



CODE OF CONDUCT

This Code of Conduct (the “Code”) describes the commitment of Patient Advocate Foundation (“PAF” or the “Company”) to the highest ethical standards of honesty and integrity as well as to compliance with all laws and legal requirements applicable to the Company, including Office of Inspector General (“OIG”) guidance for charitable patient assistance programs and PAF’s OIG Advisory Opinion 04-15, as modified, and industry guidance, including the Independent Charitable Patient Assistance Program Code of Ethics (“CPAP Code of Ethics”). This Code has been reviewed and approved by PAF senior management and the Company Board of Directors, who review this Code on at least an annual basis.

This Code is meant to set forth the legal and ethical requirements of the Company for its directors, officers, and employees, and, where appropriate, agents and subcontractors engaging in business conduct for or on behalf of the Company. This Code supplements but does not replace existing Company policies and procedures, including the PAF Employee Handbook/Business Code of Conduct and the PAF Governance Handbook. As such, all Company directors, officers, employees, and, where applicable, agents and subcontractors are required to abide by this Code, all applicable Company policies and procedures and all applicable laws and regulations when engaging in business conduct for or on behalf of the Company.

This is not a detailed rule book, nor is it all inclusive. Consequently, the Company relies on the good judgment and values of its directors, officers, employees and, where applicable, subcontractors and agents to implement the intent of this Code when neither this Code nor Company policies and procedures address a specific situation. **It is the responsibility of each director, officer, employee, and, where applicable, agent or subcontractor engaging in business conduct for or on behalf of the Company to ask questions regarding the application of the provisions of this Code or Company policies and procedures to specific situations or regarding situations not covered by this Code or Company policies and procedures and to seek guidance from their supervisors, PAF senior management or PAF’s Compliance Counsel before acting.**

Our Mission

PAF's mission is to safeguard patients through effective mediation and arbitration, ensuring access to prescribed healthcare, maintenance of financial stability and preservation of employment for patients with chronic, debilitating and life-threatening illnesses. PAF's mission can be split into three categories-

- 1) Preventing and assisting patients with **Medical Debt Crisis**
- 2) Ensuring patient **Access to Healthcare**
- 3) Ensuring continued **Employment** while experiencing a chronic, debilitating and life-threatening illness

PAF serves as a Coordinator between patients and their insurers, employers and/or creditors to resolve insurance, job retention and/or debt crisis matters as they relate to patient illnesses. PAF is a public charity under § 501(c)(3) of the Internal Revenue Code and has been recognized as an independent charity by independent charity evaluator Charity Navigator.

Our Vision

To ensure affordable access to needed healthcare for all individuals suffering from chronic, debilitating and life-threatening illnesses without materially negatively impacting such individuals' finances or employment.

Values/Ethical Principles

PAF is dedicated to the following values/ethical principles, and requires all directors, officers and employees and, where applicable, agents and subcontractors, performing services for or on behalf of PAF to comply with the following values/ethical principles:

- Act with honesty, integrity and objectivity, and in a manner that will merit the continued trust and confidence of patients and stakeholders;
- Operate independently, free from the influence of PAF donors;
- Cooperate in the provision of services to patients and in the operation of PAF's business;
- Share knowledge and best practices, and welcome honest and constructive feedback;
- Comply with all federal, state and local laws, regulations and legal requirements applicable to PAF, including OIG guidance for charitable patient assistance programs and PAF's OIG Advisory Opinion 04-15, as modified;
- Comply with the CPAP Code of Ethics;
- Comply with all applicable Company policies and procedures;
- Comply with all PAF contractual obligations to donors and other third parties;
- Be vigilant in the detection and prevention of potential fraud, waste or abuse;
- Promote ethical behavior in the provision of services for or on behalf of PAF;
- Maintain the privacy and security of personal health information transmitted or otherwise made available to PAF in accordance with applicable federal, state and local privacy and security laws and regulations and industry standards;

