

precyse®

CODE OF CONDUCT  
2015

## CONTENTS

<b>ABOUT OUR CODE OF CONDUCT</b>	<b>2</b>
<b>VISION, MISSION AND VALUES</b>	<b>3</b>
<b>INTRODUCTION TO THE CODE OF CONDUCT</b>	<b>4</b>
<b>WE COMPLY WITH THE LAW, RULES AND REGULATIONS TO WHICH WE ARE BOUND</b>	<b>5</b>
<b>WE AVOID CONFLICTS OF INTEREST</b>	<b>6</b>
<b>WE ENSURE INTEGRITY IN THE WORK WE DO</b>	<b>7</b>
<b>WE CONTINUALLY DEMONSTRATE OUR VALUES IN ALL INTERACTIONS</b>	<b>8</b>
<b>WE CONDUCT OURSELVES IN A PROFESSIONAL MANNER</b>	<b>9</b>
<b>WE STRIVE TO MAINTAIN A WORKPLACE THAT IS HEALTHY, SAFE AND RESPECTS COLLEAGUES' NEEDS</b>	<b>10</b>
<b>WE MAINTAIN THE PRIVACY, CONFIDENTIALITY AND SECURITY OF INFORMATION</b>	<b>11</b>
<b>WE ACTIVELY PROTECT OUR PROPERTY, ASSETS AND PROPRIETARY INFORMATION</b>	<b>12</b>
<b>WE ARE COMMITTED TO DOING THE RIGHT THING: HONESTY, TRUST, RESPONSIBILITY, ACCOUNTABILITY</b>	<b>13</b>

## ABOUT OUR CODE OF CONDUCT

*Welcome to Precyse!*

As a Colleague, you contribute greatly to our company and our culture. At Precyse, we have five values: Connecting, Imagination, Inclusive, Accountable and Integrity. One of the most important of these values is integrity – the adherence to moral and ethical principles. We are committed to our Clients and to each other to conduct business legally and ethically. It is reflected in our interactions with each other, with our Clients and with the community. To maintain our commitments, this Code of Conduct has been developed to help guide you in business conduct and other situations that may impact you or Precyse, directly or indirectly. It serves as a framework for ethical decision-making. It states the expectations for behaviors and relationships that all Colleagues must demonstrate in order to maintain successful operation of company business and to maintain the confidence and trust our Clients have placed with us.

Precyse Colleagues are passionate about their role in transforming the flow of healthcare information, and we are dedicated to best practices through a shared vision. I encourage you to review this guide often. Again, welcome to the team!

Best,  
Chris Powell, CEO



# VISION, MISSION AND VALUES

## OUR VISION

A world where all meaningful information is available and helps save time, money and lives.

## OUR MISSION

We are an innovation company. We deploy and advance our people, processes and technology to create solutions that drive healthcare actions.

## OUR VALUES

The manner in which we do our work and make our decisions:

### • CONNECTING

We value the human connection as energy to meet our challenges and improve our experiences.

We leverage technology to enhance our interactions with others and not to replace them.

We appreciate that we all have individual talents, skills, knowledge and experiences that together improve results and provide support as we share our journey.

### • IMAGINATION

Our creativity enhances our services, drives innovative solutions and is the foundation for our problem-solving.

We are champions of new ideas and appreciate the value of constant improvement.

We challenge ourselves and our partners to embrace new thinking as an opportunity to grow and learn.

### • INCLUSIVE

We harness the power of diversity, alternative thinking and unique perspectives of our Colleagues and Clients in solving everyday challenges.

We are respectful of the unique roles and viewpoints of others and strive to foster personal and professional growth with our interactions to create remarkable results.

### • ACCOUNTABLE

We meet our commitments to our Colleagues and Clients in a thoughtful and timely manner.

We acknowledge that others depend on our results and we take personal ownership in delivering.

Our say-do ratio is high.

### • INTEGRITY

We understand that there is no room for anything less than 100% commitment and compliance to quality and honesty.

We embrace that the fabric of our success is stitched together by the passion to do the right thing every time.

