



CHINESE COMMUNITY HEALTH PLAN STANDARDS OF CONDUCT

The Standards of Conduct are not, and shall not be construed as, a contract of employment or any other type of contract. Employment with Chinese Community Health Plan (“CCHP”) at all times is “at will,” and either the employee or CCHP has the right to terminate the employment relationship at any time.

INTRODUCTION

Chinese Community Health Plan (“CCHP”) is committed to provide quality and medically necessary care to its members. As part of this objective, CCHP strives to ensure a compassionate and ethical approach to healthcare delivery and management.

CCHP has developed and adopted its Standards of Conduct in recognition of CCHP’s responsibility to its enrollees, contractors, providers and the community we serve. It is the responsibility of every trustee, director, officer, employee, contractor, physician, and provider at CCHP to conduct him or herself in a manner that is consistent with the Standards of Conduct and CCHP’s policies and practices.

The Standards of Conduct provide an affirmative statement for employees of their ethical responsibilities within CCHP and place employees on notice that they are held responsible for abiding by the articulated standards, including applicable laws, which are the foundation of the Compliance Program.

The Standards of Conduct shall be distributed to all trustees, directors, officers, employees, contractors, physicians, and providers. The Standards of Conduct is available to all enrollees, and shall be redistributed annually or sooner if revised by CCHP. The Standards of Conduct shall apply to all areas of CCHP including but not limited to: health plan operations, marketing, and resolution of conflicts associated with patient billing and claims processing. It shall also apply to CCHP’s first-tier, downstream, and/or their respective related (“FDR”) parties. All employees are responsible to uphold the mission and values of the CCHP Standards of Conduct and to ensure that their behavior and activities is consistent with these Standards of Conduct.

MISSION AND VALUES STATEMENT

Chinese Community Health Plan (“CCHP”) is committed to serve its community. In recognition of this commitment, we will strive to deliver the highest quality health plan services to the communities we serve. The Compliance Program and related Standards of Conduct are integral to the achievement of its mission.

In pursuit of its mission, CCHP believes the following value statements:

- CCHP recognizes the unique and intrinsic value of each individual and will conduct business with persons, regardless of race, creed, color, sexual orientation or economic status;
- CCHP treats all enrollees, customers, providers and anyone else we serve with compassion, kindness and honesty;
- CCHP acts with honesty, integrity and fairness in the way it conduct business and works with the community; and
- CCHP’s colleagues are valuable individuals of its health plan team and pledge to treat one another with loyalty, respect, and dignity.

STANDARD OF CONDUCT NO. 1

LEGAL COMPLIANCE

CCHP's employees and agents will strive to ensure that all activity by or on behalf of CCHP is in compliance with all applicable laws.

The following Standards of Legal Compliance are intended to provide guidance to all CCHP employees and agents and assist them in meeting their obligations to comply with applicable laws and regulations. These Standards are neither exclusive nor complete. CCHP employees are required to comply with all applicable laws whether or not they are specifically addressed in these Standards:

- CCHP, by and through its employees and agents shall comply with all applicable laws, regulations, standards and other requirements imposed by any level of government. Without limiting the generality of that statement, CCHP's employees and agents shall comply with all requirements of the Medicare Advantage programs;
- CCHP will not pursue any business opportunity that requires engaging in unethical or illegal activity;
- Neither CCHP employees or agents shall compensate employees, physicians, or other health care professionals, directly or indirectly, in cash or by any other means, for referrals of patients. Every payment to a referral source must also be supported by proper documentation that the services contracted for were in fact provided;
- No employee or agent is authorized to enter into any joint venture, partnership or other risk sharing arrangement with any entity that is a potential or actual referral source unless the arrangement has been reviewed and approved by the Chief Executive Officer of CCHP ("CEO"), who may consult the CCHP In-House Counsel and/or outside counsel as appropriate;
- Employees or agents who perform billing and/or coding of claims must take every reasonable precaution to ensure that their work is accurate, timely, and in compliance with federal and state laws and regulations, including but not limited to those promulgated by Centers for Medicare and Medicaid Services ("CMS") and the California Department of Managed Healthcare ("DMHC"), as well as CCHP's internal policies, procedures and codes of conduct;
- No claims for payment or reimbursement of any kind, or data reporting that are false, fraudulent, inaccurate, incomplete, or fictitious may be submitted. No falsification of medical, time or other records that are used for the basis of submitting claims will be tolerated;
- CCHP will pay fee-for-service claims only for services actually rendered and which are fully documented in patients' medical records. All services for which payment is made on a capitated, per diem, case rate or other basis that are not fee-for-service also shall be fully documented in patients' medical records, and compensation must be designed and carried out in a manner which will not deter, prevent, delay, or ration access to covered and medically necessary healthcare services in violation of CMS, DMHC regulations or guidelines, or CCHP applicable Evidence of Benefits policy benefits. If the services must be coded, then only billing codes that accurately describe the services provided will be used;
- CCHP shall act promptly to investigate and correct the problem if errors in claims or data

reporting or validation that have been submitted are discovered;

