

**A Letter from Nathan J. Schultz,
President and COO, Medication Management Systems, Inc.**

Compliance and ethical behavior are the guideposts for the way in which we commit ourselves to conducting our business. These guideposts allow us to carry out our day-to-day work within a framework that holds us to the highest ethical standards as we honor our commitments to serving our patients and meeting our contractual obligations.


The MMS Board of Directors approved Code of Conduct policy provides us with a detailed point of reference to assure that we are all focused on correct behavior and doing what is right within a common ethical framework. Please read this code of conduct and make use of its resources to help guide you to always act appropriately and legally.

If, at any time, you need assistance in determining the best action to take, or if you want to report a violation of the code, or any of our policies, you can talk to your manager, our Compliance Officer, Roberta Patrow at 952-542-5364 or email compliance@medsmanagement.com. In addition, you may use a special telephone compliance hotline at 952-542-5356.

Thank you for taking time to read this code of conduct and for making it a real and living extension of your work life.



Nathan J. Schultz, Pharm.D.
President and COO

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MEDICATION MANAGEMENT SYSTEMS, INC. (“MMS”) CODE OF CONDUCT

INTRODUCTION

We need your help to ensure that MMS promotes and maintains an ethical work environment. The purpose of this Code of Conduct (“Code”) is to define and encourage ethical behavior in the conduct of all business affairs of MMS so as to be in compliance with all ethical and legal standards. Leadership expects that employees will use this Code as a guideline in order to perform their jobs honestly and ethically. It is your responsibility to act ethically and in accordance with legal standards with all individuals to whom you come in contact: customers, providers, practitioners, patients and your fellow employees. It is your responsibility to notify MMS if you believe that there is any activity that is inconsistent with these guidelines.


MMS and its customers are regulated by a number of different agencies and governed by many complex laws. Every employee needs to be aware of the laws that apply specifically to their jobs and adhere to them at all times. If a policy in this Code conflicts with the law, you must comply with the law. If a local custom or policy conflicts with this Code, you must comply with the Code. Those who violate the standards in this Code will be subject to disciplinary action, up to and including possible dismissal. Furthermore, violations of this Code may also be violations of the law and may result in civil or criminal penalties for you, your supervisors and/or MMS.

This Code of Conduct does not replace any existing policies or procedures; it is merely designed to supplement the policies and procedures outlined in your Employee Handbook. This Code of Conduct is designed to be the foundation Code for all of the MMS operations. If you believe that there are inconsistencies between this Code and any other code of conduct you may receive, please contact the MMS Corporate Compliance Office, Attention: Roberta Patrow, at (952) 542-5356.

If you know or become aware of conduct which you believe is questionable, please report it immediately to the MMS Corporate Compliance Office, Attention: Roberta Patrow, at (952) 542-5356. There is also an email address that you may use to anonymously report questionable conduct: compliance@medsmanagement.com .

Distribution of the Code of Conduct

The Code will be distributed to all MMS employees, key contractors, or individuals who serve on the MMS Board of Directors at time of hire and annually, thereafter. Vendors are required to attest to having a Code of Conduct on an annual basis.

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STANDARDS

ONE: Respect for Patients and Customers

MMS’ mission is to improve medication therapy by delivering care that identifies and resolves patients’ drug therapy problems. We accomplish this by teaching and supporting the professional practice of pharmaceutical care and providing a comprehensive medication management service that delivers pharmaceutical care to patients. Our respect for our patients and customers is demonstrated by the manner in which we provide pharmaceutical care, the manner in which we support our customers’ provision of pharmaceutical care, and the manner in which we keep track of the services provided.

Quality Service

Because we want to provide the best possible service for our customers and quality pharmaceutical care for the patients we serve, we hire and contract for services from qualified individuals, educate them, and continually monitor their performance. We also encourage enhancement of their skills, behaviors, and knowledge. Our overall goal is to correct mistakes by not ignoring them.


We also recognize the patients' right to confidentiality and do not share confidential information regarding patients with anyone who does not have a legal need to know such information or who has not been authorized to receive such information by the patient.