# INTRODUCTION TO THE CODE OF CONDUCT

Compliance and ethics are built into the framework of our company. From the beginning, we established a firm commitment to compliance and business ethics. In leading by example and by delivering on promises made to our Clients and Colleagues, Precyse has continually reaffirmed this commitment. The Precyse Code of Conduct reflects these commitments by stating our principles and expectations for conduct. The principles explain our position on a particular matter, while the standards provide guidance on how to comply. The principles are as follows:

- We comply with the law, rules and regulations to which we are bound
- We avoid conflicts of interest
- We ensure integrity in the work we do
- We continually demonstrate our Values in all interactions
- We conduct ourselves in a professional manner
- We maintain a workplace that is healthy, safe and respects Colleagues' needs
- We maintain the privacy, confidentiality and security of information
- We actively protect our property, assets and proprietary information
- We are committed to doing the right thing

It is up to each and every Colleague to adhere to these principles in their daily work and at any time they represent Precyse. If a Colleague feels another is on the wrong path, we have established a communication process, including a hotline number, to enable reporting of these issues and concerns. Precyse has made the promise and will not retaliate against any Colleague for good-faith reporting of any issue or concern.

**If you see something, say something! Immediately contact:**

- Your Precyse manager
- Your manager's Executive Leader
- Human Resources
- Corporate Compliance Officer

**Or use the Compliance Hotline:**    **Call: 844-234-7744 or**  
                                                         **Login to: [www.MyComplianceReport.com](http://www.MyComplianceReport.com)**  
                                                         **Code: "PSO"**

No manager or Colleague is permitted to engage in retaliation, retribution or any type of harassment against a Colleague for reporting a compliance-related concern in good faith.

## WE COMPLY WITH THE LAW, RULES AND REGULATIONS TO WHICH WE ARE BOUND

At Precyse, we are committed to compliance and require all Colleagues to conduct their individual duties and all Precyse operations in a manner that meets all applicable legal, ethical and regulatory standards. Maintaining high ethical standards in our business practices requires us to:

- Comply with all applicable Federal, state and local laws and regulations, including but not limited to applicable laws and regulations concerning the confidentiality of patient records and information
- Only pursue business opportunities that will not involve us, directly or indirectly, in unethical or illegal activity
- Not participate in any corrupt business practice, including bribery, kickbacks or payoffs
- Maintain all business data, records and reports completely, accurately and truthfully. We ensure generally accepted accounting practices and internal control procedures of Precyse.
- Ensure all marketing and advertising by Precyse is truthful, fair, accurate and complete. We will not make any false or misleading statements about Precyse or its services or another organization or its services

### **EXAMPLES OF SITUATIONS THAT ARE UNETHICAL AND THAT SHOULD BE REPORTED TO YOUR MANAGER:**

- **A prospective Client asks for a cash gift in return for signing a contract**
- **Hiding company finances from government auditors**
- **Concealing or intentionally disregarding another's criminal activity, such as forgery, theft or vandalism**

## WE AVOID CONFLICTS OF INTEREST

Precyse is committed to monitoring our activities to avoid conflicts of interest, actual impropriety or the appearance of impropriety. Colleagues should use the resources available to them in order to identify and avoid potential conflicts of interest as well as understand what activities and behaviors involving Clients, vendors, other Colleagues, contractors and government entities are appropriate. These resources include:

- Confidentiality and Intellectual Property Agreement
- Colleague Handbook
- Conflict of Interest Policy

To avoid conflicts of interest, Colleagues are asked to:

- Conduct all business transactions free from offers or solicitation of gifts, participation in vendor promotions and contests and benefits or other inducements in exchange for influence or assistance in a transaction.
- Decline offers of or solicitations for expensive gifts (generally worth more than \$50.00) including: cash, trips or discounts that would suggest or create any obligation.
- Avoid frequent acceptance of elaborate meals, refreshments or entertainment from Clients and/or vendors.
- Not use your positions or knowledge to profit personally or to assist others in profiting at the expense of Precyse or its Clients.
- Not interfere with the interests and/or business opportunities of Precyse.
- Disclose to the Executive Leadership Team the details of any arrangement that may pose a potential conflict of interest, including:
  - Business transactions and employment arrangements involving family members
  - Ownership or investment interests with other companies in which Precyse seeks to do business – interests held by oneself or that of a family member
  - Other interests in outside companies that do business with Precyse, which may include: employment, stock or investments exceeding 5% of the Colleague's net worth

### **EXAMPLES OF POTENTIAL CONFLICTS OF INTEREST THAT SHOULD BE AVOIDED:**

- **Giving an expensive gift to a prospective Client**
- **Recommending a competitor's services over our own to a prospective or existing Client**
- **Soliciting or employing a Colleague or independent contractor of Precyse during employment or within 12 months after employment with Precyse**

## WE ENSURE INTEGRITY IN THE WORK WE DO

In addition to our own high standards, our Clients depend on Precyse to deliver services and technology that meet and exceed their expectations for quality, accuracy and innovation. In performing our work, Colleagues must uphold professional standards:

