

Grand JiVante Corporate Compliance Program

Introduction

Grand JiVante is committed to establishing and maintaining an effective compliance program in accordance with the compliance program guidance published by the Office of the Inspector General (OIG). The purpose of the Compliance Program is to seek to prevent and detect violations of law and company policy.

Purpose

The purpose of the organization's Corporate Compliance Program is to promote and support the organization's commitment to conducting its business with honesty and integrity and in accordance with all applicable laws and regulations, including all applicable Medicare or Medicaid laws and regulations. Grand JiVante has a policy to maintain the highest level of professional and ethical standards in the conduct of its business. This policy is a reaffirmation of the importance of the highest level of ethical conduct and standards. These standards can be achieved and sustained only through the actions and conduct of all personnel of Grand JiVante. Each and every employee is obligated to conduct himself or herself in a manner to ensure the adherence to these standards. Such actions and conduct will be important factors in the yearly evaluation of each employee and will be an important factor in determining raises for employees.

Applicability

Every person involved in the activities of the organization is subject to the standards and policies of the Corporate Compliance Program. This includes members of the board of directors, officers of the corporation, senior managers, supervisors, employees, vendors, and agents. No person, regardless of his or her position with the organization, may violate or discredit the organization's commitment to ethical and legal compliance.

Elements of the Corporate Compliance Program

Compliance Officer

A Compliance Officer has been designated by the Board of Directors to oversee the development, implementation, and maintenance of the Corporate Compliance Program. The Compliance Officer is responsible for affecting the objectives of the Corporate Compliance Program, in accordance with a written work plan.

Role of the Compliance Committee

The Chief Executive Officer appoints the members of the Compliance Committee. The Compliance Committee serves the Compliance Officer in a consultative capacity and is responsible for implementing the activities of the Corporate Compliance Program under the direction of the Compliance Officer. Members of the Compliance Committee are expected to pledge a duty of confidentiality and nondisclosure of the information revealed to them in the course of executing their responsibilities as members of the Compliance Committee.

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Role of Management

Supervisors and managers are responsible for fostering an environment that encourages lawful and ethical conduct, and they will be held accountable for failing to supervise employees' compliance with the standards and policies of the organization. All supervisors and managers are expected to exercise reasonable diligence in detecting noncompliance and to take appropriate action to correct problems within their area of responsibility.

Work Plan

The objectives of the Corporate Compliance Program will be evaluated annually as a part of the strategic planning and budget setting processes of the organization. A written work plan based on a specified timeline and identifying the priorities of the program for the ensuing year will be developed in accordance with the objectives adopted by the organization.

Code of Conduct

A Code of Conduct has been developed under the direction of the Compliance Officer and adopted by the Board of Directors. The Code of Conduct sets forth the legal and ethical standards to be followed by the organization for the purpose of eliminating illegal or unethical conduct in the workplace. All employees will receive training on the Code of Conduct and will be required to sign a written acknowledgment that they have received, read, and will abide by the organization's Code of Conduct. Each employee will need to review and sign a new Code of Conduct each year.

Departmental Policies and Procedures

Policies and procedures pertaining to the high-risk areas of the organization's operations are developed under the direction of the Compliance Officer, the members of the Compliance Committee, and department managers. Employees with responsibilities in high-risk areas of the organization's operations receive specialized training on these policies and procedures.

Program Policies and Procedures

Policies and procedures governing the Corporate Compliance Program are developed under the direction of the Compliance Officer and the members of the Compliance Committee. All employees will receive training on the policies and procedures of the Corporate Compliance Program and will be required to sign a written acknowledgment that they have received, read, and will abide by the policies and procedures of the Corporate Compliance Program.

Grand Jivante has created numerous compliance policies and procedures that articulate Grand JiVante's commitment to comply with all Federal and state regulations. Many of these policies are designed to prevent fraud and abuse by providing guidance to employees working in at risk areas. Our compliance standards apply equally to all employees regardless of tenure or rank in the organization. It is the responsibility of each employee to become familiar with the policies and procedures that apply to their job.

