

Acūtis

Code of Conduct

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This Compliance Code of Conduct sets forth the mission and standards of conduct that all Acutis Team members must adhere to and follow. If you have any questions or concerns about anything covered by the Code of Conduct or about any other matter relating to the Compliance Program, or if you wish to report a concern or problem, please contact the Compliance Manager.

I. Code of conduct: values

At Acutis, we believe that rigorous technological processes and best practices are only fully realized when their benefits are accessible to every member of the team. Toward that end, we will work together each day to build a company with no gaps, no bureaucracy, and no insurmountable hierarchy. Every employee is fully accountable and fully accessible and should be completely willing to assume responsibility.

The Laboratory strives to provide high quality laboratory services for our patients without regard to age, race, color, sexual orientation, marital status, religion, sex, or national origin.

We at Acutis have a commitment to conduct our business in compliance with all applicable laws, rules, and regulations and in accordance with the highest ethical principles. The Laboratory expects the same from its Workforce. We do not and will not tolerate any form of unlawful or unethical behavior by anyone associated with the Laboratory. We will follow the letter and spirit of all applicable laws, rules, and regulations, conduct our business ethically and honestly, and act in a manner that enhances our standing in the community.

II. Code of conduct: scope of application to workforce

The Compliance Code of Conduct applies to all Acutis Team members.

All Acutis Team members shall adhere to high standards of ethical conduct and have a responsibility to help create and support a work environment in which compliance concerns may be openly raised, reviewed, discussed, and addressed.

III. Code of conduct: policies and standards

Acutis Team members shall comply with the following policies and standards:

Ethical and professional standards.

Acutis Team members shall comply with and perform their services consistent with high ethical and professional standards. They shall treat patients, co-workers, and others in a professional manner with honesty, fairness, dignity and respect.

Acutis policies and procedures

Acutis Team members shall comply with all applicable Acutis policies and procedures, including but not limited to those policies and procedures relevant to the Acutis Compliance Program.

Laws, regulations, and program requirements.

Acutis Team members shall comply with all applicable federal and state laws, regulations, and third-party payor program requirements.

Ineligible Entities and Individuals.

Acutis screens all Team members, vendors, contractors, and clients to ensure that they are not included on: a) the United States Department of Health and Human Services' Office of Inspector General's List of Excluded Individuals/Entities; (b) the General Services Administration's System for Award Management ("SAM"); (c) applicable state Medicaid excluded provider or other debarment listings; or (d) any other similar or successor list(s) of excluded or debarred individuals or entities.



HIPAA Privacy and Security.

Acutis believes in strict confidentiality policies and requires all employees to sign a confidentiality agreement at time of hire and annually thereafter. Confidentiality means that communications with or about patients involving patient health information will be private and limited to those who need the information to provide treatment, payment, and health care operations.

Quality of Care.

All professional staff employed or engaged by Acutis shall be properly licensed (and/or certified) and registered per applicable law.

Non-discrimination.

Acutis Team members shall not discriminate against other Acutis Team members, patients, or others based on race, color, sex, religion, age, national origin, ancestry, disability, or sexual orientation.

Offering or receiving items of value to induce referrals.

Federal and state laws prohibit paying, offering, or receiving anything of value to induce referrals for healthcare business unless certain conditions are met. Acutis Team members shall not offer, ask for, pay or accept anything of value in exchange for healthcare referrals. This applies to offering or receiving any money, gifts, free or discounted items or services, professional courtesies, or other arrangements with the intent to induce referrals. This applies to any such transactions involving potential referral sources, including transactions with other health care providers, vendors, or patients. Violations may subject the Acutis and its workforce to criminal and administrative penalties.

Financial relationships with physicians and other referral sources.

Federal and state laws affect contracts, agreements, and other financial relationships with physicians, practitioners, vendors, and other referral sources.

- a. Acutis Team members shall not enter any contract or other financial arrangement with or give or receive anything of value to or from, an outside physician, a physician's family member, or other referral source without the prior approval of the Compliance Officer.
- b. If Acutis has a contract or other financial relationship with an outside physician or a member of the physician's family, Acutis Team members shall not bill Medicare for any items or services referred by that physician without the prior approval of the Compliance Officer.
- c. Acutis Team members must strictly comply with the terms of any approved contract or other financial arrangement with outside physicians, their family members, or referral sources. Failure to perform or improper modifications of such contracts or arrangements may violate applicable laws.

Conflicts of Interests.

It is Acutis Team members responsibility to always act in the best interest of Acutis. When performing job duties on behalf of Acutis, Team members shall avoid any relationship, influence or activity that might impair, or even appear to impair the ability to make objective and fair decisions.

Acutis Team members must disclose any potential conflict of interests at time of hire, and annually there-after, or if the situation changes causing a conflict.

