



## CODE OF CONDUCT

### A message from Bluestone Chief Executive Officer Rajiv Patel:

Colleagues,

We are united by our purpose and focus to deliver great outcomes and bring exceptional care to patients with complex, chronic conditions. Every member of our team plays an integral role in achieving this by working together to make a difference for our patients and the communities we serve.

Our Code of Conduct outlines the expectations and standards for all Bluestone employees. It serves as a guide to ensure we provide the highest quality of care to the patients we serve and to maintain an engaging and respectful workplace for each other. Adhering to the Code of Conduct is not just a requirement but a reflection of our commitment to maintaining a culture of integrity. It is a demonstration of our core values—dedication, excellence, collaboration, and care—in every action we take.

Each of us is responsible for understanding the expectations outlined in the Code of Conduct and how they apply to our roles at Bluestone. While we may not be able to address every situation encountered in our daily responsibilities, it is imperative to seek guidance and ask questions when the best course of action is unclear. By doing so, we can collectively support each other in meeting our commitments to patients, customers, and each other.

If you ever have a concern, we encourage you to report it promptly to your manager or through the confidential reporting channels outlined under [Resources](#) in this Code of Conduct. Your dedication to upholding ethical standards is crucial to maintaining the trust and integrity of our organization.

Thank you for your commitment and dedication to Bluestone, our patients, and your colleagues. Your role is instrumental in our success, and I look forward to achieving great milestones together.

Rajiv Patel, CEO

### Bluestone's Purpose and Core Focus

- Purpose: To deliver great outcomes
- Core focus: To bring exceptional care to complex, chronically ill patients.

### Bluestone's Core Values

- **Dedication:** We are committed to our Core Focus and Values, which guide us in improving the lives of our team, patients, and communities.
- **Excellence:** We strive to deliver the highest quality of care while providing an exceptional team and customer experience.
- **Collaboration:** Always assuming good intentions, we work together as a team to be better tomorrow than we are today for our patients, each other, and our communities.
- **Caring:** With dignity and respect, we strive to treat others the way they want to be treated.



## TABLE OF CONTENTS

<a href="#"><u>Overview</u></a>	Purpose, Compliance program, Application, Your responsibilities, Role of leaders, Violations
<a href="#"><u>Patient Care</u></a>	Commitment to Care, Non-Discrimination, Patient rights, Confidentiality of information
<a href="#"><u>Business and Workplace Ethics</u></a>	Respectful Workplace, Fraud waste and abuse, Compensation and reimbursement, Business records, Use of resources, Confidentiality of business information, Conflicts of interest, Vendor relations, Physician arrangements
<a href="#"><u>Government Interactions</u></a>	Interactions with government, Political activity,
<a href="#"><u>Resources</u></a>	Where to go with questions, How to report a concern, Non Retaliation, Attestation

### **Overview: Purpose and relationship to Bluestone’s Core Focus, Core Values and Organizational Policies**

Bluestone is committed to creating a working environment in which every staff member lives Bluestone Physician Services’ values in everyday decisions and actions. The standards in this Code of Conduct are an extension of our organization’s values and our commitment to care. The Code of Conduct is intended to provide an overview of expected conduct but it is not your only resource. Review Bluestone Physician Services’ policies and procedures for additional information on the topics covered in this Code of Conduct.

### **Bluestone Physician Services Compliance Program**

The Code of Conduct, along with the organization’s policies and procedures, is an integral part of Bluestone’s Compliance Program. More information can be found on the Compliance Department’s Intranet page.

### **Application**

This Code of Conduct applies to the following groups in all departments of Bluestone:

- Employees
- Interns
- Temporary Employees
- Contractors
- Board Members
- Vendors
- Medical and professional staff



## Your Responsibilities

You have a responsibility to read and be familiar with this Code of Conduct, employee handbook, and related policies and procedures. In addition, you are responsible to:

- Be aware of and follow the policies and procedures related to your work;
- Promptly report any concern of a known or suspected violation of Bluestone's Code of Conduct (further information is described in the How to report a concern section); and
- Participate upon request in any workplace investigation with full honesty, integrity, and candor.

## Special Role of Leaders

If you are a leader, you have additional responsibilities to:

- Set an example of ethical conduct;
- Foster a culture of integrity and compliance;
- Foster a culture where your team members are comfortable asking questions;
- Appropriately and timely respond to your team's questions relating to ethical conduct and assist staff in obtaining additional resources to resolve questions;
- Promptly address violations of the Code of Conduct; and
- Address questions or concerns raised and do not retaliate against those bringing issues forward.

