




Policy Title:	<b>Crouse Medical Practice Code of Conduct</b>
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Reviewed/Approved By:	
 <hr/> Michael Rulfes, Executive Director	<u>2/18/21</u> Date

## ***Code of Conduct***

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## **a. Introduction and Intent**

***Why Have a Code of Conduct? To promote conduct that is honest, ethical and legal.***

Crouse Medical Practice (CMP) has adopted this Code of Conduct (also referred to as the “Code”) to provide standards and guidance by which employees, providers, volunteers, vendors and other individuals affiliated with Crouse Medical Practice will conduct themselves (Collectively referred to as “Employees”).

This Code of Conduct is a fundamental part of Crouse Medical Practice’s Corporate Compliance Program, and works together with our Mission, Vision and Value statements and our Corporate Compliance Policies and Procedures.

CMP’s success as a leading healthcare provider is dependent upon each staff and provider of our organization—our commitment to personal and professional integrity, our responsibility to act in good faith, and our obligation to do the right things for the right reasons. All Employees are expected to protect and promote patients’ rights, quality of care, organization-wide integrity, ethical business practices and fulfillment of our Mission, Vision and Values.

It is important for all Employees to understand personal obligations to comply with this code, immediately report any alleged violations of wrongdoing, and assist management and the Compliance Officer in investigating and/or addressing suspected violations.

The Code does not cover every situation one may encounter, nor does it replace any organization or department policy or procedure. Instead, the Code contains principles that are intended to guide Employees in making ethical decisions in carrying out duties for or on behalf of Crouse Medical Practice.

All Employees share in the responsibility to uphold the principles of caring, honesty and integrity that are fundamental to this Code of Conduct.

*If at any time, you have questions, comments or suggestions regarding the Code of Conduct or your responsibilities under the Code, please call the Compliance Officer at 315-766-1612.*

## **b. Crouse Medical Practice's Mission, Vision and Values**

### **Our Mission**

To provide the best in patient care and to promote community health.

### **Our Vision:**

- Crouse Health will provide an exceptional experience as the most trusted system for healthcare.

### **Our Values:**

- Community – working together while appreciating our differences
- Respect – honor, dignity and trust
- Open and honest communication
- Undivided commitment to quality and the patient experience
- Service to our patients, physicians and employees
- Excellence through innovation and collaboration

## **c. Code of Conduct Principles**

### **1. Quality Patient Care**

Our Mission, *"To provide the best in patient care and to promote community health"* requires the efforts and commitment of all Crouse Medical Practice Employees. It is an expectation that Crouse Medical Practice will provide high quality patient care, in a compassionate manner and in a safe environment. Each Crouse Medical Practice Employee should be committed to this expectation, even if such Employee does not provide direct patient care.

**Reporting Concerns.** Employees should report any incident of patient care or safety that does not appear to meet Crouse Medical Practice's standards of care. Reports can be made to the Employee's supervisor, the Compliance Officer 315-766-1612 and/or the Compliance Hotline 315-479-5070, ext. 66107, or via the Compliance Reporting Form on the CMP homepage. If an Employee is not satisfied with the response from CMP or believes a patient's immediate health and safety is in jeopardy, the Employee may contact the New York State Department of Health ("DOH") at 1-800-804-5447. Patient concerns related to quality of care or other such standards should be reported to the department's Practice Administrator.

**Direct Care Providers.** Employees who are directly involved in patient care must have the proper credentials, skills, expertise and competency to care for such patients. Each Employee should promptly and efficiently fulfill any personal responsibility he/she may have concerning the delivery of patient care and compliance with applicable standards of care. Care must be medically necessary, appropriate to the situation, safe and in conformity with applicable standards of care.

**Patient Rights.** Employees should become familiar with patient rights and, as appropriate, are encouraged to help patients and their families understand their rights as well. Examples of patient rights include, but are certainly not limited to, informed consent to treatment, participation in decision-making, non-discrimination and confidentiality.

**Patient Care Standards/Policies.** Crouse Medical Practice maintains policies and procedures concerning patient care and rights. All Employees are encouraged to refer to the policies and procedures that relate to their Crouse Medical Practice work-related obligations, which are available from their department supervisor.

## 2. **Workplace Conduct**

Crouse Medical Practice works diligently to foster a safe, professional, cooperative and creative workplace for all Employees, and to comply with all health and safety laws and regulations governing the workplace.

