BasePoint
ACADEMY | BREAKTHROUGH

Code of Conduct

Code of Conduct

The BasePoint Way

Dear Team,
BasePoint Academy is a dynamic organization, recognized for the quality of care we deliver to patients in their most vulnerable moments. Our goal is to deliver outstanding, compassionate care. BasePoint and its affiliated entities work together and our actions are consistent with the principles presented in this Code of Conduct. We will become the statewide leader in outpatient behavioral health services. Our work will serve as an example across our communities, our state, and our country.

Our Mission is to bring accessible, understandable, and evidence-based behavioral healthcare to our patients and their families.

We are growing to meet the great needs present in our communities. Now, more than ever, we must commit to living our core values every day. We have permission to hold one another accountable to meet and exceed our standards. Our philosophy of servant leadership elevates the needs of our patients, family, and team members, setting us apart from others in our field. It is a cornerstone of how we approach one another in each of our interactions, creating an enhanced patient experience while shaping our personal and professional growth, We are compassionate, respectful, collaborative, innovative, and committed.

Our team is our greatest strength. Together we can increase access for those who need our care, we can eliminate the stigma of seeking treatment, and we will further innovative treatment modalities. Together we will change the face of behavioral health.

BasePoint's reputation depends on you. It means every one of us exercising personal integrity each day. Our Code of Conduct provides an overview of our policies and expectations for each member of our team. It describes laws and regulations that affect our work and offers guidance when we are faced with challenging situations. The Code of Conduct does not address every situation we may face; if you have a question or concern or would like to discuss anything contained in this document, my door is open to you.

We look to you to strengthen BasePoint's reputation and culture by modeling the highest ethical standards, allowing us to provide the safest environment, and deliver exceptional care to our patients. Thank you for your dedication and contribution to BasePoint Academy.

BLAKE SERPA
FOUNDER AND CEO

Creating BasePoint Academy's Ethical Culture

We work hard every day to provide outstanding service to our partners and patients. Part of our job is to uphold the highest ethical standards as we practice our values—in other words, doing the right thing for the right reasons every time, even when no one is watching.

Leader Responsibility

We expect our leaders to foster a culture of integrity and transparency. We promote an open-door policy, where it is safe to ask questions and raise concerns without fear of retaliation. **We support our leaders in modeling ethical behavior and holding others to the same standard.** We believe it is important to listen and acknowledge the concerns of our team members and act promptly when a potential violation of law or policy occurs. Don't hesitate to seek support from the Compliance Officer.

Team Member Responsibility

Our team members are responsible for upholding our high standards when engaging in business and patient care. You are accountable for familiarizing yourself with BasePoint's Code of Conduct and policies and how they apply to you. Should you have questions or concerns, don't hesitate to raise them in a timely manner. You are responsible for completing any training as it is assigned to you.

Safety

Each of us is responsible for the safety of our patients and staff. As a team member, you should report any observed or suspected instances of non-compliance with BasePoint policies, or state and federal laws. If you are aware of a concern or feel a provider or clinician's behavior puts someone at risk, please contact your supervisor or the BasePoint hotline.

Raising Concerns

BasePoint employees, providers, and contractors should feel comfortable bringing forward compliance questions or concerns. As representatives of BasePoint, we all have a responsibility to promptly raise issues we believe, in good faith, may be a potential or actual violation of law, regulation, or the Code of Conduct. There are a variety of ways to raise concerns:

- To the Compliance Officer
- To our supervisors, directors, or any member of the management team
- Call the BasePoint hotline (800) 859-8905 at any time: 24 hours a day, seven days a week or
- Visit basepointspeaksup.com

An independent third party operates our hotline and online reporting channels. Callers may choose to remain anonymous. BasePoint will protect caller confidentiality to the extent practical during an investigation and will work to limit sharing relevant information related to an investigation only with individuals who have a legitimate business need to know.