- Follow all official coding guidelines, government regulations and correct coding initiatives to support coding assignments in order to accurately describe the services that were provided. Specifically, you must follow guidelines published in Coding Clinic and CPT Assistant as well as CMS Official Coding Guidelines and Rules and CMS coding/billing regulations published in Medicare and Medicaid Program Memoranda and Transmittals or in the Federal Register.
- Abide by the American Health Information Management Association (AHIMA) Guidelines for Ethical Coding
- Assign codes based on conditions and procedures documented in the medical record. Reflex or automatic assignment of codes will not be permitted.
- Make reasonable inquiry to ensure the coding and documentation is accurate before our Clients submit claims for reimbursement
- Discuss coding issues with managers and when necessary, a higher authority in order to resolve an issue
- Support our Clients in taking immediate steps to correct coding or data abstraction inaccuracies that may have been caused by our error or omission
- Maintain accurate and complete records of our work and performance metrics
- Maintain and submit accurate financial records and statements
- Ensure the technology created and maintained by Precyse is tested thoroughly and performs within the same standards followed by Colleagues

### **EXAMPLES OF UNETHICAL PRACTICES THAT SHOULD BE REPORTED INCLUDE:**

- **Performance evaluations or rewards based on reimbursements the Client receives**
- **Being asked to code without supporting documentation**
- **Recommending documentation to physicians that will artificially inflate the Client's claim**
- **Being asked to alter, change, add to or delete an entry in the medical record**
- **Not reporting a technical problem that leads to incorrect coding**
- **Knowingly submit personal expenses that do not comply with policy**

## WE CONTINUALLY DEMONSTRATE OUR VALUES IN ALL INTERACTIONS

The manner in which we do our work and make our decisions has a significant impact on our Colleagues, our Clients and ultimately our company. Accordingly, Precyse has a written set of Values that all Colleagues must learn and demonstrate on an everyday basis. Values are the operating principles that guide our conduct and relationships with others. These Values are included in the Code of Conduct and provided to Colleagues in more detail in the P2V2 booklet of our Mission, Vision and Values. In order to demonstrate our company's Values, Colleagues must:

- Ensure you understand our Values: Connecting, Imagination, Inclusive, Accountable and Integrity. Access and read the P2V2 booklet and discuss with your supervisor any questions you may have.
- Interact with Clients and other Colleagues in a manner that is reflective of the company's Values.
- Maintain the Precyse Value; they should always be a backdrop to our decision-making.
- Mentor other Colleagues in demonstrating Precyse Values. When they are not demonstrating our Values in any interactions, whether written, verbal, in person or from a distance, counsel them in a professional manner and help them to incorporate the Precyse Values in future interactions.

### **EXAMPLES IN WHICH THE PRECYSE VALUES NEED TO BE FURTHER DEVELOPED:**

- **Not connecting with others in a meaningful way, such as refraining from team celebrations, being late to contribute or not listening to others.**
- **Causing isolated work processes by: providing vague feedback, avoiding constructive discussions or not be willing to consider another's ideas.**
- **Accountability in work is lacking as demonstrated by frequent procrastination in making tough decisions or failure to plan ahead or communicate next steps.**
- **Sacrificing quality to meet a client demand, taking inappropriate shortcuts**

## WE CONDUCT OURSELVES IN A PROFESSIONAL MANNER

Our Colleagues hold professional certifications, author white papers, provide commentary on industry trends and have a reputation for excellence. Accordingly, how we conduct ourselves has an impact on both our personal and professional reputation for months or years to come. In order to maintain the high level of professionalism expected by Precyse and our Clients, Colleagues should:

- Make sure your professional image shows at all times by adhering to the company's and Clients' dress code, maintaining a well-groomed appearance and demonstrating through your work habits that you are prepared, timely and organized
- Communicate in a respectful manner. Avoid the use of slang, profanity or politically incorrect words or phrases. The other party may interpret such as abusive, harassing, threatening, discriminatory, disrespectful or otherwise offensive.
- Refrain from attributing your personal views as those of the company, unless authorized by your senior-most leader and the Marketing Department to do so
- Use social media and other electronic communications with care and consider the impression you create about yourself and Precyse when placing information relating to or identifying Precyse or our Colleagues on it
- Refrain from publically sharing anything you would not want on the front page of the newspaper or that you would want your friends, family, co-workers, manager or Clients to see
- Never share confidential, proprietary or potentially embarrassing business-related text messages, emails, photos, videos or other electronic messages with any third parties

