



CORPORATE CODE OF CONDUCT

Southeastern Pathology Associates

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Code of Conduct for SEPA

To fulfill its health care mission of providing quality laboratory services to patients, SEPA adopts the following standards of ethics and conduct, which shall be followed by each member of the SEPA community. In this Code of Conduct, the term “employees” includes all SEPA employees, agents, and independent contractors that are involved in the delivery of professional laboratory services to patients, or those who are involved in the preparation or submission of claims to third party payers.

Quality of Care

SEPA health care professionals will provide quality health care in a manner that is appropriate, medically necessary, and efficient. Further, all patients of SEPA will be afforded quality clinical services.

Fair Treatment of Personnel

SEPA is committed to providing equal employment opportunity and a work environment where each employee is treated with dignity and respect.

Compliance and the Law

It is the responsibility of SEPA and each member of the SEPA community, including the pathologists, employees and relevant agents, representatives, contractors and vendors, to follow all applicable laws and regulations, and to maintain a health care and business environment that is committed to integrity and ethical conduct. Any one who becomes aware of a violation of the law or the compliance policies set forth in the Code of Conduct is responsible to report it to his/her supervisor and the Compliance Officer.

Physicians, billing representatives, and relevant independent contractors must abide by all laws and regulations governing financial and billing transactions. These regulations include rules against mishandling billing and claims, offering or receiving kickbacks, conflicts of interest, making inappropriate patient referrals, destroying the environment, and unfairly influencing market competition. Further information regarding specific laws and regulations can be obtained from the Human Resources Department, the Chief Operations Officer or the President, Dr. Godbey.

Billing and Claims

SEPA is committed to charging, billing and submitting claims for reimbursement only when appropriate laboratory services have been provided and documented in the manner required by laws and regulations. Pathologists, employees, directors, officers, agents and independent contractors either providing professional services or involved in billing for such services should know and carefully follow the applicable rules for submission of bills and claims for reimbursement on behalf of SEPA. If a pathologist, employee, agent, or independent contractor knows or suspects that a bill or claim for reimbursement is incorrect, they are required to report it immediately to SEPA General Counsel, Dr. Timothy McIntire, or Chief Operations Officer, Mr. Barham Cook.

Documentation of Health Care Services

It is essential that the delivery of health care services be documented as required by laws and regulations. It is only through good documentation that the nature, quantity, and quality of services and activities can be communicated to third party payers and other health care providers. All pathologists and employees must follow the documentation rules found in the CPT Manual, Medicare guidelines, Medicaid guidelines, and other federal healthcare program or commercial insurance guidelines.

Anti-Kickback Policy

When someone who can influence billing or purchasing decisions at SEPA takes money or anything of non-monetary value from a vendor, physician, hospital, or one in a position to affect business at SEPA, it may be considered a kickback. It may also be considered a kickback if someone refers a patient to another provider or a hospital and receives something of value in exchange. No one working at SEPA or immediate family members of a SEPA pathologist or employee can offer or receive a kickback. If there is a concern about a potential kickback violation, SEPA General Counsel, Dr. McIntire, or Chief Operations Officer, Mr. Barham Cook, should be consulted before entering into any transaction to which this rule may apply. If any pathologist, employee, agent, or independent contractor knows of or suspects a kickback arrangement, they should report it to their supervisor and the Chief Operations Officer.

Market Competition

To insure compliance, SEPA prohibits various practices, including setting charges in collusion with competitors, certain exclusive arrangements with vendors, and the sharing of confidential information with competing providers (such as current information or future plans regarding salaries or charges for services provided). SEPA pathologists, employees, directors, agents and relevant contractors must comply with all state and federal antitrust (monopolies) laws and regulations.

Purchasing

All purchasing decisions must be made without any conflicts of interest that could affect the outcome. Any concerns about the legality of a proposed transaction, such as inducements offered by a vendor or supplier, must be discussed with a supervisor or the Chief Operations Officer. Purchasing policies established by SEPA provide additional guidance and should be consulted prior to any purchasing decision.

Conflicts of Interest

SEPA pathologists and employees must avoid potential or perceived conflicts of interest. This includes gifts from patients, referring physicians, hospitals, and gifts or entertainment received from vendors. A violation of a conflict of interest policy may also constitute a violation of the anti-kickback rules. The Pathologists and employees shall be familiar with and adhere to the anti-kickback rules and regulations.

