



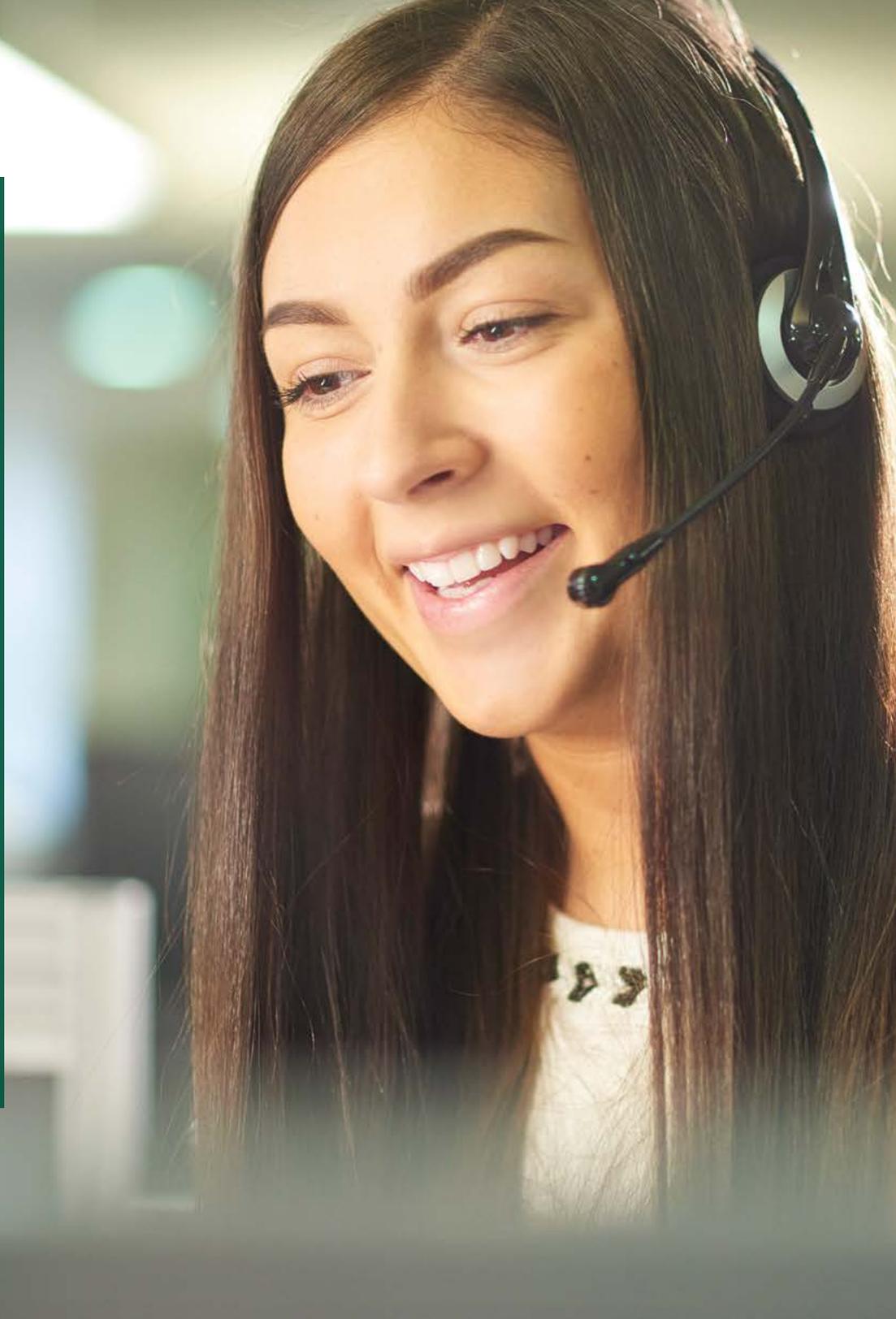
MARTIN'S POINT

HEALTH CARE

Code of Ethics

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A Message from Our President and CEO



Greetings,

I am incredibly proud of the work we do every day at Martin's Point to uphold our mission to deliver the care every person deserves. As a not-for-profit organization, our shared commitment to our patients, members, and communities defines us—and we shape our work around values and a Code of Ethics that guide our actions.