Employees will strive to work collaboratively with colleagues and communicate respectfully to and about others, and in a positive manner.

Employees are expected to become familiar with and understand Crouse Medical Practice's policies and procedures developed to promote the protection of the workplace and to observe all posted notices, warnings and regulations.

Employees shall comply with Crouse Medical Practice's policy of a smoke and drug/alcohol free workplace. Employees must report to work free from the influences of illegal drugs and alcohol.

## 3. **Non-Discrimination**

Crouse Medical Practice believes that the fair treatment of Employees, patients and others is vital to the fulfillment of its Mission, Vision and Values.

Employees shall treat all persons with respect and shall not discriminate or harass in any manner any person on the basis of race, color, religion, sex, sexual orientation, gender and/or gender identity expression, marital or parental status, national origin, ethnicity, citizenship status, veteran or military status, age, disability or source of payment with respect to patients.

Crouse Medical Practice recruits, hires, trains, promotes, assigns, transfers, lays off/recalls and terminates all members of its workforce based on the individual's ability, achievement, experience and conduct without regard to race, color, religion, sex, sexual orientation, gender and/or gender identity expression, marital or parental status, national origin, ethnicity, citizenship status, veteran or military status, age, disability, or any other classification protected by law. All allegations of discrimination and/or harassment shall be promptly investigated in accordance with human resources, corporate compliance or other applicable policies and procedures.

#### **4. Compliance with Federal, State and Local Laws and Regulations**

Crouse Medical Practice strives to ensure that all activity by or on its behalf complies with applicable laws and regulations. To foster this compliance, all Employees should familiarize themselves with the laws and regulations relating to the Employee's position. Employees who have management or supervisory positions should also seek out professional development opportunities that will help them carryout responsibilities.

Employees who are licensed professionals should become familiar with the legal requirements associated with their licenses and should have an understanding of what actions constitute professional misconduct and should avoid such actions. The New York State Education Department provides detailed information on professional licensure requirements as well as information on professional misconduct: <http://www.op.nysed.gov/prof/>

The Compliance Department will develop educational programs to help Employees understand such applicable laws and regulations. If at any time, an Employee has questions regarding a law, regulation or related Crouse Medical Practice Policy, the Compliance Officer can serve as a resource.

#### **5. Health Care Fraud and Abuse Prevention**

One of the primary goals of Crouse Medical Practice's Corporate Compliance Program is to prevent and detect fraud, waste and abuse. Health care decision-making must be based upon

the patient's medical needs, and must not be based upon financial benefits to Crouse Medical Practice, Employees (including medical staff), or that of any other entity or individual. Crouse Medical Practice is committed to this principle.

Crouse Medical Practice and its Employees may not give, receive, offer or ask for anything of value in exchange for referring patients, products, or services, in accordance with the Anti-Kickback Statute. This includes accepting anything of value for purchasing, leasing, ordering, arranging for, or recommending a particular product or service.

Federal and state law prohibit referrals by any physician who has, or whose immediate family member has, a "financial relationship" with an entity which provides medical goods or services, to that entity for the provision of certain designated health services. Crouse Medical Practice must ensure that its relationships with physicians satisfy the rules concerning the prohibition against physician self-referral (both the Federal Stark law and Anti-Kickback Statute). If a financial relationship exists, referrals are prohibited unless a specific exception is met.

In accordance with federal and state requirements, Crouse Medical Practice routinely screens employees and vendors for their eligibility or exclusion with Medicare and Medicaid programs.

Crouse Medical Practice and its Employees must not submit false, fraudulent or misleading claims to any payer, including Medicare, Medicaid, or other government or commercial third party payers.

False or fraudulent claims may include:

- Billing for services not provided;
- Claims which characterize the service differently than the service actually rendered, or claims which do not comply with payer requirements;
- Billing for services not medically necessary;
- Submitting bills without supporting documentation;
- Making false representations about a patient's condition or eligibility for purposes of participation in a health care benefits program or to get a claim paid.

Crouse Medical Practice will report and refund any overpayments discovered as part of routine monitoring, or an internal or external audit. Additionally, billing personnel, practice leadership and the Compliance Officer will work collaboratively to identify and address the system/process issues in regards to overpayments submitted to these programs.

