



Compliance Program

# CODE OF CONDUCT



## Table of Contents

- Mission and Values.....3
- Message from the Executive Director of APO.....4
- Introduction to the Code of Conduct.....6
- Non-Retaliation Policy.....12
- Code of Conduct Standards.....13
  - A. Quality of Service.....13
  - B. Confidentiality .....15
  - C. Compliance with Laws and Regulations.....21
  - D. Fraud and Abuse.....26
  - E. Conflicts of Interest .....29
  - F. Workplace Conduct and Employment Practices...36
  - G. Safeguarding APO Property and Interests .....38
- Addressing Integrity Concerns.....42
- Compliance Hotline.....45
- Code of Conduct Acknowledgement.....47

APO is a private not-for-profit organization whose purpose is to provide health services and education to the community with an emphasis on under-served and marginalized populations including, but not limited to, persons living with or at risk for Human Immunodeficiency Virus (HIV), Hepatitis C Virus (HCV), and Sexually Transmitted Infections (STI). Services are provided in a confidential, caring environment.

**We strive for excellence through our commitment to:**

- ◆ Our community
- ◆ Quality
- ◆ Advocacy
- ◆ Cultural sensitivity and linguistic competence
- ◆ Respect and compassion
- ◆ Teamwork
- ◆ Satisfaction of patients, providers, employees, and partners
- ◆ Accessibility and responsiveness
- ◆ Fiscal responsibility
- ◆ Health outcomes

## **Message from the Executive Director and the APO Board of Directors**

APO has a tradition of being a responsible citizen of the communities it serves. Our commitment to providing quality services, fully complying with the law, and meeting the highest ethical practices for business. Legal compliance and ethical conduct means doing the right thing as we go about our jobs.

APO is a not-for-profit federally funded health center committed to quality healthcare and dedicated to the health and well-being of our community through partnerships with patients, providers and community-based organizations.

### **The Program is consistent with our Vision and Values.**

This Code of Conduct is the cornerstone of the APO Compliance Program. It contains the standards of behavior that each one of us at APO is expected to observe while performing our jobs. Spelling out these standards helps us understand the compliance risks in each of our jobs and ways to avoid them. The Code of Conduct outlines APO's standards for integrity and provides everyday guidance to employees.

APO has a non-retaliation policy. Under that policy, APO will not take or tolerate retaliation or retribution against any employee who, in good faith, reports a legal concern, an ethical concern or a violation of the Code of Conduct.

The Code of Conduct establishes in general terms what doing the right thing means at APO. All APO employees, officers, members of the Board of Directors, volunteers, and other individuals working at or on behalf of APO are subject to this code.

Please read the Code of Conduct thoroughly. Our Compliance Program depends on everyone's participation for its continued success.

---

Lynne Meyerkord, Executive Director APO

**APO is committed to providing access to quality health care in the communities we serve**

To succeed in our Mission, we must maintain our patients' trust as well as the trust and respect of our employees and our business partners.

This trust rests on our commitment to the highest ethical standards in every aspect of our business. To preserve this trust, we must devote ourselves to maintaining high ethical standards in our daily work activities, in our relationships with our patients and business partners, in our corporate and financial operations and ultimately, in our provision of high quality health care services.

## Introduction to the Code of Conduct

---

APO business practices are founded upon a common set of values that govern our relationships with our patients, providers, vendors, consultants, business partners, and one another. These values include integrity, honesty, fairness, and responsibility in all our dealings.

While it is impossible to define in complete detail all conduct expected of employees, this Code of Conduct (Code) serves as a guide for each employee and for all those who do business with us.

It supports APO in fulfilling its obligations to observe the laws and public policies affecting its business. In many cases, these standards exceed the standards required by law. The Code is designed to alert employees and those who do business with us of the types of conduct expected of them.

These standards enable us to identify, address, resolve and prevent potential problems.

## Introduction to the Code of Conduct

---

**The Code of Conduct (the “Code”)** describes our ethical standards and how these standards are applied to our day-to-day activities. It is meant to be comprehensive, yet easily understood.