We hold ourselves and our business partners to these ideals and conduct our business with the highest ethical standards in compliance with law and our policies. Our Code of Ethics, in conjunction with our Compliance Program, affirms this process. It is rooted in our mission and values and reinforces the principles and professional standards that already exist among all who are associated with Martin's Point.

Our Code of Ethics serves several purposes. It:

1. Aligns us with our mission and values;
2. Educates us about the importance of compliance with laws, standards of care, ethical business practices, and basic workplace standards;
3. Communicates our commitment to ethical decision-making; and
4. Affirms our individual and collective responsibility to ensure full compliance with these laws, standards and practices.

I encourage you to take some time to read, understand, and live our Code of Ethics. While this document does not cover the specifics of every situation that you may encounter, it does guide you to available resources if you have questions.

If you or someone else has a question about how to proceed under our Code of Ethics, or a concern about possible misconduct, speak up. Reach out to management, your Human Resources Business Partner, our Legal Team, our Compliance Department, or our Compliance Hotline.

You can make an anonymous report to the Compliance Hotline at **1-800-297-8616**. Martin's Point leadership will address your concerns promptly and respectfully and will not tolerate retaliation for reporting suspected misconduct.

Thank you all for your continuing commitment to our Code of Ethics as we fulfill our mission of health care excellence.

Sincerely,

A handwritten signature in black ink that reads "Paul Kasuba". The signature is written in a cursive, professional style.

Paul Kasuba, MD
President and Chief Executive Officer

Introduction

How to use the Martin's Point Code of Ethics

Martin's Point strives to do the right thing for our members, ourselves, each other, and our community while personifying honesty, integrity, and quality. This document is our guide to conducting our business ethically. It is more than a collection of policies and statements. It is a resource that proactively informs our decisions and actions.

We Use the Code of Ethics to

- Understand how we ethically serve our members, patients, each other, and our community.
- Articulate our values and mission statement, as well as our expectations of employees and business partners, to act ethically and in compliance with law and policy.
- Understand how to report ethical concerns.

Who the Code of Ethics Applies to

Our Code of Ethics applies to all Martin's Point employees, board members, providers, volunteers, student interns and externs, temporary and per diem employees, and other individuals and business partners who are authorized to act as representatives of Martin's Point, both inside and outside our organization or facilities.

Our Duty to Understand, Clarify, and Act

Our Code is designed to provide overall guidance, but it does not address every situation. Our compliance policies and procedures provide additional specific guidance, and we have additional resources on Compass. These resources are living documents that are updated periodically to respond to changing conditions.

If we are faced with an uncertain situation, or have a concern or question regarding the Code or its application, it is our duty to ask for help. There are many people within Martin's Point available to answer our questions.

If we are not sure who to go to, we should start with our direct manager.

Depending on the question or topic area, other helpful resources within Martin's Point include:

- Compliance and Legal Affairs Department at complianceandlegalaffairsdepartment@martinspoint.org
- Support Services and Safety team at [\[projectmanagers@martinspoint.org\]](mailto:projectmanagers@martinspoint.org)
- Our Human Resources Business Partners





Enforcement

When we think that something we encounter may be contrary to this Code or a violation of a law or policy governing our conduct, we have an obligation to raise our concern. Generally, our direct manager will be in the best position to address an ethics issue quickly, but there are many other ways we can raise our concerns. You should speak up in any way that feels right to you under the circumstances.

We are encouraged to report violations of law and policy to our General Counsel and Chief Legal Officer, our Medicare Compliance Officer, appropriate government agencies or their responsible designees (such as MEDICs), and/or law enforcement. Whichever way we choose to report our Code of Ethics concerns we can be confident that Martin's Point's policy is to:

- Take all reported concerns seriously and investigate allegations of misconduct.
- Never retaliate against anyone for reporting a suspected violation in good faith or for seeking clarification on any business practice, contemplated action, or decision.

