



Summit Pathology Code of Conduct

Who we are-

In the ever-changing, dynamic environment of healthcare we prioritize patient care and service-based relationships above all else - amongst our staff, our clients, and for all of the patients we serve.

We are an employer of choice for those entering the profession and we retain happy, balanced, patient-oriented team players who thrive in a collaborative culture while feeling valued and supported through excellent compensation and benefits.

We have the space needed to promote collaboration, sustain growth, and to enhance development and operations that support and foster financial sustainability and continued success.

We invest in technology and continually improve our state-of-the-art processes to enforce and enhance our reputation for providing premier pathology services.

Commitments to our team from the pathologist partners

Give timely and constructive feedback

Maintain a positive attitude

Financially commit to necessary growth

Listen to understand each other's viewpoints and seek solutions

Address conflict with respect and active consensus building

Shadia Alam

Jeremiah Andersen

Ross Barner

Christopher Bee

Narina Grove

Gabriel Habermehl

Wentzell Hamner

Nathan Johnston

Arlene Libby

Daniel Long

Cristina McLaughlin

Craig Nerby

Richard Owings

Carrie Pizzi

Meghan Riley

Michael Smith

Jakub Stefka

Michael Walts

Mission: To provide unparalleled patient care and service above all else.

Vision: To be the leading provider in pathology medical services by combining state-of-the-art technology with

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Message from the CEO

The Code of Conduct that follows this message clarifies our ethical and behavioral expectations for all employees of Summit Pathology. It provides critical guideposts for ensuring that our daily actions and interactions are in line with the mission and vision we have defined and adopted as an organization.

According to the Ethics and Compliance Initiative:

*A well-written code of conduct **clarifies an organization's mission, values and principles**, linking them with standards of professional conduct. The code articulates the values the organization wishes to foster in leaders and employees and, in doing so, defines desired behavior. As a result, written codes of conduct or ethics can become **benchmarks** against which individual and organizational performance can be measured.*

As an employee of Summit Pathology, it is critical that you read, fully understand, and adhere to this Code of Conduct. If you have questions or concerns, please reach out to the Director of Compliance at Summit Pathology.

The work that you do each day at Summit Pathology is critical to our ability to deliver the highest quality of pathology services as we support physicians and patients who depend on the diagnostic testing we provide. The code of conduct helps remove any mystery from the ethical stance we have made as an organization.

Put simply, integrity is knowing what is right and doing what is right - as individuals and as an organization. The Code of Conduct helps us clearly understand what is "right" for Summit Pathology. Please join me in doing what is right so that Summit Pathology continues to function with the highest level of integrity as an organization.

Thank you.

Sincerely,

Jeff Christinson



What is a Code of Conduct?

The Code of Conduct is intended to 1) prevent wrongdoing, 2) encourage ethical conduct, 3) ensure compliance with all applicable state and federal laws, rules, and regulations and 4) adopt a fair, accurate and timely disclosure of compliance concerns or violations.

Ethics – Summit Pathology holds itself to the highest ethical standards and expects all employees, including management, pathologists, contractors, and vendors to do the same.

Integrity – Summit Pathology is dedicated to uncompromising integrity in all areas of the workplace. This includes our commitment to the integrity of our employees and our relationship with our customers and vendors.

Everyone at Summit Pathology is required to adhere to this Code and promote an environment of ethics, integrity, and compliance.

When an employee observes activity or behavior that appears unethical or improper, it is imperative that the employee voice their concerns directly with the Compliance Officer or leave a detailed message on the Compliance Hotline. The employee will be met with a guarantee of fair treatment and without fear of retribution or retaliation.

The Code of Conduct is intended as a guide to overall ethics and conduct within the workplace. This guide is not a substitute for the Compliance Program established at Summit Pathology SP/SPL.

Each employee is obligated to read, understand, follow, and acknowledge all compliance associated policies and procedures.

Employees who knowingly and willfully violate these standards will be subject to disciplinary action, up to and including, termination of employment.

Anonymous Helpline – 833-836-6812



Business Conduct

Summit Pathology conducts business operations with integrity as evidenced by fair, honest and ethical behavior.

