



# Professional Case Management

## SUPPLIER CODE OF CONDUCT

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## MESSAGE FROM OUR PRESIDENT

Welcome to PCM. For over 30 years, we have been providing quality health care to clients in the comfort of their homes. Over time we have expanded into multiple divisions, offering a variety of services to former nuclear weapons and uranium workers as a part of the Energy Employees Occupational Illness Compensation Program Act (EEOICPA).

In 2008 we started *PCM TRIALS*, our clinical research division, leading the way in decentralized trials and mobile research by enhancing patient centricity and successfully accelerating trial completion. Through our unique partnership with Sponsors and CROs, *PCM TRIALS* is changing the landscape of the clinical research industry.

We are dedicated to managing our business honestly and ethically with the knowledge that how we conduct ourselves day-to-day is essential to fulfilling our commitment to our mission and core values. In order to live up to this commitment, we rely on everyone associated with PCM, including our vendors, suppliers, and independent contractors, to adhere to certain principles. This Code of Conduct serves as a guide for those expectations, so please take time to read and understand the quality standards we follow. If you have questions about anything outlined in the following pages, please send any questions to [compliance@procasemanagement.com](mailto:compliance@procasemanagement.com). Once again, welcome to PCM. We look forward to working with you.

Sincerely,

A handwritten signature in black ink, appearing to read 'Greg Austin', is positioned below the word 'Sincerely,'.

Greg Austin  
President



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## PCM VALUES

With a breadth of services offered across numerous divisions, PCM works passionately to instill strength and new hope in the lives of deserving individuals. We're one diverse, highly collaborative team. And in everything we do, we share a strong set of core values.

### We Work As A Team

At PCM, we truly enjoy the people we work with, whether they are our team members, clients, or their families. We have a diverse group of people all over the country, and we each bring different strengths and talents. By working enthusiastically toward the same goal and believing in our company's mission, we collectively expand our knowledge, share ideas, and find the best ways to achieve success—not only for those we serve, but for ourselves.

### We Do The Right Thing

At PCM, we focus on the human impact of our work. This shows through the personal, genuine connections we make with our clients and their families. We understand the importance of empathy and compassion, and that quality care takes patience. And through our unwavering integrity, we bolster confidence and trust in the lives we touch.

### We Figure It Out

The healthcare industry is constantly changing and presenting new challenges, big and small. Our experience and foresight allow us to adapt to these challenges in stride, always thinking before doing. Even if the challenge seems unsolvable, we never give up when it really matters.

### We Pursue Growth

From humble beginnings in Denver, Colorado, PCM has served more nuclear weapons and uranium workers across the country than any other homecare provider, and our innovative ideas continue to progress the healthcare industry forward. Across all PCM divisions, we're constantly elevating our standard of care. By daring to lead, we inspire others to follow. And that goes for our PCM team members as well. We encourage and offer ongoing opportunities for professional growth.

### We Take Ownership

We believe courage is the cornerstone of personal and professional success. By recognizing our achievements—and our potential—we can inspire each other to grow stronger, smarter, and more driven in our work. At PCM, this sense of responsibility is one of the most powerful tools our teams have, and we believe that investing in ourselves leads to a strong foundation—not only on an individual basis, but for our company as a whole.

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# SUPPLIER CODE OF CONDUCT

## Overview

Professional Case Management, its subsidiaries, and affiliates (collectively, “PCM” or the “Company”) is committed to conducting business ethically and legally across all its global operations and expects its business partners to share this commitment. PCM’s Supplier Code of Conduct (“Code”) sets out PCM’s expectations for how its suppliers conduct business in performing services to or on behalf of PCM. All vendors, suppliers, consulting firms, staffing agencies, agency temps, subcontractors, agents, independent contractors, and other third parties engaged in providing products or services to PCM (collectively, “Suppliers”) are expected to act in accordance with this Code, including aligning guidelines, policies, and practices, and communicating and enforcing this Code throughout their organizations, including to subcontractors. Nothing in this Code is intended to replace, supersede, or conflict with any applicable legal or regulatory requirement, or any contractual obligation that any Supplier may have with PCM. To the extent there may be a conflict between this Code and a Supplier’s contract with PCM, the terms of Supplier’s contract will prevail with respect to such conflict.