- CCHP shall maintain complete and thorough claims and billing records;
- CCHP's employees and agents shall respect and protect the confidentiality of patient records and other personal information; and
- Employees and agents shall promptly report all suspected violations of the Standards of Conduct, Compliance Policies, contract violations, laws or regulations.

STANDARD OF CONDUCT NO. 2
BUSINESS ETHICS

In pursuit of CCHP's commitment to the highest standards of business ethics and integrity, employees will accurately and honestly represent Chinese Community Health Plan and will not engage in any activity or scheme intended to defraud the government, any agency or organization or anyone of money, property, or honest services.

The Standards stated below are designed to provide guidance to ensure that Chinese Community Health Plan's business activities reflect the high standards of business ethics and integrity.

- CCHP seeks positive relationships with government programs, third party payers and providers. Positive relationships require ongoing communication;
- Employees or agents shall not use or reveal any confidential information concerning CCHP or use, for personal gain, confidential information obtained as an employee or agent of CCHP;
- No employee or agent should subordinate his or her professional standards, judgment or objectivity to any individual. If significant differences of opinion in professional judgment occur, then they should be referred to management for resolution;
- Employees and agents should be honest and forthright in any representations made to enrollees, FDR, other employees or agents, and the community;
- All reports or other information required to be provided to any federal, state or local government agency shall be accurate, complete, and filed on time;
- Employees and agents must perform their duties in a way that promotes the public's trust in CCHP;
- Employees and agents shall be honest in doing their jobs;
- If an employee or agent knows of or suspects a practice or incident that violate may this Standard of Conduct, Compliance Policies, or law or regulation, then he or she must report it to appropriate levels of management;
- CCHP employees are prohibited from soliciting tips, personal gratuities, or gifts from enrollees and FDR's, and from accepting monetary tips or gratuities;
- The offer or giving of money, services, or other things of value with the expectation of influencing the judgment or decision-making process of any purchaser, provider, supplier, customer, government official or other person by CCHP is absolutely prohibited.

STANDARD OF CONDUCT NO. 3
CONFIDENTIALITY AND PROTECTION OF ASSETS

CCHP employees shall strive to maintain the confidentiality of enrollee and other confidential information in accordance with applicable legal and ethical standards and will preserve and protect the company's assets by making prudent and effective use of its resources and properly and accurately reporting their financial condition.

CCHP and its employees are in possession of and have access to a broad variety of confidential, sensitive, and proprietary information, of which the inappropriate release could be injurious to individuals, CCHP's business partners, providers and CCHP itself. Every CCHP employee has an obligation to protect and safeguard confidential, sensitive and proprietary information in a manner designed to prevent the unauthorized disclosure of information.

- All employees have an obligation to maintain the confidentiality of enrollee information in accordance with the principle of maintaining the confidentiality of enrollee/patient information in accordance with applicable laws and regulations;
- All employees and agents are personally responsible and accountable for the proper expenditure of CCHP funds and for the proper use of company property;
- All employees and agents must obtain authorization prior to committing or spending CCHP's funds;
- Employees and agents may not use CCHP's or a patient's resources for personal or improper purposes, or permit others to do so;
- Surplus, obsolete or junked property shall be disposed of in accordance with CCHP's procedures. Unauthorized disposal of property is a misuse of assets;
- Employees and agents have a duty to be productive during the time that is paid for by CCHP;
- Employees and agents may only use computer systems, networks, and software consistent with CCHP's license(s) and/or rights. They shall take all reasonable steps to protect computer systems and software from unauthorized access or intrusion;
- Any improper financial gain to the employee through misconduct involving misuse of CCHP's or an enrollee's property is prohibited, including the outright theft of property or embezzlement of money;
- CCHP's confidential and proprietary information is valuable, and should be protected from unauthorized use or exploitation. Employees and agents are expected to respect the intellectual property rights of others with whom we do business; and
- Employees and agents are expected to report any observed misuse of CCHP's property to management.

STANDARD OF CONDUCT NO. 4
CONFLICTS OF INTEREST

Trustees, officers, committee members and CCHP employees owe a duty of undivided and unqualified loyalty to the organization. Persons holding such positions may not use their positions to profit either personally or to assist others in profiting in any way at the expense of CCHP.