Failure to act in compliance with our Code and our compliance policies and procedures, or applicable law and regulations, may result in serious consequences for you, our organization, and the people and communities we serve. In particular, each of us has an affirmative duty to report a compliance issue. Failure to comply with the Code or to report compliance issues may result in discipline up to and including termination.

**Reach the Martin's Point
Compliance hotline by calling
1-800-297-8616
(available 24/7)**



Who We Are as an Organization

Mission

Our mission is our organizational “why”—a statement of why we do what we do. The mission of Martin’s Point Health Care is to *deliver the care every person deserves*. And our culture is defined by the statement—*We are People caring for People*.

Vision

Create the healthiest community through exceptional, affordable care delivered when, where, and however needed.

Culture Statement and Values

People Caring for People

We care passionately for the well-being of the people we serve, each other, our families, and our communities.

- We help each other.
- We act as owners of the business.
- We take care of ourselves.
- We are always learning better ways to do things.
- We trust each other.
- And we have fun doing it!



Compliance Policies and Procedures

Our compliance policies and procedures and this Code of Ethics contain standards of conduct that apply to all employees, members of our Board of Directors, and employees of first tier/ downstream/ related entities.

Things We Need to Know

- Our policies and procedures articulate our commitment to comply with our contractual obligations, as well as applicable federal and state statutory, regulatory, and other requirements, including the False Claims Act, the Anti-Kickback Statute, HIPAA, the Code of Federal Regulations, the Federal Sentencing Guidelines, anti-harassment laws, and state privacy laws.
- These policies and procedures are a critical component of our program to detect, prevent, and control fraud, waste, and abuse.
- Our policies and procedures also address non-retaliation, non-intimidation, the Excluded/Sanctioned parties' process, the process for reporting violations to appropriate oversight agencies, expectations of employees and the role of management in creating and maintaining a culture of compliance in our organization.
- Martin's Point provides compliance training and education to all employees, managers, senior management, student interns and externs, contractors, agents, temporary and per diem employees, and members of the Board of Directors upon hire and annually. All first tier, downstream and related entities are also subject to training requirements. Martin's Point also provides compliance training to vendors who are provided contractual access to our Electronic Health Record (EHR) to perform services on behalf of Martin's Point.

We review our policies and procedures regularly to incorporate changes in applicable law, regulations, and other requirements and regulatory agency guidance

Health and Safety

We provide a safe and secure environment for patients, members, employees, and visitors.