Employees must report suspected or actual fraud and/or abuse activities by calling the Compliance Officer at 315-766-1612 or by submitting the Compliance Reporting Form on the Crouse Medical Practice website. Reports can also be made anonymously using the Compliance Hotline 315-479-5070, ext. 66107. See the “Responsibility for Reporting” Section of this Code of Conduct for more details. Crouse Medical Practice does not retaliate against anyone who reports in good faith suspected or actual fraud and abuse or other concerns.

## **6. Coding and Reimbursement**

Crouse Medical Practice has an obligation to our patients, third-party payers and the state and federal governments to exercise diligence, care and integrity throughout the claims submission process. CMP is committed to maintaining the accuracy of every claim processed and submitted.

All persons who are involved in any aspect of CMP’s coding, billing and claims submission processes must be appropriately trained, credentialed and prepared for their responsibilities, including without limitation appropriate training with respect to the requirements of the Medicare and Medicaid programs. All CMP staff are expected to monitor compliance with applicable billing rules, to the extent they are able, and must report any false, inaccurate or questionable claims to a supervisor or to the Compliance Officer immediately.

CMP only bills for services actually rendered as reflected in the medical documentation. All clinical staff are required to document health care services in an accurate, organized, legible and timely manner and in accordance with applicable billing rules and CMP policies. Any CMP employee who knowingly submits a false claim, or provides information that may contribute to submitting a false claim, to any payer—public or private—is subject to termination from CMP. In addition, legal or criminal action may be taken.

## **7. Accurate and Truthful Documentation**

Employees who are responsible for documenting in patient records, financial records or other Crouse Medical Practice business records must perform their duties accurately, truthfully, completely and in a timely manner. All patient records, financial and accounting reports, research reports, expense accounts, time sheets and any other documentation must accurately and clearly represent the relevant facts and the true nature of a transaction. No one may alter or falsify information on any CMP record or document. Employees who suspect inaccurate documentation and/or record keeping must notify their supervisor and/or the Compliance Officer, or Compliance Hotline.



## **8. Record Retention and Destruction**

All Employees must protect the integrity of CMP's documents and records to ensure that records are maintained in accordance with regulatory and legal requirements, and for the required length of time. All records, both medical and business, shall be retained and disposed of in accordance with applicable law and CMP's specific record retention policies. Records and documents, which include both written and computer-based information, such as e-mail or computer files on disk or tape, shall be retained and destroyed in accordance with CMP policy and procedures.

## **9. Confidentiality**

Crouse Medical Practice has in its possession a broad variety of confidential, sensitive and proprietary information, which if inappropriately released, could be harmful to individuals, our business partners and to Crouse Medical Practice itself. Therefore, Employees should always safeguard confidential information concerning patients, employees, and business matters in accordance with Crouse Medical Practice's policies and procedures and relevant state and federal law. Each Employee must always respect and maintain the privacy of confidential information, even after the Employee is no longer affiliated with Crouse Medical Practice.

Employees should become familiar with their department's specific policies and procedures in addition to organization-wide policies, such as the Notice of Privacy Practices as required by the Health Insurance Portability and Accountability Act of 1996 ("HIPAA").

Employees must also treat as confidential, salary, benefits, and other personal information pertaining to Employees. Personnel files, payroll information, disciplinary matters and similar information will be maintained in a confidential manner.

In addition to safeguarding patient and personnel information, Employees must also protect Crouse Medical Practice's proprietary information. This means that Employees should not disclose CMP's confidential business information, such as contractual arrangements, strategic plans, future marketing efforts, and financial information.

Generally, an Employee should only access and use the information necessary to perform the Employee's work-related responsibilities at that time, and should only disclose information as authorized to others having an official need to know. If questions arise regarding an obligation

to maintain the confidentiality of information or the appropriateness of releasing information, Employees should seek guidance from their supervisor, manager, or director. Supervisors in turn should seek guidance from an appropriate Crouse Medical Practice administrator or the Compliance Officer. Employees who are leaving Crouse Medical Practice shall authorize prior to the employee's departure, that he/she has not removed, copied, or saved any patient information, in electronic or paper format.

#### **10. Conflict of Interest**

A conflict of interest may occur if an Employee's outside activities or personal financial interests influence or appear to influence the Employee's ability to make objective decisions in the course of the Employee carrying out his/her Crouse Medical Practice responsibilities and obligations. Employees should always avoid such conflicts of interest.

An Employee should never use his/her position to profit personally or to assist others in profiting at the expense of Crouse Medical Practice.

