

EFFECTIVE LINES OF COMMUNICATION

POLICY NUMBER:	CP-005	CREATED:	DECEMBER 2018
DEPARTMENT:	COMPLIANCE	LAST REVIEWED:	AUGUST 2019
RESPONSIBLE PARTY:	COMPLIANCE OFFICER	LAST REVISED:	AUGUST 2019
APPROVAL AUTHORITY:	COMPLIANCE COMMITTEE	NEXT REVIEW DATE:	AUGUST 2020

Purpose

The purpose of this Policy is to establish clear and effective lines of communication that will be available to all Employees, Contractors, Board members and First Tier, Downstream and Related Entities.

Scope

This Policy applies to all Employees, Contractors, volunteers, Board members and First Tier, Downstream and Related Entities.

Key Terms

Amplifon: Amplifon (USA), Inc., and its subsidiaries.

Approval Authority: The individual or committee with the authority to give final approval to a Policy or Procedure.

Board: Amplifon Hearing Health Care's Board of Directors.

Code of Conduct: This term includes the Amplifon S.p.A. Code of Ethics and the Amplifon Americas Standards of Conduct.

Compliance Committee: Amplifon's Compliance Committee, which consists of the following individuals:

- Chief Executive Officer (Chair);
- General Counsel and Compliance Officer;
- SVP of Human Resources; and
- SVP of Information Technology.

Compliance Officer: Amplifon's Compliance Officer.

Contractor: A person who provides personal services to Amplifon on a temporary basis as a non-employee pursuant to the terms of a contract.

Department: Amplifon business unit(s) and support function(s).

Downstream Entity: any party that enters into an acceptable written arrangement below the level of the arrangement between an MA organization (and contract applicant) and a first-tier entity. These written arrangements continue down to the level of the ultimate provider of health and/or administrative services.

Employee: A full-time employee, temporary employee, trainee, or other person whose work for Amplifon is under Amplifon's direct control.

First Tier Entity: any party that enters into a written arrangement with an MA organization or contract applicant to provide administrative services or health care services for a Medicare eligible individual.

Related Entity: any entity that is related to the MA organization by common ownership or control and:

1. Performs some of the MA organization's management functions under contract or delegation;
2. Furnishes services to Medicare enrollees under an oral or written agreement; or
3. Leases real property or sells materials to the MA organization at a cost of more than \$2,500 during a contract period;

Policy

It is Amplifon's policy to establish and implement effective lines of communication, ensuring confidentiality between the Compliance Officer, the Compliance Committee, the Board, Employees and Contractors. Amplifon will ensure these lines of communication are accessible to all and allow compliance issues to be reported, including a method for anonymous and confidential good faith reporting of potential compliance issues as they are identified.

Procedures

Effective Lines of Communication among the Compliance Officer, Compliance Committee, Employees, Contractors and the Board

Amplifon's Compliance Officer (or his/her designee) will communicate the following information to Employees, Contractors and the Board:

- The Compliance Officer's name, contact information and office location;
- When appropriate, laws, regulations, and guidance, including changes to statutory, regulatory, and sub-regulatory guidance; and
- Changes to Amplifon's Code of Conduct, policies, and/or procedures.

The Compliance Officer may communicate this information using any of the following mechanisms:

- Physical posting of information;
- E-mail distribution;
- Amplifon's intranet or other platforms (*e.g.*, Teams and Yammer); and/or
- Individual or group meetings with the Compliance Officer.

Communication and Reporting Mechanisms

Amplifon will:

- Ensure its Code of Conduct and/or policies and procedures require Employees, Contractors and Board members to report compliance concerns and suspected or actual violations of the compliance program;
- Have a system to report, receive, record, respond to and track compliance questions or reports of suspected or detected noncompliance with the compliance program by Employees, Contractors and the Board;
- Adopt, widely publicize, and enforce a no-tolerance policy for retaliation or retribution against any Employee, Contractor or Board member or any third parties who, in good faith, reports suspected violation of the compliance program (*see Whistleblower Policy, Policy Number (none assigned yet)*);
- Notify Employees, Contractors and Board members that they are protected from retaliation for False Claims Act complaints, as well as any other applicable anti-retaliation protections (*see Whistleblower Policy, Policy Number (none assigned yet)*);
- Widely publicize methods available for reporting potential compliance and non-retaliation policy violations, including to whom such violations may be reported and a "chain-of-command" to ensure such reports are ultimately reported to the Compliance Officer;
- Make reporting mechanisms user friendly, easy to access and navigate, and available 24 hours a day; and
- Provide a complainant (when a report is not anonymous) with information about expectations for a timely response, confidentiality, non-retaliation, and reports as an investigation progresses.

Exceptions


Any exceptions to this policy will be considered and approved on a case-by-case basis by the Approval Authority.

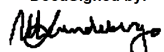
Related Policy and Compliance Documents

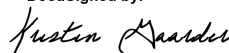
2018 CP-01.003 Compliance Officer, Compliance Committee and High-Level Oversight
Amplifon S.p.A. Code of Ethics
Amplifon Americas Standards of Conduct
Whistleblower Policy

References

Medicare Managed Care Manual, Chapter 21 – Compliance Program Guidelines (Rev. 109, 07-27-12)
64 Fed. Reg. 36368-36389
42 C.F.R. § 422.503(b)(4)(vi)

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