Compliance Training

The Compliance Officer is responsible for ensuring that all officers, directors, managers, supervisors, employees, vendors (as appropriate) and agents receive training on the ethical

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and legal principles set forth in the Code of Conduct and on the policies and procedures governing the Corporate Compliance Program. Compliance training is provided to new employees within 30 days of employment, as a part of orientation training. Additional compliance training will be provided to all employees annually. Members of the Board of Directors will receive a minimum of one hour of compliance and governance training

Specialized Training

Managers of high-risk areas of the organization's operations are responsible for ensuring that all employees under their supervision receive specialized training relevant to their area of responsibility. A minimum of one hour of specialized training will be provided to new employees within 30 days of employment, as a part of orientation training. All employees with responsibilities in high-risk areas of the organization's operations will be provided specialized training of not less than one hour per year relevant to their area of responsibility.

Reporting Violations

One function of the Compliance Program is to proactively identify issues and prevent compliance issues from developing. Under the Code of Conduct, every person performing activities on behalf of the organization is expected to report improper conduct. Any employee who knows of or suspects any illegal, unethical, or fraudulent activity should discuss the matter with his or her supervisor. In the event an employee is uncomfortable discussing a concern with his or her supervisor, or the employee is not satisfied with the supervisor's response, the employee is expected to take the concern to any member of the Compliance Committee, Compliance Officer, any member of the management team, or to report it via the compliance hotline.

Anonymous Reporting

The organization encourages direct communication between employees and their supervisors to optimize the organization's ability to adequately investigate a report of a suspected compliance violation. To encourage reporting of compliance violations by employees who are not comfortable discussing a concern directly with his or her supervisor or with another manager, the organization has implemented an anonymous reporting system.

Confidentiality and Non-retaliation Policies

The organization has adopted and strictly adheres to policies that protect the identity of an employee who has reported a compliance violation and to assure that no retaliatory actions will be taken against an employee who has made a good faith report of a compliance violation. Anyone violating these policies will be subject to disciplinary action, up to and including termination. Employees will be instructed to report any concerns about violations of these policies to the Compliance Officer.

Disciplinary Guidelines

The organization has adopted and will fairly administer policies and procedures that set out the consequences for violating the organization's standards and policies. Corporate Compliance Program policies and procedures include a statement advising all employees that strict adherence to the requirements of the program is a condition of employment, and that the organization will take disciplinary action, up to and including termination, for violation of the

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organization's standards and policies. To promote adherence to Grand JiVante's procedures and policies, the organization will consider an employee's legal and ethical conduct as a factor in evaluating the employee's performance.

Employee Screening

The organization will make a diligent search, in accordance with its policies and procedures, to identify all persons and entities excluded, debarred, or otherwise unqualified or ineligible by law from becoming an employee, vendor, contractor, or agent of the organization.

Compliance Monitoring

The organization will identify, assess, and monitor the high-risk areas of the organization's operations under the direction of the Compliance Officer and in accordance with the organization's auditing and monitoring program. The Compliance Officer may delegate responsibility for assessing any areas of risk to internal or external examiners with subject-matter expertise in the area under review.

Investigating Compliance Violations

All incidences of detected or reported violations of the organization's standards or policies, including violations of federal and state laws governing the organization's operations, will be promptly investigated under the direction of the Compliance Officer. The Compliance Officer may delegate responsibility for investigating a potential violation to a member of the Compliance Committee or to another appropriate manager. The Compliance Officer may direct that the investigation be conducted by or under the authority of an attorney. All employees will be expected to cooperate during an internal investigation. The Compliance Officer will ensure that appropriate corrective actions are implemented as necessary.

Reports

The Compliance Officer submits written periodic reports to the Board of Directors describing the activities and outcomes of the Corporate Compliance Program.

Documentation Retention Policy

The organization has adopted document retention policies and procedures regarding the creation, distribution, retention, and destruction of documents according to their nature and content.