Service excellence is one of the core values of the MMS. Service excellence includes:

- Always using good manners and courtesy with patients and customers;
- Refraining from actions that might put patients in danger;
- Following standards of care;
- Maintaining a positive and flexible customer service attitude and respond with a sense of urgency to customer needs.

MMS has specific standards regarding patient care that are included in policy and procedure manuals and/or as may be retained within individual departments. Each employee needs to be aware of the policies and laws that apply to their specific job. Ask your supervisor who is the designated "go to" resource in your work area.

Appropriate Documentation of Services

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There has been an increasing focus by governmental agencies on healthcare fraud and abuse. It is a felony to knowingly make false claims, certifications or statements to the federal government. This type of conduct may subject both MMS and you to civil and criminal sanctions, including fines, prison and suspension or debarment from federal contracting. Such conduct will not be tolerated. It is therefore essential that you take any and all steps necessary to ensure that you do not assist with, make or transmit any false claims, statements or certifications to the Federal Government. Employees must be sure that services performed are properly documented and that billing and codes are accurate. If you believe that you are being asked to perform something that is inconsistent with this standard, please call our Compliance Officer Roberta Patrow at 952-542-5364, email compliance@medsmanagement.com or call the compliance hotline at 952-542-5356.

MMS seeks legal advice whenever necessary in conducting its financial and business relationships. We retain expert legal counsel to assist managers and employees in determining how best to meet standards.


MMS reports costs under generally accepted accounting principles and as provided by MMS policy. Expenses are reported on a timely basis, with proper authority and documentation, through a prescribed process. Sometimes estimates must be made for financial reporting and it is incumbent upon everyone to use the best possible estimate regardless of the impact on other results or measures.

Accurate Record-Keeping and Financial Controls

Records pertaining to patient pharmaceutical care are kept at MMS primarily within the Assurance System. You need to be aware that you must learn the rules that apply to any health record documentation or other records with which you are required to work as part of your job responsibilities. As a guiding principle, please remember that:

- False facts and false records are not permissible. Alteration of records is strictly prohibited.
- Records are only provided to people who have a legal "need to know" or those who are authorized by a patient or someone else who has the authority to provide such an authorization.
- Records are maintained for as long as legally required.
- Patient confidentiality must be preserved.
- Records are disposed of only in accordance with established policies and protocols.

MMS maintains a system of internal controls that provides reasonable assurance that transactions and activities are executed and carried out in accordance with MMS management's authorization and are properly recorded. You are required to record and report financial and other business-related

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information fully, accurately and honestly. All business expense accounts must be documented and recorded accurately in a timely manner. No relevant information is to be omitted or concealed, nor may secret or unrecorded funds or assets be created for any purpose. The making of false or fictitious entries in the books or records of MMS is prohibited. You may not engage in any activity that contemplates the making of false or fictitious entries.

All of MMS’s books, records, accounts and financial statements must be maintained in detail, must appropriately reflect MMS’s transactions, must be promptly disclosed in accordance with any applicable laws or regulations and must conform both to applicable legal requirements and to MMS’s system of internal controls. Business records and communications often become public, and we should avoid exaggeration, derogatory remarks, guesswork, or inappropriate characterizations of people and companies that may be misunderstood. This applies to e-mail, internal memos, and formal reports.


Disposal or destruction of MMS’s records is not discretionary. Retention of records shall be in accordance with CMS guidelines, legal and regulatory requirements, and acceptable business practices. Business documents include paper documents such as letters and memos, claims, enrollment applications, computer-based information such as e-mail or computer files on disk or tape, and any other medium that contains information about the organization or its business activities. It is important to retain and destroy records appropriately according to our policy. You must not tamper with records, nor remove or destroy them prior to the specified date.

TWO: Integrity of Our Business Relationships

We seek relationships with individuals and firms who will observe our ethical standards and promote an ethical environment in the way we relate with each other. Our success hinges on the following core beliefs:

- We will provide the best in pharmaceutical care to our patients, in accordance with recognized practice standards
- We will work hard to provide the best products and services to our customers
- We will strive to earn the trust and respect of our customers and the community
- We will earn the respect of our patients, our stakeholders and our competitors by continually doing the “right thing” in our day-to-day business.