In support of our Colleagues, Precyse will:

- Ensure that Colleagues are familiar with the applicable laws, rules and regulations governing their area of work
- Employ those who possess the proper experience and competencies required to fulfill their tasks
- Ensure that Colleagues are properly licensed, certified and trained
- Ensure that Colleagues are not included in the Office of the Inspector General's List of Excluded Individuals/Entities
- Encourage Colleagues to report deficiencies or errors to a Precyse manager for resolution
- Identify areas for improvement and take steps to make positive changes

### **EXAMPLES OF UNPROFESSIONAL CONDUCT INCLUDE:**

- **Frequent tardiness or absences**
- **Referring to another person's gender, sexual orientation, race or origin using politically incorrect or otherwise disrespectful words or phrases**
- **Telling jokes that may be considered offensive, harassing or demeaning to another**
- **Posting disparaging comments on social media about our co-workers, managers, company or Clients**
- **Forcing one's political or religious views onto another in the workplace**

## WE STRIVE TO MAINTAIN A WORKPLACE THAT IS HEALTHY, SAFE AND RESPECTS COLLEAGUES' NEEDS

Precyse is committed to creating a work environment in which our Colleagues, Clients and other partners are treated respectfully and fairly and are afforded opportunities for professional development.

- Precyse is committed to Equal Employment Opportunities (EEO) and will not discriminate against Colleagues or applicants for employment on any legally recognized basis, including but not limited to: veteran status, race, color, religion, sex, national origin, physical and/or mental disability, age and/or any other protected class under Federal, state or local statute or under Precyse policy.
- We will maintain zero tolerance for all conduct that is sexually or in any way harassing, abusive or offensive toward our staff, volunteers and students and/or other third parties associated with us. Report all potential issues or problems to your manager or Human Resources immediately.
- We will maintain a work environment free of threats or acts of violence or misconduct that harasses, disrupts or interferes with an individual's work performance or creates an intimidating, offensive or hostile environment
- Colleagues should not possess firearms, other weapons, explosive devices or other dangerous materials while on Precyse and Client property.
- Colleagues are prohibited from reporting to work or working when the Colleague uses any drugs, except when the use is pursuant to a doctor's orders and the doctor advised the Colleague that the substance does not adversely affect the Colleague's ability to safely perform his or her job duties

### **EXAMPLES OF INAPPROPRIATE WORKPLACE BEHAVIOR OR ACTIVITIES THAT SHOULD BE REPORTED IMMEDIATELY INCLUDE:**

- **Any act of harassment or attempts to create an environment that makes Colleagues feel intimidated, retaliated against or bullied**
- **Presenting for work while intoxicated or under the influence of illegal drugs**
- **Threatening or otherwise preventing another from reporting one's issues or concerns to a manager or Human Resources**

## WE MAINTAIN THE PRIVACY, CONFIDENTIALITY AND SECURITY OF INFORMATION

We understand the sensitive nature of the medical information with which our Clients entrust us, the intellectual property created under the Precyse brand, as well as other company financial and administrative documents. Additionally, State and Federal privacy laws such as the Health Insurance Portability and Accountability Act of 1996 (“HIPAA”) require that specific privacy and security protections are instituted and maintained. In order to comply with applicable Client and company policies, the HIPAA Rules and other State and Federal regulations, Colleagues must:

- Abide by the Health Insurance Portability and Accountability (HIPAA) Standards for Privacy and Security or other federal or state laws or regulations. Precyse and Client policies and procedures should be referenced for specific guidance.
- Use or disclose patient information only as agreed upon with the Client as indicated in the agreement with our Client
- Maintain administrative, physical and technical safeguards that reasonably and appropriately protect the confidentiality, integrity and availability of the electronic patient information that we create, receive, maintain or transmit on behalf of our Clients
- Complete training upon hire and at least annually on privacy and security regulations and on our own confidentiality policies and procedures
- Sign a statement annually that you have read and understand the Confidentiality and Intellectual Property Agreement
- Require that any business partners or subcontractors to whom we provide patient information will agree to the same restrictions and conditions as Precyse Colleagues and implement reasonable and appropriate safeguards to protect it
- Actively safeguard and not disclose information proprietary to Precyse, including specifics of client engagements, contracts, billings, financial records, etc., directly or indirectly, or use it for any purpose except as required in the course of our employment with Precyse.

