



Department: COMPLIANCE	Version #: 5
Title: ATRIO Corporate Code of Conduct	
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Compliance: MMCM (all), ORS, OAR, URAC and Compliance	Date Approved: 08/10/2018

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Policy/Code of Conduct: ATRIO Health Plans will conduct its business in compliance with all federal, state, and local laws, rules and regulations in a manner consistent with the highest standards of business and professional ethics.

Scope: This policy applies to all ATRIO staff at all levels regardless of the hours or location of work.

Definitions:

Plan – ATRIO Health Plans

Outside entities – Any person or company with whom you may encounter outside of the Plan. e.g. Vendors, Service Area Contractor (SAC).

Purpose: To ensure ATRIO employees are aware and have read the Corporate Code and Standards of Conduct.

Process/Standards of Conduct:

In order to ensure company compliance with this code, ATRIO Health Plans provides this guidance to all employees. ATRIO Health Plans recognizes that the successful plan administration relies upon the continued competence and integrity of its employees, and that all policies and processes are committed to full compliance with all federal and state rules and regulations. The Code and Standards of Conduct are the products of this commitment and will provide guidelines that encourage and promote a working environment of legal, ethical and professional standards.

These guidelines are for all ATRIO employees to follow while acting and representing ATRIO Health Plans in any capacity. These standards do not outline individual job responsibilities but provide a framework in which an employee must operate. No one standard can be written to cover every possible business situation which may arise in the complex regulatory environment in which we operate. However, the use of available resources, including all state and federal

regulations and guidance, honest behavior, personal integrity, common sense and good judgment will help to identify appropriate action. If you have any doubts or concerns please contact any member of management or ATRIO's Compliance Officer.

ATRIO employees are asked to review this information carefully. If an employee is directed to do something that is, or believed to be, contrary to the ethical and legal representations of this code, they are required to report the incident to the Compliance Officer, any member of management, directly to the Audit & Compliance Committee of the ATRIO Board of Directors or directly to the Board of Directors. Failure to adhere to these standards can result in criminal and civil penalties and those actions found to defraud local and/or state health care programs may exclude individuals from participation in these programs.

ATRIO Health Plans operates in a heavily regulated environment with a variety of areas that may be considered at risk. An effective compliance program seeks to mitigate these risks while providing a high standard of quality care and service to the members that we serve. The various policies and procedures that describe ATRIO operations represent our response to ensure day to day operational activities fully comply with our legal, regulatory, ethical and professional responsibilities.

Conflict of Interest: ATRIO employees should not have any personal interests or outside activities that are incompatible or appear to compromise the integrity of the Plan. All employees are expected to maintain impartial relationships with all **outside entities** and to treat each interaction with the foremost interest of ATRIO in mind. Employees should avoid any outside financial interest that may influence a decision or action in the performance of their job requirements for the Plan. These interests may include:

- A personal or family interest in another entity that has business relationships with the Plan. This does not apply to minimal holdings of stock or security in another corporation whose shares are publicly traded and may do business with the Plan; or
- An investment in another business that competes with the Plan

Conflict of Interest may also occur if you use your position with ATRIO Health Plans for personal gain, for the benefit of relatives or friends, or if you are involved in outside activities that interfere with your job responsibilities.

All employees and the Board of Director members are required to disclose any potential conflicts of interest and will be asked to confirm, on an annual basis, whether they are aware of any conflicts that they may be engaged in. If such a relationship exists which may pose a conflict, the activity will be reviewed by the Audit & Compliance Committee and the Board of Directors for possible further action.

ATRIO Health Plans has a Conflict of Interests Policy that shall be given to each Employee and member of ATRIO's Board of Directors. This policy outlines the expectations and requirements regarding Conflicts of Interest in more detail.

Confidentiality/Privacy: When a member is enrolled into ATRIO Health Plans, a substantial amount of medical, personal and insurance information is collected and retained for purposes of enrollment, treatment and payment and other health care operations. This information is also known as Protected Health Information (PHI) and the usage or disclosure of this information is governed by state and federal law including the Health Insurance Portability and Accountability Act of 1996 (HIPAA). We are required by law to make sure that this information is kept private and it is our legal responsibility to ensure full compliance with these laws. Employees must never disclose, release or access any PHI in a manner that violates the privacy rights of the member. Member information will only be discussed in a manner that relates to the business at hand and no employee will have access to any information unless it is necessary to perform his/her job. Violation of this is subject to disciplinary action up to and including dismissal.

In addition, confidential information that is acquired during the course of your employment while at ATRIO is not to be discussed except as needed to perform your job. Upon termination for any reason(s), an employee is prohibited from taking, retaining or copying any information that is related to ATRIO Health Plans without express permission from the Chief Executive Officer or the Executive Vice President.

Every employee will be required to sign a confidentiality pledge on an annual basis and any violation of the company policy must be immediately reported to the Compliance Officer, CEO and/or the Audit & Compliance Committee for further action.