The following are some general guidelines on how each employee should relate to customers, business partners, or other contractors in conducting MMS business.

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Customers and Business Partners

We seek relationships with customers and business partners who share our ethical perspective and commitment. We must manage our subcontractor and supplier relationships in a fair and reasonable manner consistent with all applicable laws and good business practices. Our selection of subcontractors, suppliers and vendors will be made on the basis of objective criteria including quality, technical expertise, price, delivery, adherence to schedules or completion dates, service, and the maintenance of adequate sources of supply. Purchasing decisions must be based upon the individual subcontractor, supplier, or vendor’s ability to meet our needs, and not on personal relationships and friendships.

Kickbacks or Rebates


Kickbacks or rebates involve “rewarding” an individual or company for selecting a particular provider of goods or services. Kickbacks or rebates can take many forms and are not limited to direct cash payments or credits. You must avoid any situation where the purchase of any good or service would result in any kickback or rebate to you, your family or to MMS. In general, if you or your family may gain personally through the transaction, it is prohibited by MMS. Such practices not only are unethical, but also are in many cases illegal.

Gifts, Gratuities, and Entertainment

You may not solicit or accept gifts, gratuities, or favors of any kind from suppliers or customers. You may not encourage or solicit entertainment from any individual or company with whom MMS seeks to do business or does business. From time to time, however, you may offer or accept entertainment, but only if the entertainment is reasonable, occurs infrequently, and does not involve lavish expenditures. You should not offer or accept entertainment which is not a reasonable adjunct to a business relationship or that is intended to gain favor or influence. In no event should you offer cash or cash equivalents (gift certificates, gift cards, etc.) to federal employees. Items of nominal value, such as modest refreshments or greeting cards, which are intended solely for presentation, may be offered. The promise, offer or delivery to an official or employee of the U.S. government of a gift, favor or other gratuity would not only violate MMS policy but is also a civil or criminal offense. State and local governments, as well as foreign governments, often have similar rules.

Confidentiality

The business affairs and records of MMS are confidential. They are not to be shared with anyone inside or outside of MMS, except those who need to know in order to conduct the business of MMS.

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The following are examples of information that should always be treated as confidential:

- Information about MMS customers and beneficiaries of the customer, including protected health information (PHI) or personally identifiable information (PII), such as claims information, medical records, or social security numbers.
- Information about plans and strategies or the financial and marketing operations of MMS, except at the time that they are formally presented to the public as authorized by the MMS Board of Directors or MMS management staff.
- Trade secrets of MMS, as defined by state or federal law.
- Violation of this policy, HIPAA, HITECH or state privacy laws, is grounds for discipline up to and including termination of employment.

Excluded Individuals or Contractors

Sometimes MMS may have business arrangements wherein individuals provide services on our behalf or accept transfers of patients in order to assure continuity of care. MMS never pays for referrals of patients. Service decisions are based on each patient's clinical requirements, our ability to meet the patient's needs, and/or the patient's choice of provider or location. We do not accept payment for our referrals. MMS prohibits its employees, contractors, agents, and other representatives from offering, requesting, or receiving any direct or indirect payment because these payments would suggest that MMS is seeking preferential treatment or is paying a reward for referrals or other business. Direct payments might include any commission, rebate, bribe, or kickback. Indirect payments may be of a financial nature; they may include anything of value, such as the use of MMS property, services, or personnel as well as expensive gifts or exorbitant entertainment. No action that would otherwise be suspect is permissible merely because it appears to be customary in a particular location or a particular area of business activity. It is important that referral relationships be clearly defined and in writing.

