

## COMPLIANCE PROGRAM DISCIPLINARY STANDARDS

POLICY NUMBER:	CP-006	CREATED:	DECEMBER 2018
DEPARTMENT:	COMPLIANCE AND HUMAN RESOURCES	LAST REVIEWED:	AUGUST 2019
RESPONSIBLE PARTY:	SVP, HUMAN RESOURCES	LAST REVISED:	AUGUST 2019
APPROVAL AUTHORITY:	COMPLIANCE COMMITTEE	NEXT REVIEW DATE:	AUGUST 2020

### Purpose

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The purpose of this Policy is to articulate well-publicized disciplinary standards applicable to any Compliance Program violations, and to encourage good-faith participation in the Compliance Program by all affected individuals.

### Scope

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

### Key Terms

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**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.

**Compliance Program:** Amplifon’s Compliance Program is based on the following core policies, which collectively define its expectations and requirements:

- 1) Written Policies, Procedures and Standards of Conduct;
- 2) Compliance Officer, Compliance Committee and High-Level Oversight;
- 3) Effective Training and Education;
- 4) Effective Lines of Communication;
- 5) Compliance Program Disciplinary Standards;
- 6) Routine Monitoring, Auditing and Identification of Compliance Risks; and
- 7) Procedures and System for Prompt Response to Compliance Issues.

**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

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It is Amplifon's policy to have policies and procedures that reflect clear and specific disciplinary standards. This means that Amplifon will, through its policies and procedures:

- 1) Articulate expectations for reporting compliance issues and assisting in their resolution;
- 2) Describe noncompliance or unethical behavior using examples of violative conduct that Employees, Contractors and Board members may encounter in their jobs;
- 3) Provide for timely, consistent, and effective enforcement of the standards when noncompliance or unethical behavior is identified; and
- 4) Ensure that Employees, Contractors and Board members receive appropriate and timely training.

## Procedures

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### Disciplinary Standards

Amplifon will respond to an Employee, Contractor or Board member's violation of the Compliance Program on a case-by-case basis, depending on the facts and circumstances of the violation. Disciplinary action may include, but is not limited to:

- A verbal warning;
- Reeducation on Compliance Program guidelines;
- A written warning to the Employee's or Contractor's file;
- Suspension; or
- Termination of employment.

Amplifon reserves the right to bypass any of the steps listed above, including moving to immediate termination of an Employee, Contractor or Board member for violation of Compliance Program standards.

### Methods to Publicize Disciplinary Standards

To encourage good-faith participation in its Compliance Program, Amplifon will publicize its Compliance Program disciplinary standards using one of the following methods:

- Newsletters;
- Regular presentations at Department and/or company-wide Employee and Contractor meetings;
- General compliance training; or
- Its intranet site or other platform (*e.g.*, Teams and Yammer).

### Enforcing Disciplinary Standards

Amplifon must be able to demonstrate that disciplinary standards are enforced in a timely, consistent and effective manner. To be able to do so, Amplifon will:

- Maintain records for a period of 10 years for all disciplinary actions taken in response to Compliance Program violations, capturing the date the violation was reported, a description of the violation, the date(s) of the investigation, a summary of investigation findings, the disciplinary action taken and the date it was taken; and
- Annually review its disciplinary standards to ensure that disciplinary actions are appropriate to the seriousness of the violation, fairly and consistently administered, and imposed within a reasonable timeframe.

## Exceptions

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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

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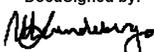
2018 CP-01.004 Effective Training and Education  
Amplifon Americas Standards of Conduct  
Amplifon S.p.A. Code of Ethics  
Amplifon Corporate Policy Manual

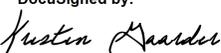
## References

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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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