



STANDARDS OF CONDUCT

Our success and reputation are not only dependent on the quality of services provided to our clients, but also on the way in which we conduct business. Becoming a leader means not only providing professional and individualized care for those seeking improvement as well as setting the standard through exemplary business practices and ethical behavior. The standards listed below are an overview and the complete Compliance Program Guide can be found on the Kinex website.

Our mission is to exceed customer expectations and improve orthopedic surgical outcomes by providing continuous passive motion and other high-quality durable medical equipment items with the highest standards of service.

EMPLOYER STANDARDS

- R&M complies with all local, state and federal regulations including to but not limited to; DME Supplier Code of Conduct, False Claims Act, State Acts, Stark Regulations, Anti-Kickback Statute, and Patient Protection and Affordable Care Act (PPACA)
- R&M will not offer, pay, solicit or accept any compensation including any kickback, bribe or rebate, directly or indirectly, overtly or covertly, in cash or in kind in exchange for a referral for products or services; or to induce purchasing, leasing, ordering, arranging for, or recommending the purchase, lease, or order of any good, facility, service or item covered under a federal health care program
- R&M will not engage in transactions that violate relevant and applicable federal or state Anti-Kickback Statutes. R&M's privacy practices have been developed using model HIPAA policies and procedures made available by the Office of Civil Rights. Privacy practices are reviewed on an annual basis and may be updated due to company changes or regulatory changes. All employees are expected to have a working knowledge of privacy practices specifically as it relates to the performance of their job duties and responsibilities
- R&M will bill only for services and products actually provided and documented in the patient's medical records and will charge for all health care services provided. This includes exact billing codes that match the Certificate/Letter of Medical Necessity's diagnosis
- A licensed physician must approve and complete a Letter or Certificate of Medical Necessity for all equipment being dispensed
- All marketing materials and advertisements are honest, informative and non-deceptive.
- R&M will conduct a background check, driver's license record check and SSN verification for all potential employees

EMPLOYEE STANDARDS

- All Employees will be provided either a hardcopy of the Employee Handbook or an electronic version. Of which an acknowledgement page must be signed and returned to the HR manager
- All R&M employees undergo annual training that contains, as necessary and appropriate to their job title and function, any new, updated or revised information, policies or procedures regarding billing, documentation, confidentiality, privacy, security and other pertinent company policies and procedures. In addition annual compliance training will be completed as well as any updated information regarding Medicare billing. Annual HIPAA refresher courses will be required as well

- Every employee has the right to work in an environment free of unlawful harassment, abusive, threatening or intimidating behavior and discriminatory retaliation. Unlawful employment discrimination and harassment based on race, color, religion, national origin, age, gender, disability, marital status and sexual orientation is unacceptable, and therefore, prohibited
- Confidentiality of all records pertaining to patient care or billing will be maintained in accordance with applicable federal and state laws and regulations. In addition patient information will not be released without patient's knowledge and written permission
- The Federal Medicare and Medicaid Anti-Kickback Statute prohibit certain conduct involving improper payments in connection with the delivery of items or services covered by federal health care programs. These prohibitions apply to anyone who knowingly and willfully solicits or receives any payment in return for referring an individual to another person for the furnishing, or arranging for the furnishing, of any item or service that may be paid in whole or in part by the Medicare or Medicaid programs, or other federally-funded health care programs. This includes knowingly engaging in deceptive, misleading or fraudulent acts
- Our privacy practices have been developed using model HIPAA policies and procedures made available by the Office of Civil Rights. All employees are expected to have a working knowledge of privacy practices specifically as it relates to the performance of their job duties and responsibilities. All information given to potential clients will be truthful, factual and informative

RESPONSIBILITIES OF MANAGERS AND/OR OTHER SUPERVISORS:

- Build and maintain a culture of compliance
- Detect and prevent compliance problems. Consult with the Compliance Committee so that compliance issues are promptly and effectively addressed
- Ensure that you and all subordinates complete all required compliance training
- Apply appropriate disciplinary action when necessary

RESPONSIBILITIES OF EACH EMPLOYEE UNDER THE CODE OF CONDUCT:

- Understand how the Compliance Program applies to your job and seek assistance and clarification from your supervisor, the Compliance Officer, or other R&M resources when you have questions about the application of the standards to your job responsibilities
- Report any conduct that you think may be in violation of the Code
- Listen and respond to questions, complaints or concerns expressed by patients, family members, visitors, or co-workers
- Complete all required compliance training

ACKNOWLEDGEMENT OF RECEIPT OF COMPLIANCE CODE OF CONDUCT

This serves as proof that the below named employee has received and read the R&M Compliance Code of Conduct and understands the Compliance Code of Conduct and their responsibilities under the Code

Employee Name (printed)

Signature

Date