Confidentiality

SEPA employees and pathologists do have access to sensitive, confidential information about patient care and billing records. SEPA prohibits the unauthorized seeking, disclosing, or giving of confidential information, particularly information contained in a patient's medical record related to a patient's care. SEPA pathologists and employees who know of any unauthorized

release of confidential patient information should report the matter immediately to his or her supervisor, the Chief Operations Officer, Mr. Barham Cook, or the President, Dr. Patrick Godbey.

Controlled Substances

SEPA prohibits the unlawful possession, use, manufacture or distribution of illicit and illegal drugs on its property or as part of any SEPA sponsored activity. All healthcare professionals, including those who maintain Drug Enforcement Agency (DEA) registration, must comply with all federal and state laws regulating controlled substances. Any employee who knows or suspects the unlawful or unauthorized possession, use, manufacture or distribution of illicit drugs must immediately notify his or her supervisor and the Chief Operations Officer, Mr. Cook.

Discrimination

SEPA is committed to equal employment and educational opportunity. In conformity with federal and state law, and SEPA policies we are guided by the principle that there shall be no discrimination against individuals because of race, color, creed, religion, national origin, sex, age, disability, veteran status, or sexual orientation. Equal opportunity and access to programs shall be available to all members of the SEPA community.

Response to Investigation

It is the obligation of SEPA to cooperate with government investigators as required by law. If a pathologist or employee receives a subpoena, search warrant or other similar document, before taking any action, the employee will immediately contact their Supervisor AND SEPA Chief Operating Officer, Mr. Barham Cook at 912-222-8751. Mr. Cook will then contact SEPA General Counsel, Dr. McIntire, who will then notify outside legal counsel as necessary. The Billing Compliance Officer or its legal representative is responsible for authorizing the release or copying of documents. If a government investigator, agent or auditor comes to SEPA, Mr. Cook and SEPA General Counsel, Dr. McIntire, must be contacted immediately before discussing any matters with such investigator, agent, or auditor.

Disciplinary Action

All SEPA employees, officers, directors, employees and pathologists as well as independent contractors and agents of SEPA that deliver care to SEPA's patients or are involved in the preparation or submission of claims to third party payers must carry out their duties for SEPA as stated in these policies. Any violation of applicable law or violation of this code will subject such individual (s) or group (s) to disciplinary action in accordance with the policies and procedures established by the SEPA Human Resources Department. These disciplinary actions also may apply to a supervisor or pathologist who directs or approves such person's improper actions, is aware of those actions but does not act appropriately to correct them, or who otherwise fails to exercise appropriate supervision.

Obligation to Report Violations

If at any time any pathologist or employee of SEPA, as well as SEPA's independent contractors and agents, becomes aware of any real or apparent violation of SEPA's billing compliance policies, he/she must report such a violation to his/her supervisor and to Mr. Barham Cook. Be assured that these reports will be treated as confidential and will be shared with others only on a bona fide need-to-know basis. SEPA will take no adverse action against anyone making these

reports in good faith, whether or not the report ultimately proves to be well founded. If a pathologist, employee or independent contractor or agent does not report conduct violating SEPA's legal compliance policies, the pathologist, employee or independent contractor or agent may be subject to disciplinary actions, in accordance with the policy and/or policies and procedures established by the SEPA Human Resources Department, and may be terminated from employment, and the independent contractors/agent's contracts with SEPA may be immediately terminated.

Independent Contractors, Vendors and Agents

All contractors and vendors who provide services to SEPA must comply with all applicable laws, SEPA policies, and the provisions contained on this code of conduct.

This provision is incorporated by reference into and supersedes any statements to the contrary contained in any agreement between the independent contractor and agent. The independent contractor and agent hereby agree that this Code of Conduct becomes an amendment to the agreement between SEPA and the independent contractor/agent upon independent contractor/agent signing the Code of Conduct receipt and acknowledgement.

Anyone wanting to make a report of a suspected wrongdoing or a potential problem may contact the Chief Operations Officer, Mr. Barham Cook, at (912) 222-8751, the President, Dr. Patrick Godbey, at (912) 222-0214 or the Director of Operations / Billing Compliance Officer, Mr. Ken Fisher 912-614-6433, or send an email to Mr. Barham Cook at bcook@sepalabs.com, Dr. Godbey at pgodbey@sepalabs.com, or Ken Fisher at kfisher@sepalabs.com.

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