



Code of Conduct

Alliance Family of Companies, LLC and/or its subsidiaries and/or affiliates, d/b/a Stratus (Company), Code of Conduct (Code) provides guidance for all of us to follow and sets forth a framework by which our organization operates carrying out our daily activities of providing quality care and services to patients in a manner compliant with our ethical obligations and applicable laws and regulations.

These obligations under this Code apply to our Board of Directors, employees, relationships with patients, physicians/providers, third-party payors, contractors and vendors.

The Code is a critical component of our Corporate Compliance Program and we are fully committed to upholding the principles outlined in the Code.

The Code reinforces more than just our policies and procedures. It drives our mission, vision and values as a company.

Our Mission, Vision and Values

Mission: We will *Own the Home* in Neurodiagnostics by Providing Best in Class Service to our Physicians and Patients.

Vision: Helping Neurologists Improve Lives by Bringing Tomorrow's Technology to Today's Patients.

Values: Our core values are defined below.

- **Service** – To patients, providers and payors
- **Training** – Our people, providers and industry
- **Responsiveness** – To customer needs through innovation, technology and service
- **Accountability** – For our personal and collective actions
- **Teamwork** – Because it takes us all
- **Understanding** – The problems patients and providers face
- **Stewards** – Of good health

Responsibilities Under the Code

Who must comply?

The Code is the foundation of our Corporate Compliance Program (CP) and applies to the Board of Directors, employees, relationships with patients, physicians/providers, third-party payors, contractors and vendors with whom we do business.

The purpose of a Compliance Program is to **prevent, detect and correct** any areas of non-compliance.

Responsibility of Employees

All employees are expected to understand and follow all laws, regulations, policies and procedures and the Code. Employee cooperation and compliance with the objectives of the CP will be considered as part of each employee's annual performance evaluation. Additionally, all employees have the duty to directly report any suspected violations of the Code of Conduct, CP, or the law to the Company. If you have any questions or need clarification regarding compliance or your obligations, you should talk to members of senior management or the Compliance Officer for clarification.

All employees are subject to disciplinary action, up to and including termination for failing to comply with the Code, CP and related policies and procedures.

Responsibility of Leadership Team, Supervisors and Managers

Leadership roles are responsible to demonstrate and promote a commitment to ethical and legal behavior that is consistent with Company mission, vision and values. Leadership is responsible to maintain a workplace environment that stresses commitment to compliance with the Code and to identify and correct situations or practices that are not consistent with Company's mission, vision and values.

Further, they are charged with preventing retaliation or discrimination against employees or others who report actual or suspected violations in good faith as outlined in the *Non-Retaliation and Non-Retribution Policy and Procedures*.

Responsibility of Compliance Officer

The Compliance Officer is responsible for overseeing and monitoring the CP and must be an example of commitment to integrity and honesty and will hold individual's accountable to the Code, CP and related policies and procedures.

Responsibility of Board of Directors

Board of Directors (BOD) provides oversight and resources to implement an effective CP. They approve the Code and designate the Compliance Officer to oversee and monitor the CP. Reports are presented on the status of the effectiveness of the CP that include management efforts. The BOD has an active membership on the Executive Compliance Committee.

Reporting Responsibilities Under the Code

Responsibility for Reporting Known or Suspected Violations

Anyone who knows or suspects a violation ***must*** report this information. If you do not report a violation, you may be subject to disciplinary action even if you were not directly involved.

The Company is committed to protecting employees and others who report problems and concerns in good faith from retaliation and retribution as outlined in the *Employee Handbook* and *Non-Retaliation and Non-Retribution Policy and Procedures*.

The Company maintains an “open-door policy” at all levels of managements for personnel to report problems and concerns. All supervisors and managers must promote this open-door attitude about personnel problems and concerns at all times, receive all concerns, problems and opinions, and explore with the employee suggestions for resolving the issue.

How and What Should You Report

Everyone has the responsibility to report something that you may know, or suspect is questionable that may impact the objectives of our Company.

Reporting may include but is not limited to, complaints regarding harassment, discrimination, retaliation, false claims, safety or health concerns, HIPAA and confidentiality, violations of the Code of Conduct or any policy, for example.