We impartially follow up on questions and concerns raised in good faith. Individuals should feel comfortable coming forward or cooperating with investigations, without fear of retaliation. If you believe you've been subject to retaliation, don't hesitate to contact the hotline or a manager who has not been involved.

As a condition of employment, all new employees will receive the Code of Conduct and the required compliance training within the first 30 days of hire for prompt completion. Team members will comply with all the elements in their day-to-day activities. Existing employees will receive the Code annually or upon revision. A Team Member's actions are significant indications of their judgment and competence. A Team Member's behavior and compliance with the Code of Conduct constitute an important element of annual performance evaluations, consideration of position assignments, and promotion. An individual's disregard of BasePoint's Code of Conduct will be addressed in accordance with the HR-34 and COMPL-18 policies which are available online to all team members.

Protect Patient And Confidential Information

Each member of the BasePoint team has a duty to protect and respect patients and other sensitive and proprietary information. We treat the privacy of our patients and clients with care and will not reveal or discuss patient-related information except with healthcare personnel involved in their care, payers, and others authorized by the patient or his/her authorized representative.

We use patient information only as necessary to perform our job. Patient information should only be shared with those people who "need to know," even among family and friends. Here are some helpful guidelines to keep in mind:

Promptly remove all PHI and sensitive information from printers and scanners. Also, if you see sensitive information on the shared machines, please turn the pages over or place them in a folder until the team member is able to retrieve them.

- Avoid discussing patient-specific information in public areas.
- Store sensitive information according to BasePoint policies
- Destroy sensitive information securely by shredding or placing it in locked, confidential bins.
- Access only the patient information you need to know to perform work for treatment, payment, or to conduct BasePoint operations.
- If you don't have a patient's consent or the appropriate written authority documentation from a law enforcement agency, do not provide the information. If you are unsure whether to share the information, first talk with your supervisor or the Compliance Officer.

BasePoint team members and contractors work throughout the DFW region. Thus, much of our information is created, communicated, and stored electronically. To help keep our information safe, you are required to:

- Click the "Encrypt Message" button for all emails containing PHI or other sensitive information if it is sent to an outside party.
- Encrypt and secure mobile devices containing confidential information. Examples include, but are not limited to, laptops, cell phones, and external hard drives.
- **Keep your passwords confidential.**
- Log off or lock your computer or workstation when you walk away or are finished working.
- Immediately report a lost or stolen device, phishing scams, and other security concerns.

Laws You Should Know

*The **Health Insurance Portability and Accountability Act (HIPAA)** ensures patients can access and accurately understand how to protect their health information. It directs how their providers will protect and treat this information. We are committed to following HIPAA, state privacy laws, and BasePoint policies.*

Be Aware: Accessing a patient's chart without a medical or professional "need to know" reason is a violation of HIPAA, state law, and BasePoint policy. Doing so may result in disciplinary action up to and including suspension or termination.

Respectful Work Environment

BasePoint values its team members. **We are all expected to maintain a work environment that allows us to feel respected.** BasePoint does not tolerate harassment, discrimination, or workplace violence against its team members.

We ask our BasePoint team members to abide by the highest ethical standards to facilitate positive outcomes and the best possible relationships with our patients and families. If you see or hear something inappropriate, it is alright to speak up. Management and compliance will investigate the concerns. If related to a BasePoint team member, we will coordinate with human resources for appropriate follow-up. If an incident results in an adverse event, we will coordinate with the facility to facilitate additional reporting, as necessary.

IF YOU SEE SOMETHING, SAY SOMETHING.

Support A Substance-Free Workplace

As team members, we are prohibited from possessing, using, distributing, or selling legal or illegal drugs or alcohol on the premises, in company vehicles, or while conducting BasePoint business. Prescription medications may be used when medically necessary.