All trustees, officers, committee members and CCHP employees are expected to regulate their actions so as to avoid actual impropriety or the appearance of impropriety that might arise from the influence of those activities or business decisions of Chinese Community Health Plan, or from disclosure or private use of business affairs or plans of Chinese Community Health Plan (“CCHP”). A conflict of interest may be a matter of degree but exists when a person (or friend, relative or associate) acts to benefit directly or indirectly by using authority or inside information to either benefit or intentionally affect CCHP in an adverse manner.

- Trustees, officers, committee members, employees and agents should not have other jobs that interfere with their ability to perform their duties at CCHP;
- Trustees, officers, committee members, employees and agents should not have positions of trust (such as directorships, offices, memberships or other relationships) with other organizations that interfere with their ability to perform their duties to CCHP;
- Trustees, officers, committee members, employees and agents should avoid any activity that conflicts with the interests of CCHP or its patients. They should try to avoid even the appearance of an impropriety. If a person suspects that he or she might have or be about to create a conflict of interest, then he or she should consult with management;
- Placing business with any firms or individuals in which, there is a family relationship may constitute a conflict of interest. Advance disclosure and approval are required in such a situation;
- Trustees, officers, committee members, employees and agents should not become involved, directly or indirectly, in outside commercial activities that could improperly influence their actions. For example, one should not be an officer, director, manager or consultant of a potential competitor, customer, or supplier of CCHP without first disclosing that relationship to management;
- Trustees, officers, committee members, employees and agents should not accept or provide benefits that could be seen as creating conflict between their personal interests and CCHP's legitimate business interests. This includes accepting expensive meals, gifts, refreshments, transportation, or entertainment provided or received in connection with the job;
- Gifts and benefits to clinicians or referral sources are not appropriate. Occasional non-cash gifts that are limited to reasonable meal expenditures or entertainment or that are of nominal value, although not expressly prohibited, are discouraged;
- Trustees, officers, committee members, employees and agents should report any potential direct or indirect conflicts of interest concerning themselves or their family members to management or the CCHP Corporate Compliance Officer; and
- Training on conflicts of interest will be conducted at new employee orientation and annually to maintain professional competency. The Human Resources Department will be responsible for retaining copies of the training agenda, along with signed attendance sheets.

STANDARD OF CONDUCT NO. 5
RESPECT FOR OTHERS

CCHP's employees and agents respect each other as human beings and health care professionals.

All employees and agents shall show proper respect and consideration for each other, regardless of position or station. Discriminatory treatment, harassment, abuse, or intimidation will not be tolerated;

- Quality service to enrollees can only be delivered through the use of qualified, competent staff. CCHP will contribute to an employee's or agent's competence by making available continuing job-related education and training (within the limits of its resources);
- Applicants and employees shall be afforded equal employment and advancement opportunities, pursuant to CCHP's policies; and federal, state, and local law;
- Employees and agents are expected to conform to the standards of their respective professions and exercise sound judgment in the performance of their duties. Any differences of opinion in professional judgment should be referred to appropriate management levels for resolution in accordance with standard grievance procedures;
- Work and safety rules were created to protect us all. Employees and agents are expected to comply with those rules;
- As defined further in its policies, CCHP strives to maintain a working environment free from all forms of sexual harassment, retaliation, or intimidation. By way of example, unwelcome sexual advances, requests for sexual favors and other verbal or physical conduct of a sexual nature are serious violations of the standards of conduct and will not be condoned or permitted;
- CCHP promotes a drug and alcohol free workplace in accordance with its policies; and
- CCHP shall not permit any action of retaliation or reprisal to be taken against an employee who reports a violation of law, regulation, standard, procedure, or policy.



STANDARDS OF CONDUCT COMPLIANCE CERTIFICATION

I have been provided with and read Chinese Community Health Plan's "Standards of Conduct" and understand the contents as they apply to my job.

If I have any question or concern about the meaning of these documents as they apply to my job responsibilities, I understand I should consult one or more of the following: my supervisor, the Corporate Compliance Officer, or the Compliance Hotline. I have retained a copy of these documents for my guidance.

I agree to comply with the Standards of Conduct as it applies to my job responsibilities.

I represent I am in complete compliance with the requirements of the Standards of Conduct as it applies to my job responsibilities.

I also represent and warrant that I have not been excluded from, or sanctioned by, or restricted by any Federal, State, or local governmental program whether relating to health care benefits, contracting programs, including to Medicare, Medi-Cal, CHAMPUS or the federal retired railway workers benefit program.

Signature: _____ Date: _____

Please print or type the information requested below:

Department: _____

Position: _____