This Code may be changed, altered, or modified by PCM from time to time in its sole but reasonable discretion. All Suppliers should read this Code at least annually and agree to comply with the requirements.

## Ethical Business Practices

### Compliance with Applicable Laws

Suppliers are required to understand the requirements of this Code, operate in accordance with the expectations outlined in this Code and comply with all laws, rules, regulations, and standards within the geographies and applicable to the businesses in which they operate. In instances where standards outlined in this Code differ from local laws, Suppliers must respect these standards within the framework of the applicable local laws. Suppliers must cooperate with regulators and be willing to comply with global, national, and local jurisdictional requirements.

### Anti-Bribery and Anti-Corruption

PCM does not tolerate bribery or corruption involving its people, Suppliers, or other business partners. Suppliers are expected to fully comply with requirements of all applicable laws and regulations designed to combat bribery and corruption, including the U.S. Foreign Corrupt Practices Act and the U.K. Bribery Act, as well as applicable local anti-bribery and anti-corruption laws.

Suppliers are prohibited from offering, providing, paying, authorizing, promising, soliciting or receiving anything of value, directly or indirectly, for the purpose of obtaining or retaining business or any improper business advantage for or from the Company. This prohibition extends not only to PCM personnel, representatives, and agents, but also to public officials (including candidates for office, employees, or officers of state-owned or controlled enterprises), employees or officers of counterparties, clients, customers, or

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suppliers (as well as their relatives, friends, agents, and associates). Suppliers are also prohibited from making facilitation payments, which are payments to public officials to expedite or secure performance of a routine, non-discretionary governmental action.

Suppliers and other third parties acting on behalf of PCM (including intermediaries, finders, agents, and business partners) are expected to maintain appropriate policies and procedures, and to act at all times in a manner consistent with this Code. The Company also prohibits the use of vendors and other third parties acting on its behalf to route or facilitate illegal or inappropriate payments.

“Anything of value” includes improper payments, such as cash bribes or kickbacks, and may also include other direct or indirect inducements, benefits, fees, commissions, and advantages, including inappropriate gifts, meals, travel, entertainment, charitable and political contributions, and offers of employment or internships. “Anything of value” can also include corrupt payments disguised as legitimate payments for goods or services.

### **Gifts, Travel and Entertainment**

Personal gifts, entertainment, loans, or anything of value, valued at the equivalent of \$50.00 USD or more in the applicable local currency, may not be accepted by Company employees from any person or organization that either does or seeks to do business with, or is a competitor of the Company, except for occasional advertising materials of nominal value and minor entertainment and meals such as business lunches.

Industry sponsorships that could be perceived as a potential conflict of interest, or that may conflict with any other requirement of this Code, should be submitted to the Compliance department for review. When in doubt, contact the Compliance department at +1.303.317.2406 or [compliance@procasemanagement.com](mailto:compliance@procasemanagement.com).

Any further questions regarding gifts or benefits from persons doing or seeking to do business with the Company should be directed to the Office of Compliance at +1.303.317.2406 or [compliance@procasemanagement.com](mailto:compliance@procasemanagement.com).

### **Anti-Trust and Fair Competition**

Suppliers shall conduct their business consistent with fair and vigorous competitive practices and in compliance with all applicable anti-trust and fair competition practices and fair competition laws.

### **Conflicts of Interest**

Suppliers must avoid improprieties and conflicts of interest or the appearance of either and should act in PCM’s best interest while performing work on PCM’s behalf. A conflict of interest may exist when a Supplier is involved in an activity that affects—or could appear to affect—objectivity. Suppliers should not, for example, deal directly with a spouse, domestic partner or other family member who is employed by PCM when negotiating Supplier’s agreement with or performing Supplier’s obligations for PCM. Suppliers must disclose to PCM’s Office of Compliance any material transaction or relationship that reasonably could be expected to give rise to an apparent or actual conflict of interest regarding its relationship with PCM.