Things We Need to Know

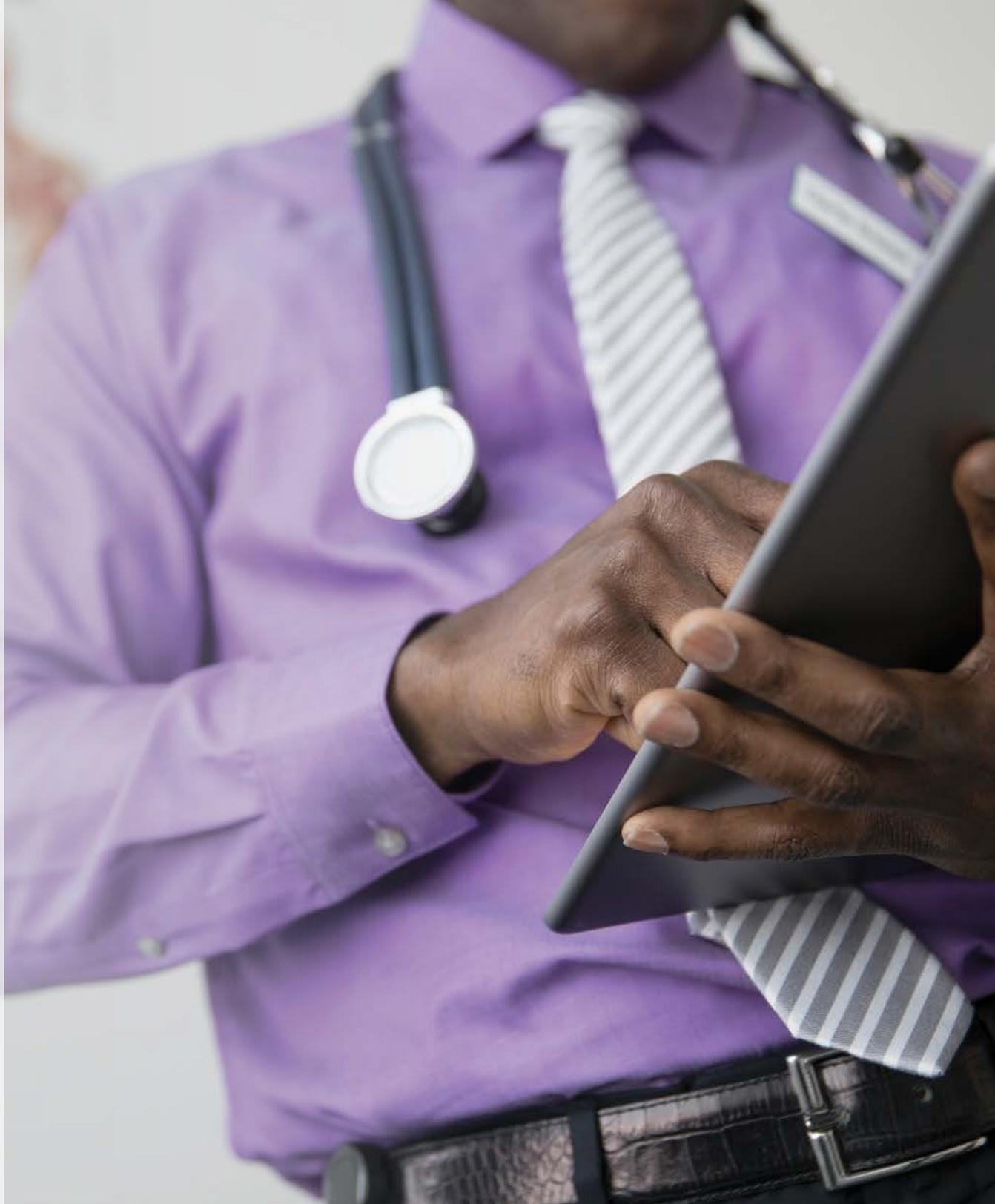
- We comply with established safety and infection control policies and procedures.
- We comply with all laws governing the handling, storage, use, and disposal of hazardous materials, other pollutants, and infectious wastes.
- We procure, maintain, dispense, and transport drugs or other controlled substances used in the treatment of patients, in compliance with applicable laws.
- We review organizational safety issues as they arise and ensure that building security and safety issues are identified and resolved in a timely manner.
- We perform periodic ergonomic evaluations to ensure employees have safe working environments.
- We encourage any concerns regarding safety of an employee's work area be reported to the Support Services Hotline at 207-791-3777 or extension 3777. Non-emergency related reports may be submitted through the "Work Order Portal" on Compass.
- Consistent with Maine law, we require annual anti-harassment training of all employees.

Quality of Care and Services

We respect the dignity, comfort, and privacy of every member and patient, and treat them with consideration, courtesy, and respect.

Things We Need to Know

- Our qualified health care professionals provide appropriate and timely care to all patients without regard to race, color, religion, gender, national origin, ancestry, age, physical or mental disability, sexual orientation, veteran status, or any other status protected by law.
- We adhere to our statement of patient rights, and we respect the choices our members and patients express in advance directives.
- We maintain complete and thorough records of patient information and we protect the privacy of our patients' and members' health records to fulfill the requirements set forth in our policies, accreditation standards, and applicable laws and regulations.



Workplace Conduct and Employment Practices

We recognize that our greatest strength lies in the efforts and talents of our employees. We treat each other with consideration, courtesy, and respect. We care passionately for the well-being of the people we serve, each other, our families, and our communities by living our values.