It is also important that we assure that any individuals with whom we transact business are not disqualified from participation in a government-sponsored reimbursement program or otherwise disqualified or sanctioned as a government contractor. Therefore, MMS employment applications, and MMS pharmaceutical care practitioner provider credentialing include an inquiry as to whether the applicant has been excluded from participation in reimbursement programs, or disqualified or sanctioned as a government contractor. We review the list of excluded individuals on a monthly basis to assure that our employees and contractors have not been excluded from participation in a government program. Any employee or contractor found on an exclusionary list is removed immediately from any work related directly to Federal healthcare programs. If you learn that someone with whom we do business is excluded, please contact our Compliance Officer.

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Three: Integrity

The integrity of each of us individually and as a whole is paramount. It is everyone’s obligation and responsibility to conduct themselves with integrity that is directly proportionate to the role and the level of responsibility that our respective positions hold. If any of us exercise decision-making authority or influence within the organization to acquire or purchase goods or services, hire personnel, or otherwise expend MMS resources, then our responsibilities will be greater than if those who do not exercise such authority or influence. We follow guidelines for identification of conflicts of interest, the acceptance of courtesies from external sources, the participation in business-related functions sponsored by external organizations, the provision of services to external organizations, and general conduct.


Conflicts of Interest

MMS’s reputation for quality is based on each of its employees. Please conduct yourself with personal integrity, exercise good judgment, and demonstrate common sense at all times. Business decisions should be made in the best interest of MMS and its patients and customers without regard to personal interest or gain. A conflict of interest can result when an employee or their family member benefits or appears to benefit from a business decision. A “conflict of interest” exists when a person’s private interest interferes in any way - or even appears to interfere - with the interests of MMS. A conflict situation can arise when an employee or officer takes actions or has interests that may make it difficult to perform his or her work objectively and effectively. You must avoid any situation where a conflict could or may appear to exist between your personal interests and those of MMS. For instance, you should avoid any outside financial interests or employment that will or may have the appearance of influencing decisions or actions taken by you on behalf of MMS. You should avoid personal or family interests in enterprises that conduct business with or compete with MMS, except for minimal holdings of stock or other securities in publicly traded companies.

MMS distributes an annual duality of interest questionnaire to its employees to provide a mechanism to identify potential conflicts. If you do not routinely receive this questionnaire, or if a new potential conflict arises after you complete this questionnaire, please disclose these potential conflicts of interest to your supervisor or administrator.

Professional Activities and Consulting

If you are asked to provide services on a consulting basis for someone outside MMS, please consult your supervisor. MMS has policies regarding secondary employment and contracting for services to assist in determining how these arrangements should be handled. In the event that you have or seek to have part-time employment outside of your job, it must not encroach on your time working on MMS

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assignments, adversely affect your job performance or have the potential of negatively impacting the reputation of MMS. Activities relating to outside employment cannot be conducted during working hours. Outside employment that is determined to be in conflict with the business interests of MMS in violation of the Code, or contrary to the circumstances of your position with MMS can lead to disciplinary action, up to and including termination of employment.

You must report any outside employment or any potential conflict of interest to the Compliance Officer. You may request that the Compliance Officer determine whether any actual or pending outside employment will cause a conflict of interest. To render a decision regarding whether outside employment will or does constitute a conflict of interest, you must provide the Compliance Officer with a complete description of your pending or present outside employment along with a description of your MMS job responsibilities.


MMS professionals and other employees may be invited to seminars or other professional education activities as a panel member, speaker, or research presenter. Commercial supporters of such activities shall not control the planning, content or execution of the professional activity. It may be customary for the meeting sponsor to pay for registration and lodging. If you are considered a faculty member of the educational event, it is permissible to accept the subsidy for yourself. However, it is not permissible to accept the cost of travel or registration on behalf of family members (unless they have qualified as faculty in their own right). This is consistent with MMS's travel policy.

Use of MMS Property

All property and other resources, including, but not limited to, financial data, proprietary information, customer information and intellectual property rights, are for transacting MMS business. MMS prohibits their use for personal benefit or gain, such as conducting a business of your own or for unauthorized charitable purposes, unless specifically approved by the Compliance Officer. You must continue to protect and comply with proper use of such resources even after you leave the employment of MMS.