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## **Anti-Tax Evasion and Anti- Facilitation of Tax Evasion**

PCM will not tolerate unlawful tax evasion or the facilitation of unlawful tax evasion. Suppliers must not directly or indirectly engage in, or facilitate the engagement by others in, the deliberate and fraudulent diversion of funds from a tax authority. Suppliers are expected to ensure the same of their agents, subcontractors, intermediaries, and workers by adopting, maintaining, and implementing reasonable processes that prevent such conduct.

## **Data Privacy, Data Security, Confidential Information, Intellectual Property, Accuracy, and Right to Audit**

### **Data Privacy**

Suppliers must comply with all applicable data privacy / protection and information security laws and regulations. Suppliers are expected to:

- Assist PCM in meeting its obligations under data privacy and protection laws by, among other things, providing PCM assistance in responding to individual rights requests and investigations by regulatory and other law enforcement bodies.
- Immediately and within 24 hours, notify PCM of any actual or suspected privacy and/or security incident after becoming aware of the incident, including collaborating in investigation and remediation efforts, unless otherwise stated in the supplier's agreement with the Company.
- Not disclose or transfer PCM data to any third party without PCM's express prior written consent.

### **Data Security**

Suppliers will handle and process data only for the purposes for which it was collected or otherwise made available. Suppliers shall demonstrate appropriate industry standard and best practice data security controls to ensure that all information is protected and secure from damage and unauthorized use. In addition, Suppliers shall also follow any data security policies and requirements specified in contractual agreements with PCM.

### **Confidential Information and Intellectual Property**

Suppliers shall not share, disclose, or use PCM's intellectual property, confidential information, or any other proprietary or non-public information that Supplier acquires through its engagement with PCM except as provided for in the applicable contract with PCM or as provided by express written consent of PCM.

### **Accuracy of Data and Records**

Suppliers must maintain, retain, and dispose of business records relating to all PCM business, together with supporting documentation in full compliance with all applicable legal and regulatory requirements. All financial books and records must conform to the generally accepted accounting principles of the jurisdiction in which the Supplier operates. Records must be legible, and transparent and reflect actual transactions and payments in reasonable detail.

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- Suppliers must not make any false representations in connection with any PCM transactions, including any misrepresentations of fact (whether written or oral).

### **Right to Audit**

Supplier shall be open and transparent to PCM's assessment and audit of their compliance with this Code.

## **Credentials, Licensing, and Insurance**

If a Supplier is required to have a particular credential, license, or insurance, it is up to the Supplier to maintain that credential, license, and/or insurance, and the Supplier must inform PCM immediately if the credential, license, or insurance becomes encumbered or restricted or is not renewed or maintained.

## **International Trade and Export Controls**

Suppliers must comply with all applicable import, export, customs, sanctions, embargoes, boycott and other trade compliance laws and regulations.

## **Social Media**

Suppliers should immediately refer to their respective PCM representative or to PCM's Marketing Department all requests for information, comments, and other media inquiries received from organizations outside of PCM. This includes formal and informal requests for interviews, photographs, written materials, and opinions.

Suppliers should exercise good judgment and caution when communicating in a public forum or on social media. Improper communications can easily have ramifications for PCM stakeholders, customers, and the public's opinion of PCM. Absent express prior written consent from an authorized PCM representative, Suppliers and their employees are not authorized to speak on PCM's behalf on any matter, nor comment upon any matter that is the subject of, or related to, the work Supplier is performing or has performed on PCM's behalf.

## **Labor and Human Rights**

### **Human Rights**

PCM respects all human rights throughout its business activities and expects the same of its Suppliers. PCM's Suppliers shall conduct their employment practices in full compliance with applicable labor and humanitarian laws and regulations. Specifically, Suppliers shall (i) treat all of their workers fairly and with dignity, (ii) adopt an approach to human rights consistent with the United Nations Universal Declaration of Human Rights, (iii) support and respect the protection of internationally proclaimed human rights, and (iv) ensure that they are not complicit in human rights abuses.