Improper inducements to Medicare or Medicaid beneficiaries.

Inducements to Medicare, Medicaid, or other government beneficiaries may violate applicable law. Acutis Team members shall not waive or discount government beneficiary co-pays unless such discount complies with Acutis' policy.

Acutis Team members shall not offer any other discount, gift, free items or service, or other inducements to clients (government beneficiaries) without first obtaining approval from the Compliance Officer.

All contracts, leases, and other financial relationships with clients will be based on the fair market value of the services or items being supplied or exchanged, and not based on the volume or value of referrals or other business between the parties.

Professional courtesies.

Acutis Team members shall not offer or receive any free or discounted items or services to or from other health care providers, their family members, or their office staff unless such offer is consistent with Acutis' Policy, or the offer has been approved by the Compliance Officer.

Improper billing activities.

Acutis Team members shall not engage in false, fraudulent, improper, or questionable billing. Such improper activities include, but are not limited to:

- a. Billing for items or services that were not actually given.
- b. Billing for or giving items or services that were not medically necessary.
- c. Submitting a claim for physician services when the services were rendered by a non-physician, or where a physician failed to provide the level of supervision required by applicable laws or regulations.
- d. Submitting a claim for payment without adequate documentation to support the claim.
- e. Signing a form for a physician.
- f. Improperly altering medical records.
- g. Using a billing code that supplies a higher payment rate than the correct billing code (i.e., "upcoding").
- h. Submitting bills in fragmented fashion to maximize reimbursement even though third-party payors require the procedures to be billed together (i.e., "unbundling").
- i. Submitting more than one claim for the same service (i.e., "duplicate billing").

If an Acutis Team members member has a question about the proper standard or procedure for documenting or submitting a claim, they should contact the Compliance Manager as described below.

Documentation and Record Retention.

Acutis shall maintain accurate records and accounts to ensure legal and ethical business practices and to prevent fraudulent activities.

Patient care must be necessary, appropriate, and well documented.

Records and accounts must be complete and not misleading. Accounting records and the reports produced from those records must be retained per applicable laws and relevant accounting standards.

Unfair competition and deceptive trade.

Federal and state antitrust laws prevent certain anti-competitive conduct, including collusive agreements among competitors to set prices; divide patient care or services; boycott other entities; etc. Acutis Team members should not engage in collusive discussions with competitors over such things as prices, employee wages, services to be given or eliminated, or division of patients or patient services without the Compliance Departments prior approval. Similarly, Acutis Team members should not discuss exclusive arrangements with third-party payors, vendors, and providers without first

discussing the matter with the Compliance Department. Finally, Acutis Team members should not engage in any deceptive acts or practices relating to Acutis.

Marketing Activities.

All marketing activities and advertising by Acutis Team members must be truthful and not misleading, must be supported by evidence to substantiate any claims made and must otherwise be per applicable law. In this regard, our best “advertisement” is the quality of our services.

All marketing activities and advertising by Acutis Team members must be based on the merits of the services provided by Acutis and not on any promise, express or implied, of payment for any referrals.

Report suspected violations.

Acutis has an obligation to promptly repay money identified as overpayments that is received from third party payers within 60 days. Acutis has a duty to ensure such overpayments are promptly reported, explained, and returned in accordance with applicable law and contractual requirements. It is essential that Acutis Team members:

- a. Comply with applicable laws, regulations, and policies; and
- b. Immediately report suspected violations or compliance concerns to their supervisor, department leader, or the Compliance Department, Anonymous reports may be made by calling the compliance hotline (631-606-4192). You may also contact the compliance department through email at complianceinquiries@acutis.com, as well as contacting the Compliance Department team members directly:

Chief Compliance Officer, David Goldberg
Compliance Manager, Sara Anderson

dgoldberg@acutis.com
sanderson@acutis.com

- c. Failure to report a suspected violation may subject Acutis Team members to appropriate discipline.

Non-retaliation.

No adverse action will be taken against an Acutis Team members member who in good faith and without reckless intent has come forth with information or evidence of a suspected violation of any law, regulation, program requirement or Acutis policy relevant to the Acutis Compliance Program.

Acknowledgment

I acknowledge that I have received, reviewed, and understand the Acutis Compliance Code of Conduct. I affirm the following:

- (1) I will follow the standards and requirements outlined in the Compliance Code of Conduct, and will ask questions if I do not understand my responsibilities under the Compliance Program
- (2) If I become aware of any possible violations of the Compliance Program, or if I have concerns or questions about the appropriateness of any practices at Acutis, I will report such issues to the Compliance department or via the Compliance Hotline
- (3) I understand that I may be subject to discipline (or other corrective action) if I violate the standards and requirements outlined in the Compliance Code of Conduct

Name

Signature

Date