## Discipline for Violations

At Bluestone Physician Services, you are expected to follow the standards as outlined in this Code of Conduct at all times. If you violate these standards, you may be subject to corrective action up to, and including termination and if appropriate, referral to local, state or federal law enforcement agencies. If you have a concern of known or suspected non-compliance, you are responsible to report it. You are strongly encouraged to first speak with your supervisor or manager about your concern. You may also contact the Compliance Department.

## Excellence

- **Dedication:** *We are committed to our Core Focus and Values, which guide us in improving the lives of our team, patients, and communities.*
- **Collaboration:** *Always assuming good intentions, we work together as a team to be better tomorrow than we are today for our patients, each other, and our communities.*
- **Caring:** *With dignity and respect, we strive to treat others the way they want to be treated.*
- **Excellence:** *We strive to deliver the highest quality of care while providing an exceptional team and customer experience.*

## **We strive to deliver the highest quality of care providing an exceptional team and customer experience.**

When everyone consistently demonstrates our high quality care in interactions with patients, their families, other care partners and each other, we will continue to deliver an exceptional experience in which the safety of our patients and employees is ensured.



## **Non-discrimination**

We are committed to fostering an inclusive culture ensuring employees work together with colleagues, partners, patients, and their family members. We do not discriminate, exclude or treat people differently based on race, color, creed, religion, national origin, age, sex, disability, sexual orientation, gender identity, marital status, veteran status, or any other classification protected by federal, state or local law.

Following these inclusion and non-discrimination practices in every interaction with our patients and with each other is essential to providing exceptional care to all those we serve.

Whenever possible, we honor and provide for the cultural, religious, language or other needs of patients and families. We also provide free aids and services to patients with visual and hearing impairments. In addition, we provide free translation and interpretation services to patients whose primary language is not English.

## **Patient rights**

Upon admission, we provide our patients with information regarding their rights as patients. You are responsible for upholding these rights, including, but not limited to, the right of patients to participate in their plans of care, be free of harm and to file a grievance should they feel their rights were violated.

## **Confidentiality of patient information**

Patients trust us to retain the confidentiality and privacy of their personal information. We are obligated to maintain the privacy of our patients by state and federal health information privacy laws. This means you should access only the patient health information needed to do your job. Additionally, you should share patient health information only with individuals who need to receive such information, such as co-workers directly involved in the patient's care.

## **Business and Workplace Ethics**

### **Respectful workplace**

Bluestone is committed to providing equal employment opportunity to all qualified individuals, regardless of their: race, color, creed, religion, national origin, sex, sexual orientation, gender identity, disability, age, marital or familial status, covered veteran status or status with regard to public assistance. We do not tolerate any form of harassment or unwelcome conduct that creates an offensive, hostile or intimidating environment.

### **Fraud, waste and abuse**

We are dedicated to preventing, detecting and reporting all fraud, waste and abuse. We expect that employees:

- submit claims to the government, insurance companies, or others that accurately reflect services provided;



- enter into contracts that provide for payments to others that represent fair market value; • disclose and make necessary repayments of overpayments; and
- maintain accurate and complete records.

### **Compensation and reimbursement documentation**

You are responsible for accurately documenting your time worked and paid time off. Additionally, you are responsible to ensure that your requests for reimbursement for business-related expenses are appropriate, reasonable and documented appropriately. If you knowingly submit inaccurate timecards or expense reports you will be subject to disciplinary action

### **Business records**

Bluestone is committed to maintaining accurate documentation for all business reporting and record keeping. All documentation you create and maintain in business reports and records must be accurate. This includes, but is not limited to:

- expense reports
- cost reports
- research reports
- accounting records
- legal records
- compliance records
- financial records

Knowingly falsifying business reports and records is a violation of this Code of Conduct and may constitute fraud and you will be subject to disciplinary action. Retaining documents for the periods required by law and Bluestone's retention policy is required.

### **Use of Bluestone Physician Services resources**

Bluestone's resources, including supplies, staff time and talent, technology, internet access and financial resources are intended to facilitate the performance of company work. With the exception of reasonable, minimal personal use, you should use company resources for business purposes only.

### **Confidentiality of Bluestone business information**

You may not use or disclose confidential Bluestone information except as necessary for the performance of job-related duties. Confidential information is defined as information that is not available to the public, including but not limited to:

- information systems
- marketing strategies
- operational details
- safety and quality review information
- strategic business plans



- financial and pricing information

This requirement applies even after your employment or work assignment with Bluestone ends.