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### **No Forced Labor or Human Trafficking**

Suppliers shall use only voluntary labor. The use of forced labor whether in the form of indentured labor, bonded labor, prison labor, or any other behavior constituting slavery or servitude by Supplier or its subcontractors is prohibited. Engaging in or the use of human or labor trafficking by a Supplier or its subcontractors is also prohibited by PCM.

### **Anti-Harassment and Nondiscrimination**

Suppliers shall cooperate with Company's commitment to a workforce free of harassment and unlawful discrimination. While we recognize and respect cultural differences, we believe that Suppliers should not engage in discrimination in hiring, compensation, access to training, promotion, termination, or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership, political affiliation or any other category protected by applicable law.

Harassment in the workplace is behavior that is unwelcome and offensive to specific individuals or groups. Harassment can take many different forms and may include verbal or physical conduct that denigrates or shows hostility toward an individual or groups and can reasonably be perceived by the individual or groups as threatening, offensive and/or insulting.

Suppliers shall not engage in physical discipline or abuse. Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation is prohibited.

PCM will not tolerate any retribution or retaliation taken against any individual who has in good faith sought out advice or has reported questionable behavior or a possible violation of this Code.

### **Diversity, Equity, and Inclusion**

PCM expects its Suppliers to support diversity, equity, and inclusion in their operations and workforces. PCM encourages its Suppliers to demonstrate a commitment to identify, measure and impose a culture of diversity and inclusion through all aspects of workplace management.

### **Compensation and Working Hours**

Suppliers shall comply with all local minimum working age laws and requirements and not utilize child labor. Employees shall not be under the legal minimum working age of the respective region or shall not be less than 16 years of age (whichever is higher).

Suppliers shall pay living wages under humane conditions. Wages and benefits paid for a standard working week meet, at a minimum, national legal standards.

Suppliers shall not require workers to work more than the maximum hours of daily labor set by local laws and ensure that overtime is paid in accordance with local laws and regulations.

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### **Employment Status and Records**

Suppliers shall employ only workers who are legally authorized to work in their location. Suppliers are responsible for validating employees' work eligibility status. Suppliers shall keep employee records in accordance with applicable local laws.

### **Identification of Concerns**

Suppliers' employees should be encouraged to report concerns or illegal activities in the workplace without fear of reprisal, intimidation, or harassment. Suppliers shall investigate such reports and take corrective action if appropriate.

## **Occupational Health and Safety**

### **Maintain a Safe and Healthy Environment**

Suppliers must provide a safe and healthy work environment and comply with all applicable safety and health laws, regulations, and practices. Suppliers will take adequate steps to prevent accidents and injury to health at work including providing workers with appropriate workplace health and safety information and training.

### **Drugs & Alcohol**

Suppliers shall prohibit the use, possession, distribution, and sale of illegal drugs in accordance with applicable local legislation while working for PCM. It is expected that there will be no unlawful use of drugs or alcohol in any location where Supplier provides services.

### **Security of Medications**

It is the Supplier's responsibility to have and follow appropriate practices for the safe dispensing of medications for individuals in Supplier's care. Supplier should refer to and be familiar with any program standards for information regarding the handling and dispensing of medication. In addition, Suppliers should be familiar with procedures for the safe disposal of hazardous waste materials such as needles.

### **Healthcare Fraud and Abuse Law**

Suppliers must comply with all applicable US and international healthcare fraud and abuse laws, including those US laws which generally prohibit persons from soliciting, offering, receiving, or paying any compensation to induce someone to order or purchase items or services that are in any way paid for by Medicare, Medicaid or other government funded healthcare programs. These applicable laws also prohibit submitting or causing to be submitted any fraudulent claim for payment to the government.

### **Violence, Threats, and Weapons**

PCM believes in a safe and secure work environment that is free from violence and threats. Threats, intimidation, and acts of violence are not tolerated.

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## Environmental Stewardship

Environmental stewardship is an important aspect of how PCM operates its business. Suppliers are encouraged to adhere to similar environmental efforts as appropriate to their businesses and align with industry best practices locally and globally.

## Raising Concerns

If Supplier becomes aware of or suspects a violation of this Code, Supplier should contact PCM's Compliance department at +1.303.317.2406 or [compliance@procase.com](mailto:compliance@procase.com).