



**SYNERGEN Health**  
**CODE OF CONDUCT**

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## 1. Message from the Leadership

Dear Team Member:

Every day, our employees continue to live our core values of CLASS (Caring, Learning, Accountable, Sharing, and Socially Responsible). This strong work ethic is exemplified through our daily commitment to providing exceptional service to our Clients with CLASS.

The success of our business is dependent on the trust and confidence we earn from our employees, Clients, and vendors. We gain credibility by adhering to our commitments, displaying honesty and integrity, and reaching company goals solely through honorable conduct.

As we conduct our business, it is wise for us to ask:

- Will this build trust and credibility for SYNERGEN?
- Will it help create a working environment in which SYNERGEN can succeed over the long term?
- Will this benefit our Clients by building their confidence that we will always do the right thing?
- Would I feel comfortable describing my decision at a Team meeting?

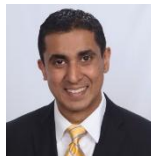
The only way we will maximize trust and credibility is by answering “yes” to those questions and by working every day to build our trust and credibility.

Everyone, regardless of position, is expected to perform duties honestly, ethically and with integrity. We are committed to doing the right thing. To ensure we are adhering to all laws and required standards, everyone has the duty to report any potential or suspected violation of this Code of Conduct, laws & standards, and SYNERGEN Health policies and procedures. We promote an Open-Door policy and are committed to ensuring that those who report issues in good faith will not face retaliation or retribution. Reports may be made anonymously or confidentially and several options for reporting misconduct are detailed.

Thank you for living up to the trust given to us by those we serve.



Mel Gunawardena  
Managing Partner



Duminda  
Gunawardena  
Managing Partner



Surinda  
Gunawardena  
Managing Director

## 2. SYNERGEN Vision, Mission, DNA and Values

### 2.1. Vision

Bringing Innovation, Excellence, and Success to our Partners.

### 2.2. Mission

At SYNERGEN Health, we are deeply committed to being a part of the change we want to see in the healthcare industry, which is why we collaborate closely with our clients to help lower the cost of collections while adhering to the highest standards of compliance.

### 2.3. DNA

<b>Innovation</b>	<b>Excellence</b>	<b>Joy</b>
We strive to innovate and transform ideas into new/improved solutions, services or processes, in order to advance, compete and differentiate ourselves successfully in the marketplace.	We strive to achieve excellence in Client service, learning, continuous improvement, knowledge sharing, teamwork and leadership.	We will bring joy to our customers, shareholders, community and ourselves. In other words, we will have a blast!

### 2.4. Values

<b>C</b> Caring	<b>L</b> Learning	<b>A</b> Accountable	<b>S</b> Sharing	<b>S</b> Socially Responsible
People, organizational and customer	For development and innovation	Aspiration, accountable and action-oriented	Through teamwork, knowledge and encouragement	Societal, integrity and commitment

## 3. Introduction

SYNERGEN Health is committed to conducting business in a legal and responsible manner, consistent with our organization's mission, vision, and values. We strive to provide our services in compliance with

all applicable laws, regulations, standards, guidelines, and SYNERGEN Health's policies and procedures. SYNERGEN Health will comply with requirements related to Client's participation in Medicare, Medicaid, and other healthcare programs. This Code of Conduct is intended to ensure that we meet our compliance goals and provide high-quality services to our Clients and business associates. It provides general guidance and is supplemented by SYNERGEN Health's other policies and procedures. This Code is organized into the following sections:

- I. Compliance Program
- II. Commitment to Patient
- III. Management Compliance Responsibilities
- IV. Record Keeping, Coding, and Billing Integrity
- V. Conflicts of Interest
- VI. Workplace Commitment
- VII. Use of Information, Property, and Equipment
- VIII. Certification and Acknowledgment

## I. Compliance Program

The SYNERGEN Health Compliance Program has been established to ensure business operations are conducted in accordance with professional standards, laws, and regulations. All those engaged in the SYNERGEN Health workplace must comply with this Code of Conduct, policies and procedures, laws, regulations, and professional standards including but not limited to:

- SYNERGEN Health promotes an Open-Door policy, and all supervisors and members of management must encourage employees, Clients as well as contractors, and other parties affiliated with SYNERGEN Health, to feel comfortable reporting concerns and asking questions.
- All those engaged by SYNERGEN Health have a duty to report any concerns or suspected violations of the Code of Conduct, specifically regarding billing policies, laws, and regulations (See Duty to Report Policy). The following process should be followed:
  - a. Talk to your supervisor, who is most familiar with the billing laws, regulations, and policies that relate to your work.
  - b. If you are not comfortable contacting your supervisor or if you do not receive an adequate response, talk to Internal Compliance Team or another member of the management team including SYNERGEN's Leadership.
  - c. If you still have questions after following the steps above, contact the SYNERGEN Health External Compliance Officer using Microsoft TEAMS or directly call on Compliance Reporting Hotline **214-979-6444**.