Employees and officers are prohibited from taking for themselves opportunities that are discovered through the use of corporate property, information or position without the consent of the Board of Directors. No employee or officer may use corporate property, information, or position for personal gain, and no employee or officer may compete with the MMS directly or indirectly. Employees and officers owe a duty to MMS to advance MMS's interests when the opportunity to do so arises.

MMS is legally obligated to protect its property and to ensure that its facilities and equipment are used appropriately. Electronic mail and voice mail systems are business tools. You may use them for limited personal reasons, but only to the extent that such use does not interfere with your job performance and even then primarily on your own time. Data on these systems are MMS property. MMS reserves the right to monitor these communications and you should not have an expectation of personal privacy with

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respect to communications using or information placed on these systems. All communications on these systems, business or personal, must be non-offensive, non-threatening, and consistent with MMS’s policy of respecting the rights of every person.

The obligation of employees and officers to protect assets includes MMS’s proprietary information. Proprietary information includes intellectual property such as trade secrets, patents, trademarks, and copyrights, as well as business, marketing and service plans, engineering and manufacturing ideas, designs, databases, records, salary information and any unpublished financial data and reports. Unauthorized use or distribution of this information is a violation of MMS policy. It could also be illegal and result in civil or criminal penalties. Any suspected incident of fraud or theft should be immediately reported for investigation.

Employees may not borrow MMS property without prior permission. Employees may not use paid work time, facilities or equipment, including computers, for unapproved purposes. Violation of these policies may result in disciplinary action. In general, these resources are provided by MMS to aid you in performing your job and should not be used for personal reasons. Personal computer passwords are confidential and must not be shared with other employees or users. Please ask your supervisor if you have questions about the appropriate use of property.


General Compliance

Employees must comply with laws and rules specific to their individual jobs. When in doubt, ask for clarification from your supervisor, department head, administrator or the Compliance Office, Attention: Roberta Patrow, at (952) 542-5364. If a federal or state law enforcement official requests information from you, please have them contact the Corporate Compliance Office. If these officials are on MMS property and requesting information, please contact your supervisor and the Corporate Compliance Office immediately.

FOUR: Integrity of Work Environment

We recognize that maintaining MMS’s Code of Conduct standards requires a work environment that fosters ethics. We want the work environment to be open, safe, and free from fear of reprisals. Everyone must contribute to creating and maintaining this type of atmosphere.

MMS is committed to maintaining an equal opportunity work environment free of any form of harassment or discrimination, as well as a workplace that is alcohol and drug free. MMS is further committed to providing a work environment that is free from intimidation, threats and acts of violence.

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Workplace violence includes the threat or actual infliction of physical violence, as well as the possession and/or use of firearms or other weapons at any time while in MMS offices or while doing the business of MMS in any location.

MMS is committed to compliance with the laws and regulations imposed by those agencies that govern workplace health and safety.

Open and Honest Communication

MMS's ability to conduct its operations requires that employees be open and honest with each other in their working relationships. MMS promotes a workplace where employees feel free to discuss concerns about any issue. Beyond the employment relationship, it is important that all MMS employees deal honestly and fairly with patients and members, their families, community members, vendors, competitors, payers, and outside contractors.

Safety and Health in the Work Place

The MMS Employee Handbook describes our workplace safety standards. As an employee, it is your responsibility to report unsafe conditions to your supervisor so that they may be immediately addressed.

Free From Harassment


MMS is committed to maintaining a work place that is free from all forms of harassment, including age, ancestry, disability, gender, marital status, national origin, race, religion, sexual preference, and/or veteran status. Respect for the richness of diversity in varying life experiences and viewpoints allows us to be of better service to our communities and each other. If you believe that you or a co-worker is being harassed, please contact your manager, a Human Resources representative, or email compliance@medsmanagement.com .

No Reprisals

MMS places a great responsibility on you to report potential concerns regarding activities that are not consistent with this Code. If you are concerned about the potential for reprisal, please email compliance@medsmanagement.com. You can request that the matter be handled anonymously.