All policies set forth in this code are mandatory and must be followed by all APO employees, and all business partners.

The Code, which you are encouraged to use as a reference, is intended to supplement —not replace— your individual department’s policies and procedures and/or all other APO policies and procedures.



**The Code is an important element of the Compliance Program.**

APO relies upon the integrity of its employees to comply not only with the letter of the Code but also with its spirit. We depend upon each employee at all times to rely upon their good judgment to do the right thing.

In addition to this Code, APO will periodically distribute memoranda and policy statements describing compliance matters, or requiring or prohibiting specified behavior by all or some of APO's employees.

To the extent that these documents prohibit or require certain conduct, they should be considered part of the Code.

## **FAILURE TO FOLLOW THE CODE**

An employee's failure to follow the Code may result in serious consequences to the employee up to and including termination, and/or criminal charges, and, where appropriate, reporting to a governmental authority, or, in the case of a business partner, it could mean termination of the relationship.

**The following are some examples of violations that will be subject to disciplinary action:**

- Any employee or officer who violates this Code or applicable laws and regulations, or APO policies and procedures, or who directs others to do so.
- Any employee or officer who deliberately withholds relevant information, or knowingly provides false information, concerning a violation of this Code or applicable laws and regulations, or APO policies and procedures.

## Introduction to the Code of Conduct

- Any employee or officer who retaliates, directly or indirectly, against another employee for reporting a suspected violation of this Code, applicable laws, regulations, or APO policies and procedures,
- Any employee who fails to assist or cooperate in an investigation of a suspected violation.
- The violator's manager can be held responsible to the extent that the circumstances of a violation reflect the manager's disregard of the Code or applicable laws and regulations or APO policies and procedures.

**This code will be enforced at all levels, fairly and without prejudice.**

### **At-Will Employment**

This Code does not create a contract of employment either expressly or implied. Nothing contained in this Code is intended to alter a person's status of "employment-at-will" with APO to any other status.

### **Non-Retaliation Policy**

Any employee who raises concerns or allegations of possible violations of the Code of Conduct, policies/procedures, laws or regulations will be received openly and courteously. There will be no direct or indirect retaliations or punishment against anyone who, in good faith, raises concerns.

### **Reporting**

Supervisors are required to set an ethical example for their employees and employees are encouraged to address any questions or concerns they might have with their supervisor first. However, there are alternative resources available, as outlined in the section "*Communicating Legal and Ethical Issues*". (pg. 43)

## **A) Quality of Service**

Our patients are the reason we are in business. APO is committed to providing access to quality, cost-effective healthcare services that respond to individual, family and community needs.

Moreover, all providers, and vendors who contract to provide services for APO, are required to operate their business in accordance with this Code. Thus, to the extent applicable, contractors and vendors agree to abide by this code and its standards, and understand that the term “we” as written herein, includes them.

1. We will serve our patients and each other in a professional manner with integrity, honesty, courtesy and respect.
2. We are expected to communicate openly, honestly and professionally with each other and with patients, providers, and regulatory agencies.

## Code of Conduct Standards

---

3. We recognize our patients' rights to receive appropriate healthcare services without discrimination based on race, creed, gender, national origin, sexual orientation, gender identity, age, physical or mental handicap or disability, type of illness or condition, need for health services, or source or amount of payment.
  
4. We shall allow only qualified, properly licensed and credentialed individuals, practicing within the scope of their license or credentials, to provide healthcare services to our patients.
  
5. We have a duty and responsibility to recognize any shortfall or error, no matter how small or insignificant. Any person who sees or hears of a problem or issue must bring it to the attention of an appropriate level of management or the Compliance Department.

6. Employees, providers, vendors and contractors should report to their supervisors or the Compliance department any incidents of inferior health care services provided to patients.

## **B) Confidentiality**

We are committed to using and disclosing information only for its intended purposes. Confidential and proprietary information will only be accessed, used, or disclosed by employees as needed to perform specific job responsibilities.