Things We Need to Know

- We provide equal employment opportunities to prospective and current employees, based solely on merit, qualifications, and abilities. We do not discriminate in employment opportunities or practices based on race, color, religion, gender, national origin, ancestry, age, disability, sexual orientation, veteran status, or any other status protected by law.
- We strive to create and maintain a work environment in which people are treated with dignity and respect. We are building a culture of belonging that is about uniting different backgrounds, beliefs, abilities and experiences in an environment where everyone feels valued and works together in support of our shared mission.
- We support and observe a workplace free of alcohol, drugs, and tobacco.
- We do not tolerate any act of retaliation or reprisal against any employee who in good faith reports suspected violations of law, or our policies or Code of Ethics. Our management team is charged with maintaining an open-door policy and fostering a work environment in which concerns are addressed.

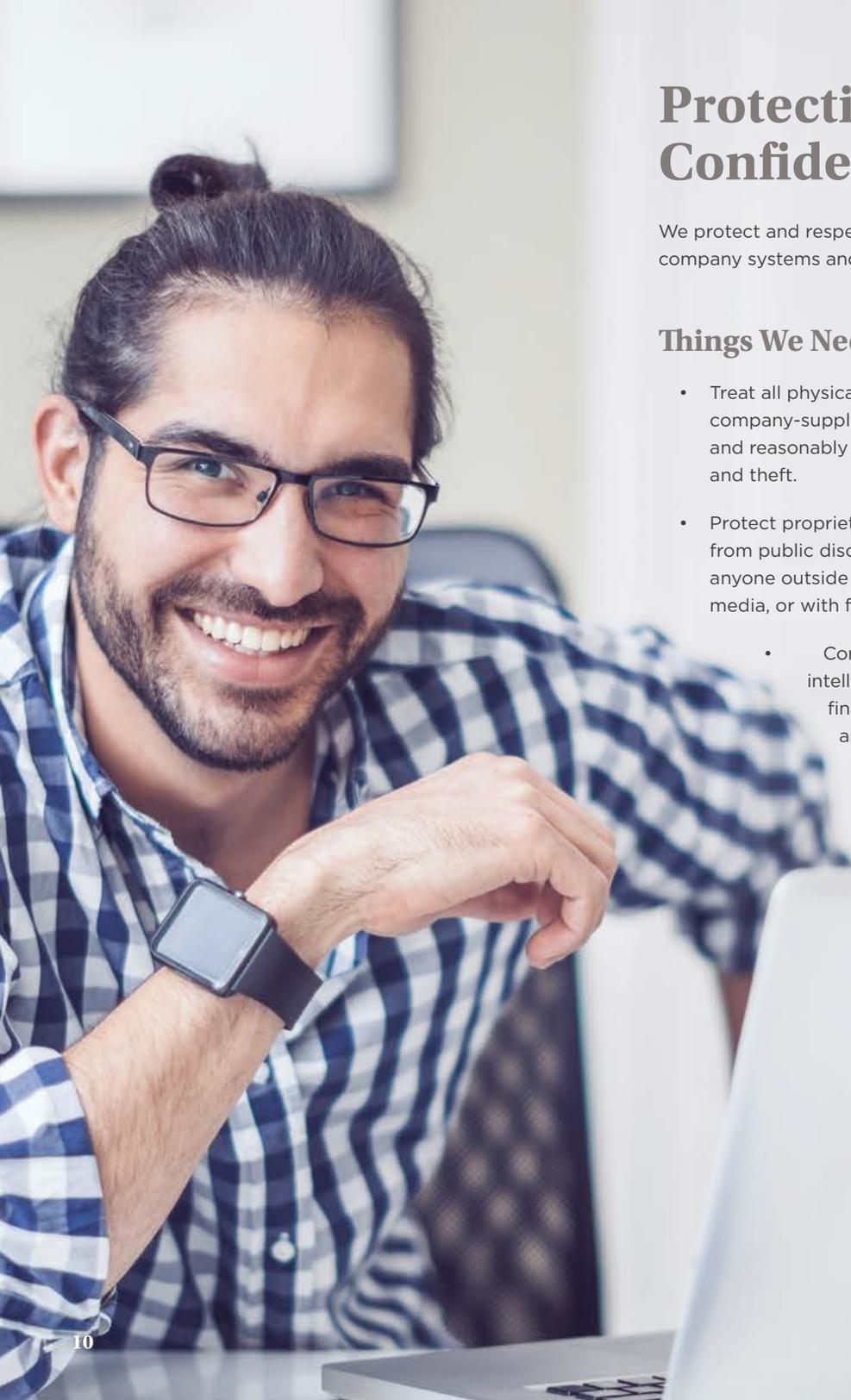


Financial Relationships with Vendors and Referral Sources

We ensure that all our relationships and financial arrangements with vendors, suppliers, and referral sources comply with all laws and regulations.

Things We Need to Know

- We do not give or receive any form of payment, kickback, or bribe to induce the referral or the purchase of any service.
- We do not offer any improper inducements or favors to patients, providers, or others to encourage the referral of patients to our facilities, the enrollment of members in our plans, or the use of a particular product or service.
- Any discounting arrangements with vendors comply with applicable law.
- All Martin's Point employees, board members, providers, volunteers, student interns and externs, temporary and per diem employees must comply with our Conflict of Interest Policy.



Protecting Company Property and Confidential Information

We protect and respect company property and the property of others entrusted to us, including physical equipment, company systems and networks, as well as confidential and proprietary information.

Things We Need to Know

- Treat all physical property, including computers, company-supplied phones, and laptops with care and reasonably safeguard them from damage, loss, and theft.
- Protect proprietary and confidential information from public disclosure and do not discuss it with anyone outside Martin's Point, including on social media, or with friends and family.
 - Confidential information includes intellectual property, business records, financial results, personnel records, and patient and member personal information. It also includes the confidential and proprietary information of our vendors and business partners.
- Help secure our networks and systems by using strong passwords and company-approved software. Avoid public wireless hotspots when doing company business.
