



Corporate Compliance Plan

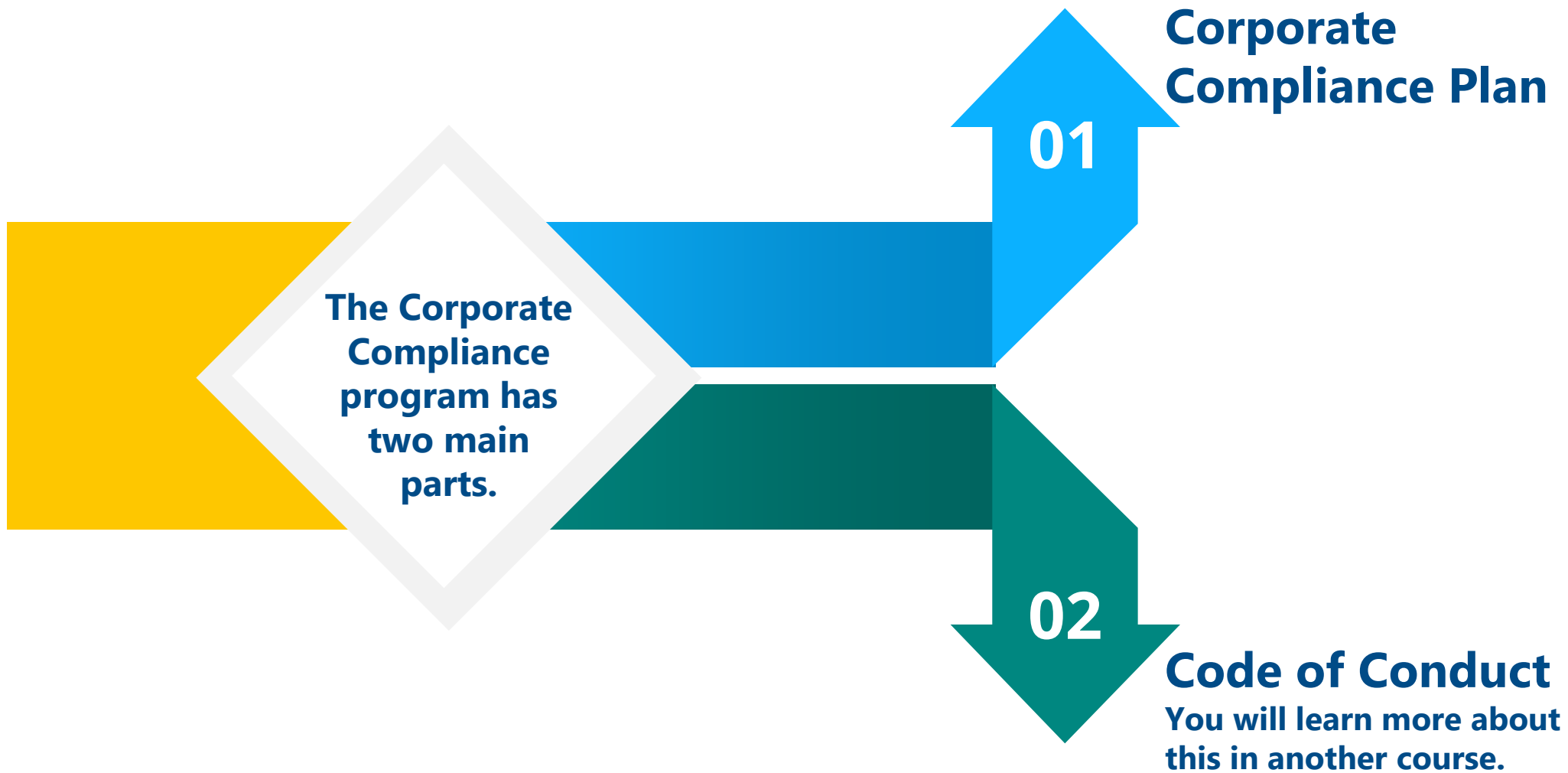
2024 Annual Safety and Compliance Training

Core Learning Objectives of this course:

Our Corporate Compliance Program is designed to ensure MHS and our workforce members follow federal, state, and local laws and regulations, as well as internal policies and procedures.

