

## CORPORATE COMPLIANCE STATEMENT

EverCare Choice, Inc. operates a managed long term care plan, a social adult day center, and a certified home health agency that is known as EverCare at Home (referred to throughout, collectively, as "EverCare"). EverCare is committed to the highest standards of ethics and integrity. Our Compliance department exists to provide help and guidance to all employees and contractors to provide our patients, members and clients with the best care possible.

It is the policy and purpose of EverCare to ensure compliance with the highest principles of professional conduct and related laws, regulations and policies on the part of all staff [employed and contracted], volunteers and members of the Board of Trustees. As such, it adopted a Corporate Compliance Plan which is reviewed annually to describe the underlying structure and process of EverCare's Corporate Compliance Plan.

- a. We expect everyone with whom we are associated to comply with all state and federal laws and regulations as well as the internally published policies and procedures of EverCare. The Compliance Plan is designed to discover, remedy and deter noncompliant, unethical, unlawful or criminal conduct and helps ensure we conduct our business and provide our services in a legal and ethical manner.
- b. We encourage ongoing internal analysis of our organization Policies and Procedures and conduct effective self-monitoring and internal reporting to ensure their efficient and effective operation. We provide a means for staff, members, patients and other consumers, to report any suspected or actual fraud or wrongdoing by EverCare staff, vendors, or any provider of services associated with EverCare.
- c. Our Compliance Program is intended to reinforce and supplement all policies which pertain to ethics, possible conflicts of interest and disclosure of same, standards or codes of conduct.
- d. In accordance to the New York State Office of the Medicaid Inspector General (NYS OMIG) we are committed to be an effective Compliance Program containing the following eight elements:
  - 1. Written Policies and Procedures and Standards of Conduct
  - 2. Designation of a Compliance Officer, Compliance Committee and High Level Oversight
  - 3. Effective Training and Education
  - 4. Effective Lines of Communication among the Compliance Officer, Compliance Committee, Employees, Governing Body and First Tier Downstream or Related Entity (FDR)
  - 5. Disciplinary Measures
  - 6. Effective system for routine monitoring, auditing and identification of compliance risks
  - 7. Procedures and system for prompt responses to compliance issues
  - 8. Non-Discrimination and Non-Retaliation

In addition, the EverCare Compliance Committee monitors the consistent applicable laws and regulations regarding our operations. We appreciate your support to report any issues to EverCare. Our Compliance Hotline is 1|844|371|4700.