Failure to report is a violation of the Code and the CP that may result in disciplinary action up to and including termination. No disciplinary action or retaliation will be taken against a person who reports a compliance concern in good faith.

When in doubt, ask yourself the following questions about your own actions:

- *Am I doing the right thing?*
- *Would I be proud of my actions and comfortable discussing them with my supervisor or manager? My friends? My family?*
- *How would it look if it were reported in tomorrow's paper?*

Red flag answers to these questions are typically answered as follows:

- *Nobody will find out.*
- *Just this once.*
- *Everybody does it.*
- *No one gets hurt.*
- *Why should I care, it is not my responsibility?*

You are encouraged to ask questions, our Compliance Officer, Leadership Team, Supervisors and Managers are all available to assist anyone seeking further information.

Four-Step Reporting Process

Employees who have a question or concern about an activity or behavior being unethical or illegal should use the four-step reporting process below to ask questions, receive answers, and report concerns.

Throughout this process, individuals' identity will be kept confidential to the extent possible.

1. Employee speaks with his or her direct supervisor or manager.
2. If the employee is not comfortable speaking with his or her supervisor or manager, or if the employee feels he or she did not receive an adequate response, the employee should speak with another member of the management team, member of the legal department, senior management official or Compliance Officer.
3. If the employee still has questions, the Compliance Officer may be contacted at (469) 995-8416, ext. 1064 or via email at compliance@afcompanies.com.
4. If, for any reason, the employee feels he or she cannot follow the above steps or prefers to remain anonymous, the employee may call the Company's confidential Compliance Hotline at 855-252-7606 or via their website at www.hotline-services.com.

Compliance Hotline

The confidential *Compliance Hotline* is available 24/7, 365 days a year. Call 855-252-7606 or you may also go to the website at www.hotline-services.com.

The Company uses a third-party service provider to manage Hotline calls. Individuals who do not wish to give their name may remain anonymous unless they choose to identify themselves. Employees who do provide their name will have their identity protected to the extent allowed by law.

No disciplinary action or retaliation will be taken against a person for calling the *Compliance Hotline* in good faith.

All calls made to the *Compliance Hotline* will be reviewed by the Company's Compliance Officer and will be responded to fairly. All calls will be investigated before any action is taken. The rights of all individuals who are subject of a *Compliance Hotline* call, will be respected and protected as outlined in the *Compliance Hotline Policy and Procedures*.

Compliance with Laws and Regulations

The Company is committed to conducting business while following all applicable federal, state and local laws, as well as Company policies and procedures. Employees are expected to be familiar with and comply with the laws which apply to the organization.

Harassment and Discrimination

The Company is committed to a work environment that is free of inappropriate and/or unlawful harassment, including but not limited to include sexual and discrimination-based harassment. These rules apply to all employees and to all conduct related directly or indirectly to the Company (such as conduct with an outside vendor, consultant, third party supplier or patient) as outlined in the *Employee Handbook*.

Safety Compliance Program and Workplace Violence Prevention

The Company is committed to maintaining a safe and healthy work environment for our employees, patients and visitors and ensuring regulatory compliance for state and federal requirements.

The Company has a zero-tolerance policy for violence in the workplace as outlined in the *Workplace Violence Prevention Program Policy and Procedures*.

HIPAA Privacy and Security Compliance Program

The Company adheres to HIPAA Privacy and Security Rules and applicable state privacy laws. The organization has in place appropriate administrative, technical and physical safeguards to protect the privacy of all protected health information (PHI) to include electronic protected health information (EPHI). Oversight of the program is assigned to the Privacy and Security Officers who work collaboratively to ensure compliance.

Patient Rights and Confidentiality

The Company is committed to protecting the rights of all of its patients and to providing quality health care. The Company will not discriminate against patients based on age, race, gender, disability status, veteran status, marital status, religion, sexual orientation, national origin, or any other illegal basis. Patients will be involved in all aspects of the patient's care and informed consent will always be obtained before treatment. The Company strictly prohibits any conduct which may be construed as patient abuse or neglect.

