



Standards of Conduct

The Standards of Conduct provide guidance to ensure our work is performed in an ethical and legal manner. If you encounter any situation which you believe violates its provisions, you should immediately consult your direct manager and/or IRC's Compliance Officer, Matt Ray.

IRC has a strong commitment to performing our duties with integrity. We expect the actions of our employees, contractors, vendors and volunteers to reflect these high standards.

It is essential that each member of Integrated Rehab Consultant's workforce know that they are free to raise concerns and propose ideas without fear of retaliation. We expect each staff member to promote the highest standards of ethics and compliance at all times within, but not limited to the areas of ethics and compliance below.

Patient Relationships

IRC is committed to delivering safe, effective, efficient, compassionate and empathetic patient-centered care. We treat all patients with warmth, respect and dignity, and provide care that is both necessary and appropriate. Integrated Rehab Consultants follows a comprehensive program to promote patient safety and high quality of care by focusing on the following:

- Attentive and dedicated service to patients
- The use of progressive research to ensure high-quality, safe patient care
- A culture that focuses on patient safety
- A comprehensive approach to the credentialing and privileging of our medical staff
- Maximizing quality treatment through effective peer review

IRC never distinguishes among patients based on race, ethnicity, religion, gender, sexual orientation, national origin, age, disability, veteran status or any other protected category. Patients are involved in decisions affecting their care by obtaining their consent for treatment or participation in any clinical research. Each patient is provided with a written statement of Patients' Rights and a Notice of Privacy Practices.

Consistent with HIPAA, Integrated Rehab Consultants and our workforce will not use, disclose or discuss patient-specific information, including patient financial information, unless it falls within HIPAA guidelines. When information protected by HIPAA is requested from IRC, the minimal amount of information will be provided, according to HIPAA regulations.

Physicians

Federal and state laws and regulations govern the relationship between hospitals and physicians who may refer patients to the facilities. The applicable federal laws include the Anti-Kickback Law and the Stark Law.

Integrated Rehab Consultants does not:

- a. Pay for referrals or offer to pay anyone for the referral of patients.
- b. Accept payments for referrals we make. Under no circumstance will Integrated Rehab Consultants, or any person(s) acting on our behalf, be permitted to solicit or receive anything of value, directly or indirectly, in exchange for



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the referral of patients. Similarly, when making patient referrals to another healthcare provider, we do not take into account the volume or value of referrals that the provider has made (or may make) to us.

Legal and Regulatory Compliance

IRC is in compliance with all appropriate federal, state and local laws and regulations. Any concerns or suspected violations must be reported to IRC's Compliance Officer Matt Ray or may be reported through our confidential Compliance Hotline at 312-635-0973, option 3. All actions will be taken to report violations to the appropriate outside entity, when necessary.

When government agencies or other entities conduct surveys, IRC will cooperate fully. We will not conceal, destroy or alter any documents; or make misleading statements to agency representatives.

Business and Financial Information

All Company records and documentation are accurate, and support business practices and actions. Records and documentation include paper documents such as letters and memos, electronic information and any other medium that contains information about our organization or its business activities. No one may remove or destroy records.

Clinical Documentation, Coding and Billing for Services

Policies and procedures are in place to ensure accurate billing to government payers, commercial insurance payers and patients. Integrated Rehab Consultants does not submit claims for payment that are false or fraudulent. Reliable medical record documentation is readily available to support any claims submitted for adjudication.

Confidential Information

Confidential information refers to proprietary information about Integrated Rehab Consultants, patient information, and third-party information. Confidential information must be used only to perform job responsibilities and will not be shared with others unless the entity has a legitimate need to know the information.

Much of IRC's clinical and business information is contained electronically, so it is essential that all employees and contract staff protect their electronic devices, and the information contained therein by securing their devices through strong password and encryption planning. IRC has specific HIPAA security policies and procedures in place that all members of IRC's workforce are expected to follow. Any questions about how to secure electronic devices or about IRC's HIPAA Security Policies and Procedures may be directed to the IRC Security Officer, Jessica McCarthy.

Anyone who suspects that confidential information may have been compromised must report the potential breach to IRC's Privacy Officer, Jessica McCarthy or may report their concern through our confidential Compliance Hotline at 312-635-0973, option 3.