1. We are responsible for holding in strict confidence any and all confidential and proprietary information pertaining to APO and its patients, employees, providers, and affiliates.

### **Confidentiality continued**

2. Confidential information includes *Individually Identifiable Health Information*, which is defined as any health information, including demographic information collected from an individual, transmitted or maintained in any form or medium, that:

- Is created or received by APO; and
- Relates to the past, present, or future physical or mental health or condition of a patient; the provision of health care to a patient, or the past, present, or future payment for the provision of health care to a patient; and
- Identifies the patient; or could reasonably be used to identify the patient.



The information deemed confidential and owned by APO includes, but is not limited to, the following:

- Data and Documents
- Claims Data
- Provider Records and Files
- Board of Director's Information
- Financial Data/Reports
- Contracts
- Employee Files
- All other Individually Identifiable Health Information
- Methods of Operations
- Medical Records
- Business Practices
- Strategic Plan
- Information Systems
- Patient Files
- Company Directories
- Policies and Procedures
- Human Resources/  
Employment Records

If you don't know or are not sure if something is confidential—Ask!

### **Patient Information**

We will not disclose Protected Health Information outside APO unless we have proper written authorization to share it, in accordance with Health Insurance Portability and Accountability Act (HIPAA) and other applicable Federal and state laws. We will follow APO policies and procedures for the handling of Protected Health Information. These requirements continue to apply even after we leave APO.

### **Employee Information**

Do not share your information or other employees' information. Information about employee salaries, Social Security numbers, age, health status, type of leave or banking information should not be shared with third parties unless required for business operations. Some of our employees are also our patients and must be afforded the same protection as all of our patients.

## **Intellectual Property and Trade Secrets**

Intellectual Property and trade secrets include all ideas, inventions, discoveries, improvements and innovations. APO owns all intellectual property that we make, create, develop, write or conceive either on our own or with another person while employed by or contracted with APO, if it relates or pertains in any way to APO's business. We will not disclose information about APO's intellectual Property and Trade Secrets to people outside of APO.

## **APO-Owned Business Information and "Insider" Information**

We will not give confidential or non-public APO information to people outside APO, such as suppliers, or outside contractors without proper authorization. This includes financial information, patient lists, computer data, computer programs, as well as descriptions of APO's processes, policies, or operations. We will not discuss APO's potential business relationships, purchases, or other organizational changes with people outside of APO.

### **Passwords**

We will protect and maintain the confidentiality and integrity of information used to access our systems, including but not limited to, passwords and other personal security codes. Keep passwords and other personal security codes confidential. We recognize that we are each responsible for the actions resulting from the use of our passwords. DO NOT let others use your password or computer while logged on.

### **Physical Safeguards**

We will maintain confidential APO business documents and information under strict control at secure work-site locations, stored in lockable file cabinets or offices. Employees will protect confidential materials from disclosure when copying, faxing, mailing, emailing or speaking to others. Computer access will be safeguarded at all times.

## **C) Compliance with Laws and Regulations**

When we accept contracts, we have an obligation to ensure that we administer those contracts and deliver our services in a manner that complies with those contracts, as well as our own high standards of honesty, integrity and excellence.

APO employees must know the rules, regulations and policies guiding operations of their work areas.

### **Contracts**

1. All contracts entered into, on behalf of APO, must be reviewed and approved by the Executive Director. We shall ensure knowledge of, and compliance with, these contracts and Federal and State regulations guiding the government programs in which APO participates.
2. All contracts must be signed by an authorized signator; there is a clear and limited list of who may sign contracts on behalf of APO. Unless you are authorized, never sign a contract on behalf of the agency.