- d. You may also use the Internal Non-Conformance Management System on SharePoint to report concerns and complaints.

**Guide for reporting types of issues**

(Refer to SYNERGEN Directory for Contact Information):

#	Type of Issues	First Report to:	Second Report to: <i>(If issue not resolved after First Report)</i>	Third Report to: <i>(If issue not resolved after Second Report)</i>	Fourth Report to: <i>(If issue not resolved after Third Report)</i>
1	Information Security, Data Security, Physical Security related	Team manager	Internal Compliance Team	External Compliance Officer	Senior Leadership Team
2	Billing Compliance, Contractual Compliance, Violations or Concerns related any regulatory compliance including anti-kickback, Stark, False Claims Act, etc.	Team manager	Internal Compliance Team	External Compliance Officer	Senior Leadership Team
3	Human Resource Related issues -Grievances, disputes, etc.	Team manager	HR Manager	GM / AGMs	Senior Leadership Team

- No retaliation for reporting suspected violations or wrongdoing will be permitted (Non-Retaliation Policy). Any attempts to retaliate or take other negative action against an individual who in good faith reports concerns or suspected violations will not be tolerated. Any reports of retaliation will be investigated. If allegations of retaliation or retribution are confirmed following an investigation, appropriate disciplinary action will be taken. Reporting “in good faith” means that you have reason to believe a violation of the Code of Conduct occurred or may have occurred and that you are sincere in your attempt to provide honest and accurate information.
- All reports of potential non-compliance with SYNERGEN Health’s Code of Conduct, policies and procedures, laws, and regulations, including the unauthorized disclosure of personal health information (PHI) will be investigated in a timely and thorough manner (Incident Management Policy). If SYNERGEN confirms a report of non-compliance, appropriate

disciplinary actions, including and up to termination, will be administered. (Non-Conformance Management Procedure)

- Every SYNERGEN Health employee will receive an initial compliance orientation and periodic training updates in compliance protocols as they relate to the employee's individual duties. Participation in required training is a condition of employment. Failure to participate in required training may result in disciplinary actions, up to and including, termination of employment.
- SYNERGEN Health will promote only honest, straightforward, fully informative, and non-deceptive marketing. We use marketing to educate the public, increase awareness of our services and recruit employees. All marketing materials must accurately describe our services and programs. In order to ensure that no incorrect information is disseminated, employees must coordinate all marketing materials with and direct all media requests to the SYNERGEN Health Executive Leadership.
- Relationships with Vendors and Suppliers
  - SYNERGEN Health is committed to employing the highest ethical standards in its relationships with vendors and suppliers with respect to source selection, negotiation, determination of contract awards, and administration of purchasing activities. All vendors and suppliers are to be selected solely based on objective criteria; personal relationships, friendships, or any other conflict of interest play no part in the selection process.
  - SYNERGEN Health does not knowingly contract or do business with a vendor that has been excluded from a government-funded healthcare program. .

## **II. Commitment to Patients**

Even though SYNERGEN Health is not a direct healthcare provider, we are committed to serving our Clients' patients by:

- Providing high-quality billing services consistent with appropriate professional and regulatory standards.
- Not permitting Employees to accept gifts from anyone being served by SYNERGEN Health to avoid conflicts of interest.
- Protecting patients' private and confidential information, in accordance with state and federal laws, and professional standards.

### III. Management Compliance Responsibilities

- Management has the added responsibility of demonstrating, through their actions, the importance of this Code of Conduct. In any business, ethical behavior does not simply happen; it is the product of clear and direct communication of behavioral expectations, modeled from the top and demonstrated by example.
- To make our Code of Conduct work, managers must be responsible for promptly addressing ethical questions or concerns raised by employees and for taking the appropriate steps to solve such issues. Managers should not consider employees' ethics concerns as threats or challenges to their authority, but rather as another encouraged form of business communication. At SYNERGEN Health, we want the ethics dialogue to become a natural part of daily work.
- If an employee has a question or issue to report regarding compliance with a law, regulation, or policy and procedure, a manager is responsible for:
  - Maintaining the person's confidentiality, to the extent possible;
  - Providing responsive and accurate information regarding the person's report;
  - Taking prompt action on credible reports of suspected violations; and
  - Informing the person that an issue or concern is being addressed.
- Managers have an obligation to:
  - Know and follow laws, regulations, and policies related to their duties;
  - Know and educate their Employees on how to report suspected or actual violations;
  - Encourage others to ask questions and to report actual or suspected violations; and
  - Know and educate their Employee on SYNERGEN Health's Non-Retaliation Policy.

### IV. Record Keeping, Coding, and Billing Integrity

Individuals responsible for providing SYNERGEN Health Revenue Cycle Services will:

- Maintain all corporate records to be true, accurate, and complete with company data being promptly and accurately entered in accordance with SYNERGEN Health and other applicable accounting/business principles.
- Not improperly influence, manipulate, or mislead any authorized auditor, nor interfere with any authorized auditor engaged to perform an audit of SYNERGEN Health's books of business, records, processes, or internal controls.



