



## **THE CCAF COMPLIANCE PROGRAM**

The Compliance Program of Cancer Care Co-Payment Assistance Foundation, Inc. (“CCAF” 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 CCAF 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 is designed, implemented, and maintained to:**

1. Establish a culture that promotes prevention, detection, and resolution of instances of conduct that does not conform to all applicable laws, regulations, the Code of Conduct, or the Company’s policies and procedures;
2. Communicate and demonstrate CCAF’s commitment to compliance;
3. Guide management and employees in efficient management and operations;
4. Provide ethical leadership and install systems to facilitate ethical and legal conduct; and
5. Provide information, guidance, and education regarding ethics, regulatory requirements, and standards of practices.

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

1. Written standards of conduct, including the CCAF Code of Conduct and Company policies and procedures;
2. Designation of a Compliance Officer;
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 document was reviewed and approved by the CCAF Board of Directors.