- Adhere to established policies governing record management and comply with record retention and destruction policies/schedules.
- If considering working or consulting for another organization while at Martin's Point, discuss this with your manager and review our Conflict of Interest Policy.
- Ask your manager if you have questions about whether information is confidential.

Conflicts of Interest

We avoid engaging in any activity, practice, or act that creates an actual, apparent, or potential conflict with the best interests of Martin's Point.

Things We Need to Know

- While working for Martin's Point, we must act in the best interest of the company in our dealings with suppliers, customers, or government agencies.
- No employee or member of his or her immediate family may directly or indirectly participate in, or have a significant interest in, any business that competes with or is a supplier to Martin's Point without the prior approval of our Legal Department.
- We all have a duty to review and comply with the Conflict of Interest Policy, complete an annual attestation, and bring conflict questions to the Legal Department whenever they arise.



Political Activities and Contributions

As a tax-exempt organization, we do not contribute company funds to federal, state, or local elections.

Things We Need to Know

- Federal and state laws restrict the use of company funds in connection with federal, state, and local elections.
- We may not include any political contribution on expense accounts or otherwise for reimbursement.
- When participating in political activities, we cannot state or imply that we are speaking on behalf of Martin's Point.

Gifts and Gratuities

We comply with law and adhere to the highest ethical standards in giving and receiving gifts and gratuities.

Things We Need to Know

- We may not accept or encourage gifts of money under any circumstances, or solicit non-monetary gifts, gratuities or any other personal benefit or favor of any kind from suppliers or customers.
- We and our immediate families may accept unsolicited, non-monetary gifts from a vendor or prospective vendor only if the gift is primarily of an advertising or promotional nature. Acceptable gifts may include those that a vendor provides to a wide spectrum of existing and potential customers if they are of a modest value. Contact your supervisor or our General Counsel if you are unsure if a gift or gratuity is permitted.
- Federal law makes it a crime to give, offer, or promise anything of value to any public official for or because of any official act performed or to be performed by the official. It is also a federal crime to make any payments to government employees, representatives, or officials, on account of or as compensation for public duties.
- We will not give gifts or gratuities exceeding the value of \$10 per gift or \$50 per calendar year to vendors, contractors, and other outside entities, or to prospective or enrolled members.