### **Accuracy of Records and Billing**

1. We shall ensure that all statements, communications, and representations are accurate, complete, truthful and timely, and comply with applicable laws and regulations.
2. We shall not tolerate known false statements to a government agency or other payor. Any employee who makes a deliberate misstatement to a government agency or other payor will risk criminal penalties and termination of employment.
3. We will cooperate with all reasonable requests for information from government and regulatory agencies. In so doing, it is essential that the legal rights of APO and of our personnel involved be protected. Any governmental or regulatory inquiry, subpoena, or other legal document regarding our business, received at home or at the work place must be forwarded to the Executive Director immediately.

4. We must ensure that payments or other benefits to providers be supported by proper documentation that the services contracted for were, in fact, provided.
  
5. We will follow appropriate procedures governing the retention and destruction of records consistent with applicable laws, regulation, contracts, company policies and business needs. We must never misrepresent facts, falsify or suppress records that may be relevant to a legal action, financial or governmental investigation. We will consult with and follow the instructions of legal counsel.
  
6. We will establish, maintain, support and follow internal controls designed to provide reasonable assurance that transactions are authorized and that data is recorded and presented in a manner that is accurate, complete, current and reliable.

### **Kickbacks**

1. We do not offer payment, gratuities, or favors to any employees, providers, or vendors, current, former or potential, for referrals of patients.
2. We will not offer or give gratuities or anything of value to any employee or representative of a government agency that regulates or audits APO operations or with which APO has or is seeking to obtain a contract.
3. We are prohibited from accepting or giving gifts, gratuities or anything beyond common business courtesies of nominal value. (See Gift, Gratuities & Kickback Sections, pg. 31)

### **Work Environment**

1. We must comply with Federal and State employment laws applicable to Federal and State contractors, prohibiting discrimination based on race, creed, gender, national origin, sexual orientation, gender identity or age. APO is an Equal Opportunity Employer.



2. We must not discriminate against individuals in the terms and conditions of employment based on handicap, disability or perceived disability.
3. APO shall not hire or do business with individuals or entities that have been debarred or excluded from participation in State or Federal health care.
4. We shall not be required to lower our professional standards, judgment or objectivity to accommodate another individual.
5. Considerable difference of opinion in professional judgment should be referred to appropriate management levels for resolution.

*Failure to comply with these requirements and terms of our contracts may jeopardize APO's ability to participate in government programs; violators will be subject to the full range of disciplinary actions, up to and including termination. Violations, or the suspicion of a violation, must be immediately reported to a supervisor or the APO Compliance Department.*

## **D) Fraud and Abuse**

APO's reputation for integrity and our continued success depend on each of us being honest and following all laws and regulations.

Fraud, dishonesty or criminal conduct on the part of any employee, board member, volunteer, director or anyone doing business with the company will not be tolerated.

1. Fraud is knowingly lying, cheating, or withholding truth that results in an unauthorized benefit. Fraud includes but is not limited to:
  - Any incentive given or received in exchange for referral of patients;
  - Providing false or misleading information to become a patient;

- Engaging in fraudulent or misleading marketing practices;
- Providing false or misleading information to obtain payment;
- Submitting false, fraudulent or misleading claims such as:
  - Claims for services not delivered;
  - Claims for a service different from the service actually delivered or received;
  - Claims that do not follow applicable legal requirements.

## Code of Conduct Standards

---

2. Abuse refers to the practices that cheat or “game the system” and result in unnecessary cost to the State, Federal government, or APO. These include:
  - Providing more or less services than are medically necessary;
  - Payment or billing for services that are not medically necessary;
  - Failure to meet professionally recognized standards for quality health care.
3. If you detect or suspect an actual or potential fraud or abuse situation, you must immediately discuss it with the Executive Director, or the Compliance Department.
4. Each report will be thoroughly investigated and violations of the law may be reported to State and/or Federal law enforcement agencies, as appropriate.

## **E) Conflicts of Interest**

We are expected to serve our patients on behalf of APO at all times. We will avoid any conflicts between our private interests and the best interests of APO and its patients.

We must avoid situations where our personal interests could conflict, or reasonably appear to conflict, with the interest of APO. We must be free of actual, apparent or potential conflicts of interest when dealing with persons or business entities on behalf of APO.