Employee Relations: Equal Opportunity Employer/Harassment: ATRIO Health Plans values the skills, assets and talent each employee brings to the organization. We are determined to provide an equal opportunity environment and will comply with all laws, regulations and policies regarding personnel actions. It is our policy to provide equal opportunity without regard to race, religion, color, national origin, age, gender, disability, marital status, veteran status or any other characteristics protected by federal, state or local laws. ATRIO Health Plans does not discriminate against anyone with a disability regarding terms of employment and will make reasonable accommodations for the disability or special needs of an employee when the condition allows us to do so.

ATRIO employees have the right to work in an environment which is safe and free of harassment or discrimination. All employees will treat one another with respect, courtesy and fairness and any behavior contrary to this expectation is subject to disciplinary action. ATRIO will not tolerate any sexual, racial, ethnic, religious or other forms of

harassment and will address any complaints in the most expedient manner possible. Workplace violence such as robbery, assault (physical or verbal) and other crimes committed by a current, future or former employees, will not be tolerated. Employees will not bring firearms, explosive devices or other weapons or dangerous material to the office or workplace.

Every employee is responsible to ensure that the work environment is safe and any one that is a witness to any form of violence, harassment or discrimination is required to report the incident to the Compliance Officer.

Fraud, Waste and Abuse: ATRIO Health Plans is committed to the detection and prevention of potential fraud, waste and abuse activities.

- Fraud is defined as an intentional deception or misrepresentation made by an individual who knows that the information is false and could result in an unauthorized benefit to him/herself, another person or the Plan;
- Waste is defined as the overutilization of services, or other practices that, directly or indirectly, result in unnecessary costs to the Medicare program; and
- Abuse is an incident or practice that is not consistent with sound medical business or fiscal practices which may result in unnecessary program costs, improper payment for services and directly or indirectly results in unnecessary costs to the programs that we administer.

As an ATRIO employee, if you are asked to do something you believe is contrary to this Code of Conduct, state or federal law, or the regulatory requirements in which we operate, you are required to report the incident/occurrence to a member of management, the Compliance Officer or the CEO. All reports will be handled confidentially and as expeditiously as possible. Further action based on the investigation will be taken by the Audit & Compliance Committee in accordance with state and federal requirements.

III. Reporting/Investigation and Response:

ATRIO Health Plans has a confidential disclosure program for all employees to report known or suspected conduct or activities by any person engaged in the performance of duties for ATRIO that violates the Code/Standards of conduct or any state or federal law. This program may also be used for individuals who are uncertain whether an action violates the Code and would like to communicate with the Plan on a confidential basis.

All reports will be treated with respect and held in the strictest of confidence. ATRIO will not tolerate any retribution or retaliation against any person for reporting good faith suspected violations of the code or of state or federal law. Any member of management who takes retaliatory action against an employee for reporting a compliance issue will be subject to severe disciplinary action up to and including termination of employment.

Questions or concerns about potential compliance issues or violations may be addressed to any of the following:

- Your supervisor or manager
- The Compliance Officer
- Compliance Program Manager
- The Chief Executive Officer
- Chairman of the Audit Committee
- Any Board of Director member
- Website reporting at <http://www.atriohp.com>
- Anonymously – PO Box 12645, Salem, OR 97301
- Anonymously - <https://www.atriohp.com/Compliance-Program/Submit-Incident-Report-Online.aspx>

These reports may be made anonymously and will be investigated and acted upon in the same manner as reports made by employees who choose to identify themselves.

Prompt, appropriate and confidential investigation will be conducted for any good faith report. The Compliance Officer will coordinate any findings from the investigations and will share the complaint and investigation with the Audit & Compliance Committee to ensure a complete review. Once a reported violation is researched through the investigation process the Compliance Officer, in coordination with the Compliance Program Manager or the Audit & Compliance Committee, will recommend any corrective action.

IV. Employee Responsibilities:

- To act with honesty and integrity and in full compliance with the Code/Standards of Conduct;
- Promote honest and ethical behavior within the Company;
- Avoid conflicts of interest or if one is possible to disclose the potential conflict for further evaluation (See ATRIO Conflicts of Interest policy);
- To comply with all state and federal rules and regulations;
- Respect the confidentiality of all information acquired in the course of their work and to not to access or disclose information that violates the Confidentiality/Privacy policy of the company;
- To report any violations of this Code/Standards of Conduct or any violations of local, state or federal law;
- To disclose any indictment or potential indictment with regard to a felony, a misdemeanor involving fraud or dishonesty; or any crime punishable by imprisonment for more than one year; and
- To disclose any exclusions by the Department of Health and Human Services (DHHS) Officer of the Inspector General (OIG) or General Services Administration (GSA), or other entity as required.

This Compliance Program is a mandatory policy of ATRIO Health Plans. All employees will sign a form which indicates that they have received this policy, have read and understand it. This will be affirmed on an annual basis. Compliance with this program will be considered in any employee evaluation and in decisions regarding promotion or compensation.

ATRIO Health Plans values the relationship with all employees and endeavors to ensure that all business activity is conducted in full compliance with all contracts, state and federal laws that govern the business activities of ATRIO. No policy will be created that undermines this intent and no activity by an employee will be tolerated that violates these provisions.

Related Documents:

N/A