

Neighbor Care Pharmacy Inc.

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Humana Compliance Addendum Policy

1. Purpose:

This addendum outlines Neighbor Care Pharmacy Inc.'s commitment to meeting the specific compliance requirements of Humana Pharmacy Solutions, in alignment with CMS Medicare Part D regulations.

2. Policy Statement:

Neighbor Care Pharmacy Inc. maintains full adherence to Humana's Compliance Program Guidelines.

3. Compliance Program Elements:

- All employees complete annual CMS-compliant General Compliance and FWA training, which meets or exceeds Humana's standards.
- A documented Standards of Conduct is maintained and acknowledged by all personnel.
- Employees and applicable contractors/vendors are screened monthly against the OIG List of Excluded Individuals and Entities (LEIE) and the SAM.gov exclusion list.
- A confidential and anonymous mechanism is provided for employees to report non-compliance or suspected fraud.
- Investigations of reported concerns are documented and followed with appropriate corrective action.
- Disciplinary standards for non-compliance are clearly defined and consistently enforced.

4. Oversight and Responsibility:

- A designated Compliance Officer is responsible for the implementation and oversight of Humana-related policies.
- Internal audits are conducted regularly to monitor adherence to these requirements.
- Documentation related to Humana compliance (training, attestations, screening logs, investigations) is retained for a minimum of ten (10) years.

5. Training and Communication:

- Humana compliance requirements are communicated to all employees annually through training sessions and updated policy reviews.
- Downstream entities are informed of these obligations as part of the contracting and oversight process.

6. Review and Updates:

This addendum shall be reviewed annually by the Compliance Officer and updated as required to maintain full compliance with Humana and CMS expectations.