### **Conflicts of interest**

You have a duty at all times to conduct the business of Bluestone Physician Services in an impartial and unbiased manner and in the best interest of Bluestone. Any outside business activities that interfere with your ability to fulfill your responsibilities to Bluestone can be harmful to your performance, your coworkers, patients and the organization. A conflict of interest exists when you have a financial or any other professional or personal relationship or interest that makes it difficult for you to exercise independent judgment or act in Bluestone's best interests. When you have a relationship or interest that might create a conflict of interest, discuss it with a manager or supervisor to make sure that relationship or interest does not interfere with your ability to exercise independent judgment. You are required to disclose potential conflicts of interest and follow any plan put in place to manage the potential conflict

### **Vendor Relations**

You are expected to work in the best interests of our patients and Bluestone when doing business with others. Decisions and actions you take must be based on the needs of the patients, families, the organization and the community we serve. Therefore, you may not offer, solicit, or accept gifts or entertainment that would, or would appear to, influence your decisions on behalf of Bluestone.

Unsolicited gifts of less than \$50 may be accepted from Non-Health Industry Vendors. These gifts may not be Cash, Gift Cards or other Cash Equivalents of any value. You may not accept a gift of any value from a Health Industry Vendor.

### **Physician agreements, transactions and referrals**

Bluestone structures its transactions with physicians to comply with federal Anti-Kickback and Stark Laws. Under these laws, Bluestone is prohibited from paying for referrals or receiving anything in exchange for referrals. You should not solicit, offer, or accept anything in return for patient referrals or negotiate an arrangement that involves the exchange of value for patient referrals. Consult with the Bluestone's Legal Counsel if you are negotiating an arrangement with a physician, physician group, or other provider that makes referrals to or receives referrals from Bluestone.

## **Government Interactions**

### **Interactions with government**

If you are approached by a government investigator or receive a subpoena or other request for information related to an investigation of Bluestone or its business practices, contact the Compliance department. You are expected to cooperate with Bluestone to respond in any investigation and you are expected to tell the truth. Failure to tell the truth may itself constitute



a violation of the law. Under no circumstances should you attempt to hide evidence or to destroy or alter any documents or other evidence.

### **Political activity**

Bluestone encourages its employees to be active in their community, including the political process. However, you should not use Bluestone resources to personally support a particular political candidate, party, organization or committee.

## **Resources**

### **Where to go with questions**

Bluestone's policies and procedures provide additional, detailed information about conduct expectations and requirements. Policies are available in the [Policy Center](#) on the Bluestone Intranet. If you need assistance finding a policy or if you have questions not answered in the available policies, contact your leader or Compliance Department for assistance.

### **How to report a concern**

If you have a concern of known or suspected non-compliance, you have an obligation to report it. You are strongly encouraged to first speak with your supervisor or manager about your concern. You can email [Compliance@Bluestonemd.com](mailto:Compliance@Bluestonemd.com). Another option is contacting Bluestone's Corporate Compliance Hotline at 800-928-0084 or at [report.complyline.com](http://report.complyline.com) (organization PIN 131274, ID 1). Reports to the Compliance hotline may be made anonymously.

### **Non-retaliation**

Bluestone is committed to creating an environment that encourages and protects those who report unethical behavior, illegal activity or policy violations. You will not be retaliated against because you, in good faith, report unethical behavior or violations of law, regulations, or company policy. This means that Bluestone will not take any adverse employment action against you or any associated third parties for calling attention to illegal or unethical acts involving Bluestone. Examples include:

- Health care billing compliance concerns
- Health care quality or safety concerns
- Workplace concerns, such as harassment or discrimination

### **Attestation:**

By my signature below, I attest that I have read the Bluestone Code of Conduct.

- I understand that I must personally comply with the code of conduct, as well as federal and state law.



- I understand that I must know and understand the policies that apply to my job.
- I understand that I must report any potential violations of this Code of Conduct or Bluestone policies to appropriate leadership, including my supervisor or VP of Compliance.

Print Name \_\_\_\_\_ Date \_\_\_\_\_

Signature of Employee \_\_\_\_\_

1

## Revision History

Date (MM/YYYY)	Revisions	Owner/Name/Title	Version
12/19/23	Original	Andrea Fuhrmanek-Kloubec, VP Corporate Compliance	1.0
06/2024	Review/Revisions	Andrea Fuhrmanek-Kloubec, VP Corporate Compliance/Brian Holsten, Director of HR	1.1

<sup>1</sup> Prepared at the direction, request, and in furtherance of the purposes of a review organization and any and all information and documentation prepared in furtherance of this policy is confidential and should not be shared outside of Bluestone Physician Services or its Affiliates. Protected under Wis. Stat. 146.38 and Minn. Stat. 145.61et seq. and FL Stat 766.101. The information contained herein is provided for informational purposes only and does not constitute legal, medical, or professional advice. Further, these policies and procedures are subject to change without prior notice, and Bluestone makes no representation to reliance on users of outdated information. Users should check back here for updates regularly.