### **EXAMPLES OF ACTIVITIES THAT PUT PATIENT OR COMPANY INFORMATION AT RISK INCLUDE:**

- **Sending an unencrypted email containing patient-identifying information or proprietary information**
- **Sharing passwords and other access codes**
- **Using or disclosing more patient information than is necessary to accomplish one’s work**
- **Accessing patient or business information without a need to know**
- **Not implementing safeguards at all times – whether they are passwords, locks or other barriers**
- **Having confidential conversations in public areas or in situations where one can be overheard easily**
- **Sharing work products or other company documents with a Precyse competitor**
- **Not requiring that a confidentiality agreement be signed before exchanging information with another party**

## WE ACTIVELY PROTECT OUR PROPERTY, ASSETS AND PROPRIETARY INFORMATION

We are committed to protecting both our assets and the assets of our Clients against loss, theft, destruction and misuse. Precyse recognizes assets to be our Colleagues, our proprietary information, intellectual and physical property and financial resources. In order to protect these and other resources, Colleagues must:

- Treat all resources with care as if they belong to you in order to prevent theft, damage or other misuse
- Perform work related to company business while on company time
- Submit to Precyse any intellectual property created or developed as part of your duties and not own, retain or distribute it to others. Colleagues sign a document acknowledging that any proprietary information or work product they create while employed by the Company is the property of the Company in accordance with this policy.
- Safeguard confidential information and documents to prevent access by unauthorized individuals
- Use Precyse computers and technology, including Precyse Code, Precyse CDI and Precyse University as necessary to perform work on behalf of Precyse and not use or share licenses in an unauthorized manner
- Return all equipment and other property provided to you during your tenure upon leaving employment with Precyse. Retention of Precyse property without written authorization is considered theft.

### **EXAMPLES OF MISUSE OF COMPANY PROPERTY, ASSETS AND PROPRIETARY INFORMATION INCLUDE:**

- **Use of any supplies, funds or other assets or property of Precyse for personal gain**
- **Fraudulently reporting hours worked or time off**
- **Use of company technology while working for a Precyse competitor**
- **Developing intellectual property and selling it to another company**
- **Leaking Precyse strategic plans to a third party**

## WE ARE COMMITTED TO DOING THE RIGHT THING: HONESTY, TRUST, RESPONSIBILITY, ACCOUNTABILITY

The Compliance Program at Precyse is designed to support our efforts to prevent, detect and eliminate waste, fraud and abuse of resources. We are always accountable for our work, services and technology and seek to actively protect and conserve it. If a report of non-compliance is made, it is shared with the leadership team and actions are taken to address, and whenever possible, mitigate any harmful effects and remedy the issue.

Sometimes doing the right thing requires us to speak up, point out the problems to our managers or to report someone or something that is wrong. It can be hard for you to do, but it needs to happen in order to do the right thing. Precyse has put in place safeguards to protect you so that you may report any situation that violates or may violate our Code of Conduct, our policies and procedures or the laws or regulations to which we are bound.