Crouse Medical Practice requires certain Employees to disclose financial interests that the Employee (or the Employee's immediate family member) may have that would interfere or affect the Employee's responsibilities for or on behalf of Crouse Medical Practice. Employees should refer to Crouse Medical Practice's Conflict of Interest Policy for more details concerning conflicts.

#### **11. Provider/Organization Business Relationships and Referrals**

Any business relationship or arrangement between CMP and a physician, physician entity or other healthcare provider must be structured to ensure compliance with all legal requirements, including, but not limited to, the fraud and abuse laws and regulations, and to avoid jeopardizing CMP's tax-exempt status. Such relationships and arrangements must be documented in writing, signed by the parties and subject to review and approval by CMP's outside counsel.

CMP does not pay for patient referrals. CMP's acceptance of patient referrals is based on the medical needs of the patient and its ability to provide needed services. All CMP Directors, officers and Employees are prohibited from paying or offering to pay, directly or indirectly, for referral of patients. In addition, CMP will not offer or solicit payments for the referrals it receives from a provider, nor take into account the volume or value of referrals that the

provider has or may make CMP. No CMP Director, officer or Employee shall accept or solicit any payment or item of value, directly or indirectly, for referrals of patients to CMP.

## **12. Protection of Crouse Medical Practice Assets**

Employees must strive to preserve Crouse Medical Practice's assets, including equipment, materials, supplies, time and information, and to protect assets from loss, damage, theft, misuse, and waste.

Employees must not remove Crouse Medical Practice's equipment, materials and supplies from the premises for personal use and must only use such assets as authorized under CMP policy.

Employees whose responsibilities include the management of departmental funds shall maintain internal controls and record keeping and shall exercise appropriate oversight. Any use of Crouse Medical Practice's resources for personal financial gain unrelated to CMP business is not permitted.

Employee's use of travel expenses must be consistent with the Employee's job responsibility and Crouse Medical Practice's needs and resources. Employees are expected to exercise reasonable judgment in incurring travel expenses and shall provide sufficient documentation for purposes of reimbursement.

As mentioned, time is also an asset. Employees shall report time and attendance accurately and shall use their work time productively.

## **13. Gifts and Gratuities**

Gifts that influence decision-making by or on behalf of Crouse Medical Practice are not permitted. Employees are prohibited from *soliciting* tips, personal gratuities or any gifts from patients or their family members and from accepting any monetary tips or gratuities. Employees may accept (if offered), occasional gifts of appreciation of no more than a nominal value from patients/families such as flowers, food or candy. Monetary gifts of any value may not be accepted.

Employees may not accept or solicit from CMP's business associates or vendors, individually or on behalf of Crouse Medical Practice, gifts, favors, services, entertainment or other things of value to the extent that decision-making or actions affecting CMP might be influenced. Similarly, the offer or giving of money, services or other things of value with the expectation of

influencing the judgment or decision-making process of any purchaser, supplier, customer, government official or other person is absolutely prohibited. Employees must report any such conduct to the Employee's supervisor and/or the Compliance Officer.

#### **14. Tax Exempt Status**

Crouse Medical Practice is a tax exempt organization and has certain legal and ethical responsibilities. Importantly, CMP is obligated to engage in activities that support its charitable purposes and to ensure that its resources are used in a manner that furthers the public good rather than the private or personal interests of any individual. As a result, Crouse Medical Practice and its Employees will only enter into compensation arrangements that reflect fair market value for the service or item. In addition, Crouse Medical Practice will accurately report tax payments and will file all tax information and returns in a lawful manner.

#### **15. Political/Lobbying Activity**

Participation by Crouse Medical Practice in a political campaign or lobbying could jeopardize CMP's tax-exempt status. Therefore, Employees may not use CMP's funds, time, equipment or other assets to campaign for or against any political candidate, or to engage in a lobbying activity. This includes contributing t-shirts, hats or any other tangible item that includes the CMP logo.

Employees may participate in or contribute to, a political/lobbying activity of their choosing as a private citizen, but not as a Crouse Medical Practice representative.

Crouse Medical Practice, where its experience may be helpful, may publically offer recommendations concerning legislation or regulations being considered. In addition, Crouse Medical Practice may analyze and take public positions on issues that have a relationship to the operations of the organization when our experience contributes to the understanding of such issues.