- Avoid actual or perceived interests that conflict with PAF's or a director's, officer's, employee's or, if applicable, subcontractor's or agent's, ability to carry out its mission and provide services to patients. Disclose any actual or potential conflicts of interest to PAF in accordance with Company policies and procedures;
- Train directors, officers, employees and, where appropriate, agents and subcontractors, as to legal compliance. Such training is conducted upon hire and annually;
- Respect PAF's proprietary information and trade secrets and the proprietary information and trade secrets of competitors, donors and third parties in accordance with applicable federal, state and local laws and regulations, Company policies and procedures, as well as contractual commitments undertaken by PAF;
- Maintain accurate and complete books and records, including accounting and financial data, and retain such books and records in accordance with applicable federal, state and local laws and regulations, Company's record retention policies and procedures and Company instructions;
- Use Company resources in accordance with applicable Company policies and procedures;
- Only employ individuals and contract with agents and subcontractors to provide services for or on behalf of PAF who are not excluded or debarred from federal or state procurement activities or federal or state health care programs, including Medicare and Medicaid;
- Afford equal opportunity. Ensure directors, officers, employees and, where applicable agents and subcontractors, are judged for their job performance and ability;
- Maintain a workplace free from physical or verbal abuse or harassment. Abuse or harassment directed toward a director, officer, employee, agent, subcontractor, patient, vendor or any third party is unacceptable in any form;
- Promptly investigate and address potential violations of applicable law, regulation, OIG guidance, PAF's Advisory Opinion, the CPAP Code of Ethics, this Code or Company compliance policies and procedures.
- All directors, officers, employees and, where applicable, agents and subcontractors are required to report potentially violations of applicable law, regulation, this Code or Company compliance policies and procedures to a PAF manager, the Compliance Coordinator, or PAF's Compliance Counsel in accordance with PAF policies and procedures. **Reports can be made anonymously and confidentially through the compliance hotline at 1-202-480-2291, 24 hours a day, 7 days a week;** and
- Promptly correct any unlawful or unethical behavior after its discovery and take action to prevent recurrences in the future.

Protection From Retaliation

All Company employees and, where applicable, subcontractors and agents, have a duty to report any suspected violation of applicable law, regulation, OIG guidance, PAF's Advisory Opinion, the CPAP Code of Ethics, this Code or Company compliance policies and procedures. **PAF will not tolerate any form of retaliation for reporting, in good faith, a suspected violation of law,**

regulation, OIG guidance, PAF's Advisory Opinion, the CPAP Code of Ethics, this Code or Company policies and procedures. Any such retaliation will be investigated and, upon substantiation, met with disciplinary action up to and including termination. All Company employees, subcontractors and agents are protected from retaliation related to the good faith reporting of any suspected violation of applicable law, regulation, OIG guidance, PAF's Advisory Opinion, the CPAP Code of Ethics, this Code or Company policies and procedures.

All Company employees and, where applicable, subcontractors and agents, have a duty to report any retaliation relating to good faith reporting of any suspected violation of applicable law, regulation, OIG guidance, PAF's Advisory Opinion, the CPAP Code of Ethics, this Code or Company policies and procedures. Such retaliation may be reported to a PAF manager, the Compliance Coordinator, or PAF's Compliance Counsel in accordance with PAF policies and procedures.

Compliance with this Code of Conduct

Company directors, officers, employees, and, where applicable, subcontractors and agents, are expected to abide by the standards set forth in this Code of Conduct and applicable Company policies and procedures. Company employees are subject to disciplinary action, up to and including termination, for violating this Code or applicable Company policies and procedures, including the failure to report a potential violation of applicable law, regulation or PAF's policies and procedures to PAF. Directors may be disciplined for violating this Code and/or Board of Director level standards set forth in the Governance Handbook by the Governance Committee in accordance with the Governance Handbook and those Board-level standards. PAF's relationship with an agent or subcontractor may be terminated by PAF if the agent or subcontractor violates this Code and/or applicable Company policies and procedures.

Acknowledgement of the Code of Conduct

All employees and, where applicable, agents and subcontractors, are required upon hire and annually to certify that they have received, read and agree to abide by this Code of Conduct in their provision of services to or on behalf of PAF.