If you believe that you are being retaliated against for reporting or otherwise discussing concerns you may have, please contact the Compliance Officer, Attention: Roberta Patrow, at (952) 542-5364 or email compliance@medsmanagement.com.

FIVE: Compliance with the Law

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MMS has an obligation to comply with all applicable laws and regulations, and the applicable rules of third-party payment programs. We will strive to ensure that all activity by or on behalf of the organization is in compliance with these laws, regulations and rules, whether or not they are specifically addressed in this Code of Conduct or MMS policies. The principles set forth in Section 5 are neither exclusive nor complete. If questions regarding the existence, interpretation or application of any law, regulations or rule arise, they should be directed to the MMS Compliance Officer, Attention: Roberta Patrow, at (952) 542-5364.

Compliance with Laws, Rules and Regulations

Obeying the law is the foundation on which our ethical standards are built. All employees and officers must respect and obey all applicable laws, rules and regulations in which we operate. Although employees and officers are not expected to know the details of each of these laws, rules and regulations, it is important to know enough to determine when to seek advice from appropriate personnel.


Antitrust

All MMS employees must comply with applicable antitrust laws and other similar laws which regulate competition. Examples of conduct prohibited by such laws include (a) agreements to fix prices, bid rigging, or collusion with competitors (including price sharing); (b) boycotts, certain exclusive dealings, and price discrimination agreements; and (c) unfair trade practices, including bribery, misappropriation of trade secrets, deception, intimidation and similar unfair practices. You must strictly avoid communications with competitors involving any of the subjects listed above. Although it may be appropriate in public settings to discuss policy issues, such as government procurement regulations, with competitors, you must strictly avoid discussions or exchanges of information with competitors relating to prices, costs, business or marketing plans, or any other type of confidential, competitively sensitive information.

MMS employees are expected to seek advice from our Compliance Officer when confronted with business decisions involving a risk of violation of antitrust laws or other similar laws. Any activity that violates the antitrust laws is strictly forbidden. Failure to observe the antitrust laws may result in substantial civil and criminal penalties against MMS and may also result in MMS being barred from contracts with the federal government.

Fraud and Abuse

MMS employees must refrain from conduct that may violate the fraud and abuse laws. These laws generally prohibit (a) direct, indirect or disguised payment in exchange for the referral of patients or other business; (b) the submission of false, fraudulent or misleading claims to any government entity or

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third party payer, including claims for services not rendered, claims which characterize the service differently than the service actually rendered, claims for which appropriate documentation does not exist or claims which do not otherwise comply with applicable program or contractual requirements; and (c) making false representations to any person or entity in order to gain or retain participation in a program or to obtain payment for any service. MMS personnel must report immediately to our Compliance Office, Attention: Roberta Patrow, at (952) 542-5356 any requests or demand by any person or entity for any improper benefit.

Political Activity and Contributions

Federal and state laws restrict the use of MMS’s funds in connection with federal and state elections. Accordingly, it is against MMS’s policy, and also may be illegal, for you to submit the cost of any political contribution to MMS for reimbursement on your expense account or in any other manner.

The political process has become highly regulated. If you have questions about what is or is not proper, you should consult with the Compliance Officer before agreeing to do anything that could be construed as improperly involving MMS in any political activity at the federal, state, or local level.

Use of Medicare Information


Medicare information cannot be used in any manner that is not specifically authorized by the Centers for Medicare & Medicaid Services (CMS) or that is inconsistent with applicable federal and state privacy and other laws.

Audits – Internal and External

The operations, records and practices of MMS and its customers who are Medicare plans are subject to both internal and external audits. Because it is the policy of MMS to conduct its business in a legal and ethical manner, in compliance with all laws, regulations and contract terms, MMS and its managers, officers and staff are expected to cooperate fully with all audits. Furthermore, MMS policy prohibits any direct or indirect act intended to coerce, manipulate, mislead or fraudulently influence MMS’ auditors.

