

OrthoNebraska is committed to conducting business in an ethical and honest manner and within the bounds of the law. This Code of Conduct is intended to provide employees, physicians, volunteers, vendors, officers, directors, and other agents of OrthoNebraska with guidelines for conducting business in a manner that fulfills that commitment. The Code of Conduct is supplementary to the mission, vision and values of OrthoNebraska and applies equally to everyone, whether an employee, senior management, board member, or a vendor doing business with OrthoNebraska. The Code of Conduct has been developed to be easily understood and demonstrates in the clearest terms the commitment of OrthoNebraska to the highest standards of ethics and compliance. The Code of Conduct is not intended to cover every situation that may be encountered, but it is intended to promote compliance with all applicable laws and regulations, whether or not specifically addressed in the Code of Conduct.

1. OBEY THE LAW

OrthoNebraska is committed to conducting its services lawfully and ethically. OrthoNebraska is committed to full compliance with all Federal and State health care program requirements. It is critical that all OrthoNebraska employees and agents meet the highest standards of conduct through strict observance of all laws and regulatory requirements.

As a condition of employment, all OrthoNebraska employees are expected to comply with applicable laws and regulations. Unfamiliarity with relevant laws and regulations is no excuse for violations.

OrthoNebraska employees, agents, and vendors can learn the laws and regulations by asking managers and other designated OrthoNebraska representatives when assistance is needed in understanding how Federal and State laws and regulations apply to performance of their duties or their relationship with OrthoNebraska. OrthoNebraska employees and agents are also expected to be informed about laws and regulations through participating in training programs, reading OrthoNebraska policies and other communications, taking initiative for selfdevelopment and contacting the OrthoNebraska Compliance Officer when appropriate.

2. APPROPRIATE BILLING PRACTICES

All OrthoNebraska employees and agents must be committed to full compliance with all Federal and State health care program requirements and submit accurate billing consistent with such requirements and with OrthoNebraska's policies and procedures. OrthoNebraska will bill for eligible services that are rendered, appropriately documented, and consistent with applicable medical necessity guidelines. OrthoNebraska employees and agents involved in billing and coding are expected to be knowledgeable in all aspects of current laws and regulations affecting their duties and must take all reasonable steps to ensure their work is accurate, timely, supported by the medical record, and compliant with applicable laws and regulations.

3. KEEP ACCURATE RECORDS

Every OrthoNebraska employee and agent is expected to comply with OrthoNebraska policies and Federal and State laws and regulations regarding record keeping. All records must be prepared accurately and retained in accordance with OrthoNebraska policies and Federal and State laws and regulations. This includes both clinical and non-clinical documentation.

4. REPORT INFORMATION TRUTHFULLY

All communications within OrthoNebraska or to outside organizations must be truthful.

5. BEHAVE ETHICALLY

Every OrthoNebraska employee and agent is expected to adhere to high ethical standards in performing duties and to comply with the OrthoNebraska Organizational Code of Ethics policy.

6. CONFLICTS OF INTEREST

OrthoNebraska employees are prohibited from having a direct or indirect interest, financial or otherwise, in a corporation or business, engaging in a professional activity, or incurring an obligation of any nature that is in substantial conflict with or that might reasonably tend to influence the discharge of the employee's official duties at OrthoNebraska. All employees are expected to disclose, annually, any financial arrangement with a company or entity external to OrthoNebraska that might create a potential conflict of interest. OrthoNebraska employees and agents are expected to avoid any situation which could be viewed as a conflict of interest in which the individual's position is used for personal gain.

7. IMPROPER PAYMENTS

Payments such as bribes, kickbacks, or payoffs are improper and illegal and are strictly prohibited by OrthoNebraska. No OrthoNebraska employee or agent shall make a payment or offer any other item of value to any patient, competitor, supplier, official representative of any governmental or regulatory body, or any other person or entity having an actual or potential relationship with OrthoNebraska for the purpose of inducing favorable behavior, decisions, or actions in connection with any OrthoNebraska business. No OrthoNebraska employee or agent may receive any payment or other item of value outside the normal compensation arrangement for performance of his/her responsibilities on behalf of OrthoNebraska. Employees who are involved in any type of improper payment scheme will receive disciplinary action, including termination and possible prosecution, if applicable.

8. CONFIDENTIALITY

Every OrthoNebraska employee and agent is expected to comply with OrthoNebraska's policies regarding patient information confidentiality and privacy.

9. REPORTING VIOLATIONS

Every OrthoNebraska employee and agent is expected to report any activity that he or she reasonably believes is in violation of the law or OrthoNebraska policy, or any Federal, State or local health care requirement. Reports may be made by any individual to his or her manager or to the Compliance Office either in person or anonymously via the Compliance telephone "hotline". The Compliance Hotline number is 1-800-399-2951. Reports of violations by OrthoNebraska employees or agents may be made without fear of retaliation. All precautions are taken to protect the anonymity of those filing a complaint as well as the individual(s) who is the subject of the complaint.

10. DISCIPLINARY MEASURES

OrthoNebraska employees are subject to disciplinary action for failure to comply with all Federal and State health care program requirements and with OrthoNebraska's policies and procedures. This includes failure to report a suspected violation of any Federal or State health program requirement and/or OrthoNebraska policies and procedures. Depending on the severity of the violation, disciplinary action may range from oral reprimand to termination. There is also a range of penalties under Federal and State law that can apply to employees, agents and OrthoNebraska for violations of such Federal and State laws. These penalties include monetary fines, civil and criminal legal actions, and exclusion from participation in Federal and State health programs.

I understand that the *Code of Conduct* applies to my employment and that following all laws, regulations, policies and the *Code of Conduct* is a condition of my employment. I will seek advice from my supervisor, Human Resources, the Compliance Officer, or I will call the Compliance Hotline with any compliance questions or issues.

My signature certifies that I have read and understand the *Code of Conduct*. My signature also certifies that I will adhere to and promote the elements of this *Code of Conduct*.

Employee Name (Print)	Employee ID#
Employee Signature	Date

Revised June 1, 2017

Nebraska Orthopaedic Hospital, LLC and OrthoWest, PC are each operating under the name OrthoNebraska. For more visit OrthoNebraska.com/legal.