It is the desire of Summit Pathology to engage in ethical and legal business practices. In doing so, the purpose of business entertainment is to create long-standing relationships with our customers. These customers include physicians, physician practices, hospitals and their employees, patients, vendors, and contractors. Gifts and entertainment may never be solicited or accepted by any pathologists, officer, employee (or any family member of a pathologists, officer, or employee) unless it meets the following criteria: 1) is not a cash gift, 2) maintains consistency with the business practices, 3) is not excessive in value, and 4) meets the allowable federal guidelines and standards. Any offering of gifts or proposed gifts must be discussed directly with the Compliance Officer.

In addition, pathologists, officers, or employees may **not** provide gifts, loans, or other benefits to a current or potential customer. Allowable gifts are appropriate under the following circumstances: 1) the gift is occasional, 2) the value is modest, 3) the value is part of an educational or marketing activity, and 4) the value or benefit does not violate any state or federal law. The gifts may only be in the form of items or services (not cash or cash equivalent) that do not exceed an aggregate of the total allowable expenditures per year, per physician.



Conflict of Interest

Any perception of a conflict of interest must be avoided at all times. In order to advance the goals of Summit Pathology SP/SPL, pathologists and employees must avoid engaging in any actions that may influence their judgment or impartiality. A conflict of interest may include working for a competitor, vendor, or other health care provider.

Accepting gifts, payments or services from individuals, groups or vendors that do business with Summit Pathology is prohibited.

Owning or having a financial relationship or financial interest with a competitor is prohibited.

Employees may hold a second job as long as it does not directly or indirectly compete with Summit Pathology SP/SPL, does not require any use of Summit Pathology SP/SPL's assets or any confidential information, does not affect your ability to properly function in your job, does not conflict with the employee's work schedule and does not have a negative effect on the image or community standing of Summit Pathology SP/SPL



Confidentiality

Summit Pathology strives to maintain the trust of physicians, patients, and the community we serve.

Confidential information entrusted to Summit Pathology must be maintained at all times. All employees, pathologists, consultants, and vendors must never disclose confidential information to anyone unless the disclosure is required by law.

Confidential information must be protected against theft, loss, or inappropriate disclosure. This may include electronic protected health information (ePHI), financial information and policies.

Any Summit Pathology proprietary information may only be used for company purposes and disclosed only to authorized personnel. Documents containing proprietary information may not be copied, released, or removed from the premises unless prior authorization is issued.

Summit Pathology is committed to honoring its patient's expectations to secure privileged information and maintaining patient privacy. Summit Pathology will follow state and federal law with regard to privacy and confidentiality of patient data. This data includes patient records/reports, both paper and electronically, and any other identifiable patient data in accordance with the Health Insurance Portability and Accountability Act of 1996 (HIPAA).

Personnel should never discuss a patient's test results or provide information about a patient unless authorized on a "need to know" basis. Patient test results may not be released without written authorization and proof of identity. Records should not leave the premises, altered, or destroyed, other than following Summit Pathology SP/SPL's records retention policy for destruction.

Employees may not post on social networking sites and blogs any sensitive, proprietary, or confidential information about the company or any Protected Health Information (PHI). Communicating confidential information is grounds for termination of employment.

Employees should report any violations of patient confidentiality policies directly to the Compliance Officer.



Billing / Arrangements with Physicians

Summit Pathology will bill only for services rendered, and all billing must comply with federally funded requirements. Employees or contractors representing Summit Pathology must provide accurate reporting, especially to any government agency or payer. Each claim submission for payment or approval must be accurate and contain appropriate codes reflecting only items or services performed and must be well documented. Our billing services will correct billing errors and provide timely refunds as appropriate. Providing inaccurate reporting may expose the company and employee to civil and criminal penalties, as well as possible termination of employment or contract.

In order to comply with Fraud and Abuse laws governing Medicare, Medicaid (CMS) and other federal health programs, payment of remuneration in return for the referral of Medicare and Medicaid patients to induce the purchase of goods or services is strictly prohibited. Making false claims to Medicare and Medicaid is also strictly prohibited. No employee may offer any benefit to a referring physician or any other referral type with the condition that the physician or physician group will refer or agree to refer any specimens from patients to a medical facility owned or operated by the practice or any practice members. Any agreement that may involve compensation or referrals with a physician or physician group must be approved by legal counsel prior to execution.