Our Compliance Program:

- Demonstrates MHS's commitment to responsible and honest business conduct
- Encourages employees to report potential problems
- Increases the likelihood of preventing, identifying, and correcting unlawful conduct
- Helps mitigate damage in cases of non-compliance



The Corporate Compliance program has two main parts.

01

Corporate Compliance Plan

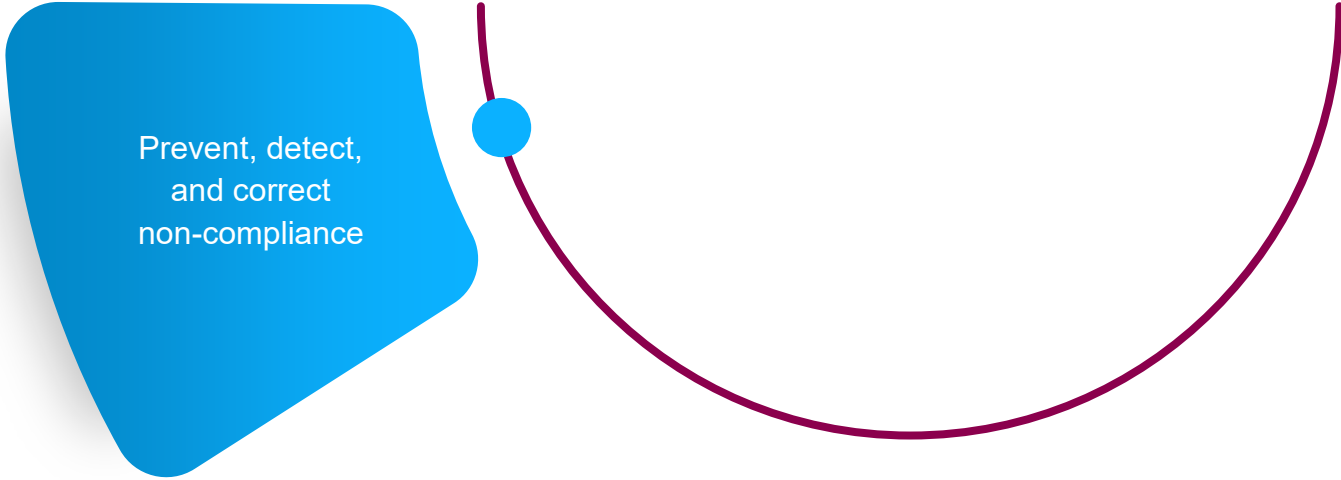
02

Code of Conduct
You will learn more about this in another course.

An effective compliance program must foster a culture of compliance within an organization and, at a minimum:

