



# H2 HEALTH

## Standards of Business Conduct and Compliance Program Guide

### **Compliance Reporting Resources**

H2 Health Compliance Hotline Email: [compliance@h2health.com](mailto:compliance@h2health.com)

By mail:

H2 Compliance Reports, 484 Riverside Avenue, Jacksonville, FL 32202

By phone: Compliance Hotline: 844-424-2543

H2 Health recognizes the need to conduct business with honesty and integrity and in compliance with all applicable federal and state laws and payor requirements. This recognition is supported by an organizational commitment to promote ethical and compliant business operations. H2 Health is committed to conducting its business according to the highest standards of ethics, honesty and fairness and in accordance with applicable laws and regulations. This commitment to observing the highest ethical standards is designed to ensure compliance with applicable laws and regulations in the various jurisdictions where we operate, and to earn and keep the continued trust of our patients, clients, stakeholders, personnel and business partners.

H2 Health has established a Standards of Business Conduct and Compliance Program to reinforce its dedication to compliance and assist its employees, management team, and affiliates in compliance with federal and state laws while conducting business in an ethical manner.

We have created a culture of compliance that demands teamwork and leadership to execute on our commitment to “Do the Right Thing”. To promote a workplace that values integrity, honesty, and compliance with the law, all employees must be informed and abide by these standards of conduct. The Standards of Business Conduct and Compliance Program are designed to assist H2 Health employees and others to address and resolve issues of ethics, compliance and appropriate conduct in the workplace.

H2 Health will make available our Standards of Business Conduct and Compliance Program Guide to every employee, business associate and affiliate.

**All H2 Health employees have the following duties:**

- Understand that they are to read and become familiar with the contents of the Program Guide as it outlines the Company's commitment to compliance, policies, and employee responsibilities.
- Employees are responsible for reading the Standards of Business Conduct and Compliance Program Guide and all updates published.
- Employees must acknowledge their receipt and review of the code by attesting in writing or electronically that they understand that they are to read and become familiar with the contents of this Compliance Program Guide upon hire and/or as periodically required by Company.

An individual's signature reflects a commitment that one has read, understands, accepts, abides by, and participates in the H2 Health Compliance Program and agrees that participation with this code is a condition of employment.

H2 Health is committed to regular reviews of the Standards of Business Conduct and Compliance Program; both will be updated as necessary and ensure that employees have access to information regarding any modifications or changes. This Compliance Program Guide is not intended to be an exhaustive guide to all the detailed rules and regulations governing the services provided by H2 Health but rather to establish guiding principles for all employees.

This Guide establishes minimum standards to be observed by all H2 Health employees, independent contractors, consultants, board members and investors. For H2 Health to adopt and implement its Compliance Program, we have established a Compliance Committee and have designated a Chief Compliance Officer. The Compliance Committee is responsible for approving the Compliance Program Guide and any amendments or revisions. The Compliance Officer has been given the authority to direct and oversee all aspects of the Compliance Program.

Annually, H2 Health will review key areas of potential compliance risk and set forth a system to identify risk elements in each key area. The annual risk assessment will take into consideration the annual work plans published by the Office of Inspector General of the Department of Health and Human Services, industry guidance as provided by the American Physical Therapy Association, American Occupational Therapy Association, and the Health Care Compliance Association, in addition to internal and external auditing and monitoring results.