Protection of Company Assets and Proprietary Information

Employees should protect all Summit Pathology data and property against loss, theft, and misuse. This includes proprietary information belonging to Summit Pathology SP/SPL. Information must be kept confidential and ensure it is not available to unauthorized persons.

In addition to protecting and not misusing company assets and resources, each employee must also protect intellectual property. This includes scientific and technical knowledge and any activities, including information that Summit Pathology develops in production, marketing, sales, and finance.

Information related to Summit Pathology and its associates is highly confidential and may not be disclosed to anyone outside of the organization.

The integrity and judgment of employees, both on and off the job, are vital to protecting proprietary information. If an employee becomes aware that proprietary information has been lost, compromised, or misused, they must immediately contact the Chief Compliance Officer so an investigation may be pursued, or action may be taken to protect the company.



Working Environment / Safety

Sexual Harassment

No employee of Summit Pathology shall engage in any conduct that may be construed as sexual harassment as established by the Equal Employment Opportunity Commission and by company policy.

Discrimination

Summit Pathology will not tolerate any illegal discrimination, harassment, or retaliation of any kind. Violence or intimidating behavior will not be permitted. Any disparaging comments based on race, ethnic origin, sexual orientation, or unwanted sexual advances will be terms for an investigation and may result in termination of employment.

Drug Free Work Environment

Summit Pathology prohibits employees from possessing, using, distributing, purchasing, or selling illegal substances. These actions are illegal and counterproductive to business interests and will not be tolerated, either during scheduled work time or any time while conducting laboratory business.

Alcohol abuse will not be tolerated during scheduled work time or any time while conducting laboratory business. Reporting to work under the influence of controlled substances or alcohol is strictly prohibited.

Summit Pathology takes laboratory safety very seriously. Employees should report any concerns or violations to your immediate supervisor/manager or the Compliance Officer.

Safety

Summit Pathology is responsible for maintaining a safe work environment. Employees must comply with all local, state, federal and laws and regulations, this includes rules and regulation of the Occupational Safety and Health Administration (OSHA).



Members of the Summit Pathology Compliance Committee

Cristina McLaughlin, M.D. – cmclaughlin@summitpathology.com

Michael Smith, M.D. – msmith@summitpathology.com

Jeff Christinson, CEO – jchristinson@summitpathology.com

Kristin Marriott, CPCO – kmarriott@summitpathology.com
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Terry Ocana – tocana@summitpathology.com
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Tammie Strohl – tstrohl@summitpathology.com
Director of Human Resources

Jaimi Sweet – jsweet@summitpathology.com
Certified Coding Specialist

Summitpathology.ethicspoint.com
Summitpathologymobile.ethicspoint.com

Anonymous Helpline – 833-836-6812





Employee Acknowledgement Form

I hereby acknowledge receipt of Code of Conduct Policy Statements.

I certify that:

- I have fully reviewed the Code of Conduct, that I have been given an opportunity to ask questions about the document, and that I understand the statements and procedures contained therein.
- I agree to follow all the Compliance Policy Statements contained in the Code of Conduct and will comply with all applicable laws, regulations, program requirements and standards of ethical conduct.
- I will report promptly any known or suspected violations of this Code of Conduct. By my signature below, I further certify that I am not aware of any such violations by any Summit Pathology personnel, whether actual or suspected.
- I understand that my failure to maintain my personal commitment set forth above may subject me to discipline, up to and including termination of employment.

Complete ONE of the following:

I reviewed the Code of Conduct by reviewing with one of the following and was provided the opportunity to ask questions:

- Human Resources
- Member of management
- Compliance representative
- Reading it on my own

on _____, 20_____

Name: _____

Printed Name

Title: _____

Date: _____

Signature: _____

Note: After form is read, signed, and dated, please return it to Human Resources Department to become a part of your personnel file.

“Ethics is knowing the difference between what you have a right to do and
what is right to do”

~Potter Stewart

“Integrity gives you real freedom because you have nothing to fear since you
have nothing to hide”

~Zig Zigler

“The reputation of a thousand years may be undermined by the conduct of
one hour”

~Japanese Proverb