Privacy

We strictly maintain the privacy and confidentiality of information entrusted to us in accordance with law and the highest ethical standards. We maintain this privacy even after our association with Martin's Point has ended.

Things We Need to Know

- We respect the privacy of our patients, members, and co-workers and safeguard patient, member, and customer information. We protect the privacy of health records in compliance with federal and state laws and accreditation requirements.
- We maintain medical and business documents, and follow our record retention policy, in accordance with HIPAA, 42 CFR Part 2, state privacy laws, and other applicable guidelines.
- We only disclose minimum necessary information regarding medical, clinical, or business information and only when such information is related to treatment, payment, or operations. We provide specialized training to employees regarding personal health information as it pertains to their particular job function.
- We do not discuss patient, member, or employee information in any public area where conversations may be overheard.
- We use secure email to transmit protected health information both internally and externally.

Compliance with Laws and Regulations

We follow all applicable federal, state, and local laws and regulations with high standards of ethics, integrity, and timeliness.

Things We Need to Know

- We provide health care and administrative services in compliance with federal, state, and local laws and regulations.
- We provide our employees and agents with information about the governing rules and regulations and relevant changes related to our business practices and delivery of care to our patients.
- We do not engage in inappropriate discussions with competitors regarding business issues.

All employees are bound by laws and regulations that govern our company, including:

- False Claims Act
- Anti-Kickback Statute
- Stark Law
- Health Insurance Portability and Accountability Act (HIPAA)
- Medicare Advantage (MA) and TRICARE (USFHP) regulations
- Regulatory guidance from CMS for MA and Part D, and from the Defense Health Agency for USFHP
- Applicable state laws

Responsible Communications and Social Media

Authorized employees represent Martin's Point responsibly with the press and the public, and on social media.

Speaking on Behalf of Martin's Point

- To ensure we have a consistent message, only certain people are authorized to speak on behalf of our company.
- If you receive a question about the company from the press, a government official, or a community organization, refer them to Steve Amendo, Chief Marketing Officer.

Responsible Messaging and Social Media Use

- Be mindful when creating email, leaving voicemail, or writing instant or text messages. Carefully review email or text before sending to avoid misunderstandings.
- Never disclose information regarding our patients or members in any public forum.
- Never use offensive language or send inappropriate content.
- Do not conduct company business using personal email accounts.
- Read our Social Media Use Policy before referring to Martin's Point on external social media sites.
- Ensure that any company information you share is not confidential or proprietary.
- Direct any questions to the Chief Marketing Officer.

Our Ethical Decision-Making Framework

We recognize the complexity of our business and the importance of protecting our reputation. When faced with business decisions that have ethical implications, we involve the right people in considering the following questions:

- 1. Should I be troubled by this? Is this consistent with Martin's Point's commitment to integrity?**
Is it really an issue? Am I genuinely perplexed, or am I afraid to do what is right?
- 2. Who will be affected by my decisions? How will they be affected?**
What other people may be affected by my decisions? Another department, patients, members, providers? What will be the impact if I act, or decide not to act? Consider the Golden Rule (Treat others as you would like to be treated).
- 3. What is my responsibility to act? What will happen if I don't act?**
Have I caused the problem, or has someone else? How far should I go in resolving the issue? How serious a problem is it? If it is not my problem, will someone else take action if I don't?

- 4. What are the ethical considerations?**
Is it a question of legal obligations, fairness, promise keeping, honesty, doing good, or avoiding harm?
- 5. Who needs to be involved in making this decision?**
Should I consult my manager, my HR Business Partner, our internal legal counsel, or our Compliance Department? If I'm afraid to raise this issue, should I anonymously call the Compliance Hotline?
- 6. Am I being true to myself and the Martin's Point mission, to deliver the care that every person deserves?**
How would my actions appear to our patients and members, or our community?
What kind of person or company would do what I am contemplating? Have I made the right decision for the right reason? Would I be proud to share my decision with my family? With coworkers? With regulatory agencies? How would I feel if it were reported on the front page of the newspaper?



MARTIN'S POINT[®]
HEALTH CARE