Crouse Medical Practice has many contacts and dealings with governmental agencies and officials. CMP and its Employees shall conduct all such contacts and transactions in an honest and ethical manner. No one shall attempt to influence the decision-making process of government agencies or officials by an improper offer of any benefit. Employees should immediately report any suspected or actual improper requests or demands by a government agency or official to the Compliance Officer.

## **16. Fair Competition**

Crouse Medical Practice strives to ensure that all activity by or on its behalf complies with laws governing fair competition (these laws are also known as “antitrust laws”). These laws prohibit certain activity that could give an organization an unfair business advantage over a competitor. Examples of prohibited unfair competition activities include: agreements to fix prices, bid rigging, collusion with competitors, boycotts, certain exclusive dealing and price discrimination agreements, unfair trade practices, including bribery, misappropriation of trade secrets, deception, intimidation and similar unfair practices. Employees must not engage in prohibited unfair competition activities and must seek advice from the Compliance Officer when confronted with business decisions which might violate these laws.

## **17. Marketing**

Crouse Medical Practice may use marketing and advertising activities to educate the public, provide information to the community and increase awareness of CMP’s services. CMP will present only truthful, fully informative and non-deceptive information in these materials and announcements.

## **18. Prescription Drugs and Controlled Substances**

Crouse Medical Practice is committed to the safe and legal handling of all drugs and controlled substances. Employees having responsibility for, or access to, prescription drugs, controlled substances, over-the-counter drugs, or any street-valued medical supply (hypodermic needles for example) shall maintain the highest possible professional and ethical standards with regards to such drugs and supplies. Employees should become familiar with the laws, internal policies, and patient care standards that govern their work with these substances and supplies. Drugs must only be provided upon an order of a licensed provider who is authorized by New York State to write prescriptions. Any applicable CMP policies and procedures must be followed for proper storage and inventory of sample medications, and for proper dispensing of sample medications as directed by the provider. Employees must follow applicable CMP policies and procedures for handling outdated or unused drugs. Employees must immediately report any known or suspected inappropriate distribution or diversion of drugs or supplies, or theft/loss of prescriptions, to their supervisor or the Compliance Officer.

The New York State Bureau of Narcotic Enforcement provides many references for providers concerning drug diversion and other controlled substances issues on its website:

<http://www.health.state.ny.us/professionals/narcotic/practitioners/>

## 19. Environmental Health and Safety

Crouse Medical Practice shall manage and operate its business in a manner that respects our environment and conserves natural resources. Employees shall comply with CMP's safety and health policies, including OSHA regulations, to help ensure that patients, visitors, the workforce and others are protected from unnecessary risks and unsafe conditions. For example, Employees shall dispose of all waste in accordance with applicable laws and regulations and shall strive to utilize resources appropriately and efficiently, including recycling where possible. Employees shall immediately report suspected violations of an environmental or occupational health and safety law and shall work cooperatively with the appropriate authorities to remedy any environmental contamination that may occur in the workplace.

## 20. Scientific and Clinical Research

CMP is firmly committed to adhering to the basic ethical principles underlying the acceptable conduct of research involving human subjects, as set forth in The Belmont Report: Ethical Principles and Guidelines for the Protection of Human Subjects of Research. These three principles, respect for persons, beneficence, and justice are particularly relevant to the protection of human subjects in biomedical and behavioral research, and are the accepted requirements for the ethical conduct of such research.

- **Respect for persons** involves recognition of the personal dignity and autonomy (self-rule) of individuals, and special protection of those persons with diminished autonomy.
- **Beneficence** entails an obligation to protect persons from harm by maximizing anticipated results and minimizing possible risks of harm.
- **Justice** requires that the benefits and burdens of research be distributed fairly.

Employees who are involved in proposing and/or conducting research activities will ensure that their work is conducted with the highest ethical standards in accordance with federal, New York state and local laws and regulations, and applicable Crouse Health policy and procedures, including those from the Hospital's Institutional Review Board ("IRB"). Employees must always document accurately, truthfully and completely and must never make up and/or falsify research data or results. Employees who have concerns or questions regarding a research activity should contact their supervisor, the Corporate Compliance Officer or the Hospital's IRB Administrator at 315-470-5917.

## **21. Government Investigations, Accreditations and Surveys**

Crouse Medical Practice Employees shall cooperate fully and promptly with appropriate government investigations into potential violations of the law and to the efforts of accreditation, enforcement and surveying agencies. Governmental and/or agency inquiries or requests should be promptly referred to the Corporate Compliance Officer or President.