We must award business solely on merit, getting the best value for APO, and wherever practical, on a competitive basis. A conflict of interest occurs whenever an employee permits the possibility of direct or indirect personal gain to influence his or her judgment, decisions or actions regarding APO business.

Employees should disclose potential conflicts of interest to their Supervisor or the Compliance Office.

### **Nepotism\* and other forms of favoritism**

You may not have direct or indirect responsibility for the hiring or supervision of a family member. Employment of family members is permitted so long as employees are not reporting directly or indirectly to each other.

We must disclose possible conflicts of interest for resolution. A family member generally includes an employee's :

- Spouse/domestic partner
- Grandparent
- Siblings
- Grandchild
- In-laws
- Corresponding immediate family members of any employee's spouse or partner
- Parent/Stepparent
- Children

We may not use information that comes to us in the course of employment for personal investment or gain, nor can we provide this type of information to family members or others. *\*Nepotism means favoring relatives or personal friends because of their relationship rather than because of their abilities.*

### **Gifts, Gratuities and Kickbacks**

- We are prohibited from accepting or giving gifts or gratuities beyond common business courtesies of nominal value.
- Under no circumstances will we accept or give kickbacks when obtaining or awarding contracts, services, referrals, goods, or business. *(A kickback means to willfully offer, receive, request or pay anything of value in order to persuade or reward referrals of business including goods or services.)*
- We should not accept gifts, payments, fees, services, discounts, valued privileges or favors (even those nominal in value) which would, or might appear to, improperly influence our decision-making on behalf of APO.

### **Gifts Gratuities and Kickbacks Continued**

- We have an affirmative duty to avoid accepting or providing benefits that could be interpreted as conflicting with APO's legitimate business and interests, including, without limitation; payments, fees, services, discounts, valued privileges or favors where there would, or might appear to improperly influence the performance of our duties.
- We may not accept cash gifts, including checks, honorariums, or money orders of any amount. However, gifts of nominal value (\$100 or less) and reasonable meal and entertainment courtesies are not prohibited. Non-cash gifts that exceed \$100 must be returned or turned over to your supervisor or the Compliance department.
- Gifts given internally should not exceed the nominal value of fifty dollars (\$50). Employees are discouraged from giving gifts to management and in no instance shall any individual gift to management exceed the value of twenty five dollars (\$25) unless approved in advance.



### Conflicts of Interest (Continued)

- At a vendor’s invitation (not an employee’s request) an employee may accept a meal, refreshment, attendance at a local theater or sporting event and/or other entertainment in connection with furthering APO’s business interest. Provided that the business courtesy is:
  - Of a reasonable value,
  - Is offered infrequently,
  - Is customary and a part of normal business practices, it imposes no sense of obligation on the giver or recipient, it involves no special treatment, such as free services or special discounts, it is not a loan or payment,
  - It would not be perceived as likely to influence the employees “business judgment”, and
  - It would be appropriate to reciprocate in a similar manner.

### **Conflicts of Interest (Continued)**

- In most circumstances a business representative of the vendor should be in attendance with the employee.
- Gifts or items of value must never be offered to government employees
- Monetary gifts to or from patients or potential patients should not be given or accepted.

### **Outside Employment**

- We shall not become involved, directly or indirectly, in outside commercial interests, which would improperly influence our actions on behalf of APO. This may include being an officer, director, manager, employee or consultant of a competitor, vendor or contractor of APO.
- We may not engage in any outside activity that impairs our job performance or interferes with our ability to perform our duties adequately.

## **Political Activity**

- Employees are encouraged to vote and actively participate in the political affairs of their communities. Except for the time allowed by law, these activities must take place on your own time and at your own expense.
- APO shall not participate or intervene in any political campaign on behalf of or in opposition to any candidate for public office. This includes the publishing or distribution of statements regarding candidates.
- Employees must not associate APO with, or imply APO's endorsement of, personal political activity. APO funds may not be expended in support of or in opposition to any political candidate or political party.

