 10. Confidential and Proprietary Information

Integral to AFMC's business success is our protection of confidential company information, as well as nonpublic information entrusted to us by employees, customers and other business partners. Confidential and proprietary information includes such things as pricing and financial data, customer names/addresses or nonpublic information about other companies, including current or potential suppliers and vendors. We will not disclose confidential and nonpublic information without a valid business purpose and proper authorization.

## 11. Program Evaluation

AFMC management shall regularly review program effectiveness and make revisions as needed to stay consistent with evolving laws and contractual agreements.

## 12. Procedure for Reviewing and Managing Conflicts

Representatives of AFMC involved in a conflict or appearance of a conflict should report this information to the AFMC Compliance Office for development of a mitigation plan. The report should describe in detail the activity that gives rise to the conflict and any special circumstances surrounding the situation. The internal compliance committee will review the mitigation plan and determine if the course of action is appropriate for the situation.

## 13. Report to Centers for Medicare & Medicaid Services (CMS) and other Contractors

AFMC will disclose all actual, apparent and potential conflicts of interest to existing contractors, including its CMS Prime Contractor who will then comply with its obligations to CMS, which can include submitting it to the CMS Contracting Officer upon discovery and any other time as specified in the current contract.

## 14. Report to the Board of Directors and CEO

All conflicts reviewed by the Compliance Office and the internal compliance committee will be reported to the compliance committee of the Board of Directors. The report will include the nature of the conflict, parties involved and the disposition of the conflict.

## SUMMARY

AFMC exists within a highly regulated environment and the number of rules and regulations can seem overwhelming, not to mention confusing. It is very important that you follow all these rules, regulations and requirements.

AFMC and the individuals who we serve rely upon each employee of AFMC to conduct themselves in the spirit of our core values. By ensuring that integrity is at the HEART of everything we do, we're confident everyone can reach their fullest potential.

If you have a compliance-related concern, you can make a report 24 hours per day, 7 days per week:

EthicsPoint Hotline: **1-844-927-4164**

Web Intake Site URL: [\*\*https://afmc.ethicspoint.com\*\*](https://afmc.ethicspoint.com)

Mobile Intake Site URL: [\*\*https://afmc.navexone.com/\*\*](https://afmc.navexone.com/)



Healthy People. Healthy Businesses.  
Healthy Communities.