- Bill patients and third-party payers in accordance with applicable laws, regulations, policies, and procedures; and not “knowingly” submit or cause to be submitted claims that are false or fraudulent. Examples of “knowingly”: Billing for non-FDA approved drugs, and you knew that the FDA approval was only in the final stages of approval, but not yet approved would be “knowingly”. If you accidentally typed in the wrong CPT code, you are not “knowingly” submitting an inaccurate claim.
- Periodically review bills, reimbursement, and medical records to ensure compliance with applicable billing, coding, and documentation requirements, i.e., double billing, unbundling, up coding, etc. are not appropriate.
- Apply CPT and ICD-10 codes used for claims submission, following officially published guidelines that are supported by documentation that is provided by the Client.
- Disclose billing errors to third-party payers (and patients) and inform Clients of refund obligations that are identified in the SYNERGEN Health billing process.
- Not offer, provide, solicit, or accept kickbacks, bribes, rebates, or anything of value tied to influencing the referral of services covered and payable by a federal or state health care program.

## V. Conflicts of Interest

SYNERGEN Health employees will avoid any conflicts of interest between their private interests and those of SYNERGEN Health that may prevent them or appear to prevent them from fulfilling their job responsibilities ethically and responsibly (Conflicts of Interest Policy).

- SYNERGEN Health employees and business associates shall refrain from and avoid conflicts or the appearance of conflicts, between the performance of their duties at SYNERGEN Health and their private interests.
- No one engaged by SYNERGEN Health may solicit, receive, offer, or provide gifts or favors (e.g., cash, meals, and entertainment), which may be interpreted as improperly influencing the performance of their job responsibilities.
- No one at SYNERGEN Health may either give or accept business courtesies that constitute, or could reasonably be perceived as constituting, unfair business inducements that would violate law, regulation, or policies or would cause embarrassment or reflect negatively on SYNERGEN Health’s reputation.

- Employees may accept unsolicited gifts of nominal value, other than money, such as flowers, fruit baskets, calendars, pens, mugs, caps, and t-shirts (or other novelty, advertising, or promotional items).
- Generally, SYNERGEN Health employees may not accept compensation of any amount from entities with whom SYNERGEN Health does or may do business. Tangible gifts (including tickets to a sporting or entertainment event) that have a market value greater than \$100 may not be accepted unless approved in writing by management.
- Any situations that would create or appear to create a conflict of interest shall be reported to the Compliance Officer.

## **VI. Workplace Commitment**

SYNERGEN Health strives to establish and maintain a work environment where employees, contractors, and volunteers are treated with respect and fairness. SYNERGEN Health will:

- Maintain a work environment free of harassment and intimidation. Verbal, physical, or sexual harassment will not be tolerated (Sexual Harassment Policy, & Zero Tolerance Policy).
- Make all employment and promotion decisions without regard for an individual's race, color, sex, national origin, age, disability, or any other classification or status protected by local, state, or federal law.
- Have all employees and others engaged, regardless of status or position, follow the Code of Conduct, Employee Handbook, and SYNERGEN Health's policies and procedures.
- Maintain a workplace that protects the health and safety of everyone in the workplace.
- Ensure all those in the workplace show respect and consideration for one another regardless of status or position.
- Resolve disagreements and conflicts in the workplace by following proper procedures and in a fair and respectful manner.

- Not hire or contract with individuals or entities that have been sanctioned or excluded by any federal or state health care program.

## VII. Use of Information, Property & Equipment

SYNERGEN Health resources, including time, material, equipment, and information, are provided for company business use only. SYNERGEN Health employees will:

- Protect patient and company information and property from improper use, disclosure, loss, theft, or destruction according to federal and state regulations. (See HIPAA policies)
- Not use company equipment such as email, computers, copiers, and fax machines in the conduct of an outside business or in support of any religious, political, or other outside daily activity, except for company-requested support to nonprofit organizations. Disclose company information only as required in the performance of their duties or as authorized by SYNERGEN Health, HIPAA Privacy Regulations, and Health Information Technology for Economic and Clinical Health Act (HITECH).
- Not solicit contributions nor distribute non-work-related materials during work hours.
- Follow established internal procedures for the handling of SYNERGEN Health's funds and property. Properly maintain and use SYNERGEN Health's supplies.
- Social Media -- social media refers to online communities and personal blogs in which users post information, personal messages, and other content. When social media is used inappropriately, it can violate patient privacy leading to significant damage to SYNERGEN Health and SYNERGEN Health's Employees through, without limitation:
  - Breach of patient privacy causing harm to the patient
  - Reputational harm
  - Loss of Client/patient trust
  - Substantial fines and penalties

Use of any social media must follow the established SYNERGEN Health Social Media policy.

Authorized Approvers: Duminda Gunawardena, Shehan Wijayanayake, Mel Gunawardena, Faye Griffin, Aroodgahan Ratnananthan last updated June 17, 2024