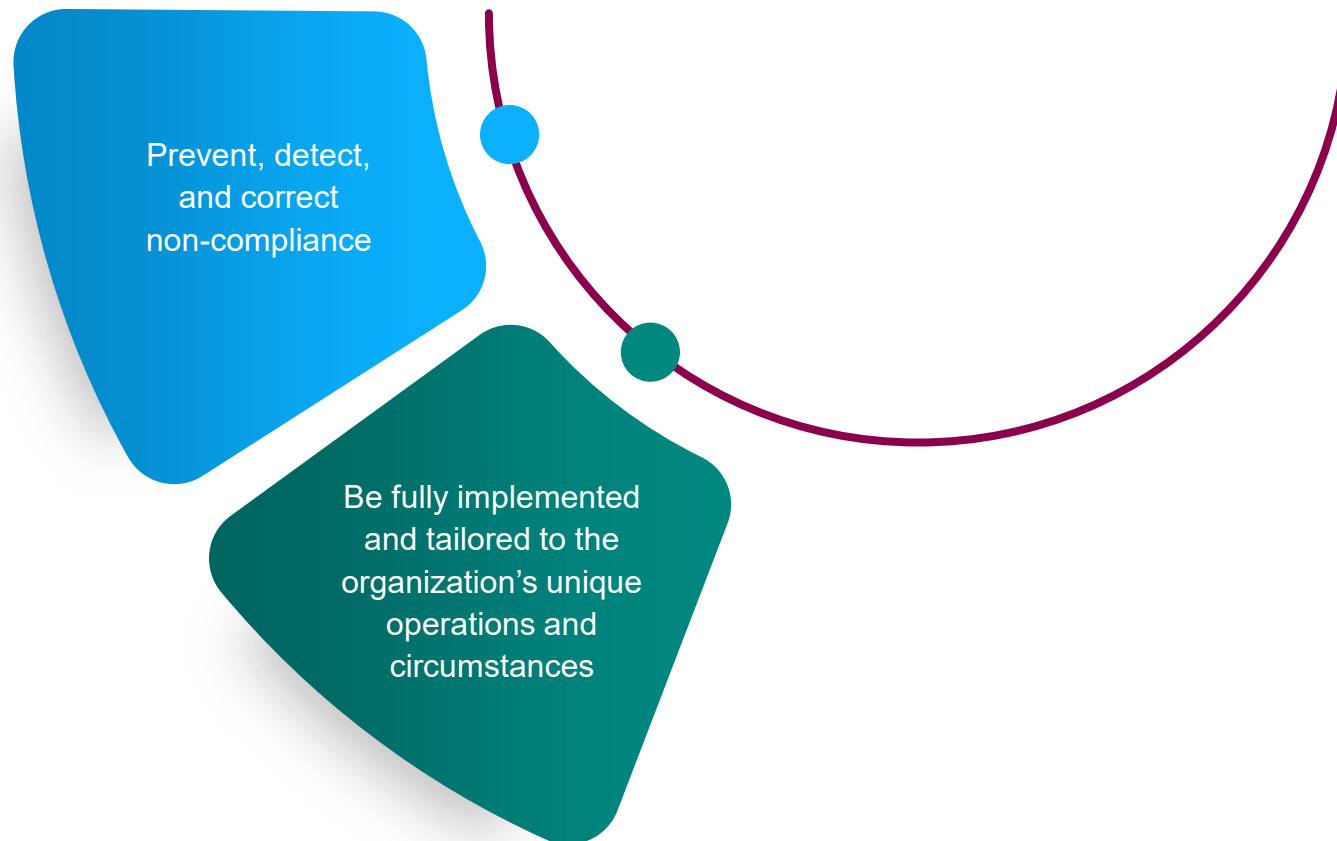


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