



## Cancer Care Co-Payment Assistance Foundation, Inc. Code of Conduct

This Code of Conduct (the “Code”) describes the commitment of the Cancer Care Co-Payment Assistance Foundation, Inc. (“CCAF” or the “Company”) to the highest ethical standards of honesty and integrity as well as to compliance with all laws and legal requirements applicable to the Company, including Office of Inspector General (“OIG”) guidance for charitable patient assistance programs and CCAF’s OIG Advisory Opinion 07-11, as modified. This Code has been reviewed and approved by CCAF senior management and the Company Board of Directors, who review this Code on at least an annual basis.

This Code is meant to set forth the legal and ethical requirements of the Company for its directors, officers, and employees, and, where appropriate, agents and subcontractors engaging in business conduct for or on behalf of the Company. This Code supplements but does not replace existing Company policies and procedures, including the CancerCare, Inc. Human Resources Policies and Procedures Manual. As such, all Company directors, officers, employees, and, where applicable, agents and subcontractors are required to abide by this Code, all applicable Company policies and procedures and all applicable laws and regulations when engaging in business conduct for or on behalf of the Company.

This is not a detailed rule book, nor is it all inclusive. Consequently, the Company relies on the good judgment and values of its directors, officers, employees and, where applicable, subcontractors and agents to implement the intent of this Code when neither this Code nor Company policies and procedures address a specific situation. **It is the responsibility of each director, officer, employee, and, where applicable, agent or subcontractor engaging in business conduct for or on behalf of the Company to ask questions regarding the application of the provisions of this Code or Company policies and procedures to specific situations or regarding situations not covered by this Code or Company policies and procedures and to seek guidance from their supervisors, CCAF senior management or CCAF’s Compliance Officer before acting.**

### Our Mission

The purpose of CCAF is to:

- provide financial assistance to individuals with cancer in the form of co-payment assistance for both prescribed treatment and supportive medications, premium assistance or other direct financial assistance in order to insure access to care, treatment and prescribed medications;
- assist individuals with cancer regarding co-payment and financial assistance including practical support, information and referrals to corporate, governmental and other not-for-profit financial assistance programs; and
- provide referrals for professional support services to anyone affected by cancer who contacts the organization including the person with cancer, their loved ones, caregivers or children.

CCAF is a supporting organization public charity under § 509(a)(3) of the Internal Revenue Code.

## **Our Vision**

CCAF is dedicated to removing insurance barriers by helping qualified patients afford the co-payments, coinsurance and deductibles for prescribed cancer treatments.

## **Values/Ethical Principles**

CCAF is dedicated to the following values/ethical principles, and requires all directors, officers and employees and, where applicable, agents and subcontractors, performing services for or on behalf of CCAF to comply with the following values/ethical principles:

- Act with honesty, integrity and objectivity, and in a manner that will merit the continued trust and confidence of patients and stakeholders;
- Operate independently, free from the influence of CCAF donors;
- Cooperate in the provision of services to patients and in the operation of CCAF's business. Share knowledge and best practices, and welcome honest and constructive feedback;
- Comply with all federal, state and local laws, regulations and legal requirements applicable to CCAF, including OIG guidance for charitable patient assistance programs and CCAF's OIG Advisory Opinion 07-11, as modified;
- Comply with all applicable Company policies and procedures;
- Comply with all CCAF contractual obligations to third parties;
- Be vigilant in the detection and prevention of potential fraud, waste or abuse;
- Promote ethical behavior in the provision of services for or on behalf of CCAF;
- Maintain the privacy and security of personal health information transmitted or otherwise made available to CCAF in accordance with applicable federal, state and local privacy and security laws and regulations, including the Health Insurance Portability and Accountability Act of 1996 and related regulations (collectively "HIPAA") and industry standards;
- Avoid actual or perceived interests that conflict with CCAF's or a director's, officer's, employee's or, if applicable, subcontractor's or agent's, ability to carry out its mission and provide services to patients. Disclose any actual or potential conflicts of interest to CCAF in accordance with Company policies and procedures;
- Train directors, officers, employees and, where appropriate, agents and subcontractors upon initial hire/appointment and thereafter on an annual basis, as to legal compliance;