Crouse Medical Practice promptly and thoroughly investigates reports of suspected illegal activities or violations of the Corporate Compliance Program or this Code of Conduct. Employees must cooperate with such investigations and may not take actions to prevent, hinder or delay a full investigation. For example, Employees must never alter or destroy records or documents requested in the course of an investigation, nor shall Employees make a false or misleading statement on such documents or to an investigator. Also, Employees must never pressure any person to provide false information to, or to hide information from, an investigator.

## **22. Responsibility for Reporting**

Corporate Compliance is everyone's responsibility. Therefore, all Employees are required to report their good faith belief of any suspected or actual violation of the Code of Conduct, the Corporate Compliance Program, CMP policies, or applicable law. Sometimes it is unclear whether a particular activity or situation may be a violation of the Code or the Compliance Program. When this happens, Employees should contact their supervisors or the Compliance Officer. If at any point it is a conflict to report a concern to the supervisor (example: the supervisor is involved in the alleged misconduct), then the employee is required to report the concern to a higher level of management and/or the Compliance Officer/Compliance Hotline.

Reports of suspected or actual violations can be made in a number of ways as described below:

- Orally or in writing to the Employee's director/supervisor;
- By calling the Compliance Officer at 315-766-1612;
- By calling the Anonymous Compliance Hotline at 315-479-5070, ext. 66107;
- By mailing a written concern or complaint to the Compliance Officer at 739 Irving Avenue, Suite 340A, Syracuse, NY 13210; and/or
- By completing the Compliance Reporting Form on the CMP website:  
<https://crousemed.com/compliance/>

Crouse Medical Practice, at the request of the Employee, will maintain the confidentiality of the reporting Employee to the extent possible, consistent with its obligations to investigate the Employee's concerns and take necessary corrective action. Anonymous reporting is available.

Employees who fail to report suspected or actual violations are themselves violating this Code, our Corporate Compliance Program, and possibly the False Claims Act, and may be subject to discipline, which could result in termination from employment or affiliation CMP.

### **23. Non-Intimidation/Non-Retaliation**

Crouse Medical Practice is committed to fostering a workplace that is conducive to open discussion by its Employees of its business and clinical practices. To promote an open culture, CMP has adopted a strict non-retaliation policy to protect its Employees. Accordingly, there will be no retaliation in the terms and conditions of employment or affiliation as a result of an Employee's good faith reporting of a violation or suspected violation. Any manager, supervisor or other Employee who commits or condones any form of retaliation will be subject to discipline up to, and possibly including, termination. For more information regarding applicable non-retaliation and whistleblower protection laws, please refer to the *Reporting Compliance Issues and Non-Retaliation* Corporate Compliance Policy.

### **24. Enforcement of the Code of Conduct**

Employees must understand that they will be subject to discipline for violations of the Code of Conduct, up to and including termination of employment or affiliation with Crouse Medical Practice. The specific disciplinary action depends upon the nature and severity of the violation. Crouse Medical Practice imposes sanctions in a consistent manner in accordance with CMP policies and procedures.

Examples of violations of the Code which could result in disciplinary action include:

- Participating in activities that violate the Code;
- Encouraging others to violate the Code;
- Failing to report suspected violations of the Code; and
- For employees who are supervisors or managers, failing to detect violations of the Code, if such violation should have been discovered in the reasonable course of the Employee's job responsibilities.

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*End of Code of Conduct*



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25. Commitment to Compliance

By signing below, I acknowledge and agree to the following:

- I have received a copy of the Crouse Medical Practice's Code of Conduct.
- I understand that I have an obligation to read it and understand it, and I agree to abide by its principles.
- I further agree to conduct myself in an ethical, legal and responsible manner at all times.
- I also agree to keep this booklet for future reference.
- I understand that I am expected to promptly report any issues, concerns, violations, or suspected violations to my supervisor, other CMP management staff, the Compliance Officer, or the Compliance Hotline.
- I understand that if I have questions or concerns about its content or other CMP policies, I will ask for clarification from my supervisor, the Compliance Officer or a member of the Human Resources Department.

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

Printed Name: \_\_\_\_\_

*Please sign and return this form to your Compliance Officer, or to your supervisor as directed. It will be included in your personnel records.*