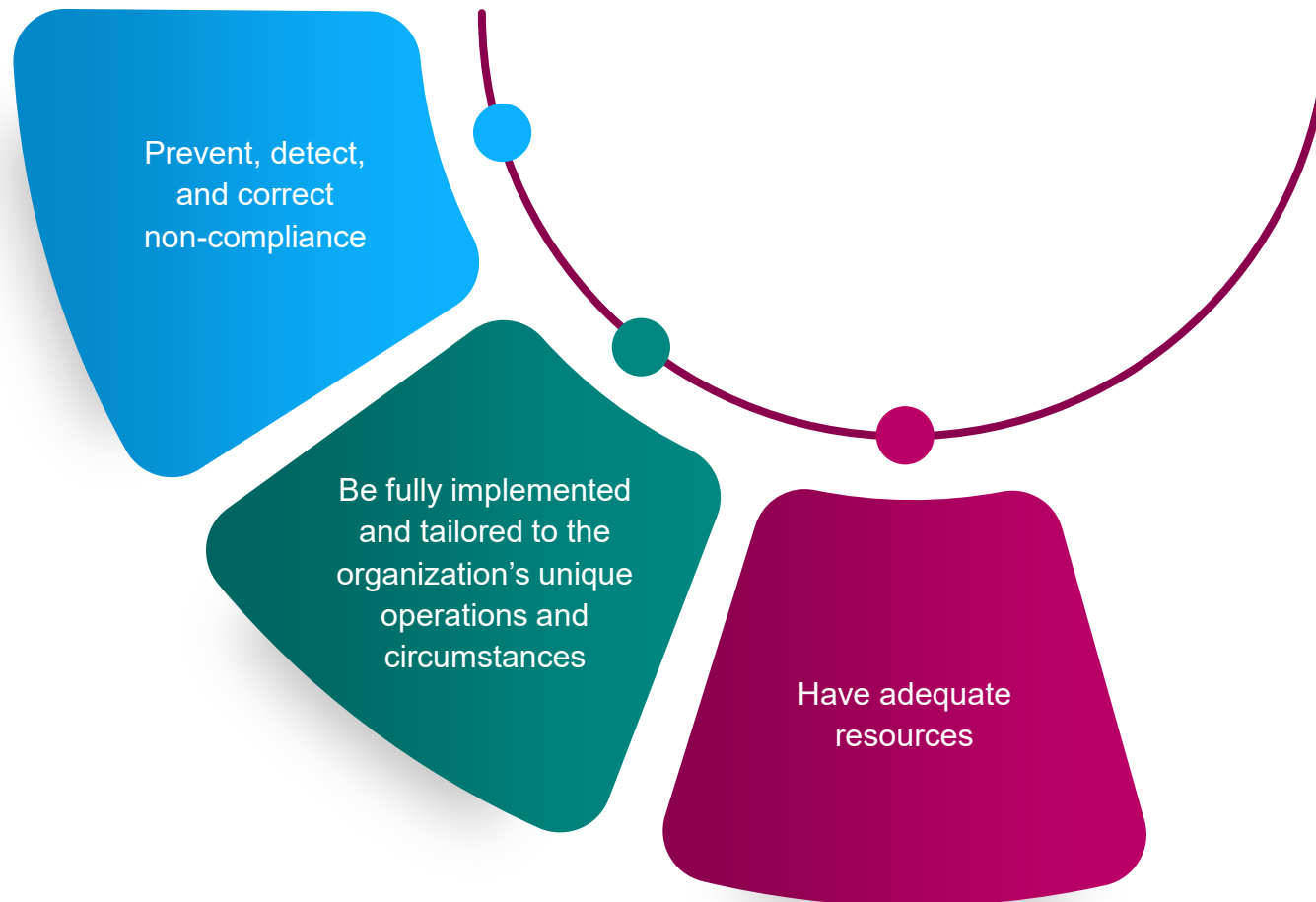