## **F) Workplace Conduct and Employment Practices**

APO is committed to maintaining a work environment where we treat each other with honesty, dignity, and respect.

APO values diversity and the cultural contributions of all employees, regardless of their position, sexual orientation, gender identity, family status, age, race, sex, disability, religion or national origin. All employment practices are based on ability and performance.

1. APO seeks to be a responsible employer by providing opportunities for professional satisfaction, pride of work, and career growth for all employees.
2. We have a fundamental responsibility to show appropriate respect for and consideration of one another, regardless of position or relationship.

3. APO will not tolerate sexual advances, actions, comments, inappropriate physical contact or any other conduct that is intimidating or otherwise creates an offensive or hostile work environment.
4. APO respects the right to work in an environment free from harassment and discrimination, where employee's privacy and dignity are valued and protected from offensive, obscene, or threatening behavior.
5. APO maintains a drug free work place. We will not tolerate an employee being under the influence of illicit drugs or alcohol while on duty.
6. APO shall conform to the standards of our professions and exercise judgment and objectivity in the performance of our duties. Any difference of opinion in professional judgment should be referred to appropriate management for resolution.

## Code of Conduct Standards

---

7. Employee safety is important to APO. APO will make a special effort to protect and help keep safe its employees who work in or outside of the APO offices. APO has specific internal policies and procedures to address employee safety and APO is committed to working cooperatively with employees to resolve safety concerns.
8. We shall not permit any action of retaliation or punishment to be taken against an employee who, in good faith, reports a violation or suspicion of a violation of a law, regulation, company policy or the Code.

### **G) Safeguarding APO Property and Interests**

We will use and maintain APO assets with care and respect, guarding against misuse, waste, abuse, loss and theft.

APO assets include, but are not limited to, corporate data, business strategies and plans, financial data, and other trade secrets or confidential information about APO business or its employees. APO property also includes all computer files, equipment, furniture, vehicles, office supplies, corporate funds, credit cards, employee time, and computer supplies and software. Additionally;

- We shall consider any information concerning the business affairs of APO, our suppliers, employees, or personnel, as confidential. No information may be shared except as authorized or in the performance of our duties.
- We shall dispose of surplus, obsolete or junked property in accordance with company policies and procedures. Unauthorized appropriation or disposal of property is a misuse of assets.
- We shall not engage in financial misconduct, including any activity involving APO property that results in an improper financial gain to the employee from outright theft of property, embezzlement of money, or the use of money belonging to APO for anything other than an authorized purpose. This also includes an employee knowingly turning in false time records, or the unauthorized use of company equipment or property.
- We are expected to exercise reasonable care to protect our personal property while on APO premises.

### **Intellectual Property and Trade Secrets**

- Intellectual property and trade secrets include all ideas, inventions, discoveries, improvements and innovations. APO owns all intellectual property that we make, create, develop, write or conceive either on our own or with another person while employed by or contracted with APO.

### **Unauthorized Software**

- We follow State and Federal laws pertaining to copyright protection. This includes duplication of print materials, as well as duplication of licensed computer software.
- We shall never copy computer software. The unauthorized copying or use of software could be a violation of federal copyright laws and could result in civil and/or criminal liability.
- We shall not take any APO commercial software products home for personal use.



### **Use of Internet and Other Electronic Devices**

- All communication systems, electronic mail, internet, phones, voice-mail, and fax are the property of APO and are to be used for business purposes.
- Company systems may not be used to send chain letters or personal broadcast messages.
- Company systems may not be used for viewing, sending or receiving offensive or inappropriate materials.
- No communications are private and are all subject to review by APO management.