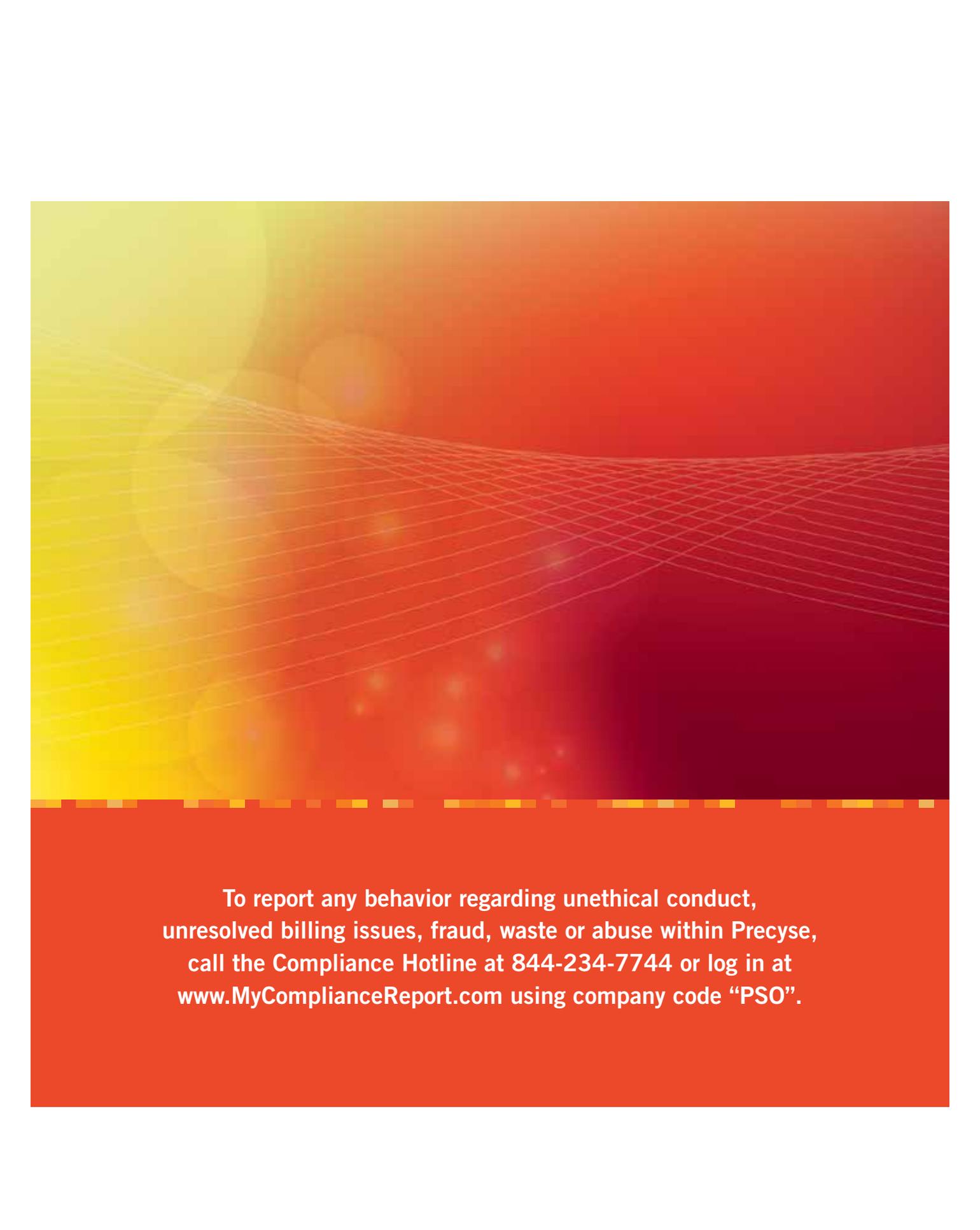
We encourage the resolution of issues at a departmental level with your Precyse manager whenever possible, but you may also report suspected violations to the Vice President of Human Resources or the Compliance and Privacy Officer. We know that there are times when concerns cannot be addressed properly through the normal chain-of-command or where for other reasons you do not wish to use these channels. In these cases, you are encouraged to call the Precyse Compliance Hotline at 844-234-7744 or log in at [www.MyComplianceReport.com](http://www.MyComplianceReport.com) with company code "PSO." You may remain anonymous, unless you choose to identify yourself. Precyse will make every effort to protect the identity of the reporter to the extent feasible and to protect that person from harassment and job-related retribution.

To uphold our commitment to doing the right thing, Precyse will:

- Review all reported concerns promptly
- To the extent possible, maintain confidentiality of the individual making a report
- Not take corrective action or other form of retaliation or revenge against any Colleague who, in good faith, reports an issue, problem, concern or violation to a Precyse manager, the Human Resources Department, the Compliance and Privacy Officer or on the Precyse Compliance Hotline
- Take into account that self-disclosure is in line with our Vision and Values Program and thus may have an impact on potential corrective actions
- Take actions to resolve any identified problems and mitigate harm resulting from an action or inaction
- Report all activities of the Corporate Compliance Program to our Executive and Senior Leadership Teams and Board of Directors
- Ensure all who act on behalf of Precyse are aware of our Code of Conduct and Corporate Compliance Program by requiring an annual review and attestation to be signed that acknowledges understanding and pledges commitment to our principles.

### **EXAMPLES OF NON-COMPLIANCE WITH OUR CODE OF CONDUCT THAT SHOULD BE REPORTED IMMEDIATELY:**

- **Individuals who discourage or prevent others from reporting issues and concerns**
- **Termination of a Colleague in retaliation for making a report**
- **Individuals who knowingly made false statements to a Precyse manager, Compliance Officer or other party investigating a report**



To report any behavior regarding unethical conduct, unresolved billing issues, fraud, waste or abuse within Precyse, call the Compliance Hotline at 844-234-7744 or log in at [www.MyComplianceReport.com](http://www.MyComplianceReport.com) using company code "PSO".