Prevent, detect,
and correct
non-compliance

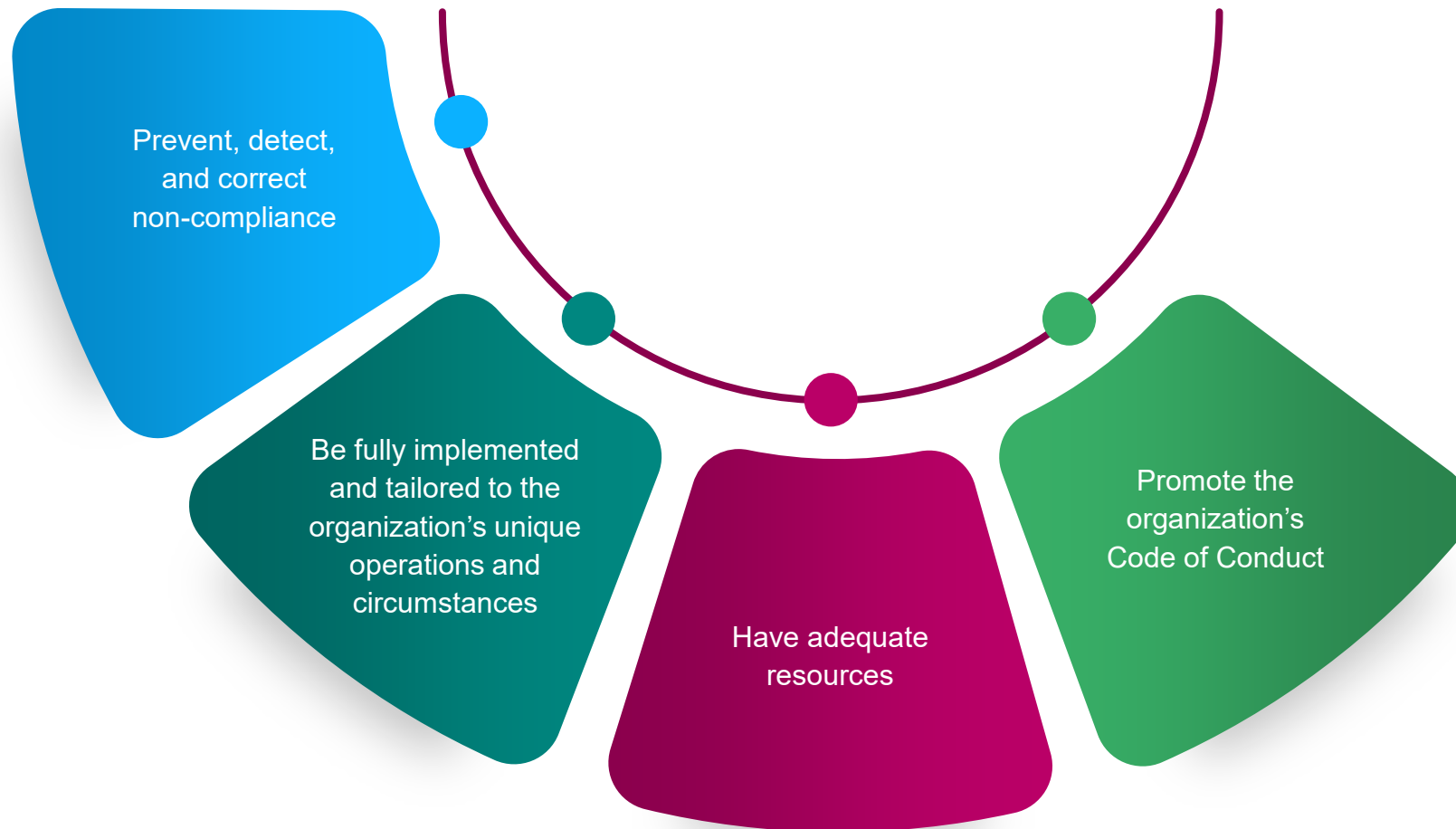
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