



## CODE OF CONDUCT - 2024

The *Mission* of AIDS Healthcare Foundation and its subsidiaries (collectively "AHF") is to provide people with HIV/AIDS cutting edge medicine and advocacy regardless of their ability to pay. The organization also follows AHF's five *Core Values*: Patient Centered • Value Employees • Respect for Diversity • Nimble • Fight for What's Right.

This Code of Conduct is a key element of AHF's *Compliance Program*, declaring and implementing AHF's commitment to highest ethical practices and compliance with all federal and state laws and standards.<sup>1</sup> Everyone working within and with AHF – directors, officers, volunteers, managers, employees, providers, subcontractors – is responsible for following this Code. Principles of conduct include:

- Follow AHF's Mission and live the Core Values in your daily work
- Provide high quality, skilled, and competent care
- Offer courteous, compassionate, reliable services to all
- Conduct yourself with professionalism, honesty, and integrity
- Treat all people with respect and dignity
- Treat co-workers, patients, and plan members fairly and equally, regardless of race, color, religion, sex, gender, national ancestry, age, physical or mental disability, sexual orientation, veteran status, or any other status protected by law.
- Safeguard the privacy and confidentiality of patient information entrusted to AHF
- Prevent, detect, and correct potential instances of fraud, waste, or abuse

Whether you are an employee, manager, director, provider, or subcontractor, your participation in AHF's Compliance Program is critical to helping AHF maintain compliance and a caring, respectful work environment. By following this Code, you help AHF reduce the risks and serious consequences for non-compliance. Your duties include:

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<sup>1</sup> As a recipient of government funds for many of its healthcare programs, AHF and its affiliates have a duty to fully follow all applicable federal and state laws (such as California and Florida) as well as the contractual requirements of government-agency payors, for example, Centers for Medicare & Medicaid Services (CMS), California Department of Health Care Services (DHCS), California Department of Managed Health Care (DMHC), Florida Office of Insurance Regulation (OIR), Los Angeles County Public Division of HIV and STD Programs (DHSP). AHF affiliates include AHF Healthcare Centers, and AHF MCO of Florida, Inc.

- Complete all compliance training required by AHF and cooperate with the Compliance Program
- Securely maintain patient health information pursuant to federal and state privacy laws and accreditation standards, including the Health Insurance Portability and Accountability Act (HIPAA) and AHF policies and procedures. Access and disclose patient and other sensitive or confidential information only pursuant to appropriate authorizations and privileges and on a "need to know" basis
- Follow all IT-related procedures related to electronic information security
- Maintain company integrity by reporting any conflicts of interests you may have as required by AHF's policies
- Responsibly use all AHF equipment and assets to avoid unnecessary damage or theft
- Actively participate in the detection, prevention and correction of fraud, waste or abuse. Report to AHF any potential incidents of fraud, waste or abuse, including but not limited to suspected violations of law, regulations, or Medicare/Medicaid program requirements
- Do not 1) offer any unlawful incentives to clients, providers, or others to encourage the use of AHF products or services 2) take any gift, payment, kickback or bribe as an inducement to refer or purchase any service 3) knowingly make any false statements, verbal or written, to government agencies or other payors
- Timely report (or assist in reporting) government-contract required reporting elements
- Work safely, according to AHF safety policies and procedures
- Where applicable to your area of operation:
  - code and bill accurately and timely, in accordance with nationally recognized standards and rules and AHF policies and procedures. Submit to government payors or their agents only those claims that are covered services, medically necessary, and rendered and billed in accordance with applicable laws and AHF policies and procedures
  - timely pay contractors according to contract requirements and federal and/or state prompt payment laws
  - use only marketing and promotional materials that are clear and accurate and have received all necessary internal and external approvals
  - purchase, maintain, dispense, and transport drugs and other controlled substances as required by applicable laws and regulations
  - regularly review providers' credentials according to federal and state laws and accreditation standards
  - provide benefits to plan members based on need and medical necessity and without restriction related to mental as well as physical illness, claims experience, receipt of health care, medical history, genetic information, evidence of insurability, including conditions arising out of acts of domestic violence, or disability

*If you suspect noncompliance, do the following:*

**AHF Employees:**

- Consult AHF policies and procedures
- Speak with your supervisor
- If your supervisor does not act in a reasonable amount of time, or you are uncomfortable reporting to your supervisor, speak to AHF's Compliance Officer/Director of Compliance, AHF's Legal Department, or a Senior Manager

**Directors, Providers and subcontractors:**

- Report to AHF's Compliance Officer/Director of Compliance or Legal Department

You can always make an anonymous report using **AHF's Compliance Hotline:**

**1-800-AIDSHIV**

AHF's Compliance Department investigates all reports of fraud, waste, or abuse and works with internal departments and/or subcontractors to correct any noncompliance, making reports to federal or state regulators pursuant to applicable program requirements.

AHF does not tolerate any retaliation or intimidation against anyone who participates in good faith in the Compliance Program by, for example, reporting potential issues, investigating issues, conducting self-evaluations, audits and remedial actions, and reporting to appropriate authorities.

Anyone who fails to uphold this Code of Conduct will be subject to discipline, which may include (depending on severity) oral or written warnings and reprimands, suspensions, up to and including termination, and financial penalties (where allowed by law).