Laws You Should Know

*The **Texas Commercial Bribery Statute** prohibits a fiduciary, such as a physician, from knowingly or intentionally accepting, without the consent of the beneficiary, such as a patient, any benefit to influence the fiduciary's conduct in relation to the beneficiary's affairs.*

*The **Texas Patient Solicitation Act** prohibits a person from knowingly offering to pay or agreeing to accept, directly or indirectly, overtly, or covertly any remuneration in cash or in kind to or from another for securing or soliciting a patient or patronage for or from a licensed Texas provider. The Texas Patient Solicitation Act recognizes the safe harbors enumerated under the Federal Anti-Kickback Statute.*
The Eliminating Kickbacks in Recovery Act ("EKRA") prohibits knowingly or willfully soliciting, receiving, paying, or offering any remuneration, directly or indirectly, in cash or in kind, in return for referring a patient or patronage to a recovery home, clinical treatment facility, or laboratory.

*The **Travel Act** forbids the use of any "facility in interstate or foreign commerce" with intent to commit, facilitate, or distribute the proceeds of any unlawful activity. It takes what is essentially a state offense and provides a platform to pursue prosecution at the federal level instead.*

Taken together, the Travel Act and state bribery laws are important because they significantly broaden the scope of fraud and abuse enforcement. Specifically, the combination of the federal Travel Act and, for example, the state Texas Patient Solicitation Act increases the potential liability of organizations and providers that don't accept federal beneficiaries. (In other words, those entities that have not traditionally accepted federal reimbursement for services provided to federal health care programs such as Medicare.)

The ***Anti-Kickback Statute (AKS)*** *makes it a crime to offer, pay, solicit, or receive anything of value in exchange for the referral of those items or services which are reimbursable by a federal healthcare program. In addition, the* ***Federal False Claims Act (FCA)*** *and Deficit Reduction Act (DRA) are in place to ensure Medicare, Medicaid, and TRICARE are protected from fraud and abuse.*

We abide by these and all applicable laws to detect, report, and prevent fraud, waste, and abuse, and to protect whistleblowers.

The takeaway? When considering a new business arrangement, be sure to first check with the compliance and legal teams.

Conflicts of Interest

Because we want to promote a culture of transparency, we inform our managers if we are involved in a situation that is or may appear to be a conflict of interest. Examples of potential conflicts of interest that should be discussed with our supervisors include, but are not limited to:

- working for, or having a financial interest in, another organization,
- benefitting personally from opportunities available to you because of your relationship with BasePoint, or serving as a Director, consultant, partner, or employee of an organization doing business with BasePoint.

Some roles may limit the nature of the activities we perform for BasePoint. Be sure to discuss the situation with your supervisor. If you are in a position that has the appearance of a conflict, it is best to withdraw or recuse yourself from that decision.

During employment with BasePoint, team members are not allowed to directly or indirectly compete with our organization. However, we do understand that our team members may hold another job during their employment with us.

We never offer, give or receive something of value in exchange for, or in hopes of receiving, referrals. We do not offer, give, or accept bribes or kickbacks. We compensate and determine our business arrangements based on fair market value, not the volume or value of referrals.

The takeaway? Talk with your supervisor or the compliance department about the situation. BasePoint will determine whether any work or interest constitutes a violation of its Conflict of Interest Policy.

Exercising objectivity, good judgment, and protecting our reputation are core values at BasePoint. We don't make decisions for personal gain or accept gifts, entertainment, or business meals that will influence our decisions. Keep in mind that a gift is defined as anything of value. Any vendor perks provided or received should be reasonable and nominal in value. Contact the compliance department for more information.

Gifts And Donations

Exercising objectivity, good judgment, and protecting our reputation are core values at BasePoint. We don't make decisions for personal gain or accept gifts, entertainment, or business meals that will influence our decisions. Keep in mind that a gift is defined as anything of value. Any vendor perks provided or received should be reasonable and nominal in value. Contact the Compliance Officer for more information.

Permitted Gifts, Entertainment, and Meals

Occasional gifts purchased by BasePoint for its employees. Please note that gifts over a certain threshold are the employee's taxable income. Contact payroll for the current IRS guidance.