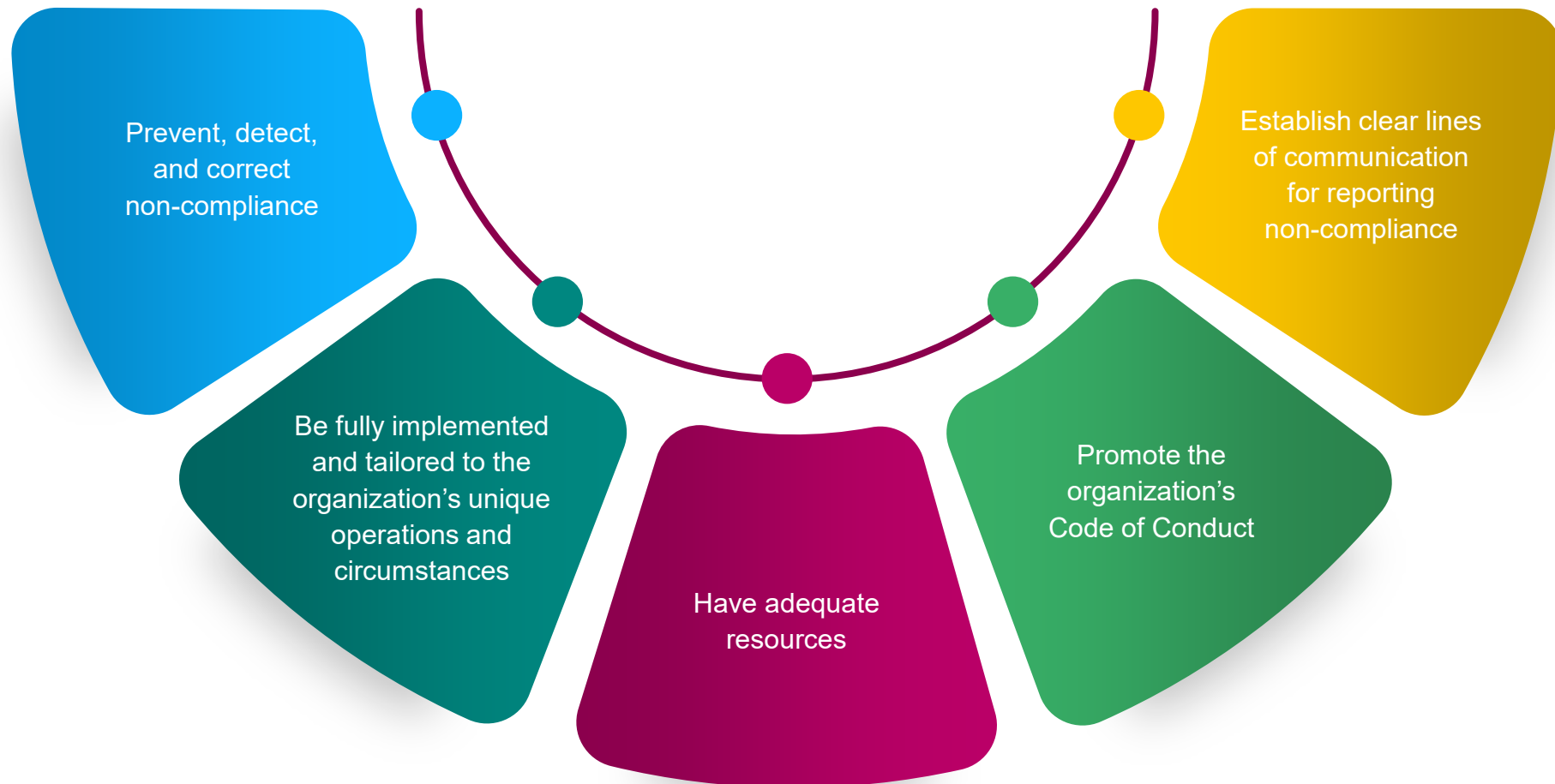
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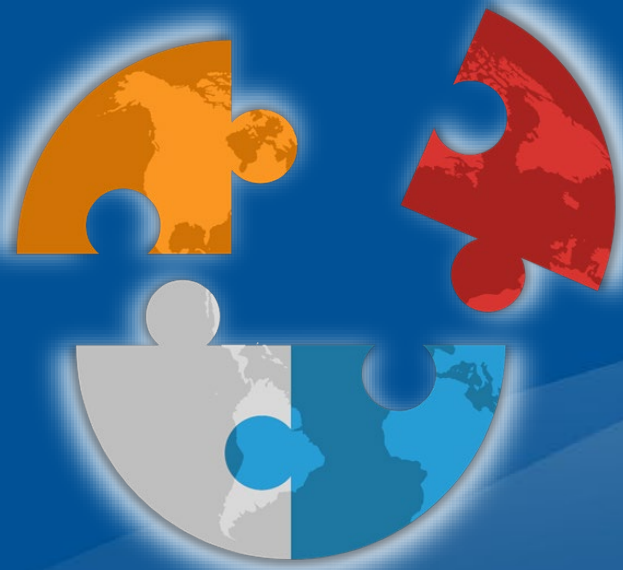


