

The Millennium Health Standards of Conduct

The Millennium Health Standards of Conduct is intended to be a simple, impactful summary of the standards of behavior that we expect from *all* Millennium Health Covered Persons. A Covered Person generally includes employees and contractors who provide significant service to Millennium Health.

A Statement from our CEO, Scott Walton

At Millennium Health, our commitment to compliance is foundational to everything we do. It reflects not only our dedication to ethical business practices but also our responsibility to the patients, providers, and partners who rely on us. An effective compliance program begins with clear, easy-to-understand standards of expected behavior—and that's exactly what this single-page Standards of Conduct document is designed to provide.

This Standards of Conduct outlines the core principles that guide how we do business at Millennium Health. While it is intentionally brief to ensure it can be easily referenced and recalled in everyday situations, it does not cover every possible scenario. Instead, it serves as a high-level framework, supported by detailed policies and Standard Operating Procedures (SOPs) that offer further guidance.

We expect all Millennium Health Covered Persons to maintain a working familiarity with these Standards and the supporting SOPs. Your understanding and application of these principles are essential to our continued success and integrity.

Thank you for your ongoing commitment to our compliance program and for helping us uphold the values that define Millennium Health.

Compliance Contacts

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Our Standards are Applicable to All Millennium Health Covered Persons

- 1. Ask Questions, Seek Guidance.** All Covered Persons have the right to ask questions and seek guidance regarding suspected compliance issues.
- 2. Comply with Laws and MH Policies.** Comply with all Federal health care and other applicable government program requirements and Millennium's own Policies and Procedures, such as Compliance, Clinical, Human Resources, Lab, IT, and Legal policies.
- 3. Suspect Something, Say Something.** All Covered Persons are expected to report suspected violations of Federal health care and other applicable government program requirements, laws, regulations, or Millennium policies to Compliance or the Compliance Hotline.
- 4. Only Engage in Permitted Activities.** Employees will only engage in activities that are permitted by their job functions and applicable policies, SOPs, Roles and Responsibilities, and other work-related instructions or agreements.
- 5. Follow Ethical Business Practices.** Adhere to the professional organization standards for responsible and ethical business practices applicable to your role at Millennium Health.
- 6. Accurately Submitted and Policy Permitted.** Prepare and submit accurate claims consistent with Federal health care program requirements, applicable payer policies, and Millennium Billing policies.
- 7. Business is Earned, Not Bought.** Do not provide anything of value to a health care provider in exchange for a referral of specimens.
- 8. No Snooping.** Use patient information ONLY when needed to perform a job function—no snooping—and always secure emails, papers, electronic files, system access and other documents that contain patient and company confidential information.
- 9. No Guessing; Use Approved Messaging.** All statements, claims, publications, and messaging about Millennium's services and products must be supported by valid science and approved by MRC; never promote Millennium's services or products in a false or misleading manner.
- 10. Only Providers Determine Medical Necessity.** Decisions about medical necessity for testing services, including diagnosis codes and tests to be selected, must be individually determined and made solely by the ordering provider.
- 11. Accurate Documents, Authentic Signatures.** All documentation and reports must be based on true and accurate information; signatures on documents must be authentic.
- 12. Non-Retaliation, Confidentiality, Anonymity.** Millennium is committed to its non-retaliation policy and will maintain, as appropriate, the confidentiality and anonymity of compliance reports.