BasePoint may, on occasion, purchase a nominal item for a patient or patient's family. The retail value of the item may not exceed $15 or $75 in total per year. These items may not be cash or cash equivalents. A gift card is acceptable but only if it is not redeemable for cash. An example is a $15 bookstore gift card provided to a patient for service recovery.

Occasional business meals or events purchased by or for a physician. Please check with compliance before participating.

Occasional business meals purchased by or for a vendor or business associate, or received from a vendor or business associate. The purpose of the meal should be to discuss BasePoint business. For example, a lunch and learn provided to a physician's office to educate providers and staff about the BasePoint program.

Occasional business entertainment purchased by or for a vendor or business associate, as long as the cost paid does not exceed $100 per vendor/customer per event, and they attend the event with the employee to discuss business. The employee should obtain approval from his/her supervisor and notify compliance prior to attending the event. Remember, we never provide or accept cash or cash equivalents from third parties, including, but not limited to, traveler's checks, money orders, stock, negotiable instruments, or honorariums.

Perishable items such as food should be shared among BasePoint team members.

Gifts and Entertainment that are Not Permitted

BasePoint team members may not ask for or accept gifts from patients and their family members.

Nor do we purchase, give, or receive gifts and/or meals from US or foreign government officials and their agents.

We comply with all federal and state healthcare fraud and abuse laws and regulations, including the Anti-Kickback Statute and the False Claims Act.

Support Ethical Business Practices

BasePoint is committed to ensuring we code and bill accurately for services rendered. It is important that claims accurately reflect the services provided, are supported by medical documentation, and comply with applicable federal and state laws and regulations. If we identify an error, we correct it when it is discovered. **Each of us plays a part in providing or supporting necessary, quality care that is coded and billed correctly.** We abide by all federal and state regulations.

Accurate Record Keeping

As members of the BasePoint workforce, we have a duty to maintain all medical and business records in accordance with laws and our record retention policies. We have a responsibility not to alter or falsify information on any record or document. We help hold one another accountable for developing and maintaining the most accurate records possible. Remember, don't sign your name unless you know the statement is true. Don't sign other people's names to records and documents or share passwords.

Our staff should never include false, fraudulent, deceptive, or misleading information in BasePoint records. Be sure to check the organizational policy on record retention and destruction to determine the length of time we must maintain different types of information and where these materials should be located.

Cooperating with Inquiries and Investigations

BasePoint is subject to various federal and state regulations. On occasion, we may encounter officials responsible for regulating aspects of healthcare or business practices. **We cooperate with government inquiries and investigations.** If you receive a subpoena, inquiry, or other document from any government agency regarding our business or patients, whether at home or at work, contact the General Counsel immediately. If you become aware of an imminent or ongoing investigation or audit, you should retain all documents in your control relating to the matter. Our policy, COMPL-13, gives you direction and guidance if you have questions.

The compliance department is available to provide assistance and support, and answer questions related to the Code of Conduct and other compliance and privacy concerns. Don't hesitate to contact the Compliance Officer at any time.

Violations of The Code of Conduct

Abiding by the principles set forth in the BasePoint Code of Conduct is a condition of employment. Violations are evaluated and should be managed consistently with regard to sanctions, such as disciplinary action up to and including termination.

Workforce members have a duty to raise issues in good faith regarding potential violations of the Code of Conduct; individuals involved in an incident or deliberately withholding relevant and material information concerning a potential compliance, ethics, or fraud, waste, and abuse matter may be subject to sanctions under BasePoint's policies and procedures.

BasePoint Compliance and Ethics Hotline: (800) 859-8905 | 24/7 or visit: basepointspeaksup.com

Thank you for all you do to make BasePoint the most collaborative, ethical, and enjoyable place to work.

OUR TEAM MEMBERS ARE THE DIFFERENCE!