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For our compliance program to continue to be successful, every MHS employee and agent needs to understand their responsibility to support the culture of compliance.

It's crucial that we do not personally, or as an organization, engage in any inappropriate or illegal behavior.

**Our
Compliance
Program**

**Demonstrates MHS's commitment
to responsible and honest
business conduct**



**Encourages employees to report
potential problems**



**Increases the likelihood of
preventing, identifying, and
correcting unlawful conduct**



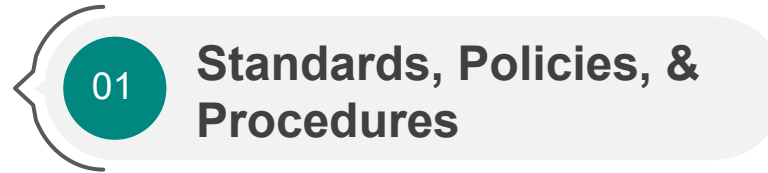
**Helps mitigate damage in cases
of non-compliance**



The Corporate Compliance Plan consists of seven elements.

These 7 Elements are based on recommendations from the Office of Inspector General (OIG) and are identified in the US Sentencing Guidelines as essential to an effective compliance program.

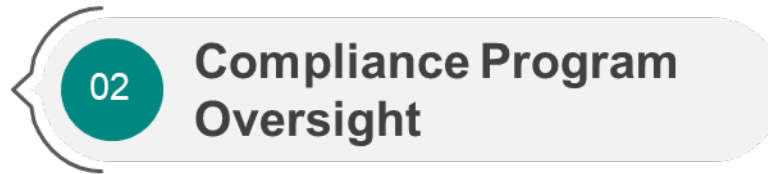




01 Standards, Policies, & Procedures

The foundational documents of the Corporate Compliance Program are the Corporate Compliance Plan and the Code of Conduct, which are designed to provide guidance to employees on what is and is not appropriate behavior. Other standards, policies, and procedures may take different forms. Examples include Compliance department policies and procedures, Human Resources policies and procedures, and individual department policies.

Particular emphasis has been placed on the areas of financial billing, accreditation, conflicts of interest, physician relationships, quality of care, research, gifts, confidentiality, non-discrimination, and organizational ethics.



02 Compliance Program Oversight

The Audit and Compliance Committee of the MHS Board of Directors has been delegated oversight over the Corporate Compliance Program. The MHS Board appoints the Chief Compliance Officer; adopts and implements the Corporate Compliance Program and related policies, procedures, monitoring, and enforcement; and exercises final authority on all compliance matters.

The Corporate Compliance Program is overseen by the Vice President of Compliance/MHS Corporate Compliance Officer and the Chief Compliance Officer. The Vice President of Compliance will also delegate authority to assist with oversight activities.

02

Compliance Program Oversight

Shari Flowers, General Counsel & VP Compliance

Jen Anderson, Chief Compliance Officer

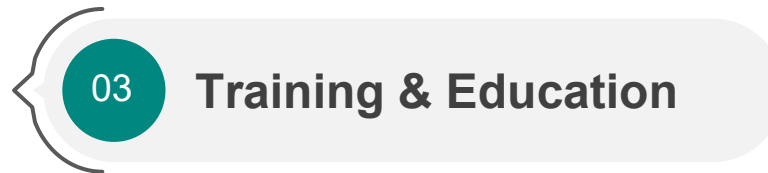
Anita Patterson, Privacy Officer

Donna Wellwood-Clawson, Director Employee Relations

Michael Kearns, Director Information Security



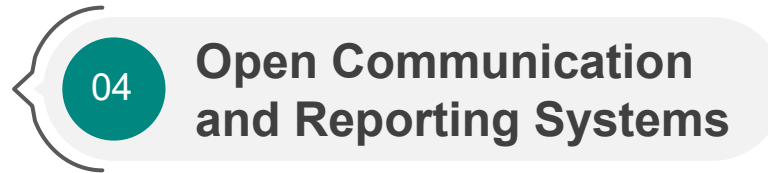
**Who do I
contact for
compliance
issues?**



03 Training & Education

MHS has various policies and educational programs designed to teach personnel about the Corporate Compliance Program. It is the responsibility of all employees and agents of MHS to be knowledgeable about the compliance requirements of their specific positions.