## Addressing Integrity Concerns

---

- Healthcare is governed by complex, demanding and changing laws, rules and regulations. Sometimes application of these rules and regulations creates uncertainty and questions. The APO Code of Conduct gives us the tools to help resolve any concerns or questions we may have about business ethics, integrity, and APO expectations.
- Open discussion of issues and concerns by all employees and management without any fear of retaliation is essential to the success of the Corporate Compliance Program. For this reason, APO has a non-retaliation policy to protect those who report legal or ethical issues in good faith. APO encourages you to discuss legal and ethical issues that arise while performing your job.
- We have a responsibility to perform our jobs in an honest and ethical way. We have a requirement to report the knowledge or suspicion that we, in good faith, believe may be a violation of any applicable laws, regulations, policies or APO Code of Conduct. APO has an absolute policy against any retaliation for bringing forward a good faith concern. Violations of this policy will be subject to disciplinary action.

The Compliance Department is charged with ensuring that all employees receive annual compliance training.

### **Communicating Legal and Ethical Issues**

If you are confronted with a compliance or ethical dilemma, ask yourself the following questions:

1. Does it seem like a law, regulation, or APO policy is being violated?
2. Does the behavior/act at issue appear to be unacceptable or unethical to you?
3. Does it seem inconsistent with APO values and the Code of Conduct?

**IF YOUR ANSWER TO ANY OF THESE QUESTIONS IS YES, THEN, IT'S TIME TO ACT!**

## Addressing Integrity Concerns

---

### **Step 1\***

Discuss the issue with your immediate supervisor who knows you and the issues in your workplace. Your supervisor is in a good position to understand your concerns. Give your supervisor an opportunity to resolve the issue. Your supervisor is responsible for upholding the APO Code of Conduct in your work area. If you still have concerns after talking with your supervisor or if you are not comfortable discussing the issues with your supervisor, go to the next step.

### **Step 2\***

Discuss the issue with another manager or the Executive Director. If you have raised an issue and you believe it did not get proper attention or if your supervisor cannot find the appropriate answer(s), or if the issue concerns wrongful or inappropriate conduct on the part of your supervisor, you may relate your concerns to the Executive Director

### **Step 3\***

If your supervisor or other manager is unable to resolve the issue satisfactorily, you may contact the Compliance Department for further guidance to help you resolve the issue.

**Step 4\***

If you do not feel comfortable discussing your issue(s) with your supervisor or manager, and you have a compliance issue, you may call the Compliance Hotline. The Hotline is available twenty-four (24) hours per day, 365 days per year. The number is:

**417-881-1900 Ext 118**

All calls to the hotline may be made anonymously and without fear of retaliation. Calls made after hours will be collected by our answering service, unless you dial 118 to be directly patched to the hotline voicemail box.

The calls are not traced and the information is treated in a confidential manner, subject to the limits imposed by law.

Employees are encouraged to provide as much information as they know in order to assist with further investigation. Careful efforts will be made to ensure that investigations are handled confidentially.

## Addressing Integrity Concerns

---

The Hotline is intended to supplement the existing internal communication channels. It is not intended to replace our management team.

Calls are handled confidentially and the caller is protected from any form of retaliation.

Anyone attempting to retaliate against an employee will be subject to disciplinary action, up to and including termination.

You will be asked to sign a Code of Conduct Acknowledgement each year, a copy of which is included on the next page.

Once you have read the entire Code of Conduct please photocopy the attached Acknowledgement, sign and date the copy and return to the Compliance Director. This will be kept in your personnel file to document your understanding of the APO Code of Conduct.

## Code of Conduct Acknowledgement

1. I have received, read and understand the APO Code of Conduct.
2. I understand that all employees of APO, including me, are expected to abide by the Code of Conduct and that it is not a guarantee of my employment with APO.
3. I will report any potential violation of which I become aware promptly to my manager, the Compliance Department, or the Hot-line.
4. I understand that there will not be retaliation for raising a compliance issue in good faith.
5. I understand that any violation of the Code of Conduct may result in corrective action and/or disciplinary action up to and including termination.
6. I understand that my failure to cooperate in a compliance investigation can be grounds for termination.

\_\_\_\_\_  
Name (Printed)

\_\_\_\_\_  
Title

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date



**Thank you for  
your commitment  
to the integrity  
of APO**