The Company is committed to maintaining the confidentiality, integrity, and availability of patient information. All personnel are expected to follow the "minimum necessary" standard, meaning that personnel are only permitted to access and use the minimum PHI necessary to perform their specific job functions. Any violation of this standard, or any state or federal privacy law may result in immediate disciplinary action, including termination.

Conflict of Interest

The Company will not allow any conflict of interest or the appearance of a conflict for employees, consultants, contractors, members of the BOD or representatives of the Company.

Conflict of Interest and Disclosure Statements are required, upon hire, whenever there is a change, and annually to report any outside employment, business interests or activities as outlined in the *Conflict of Interest and Disclosure Policy and Procedures*.

The following items listed are also related to Conflict of Interest.

Gifts

Employees may not directly or indirectly solicit or accept personal fees, commissions, gifts or gratuities from any other healthcare provider, patient, visitor, vendor, supplier, contractor or other individual or entity that has a relationship with the Company as outlined in the *Gifts Policy and Procedures*.

Bribes, Kickbacks, Payments, Insider Information

The Company procures goods and services and provides services on an impartial and objective basis, free from outside influence.

Employees may not:

- Offer, give, solicit or receive any form of bribe or kickback
- Give financial or other support to any outside activity or organization without appropriate written authorization
- Use or disclose proprietary or confidential Company information for personal gain or to the Company's detriment
- Borrow money from entities doing or seeking to do business with the Company

Personal Relationships

An employee may not:

- Engage in a personal relationship with another employee, client or supplier that affects one's ability to do one's job or disrupts the workplace or violates the terms of the Employee Handbook
- Encourage entities dealing with the Company or our clients to buy supplies or services from one's relative or friends

Marketing and Advertising

The Company will present only truthful, informative and non-deceptive information in its marketing, advertising, and other promotional material. Employees will only use marketing, advertising, and other promotional materials which have been approved by the legal department. Employees will not modify or alter pre-approved materials, create their own materials, or use approved marketing or promotional materials in an unapproved manner. If an employee has questions or concerns about the appropriate use of marketing, advertising, or other promotional materials, they should talk to their supervisor or the legal department.

Third-Party Payors

The Company is committed to ensuring that all billing to government, private insurance payors, and patients is truthful and accurate and that it will conform with all necessary federal and state laws and regulations.

The Company will only bill for services which have actually been performed and will require substantiated medical documentation be provided for all services provided. All records used as the basis of a claim submission must be prepared in a timely, organized, and legible form.

If billing errors or violations of any third-party payor billing requirements are discovered, appropriate corrective action will be taken, including refunding any overpayments.

Any questions or concerns about billing or documentation, or suspected erroneous or otherwise improper billing activity should be reported to your supervisor and the Compliance Officer directly.

Federal and State False Claims Acts

The Company is committed to maintaining accurate billing processes and procedures in accordance with the Federal False Claims Act and State False Claims Act. The Company strictly prohibits any employee or other person from knowingly presenting, or causing to be presented, claims for payment or approval which are false, fictitious, or fraudulent.

We will implement policies for all employees and any contractor or agent of Company, pertaining to the Federal False Claims Act (FCA), including the administrative remedies for false claims and statements, any State laws pertaining to civil or criminal penalties for false claims and statements and whistleblower protections under such laws.

We understand that *Qui Tam* Provisions (whistleblower rights) of the FCA allow a person to bring an action under the FCA on behalf of the Federal Government.

We will train all employees on these false claims policies, as well as for preventing, detecting and reporting fraud, waste and abuse.

We will not retaliate against employees exercising their rights under the FCA.

We will not violate the Texas False Claims Act (Texas Medicaid Fraud Prevention Act) that also allows whistleblowers to bring suit in the name of the State of Texas and is substantially similar to the Federal FCA and imposes serious criminal and civil penalties for violations.

The Code is located on our website and is readily available for employees on Exponent HR along with related policies and procedures referenced.

The Company reserves the right to amend the Code of Conduct, Compliance Program, and all related policies and procedures at any time in its sole discretion.

The Company conducts training upon hire and annually. We provide the opportunity to ask questions and encourage employees to communicate opportunities for continuous improvement with their Supervisor, Manager, or Management.