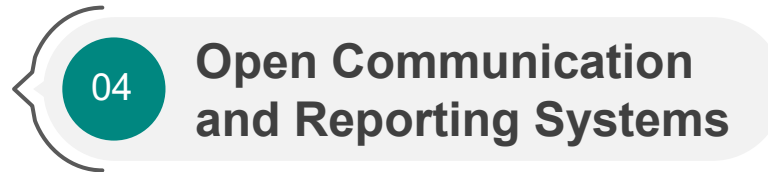
This course provides basic compliance training, and it is supplemented with articles in employee and management newsletters and live, on-site training designed to enable discussion and full understanding of complex regulations for each department based on the specific risks associated with job duties. For additional compliance training, please talk to your supervisor or contact the Compliance Department.



04 Open Communication and Reporting Systems

All employees and agents of MHS who have firsthand knowledge of activities or omissions that may violate applicable laws, regulations, the Code of Conduct, policies, or professional standards have an affirmative obligation to report such wrongdoing.

No employee or agent making a good faith report will be retaliated against by MHS or any of its affiliates, employees or agents.



04 Open Communication and Reporting Systems

Everyone is encouraged to contact their Supervisor or the Compliance Department for clarification or direction regarding the Corporate Compliance Program.

If you have a concern or knowledge of a violation of applicable laws or regulations, you are required to report such activity.

No retaliation will be permitted against an employee making such a report. Employees making reports are encouraged to disclose their identity to allow a full and timely investigation of the concerns, however, anonymous reporting is an option. No report will be refused or treated less seriously because the reporter chooses not to be identified.

04

Open Communication and Reporting Systems

Reporting Compliance Issues:

See Something? Say Something!

Reporting is available for any Fraud, Compliance & Ethics, or Human Resource issue. Reporting is confidential and always available through an independent third party.



COMPLIANCE HOTLINE

1-877-640-0005 (English)

1-800-216-1288 (Spanish)

<https://www.lighthouse-services.com/reporting-hotlines/>



05

Monitoring & Auditing

Monitoring is the process of continuously or periodically checking performance of staff and/or systems to ensure they are working efficiently and effectively and in compliance with all applicable laws and regulations.

Auditing is the oversight process used to review procedures, systems, and processes. Auditing across MHS is conducted by the Internal Audit department, an independent department dedicated to evaluating and improving the effectiveness of the risk management, internal control, and corporate governance processes while adding value by improving operation and process efficiency.

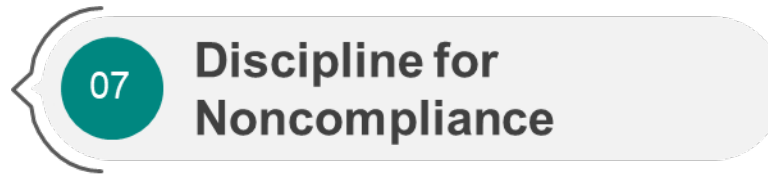
Monitoring & Auditing Activities are reported through these various Compliance Committees: Therapy Compliance, Operational Compliance, Corporate Compliance.

Any compliance issues that are reported or discovered will be promptly and fully investigated by the Compliance Department.

Following an investigation, the Compliance Department, in coordination with relevant departments and supervisory personnel, will take whatever corrective actions are necessary and appropriate to make sure we are in full compliance with all applicable laws and regulations and to prevent further, similar violations.

Corrective action may include:

- Updates to policies and procedures
- Staff re-education
- Disciplinary action
- System and/or process redesign



07 Discipline for Noncompliance

Anyone who knowingly violates MHS policy is subject to disciplinary action.

This may include documented discussion, written warning, suspension, termination, suspension of the right to access the MHS IT Network, and/or termination of other privileges.

Depending on the circumstances and severity of the issue, MHS may also notify law enforcement officials and/or regulatory, accreditation, and licensure organizations.

07

Discipline for Noncompliance

Examples of inappropriate and/or illegal behavior include:

- Falsifying, forging, or altering records, bills, or other documents
- Stealing or misusing funds, supplies, property, and/or other MHS resources
- Accessing or altering computer files or patient records without authority
- Falsifying reports to management or external agencies
- Violating the MHS Conflict of Interest policy
- Storing patient information on unsecured mobile/portable devices
- Failing to comply with OSHA guidelines
- Accessing or sharing confidential information without a need-to-know
- Inappropriately accessing or using protected health information