- Respect CCAF's proprietary information and trade secrets and the proprietary information and trade secrets of competitors, donors and third parties in accordance with applicable federal, state and local laws and regulations, Company policies and procedures, as well as contractual commitments undertaken by CCAF;
- Maintain accurate and complete books and records, including accounting and financial data, and retain such books and records in accordance with applicable federal, state and local laws and regulations, Company's record retention policies and procedures and Company instructions;
- Use Company resources solely for Company business in accordance with applicable Company policies and procedures;
- Only employ individuals and contract with agents and subcontractors to provide services for or on behalf of CCAF who are not excluded or debarred from federal or state procurement activities or federal or state health care programs, including Medicare and Medicaid;
- Afford equal employment opportunity and ensure directors, officers, employees and, where applicable agents and subcontractors, are judged for their job performance and ability;
- Maintain a workplace free from physical or verbal abuse or harassment. Abuse or harassment directed toward a director, officer, employee, agent, subcontractor, patient, vendor or any third party is unacceptable in any form;
- Promptly investigate and address potential violations of applicable law, regulation, OIG guidance, CCAF's Advisory Opinion, this Code or Company policies and procedures; and
- Promptly correct any unlawful or unethical behavior after its discovery and take action to prevent recurrences in the future.

All directors, officers, employees and, where applicable, agents and subcontractors are required to report potentially violations of applicable law, regulation, this Code or Company policies and procedures to CCAF Senior Management or CCAF's Compliance Officer in accordance with CCAF policies and procedures.

**Reports can be made by** contacting the Compliance Officer by phone at 212-712-6151 or email to [johnr@cancercare.org](mailto:johnr@cancercare.org)

Or

anonymously and confidentially via email or by mail (which will be forwarded to the Foundation's Board for review)

[compliance@cancercarecopay.org](mailto:compliance@cancercarecopay.org)

Cancer Care Co-Payment Assistance Foundation Compliance Officer  
Cancer Care Co-Payment Assistance Foundation

275 Seventh Avenue  
22<sup>nd</sup> Floor  
New York, NY 10001

### **Protection From Retaliation**

All Company employees and, where applicable, subcontractors and agents, have a duty to report any suspected violation of applicable law, regulation, OIG guidance, CCAF's Advisory Opinion, this Code or Company policies and procedures. **CCAF will not tolerate any form of retaliation for reporting, in good faith, a suspected violation of law, regulation, OIG guidance, CCAF's Advisory Opinion, this Code or Company policies and procedures.** Any such retaliation will be investigated and, upon substantiation, met with disciplinary action up to and including termination. All Company employees, subcontractors and agents are protected from retaliation related to the good faith reporting of any suspected violation of applicable law, regulation, OIG guidance, CCAF's Advisory Opinion, this Code or Company policies and procedures.

All Company employees and, where applicable, subcontractors and agents, have a duty to report any retaliation relating to good faith reporting of any suspected violation of applicable law, regulation, OIG guidance, CCAF's Advisory Opinion, this Code or Company policies and procedures. Such retaliation may be reported to CCAF Senior Management or CCAF's Compliance Officer in accordance with CCAF policies and procedures.

### **Compliance with this Code of Conduct**

Company directors, officers, employees, and, where applicable, subcontractors and agents, are expected to abide by the standards set forth in this Code of Conduct and applicable Company policies and procedures. Company employees are subject to disciplinary action, up to and including termination, for violating this Code or applicable Company policies and procedures, including the failure to report a potential violation of applicable law, regulation or CCAF's policies and procedures to CCAF. CCAF's relationship with an agent or subcontractor may be terminated by CCAF if the agent or subcontractor violates this Code and/or applicable Company policies and procedures.

### **Acknowledgement of the Code of Conduct**

All directors, officers, employees and, where applicable, agents and subcontractors, are required upon hire and annually thereafter to certify that they have received, read and agree to abide by this Code of Conduct in their provision of services to or on behalf of CCAF.