

## **COMPLIANCE PROGRAM**

The Compliance Program of Patient Advocate Foundation (“PAF” or the “Company”) is designed to assist the Company in preventing, detecting, and responding to illegal, improper, and unethical conduct. The Compliance Program is designed to serve as a procedural framework for enhancing and monitoring compliance with applicable law, regulation, the PAF Code of Conduct and the Company’s policies and procedures. The Compliance Program is based on the elements of an effective compliance program set forth in the Federal Sentencing Guidelines Manual and applicable Department of Health and Human Services Office of Inspector General (“OIG”) guidance.

### **The Compliance Program has the following key elements:**

1. Written standards of conduct, including the PAF Code of Conduct and Company policies and procedures;
2. Compliance Counsel, a Compliance Coordinator, and a Compliance Committee;
3. Regular, effective education and training;
4. Reporting channels to field compliance questions, concerns, and to report complaints, anonymously, if preferred, and without fear of retaliation;
5. Monitoring and auditing activities;
6. Publicized disciplinary guidelines to enforce the Company’s compliance standards; and
7. A mechanism to respond promptly to detected offenses and develop corrective action as necessary.

This Compliance Program was reviewed and approved by the PAF Board of Directors.

### **The PAF Code of Conduct & Policies & Procedures**

As part of the Compliance Program, to further the Company’s commitment to compliance, PAF has developed the PAF Code of Conduct, as well as specific policies and procedures to address those regulatory issues and standards likely to be of most consequence to the Company’s operations, including Office of Inspector General (“OIG”) guidance for charitable patient assistance programs, PAF’s OIG Advisory Opinion 04-15, as modified, and the Independent Charitable Patient Assistance Program Code of Ethics (“CPAP Code of Ethics”).

All PAF directors, officers, and employees must annually certify that they have received, read, understood, and agree to abide by the PAF Code of Conduct.

### **Compliance Counsel & Compliance Coordinator**

Stephanie Trunk, partner at Arent Fox LLP, PAF's outside healthcare regulatory counsel, serves as PAF's Compliance Counsel. Compliance Counsel works closely with the Compliance Coordinator to ensure PAF's compliance with applicable law, regulation, the PAF Code of Conduct and the Company's compliance policies and procedures.

### **Compliance Committee**

The PAF Compliance Committee oversees and administers the PAF Compliance Program. The Committee is comprised of representatives from various Company departments across PAF, with diverse backgrounds and who are generally knowledgeable about compliance issues and challenges facing the Company. The Compliance Committee, which meets at least quarterly, is chaired by Compliance Counsel. The Compliance Committee operates in accordance with the Compliance Committee Charter.

### **How to Report a Suspected Compliance Concern**

- Report anonymously and confidentially through the compliance hotline at 1-202-480-2291
- Report anonymously and confidentially by mail:  
Confidential  
Stephanie Trunk  
Compliance Counsel to PAF  
Arent Fox LLP  
1717 K St, NW  
Washington, DC 20006

Messages may be left on the compliance hotline 24 hours a day, 7 days a week. All reports should contain as much detail as possible so that a thorough investigation may be conducted. All reports of suspected violations of law, the Code of Conduct, or Company compliance policies and procedures are logged and shall remain confidential, to the extent possible.

### **For More Information about PAF's Compliance Program**

Send an email to the Compliance Coordinator at [compliance@patientadvocate.org](mailto:compliance@patientadvocate.org)

Contact the Compliance Counsel- Stephanie Trunk- at [stephanie.trunk@arentfox.com](mailto:stephanie.trunk@arentfox.com) or (202) 857-6171