Government Investigations

It is MMS’s policy to cooperate fully with any authorized government investigation. This includes full and accurate disclosure in response to reasonable government requests for information. If you are contacted by a government investigator, receive a subpoena or written request for information, or are asked to discuss or turn over to anyone outside of MMS information connected with MMS, you should

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immediately notify the Compliance Officer. The Compliance Officer will assist you in responding to the government’s request or the coordination with MMS’s legal counsel.

Although you are free to cooperate individually with government investigators, you may not release any documents or data that belong to MMS or are in their custody or control without first obtaining authorization from the Compliance Officer.

No one on behalf of MMS should ever, under any circumstances, do any of the following:

- Mislead, lie or provide false information to government investigators;
- Destroy MMS documents in anticipation of a request for those documents from a government agency or court;
- Alter MMS documents or records; or
- Request anyone to hide information from or provide false or misleading information to government investigators.

Violation of any of the above is grounds for discipline up to and including termination of employment.


CONCLUSION

MMS expects its employees to adhere to the law and to carry out their duties in an ethical manner. Policies and procedures are established to help you in this regard. MMS likewise expects you to report any known or perceived violations or any other form of employee misconduct. Violations are serious matters. Corrective action is outlined in the employee handbook. However, in addition, it is possible that legal action could result.

Reporting any Illegal or Unethical Behavior

You have an obligation to report any activity that you know or suspect violates any law or regulation, ethical principle, policy, the Code, or the MMS Compliance Program. Examples of relevant laws and regulations include, but are not limited to, federal and state criminal codes, Medicare rules, insurance regulations, and health and safety requirements. You may report violations to:

- To your supervisor
- MMS Compliance Officer **(952-542-5348)**
- MMS Compliance email address (compliance@medsmanagement.com)
- MMS Compliance Hotline **(952-542-5356)**

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- Any member of the MMS management staff or the MMS Board of Directors

Failure to report may be grounds for discipline, up to and including termination of employment.

MMS will not tolerate any form of retribution or retaliation, because someone reported in good faith, known or suspected incidents of noncompliance. Every attempt will be made to maintain the confidentiality of your report, to the extent allowed by law.


Disciplinary Actions

You are expected to follow the Code, MMS policies and procedures, and all laws, rules and regulations applicable to MMS’ business activities, violations of the Code, applicable policies, procedures or laws will subject you to disciplinary action, up to and including termination of employment. The nature of the violation and the specific circumstances involved will dictate the degree of disciplinary action taken.

MMS will pursue the detection and prevention of unlawful acts committed by a staff member against MMS, its other staff members, patients or customers. Such acts include, but are not limited to, theft, wrongful receipt or issuance of payments, deliberate misrepresentation, misappropriations, misuse or improper disposal of company assets, substance abuse, possession of weapons or illegal drugs on company premises, bribes, and other actions which could compromise MMS’s integrity, reputation or public trust. Committing any unlawful act is grounds for discipline up to and including termination of employment. Wrongful acts committed against MMS will be pursued to the fullest extent permitted by law.

Annual Acknowledgement

To help ensure compliance with the MMS Code of Conduct, all MMS Board of Directors and MMS employees and key contractors, including the President and COO and the Compliance Officer, are required to review the MMS Code of Conduct and acknowledge their understanding and adherence in writing upon hire or appointment and annually thereafter.

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ACKNOWLEDGEMENT

I have received, read, and acknowledge this Code of Conduct. I agree to carry out my job responsibilities in an ethical manner and in compliance with established policies and procedures of MMS. I understand that I may be subject to disciplinary action, up to and including termination of employment, if I do not perform my work duties in an appropriate ethical manner. I also understand that it is my obligation to obtain additional information about legal requirements or other requirements as may be necessary to complete my job responsibilities. If I have any questions, I understand that I have the ability to discuss questions with my supervisor, administrator, or the Compliance Officer. In addition, I understand that I have an obligation to report conduct I believe to be inconsistent with these guidelines and that I have access to a Compliance Officer, Roberta Patrow at 952-542-5364 and/or email address compliance@medsmanagement.com to communicate concerns. In addition, you may use a special telephone compliance hotline at 952-542-5356.

Signature _____

Print Name _____

Date _____