

# **Neighbor Care Pharmacy Inc.**

## **Employee Code of Conduct - MedImpact Compliance**

Effective Date: 02/01/2010

Location: 2315 65th Street, Brooklyn, NY 11204

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### **Purpose**

To establish a clear standard of professional, ethical, and legal conduct expected of all employees of Neighbor Care Pharmacy Inc. in compliance with MedImpact Pharmacy Program requirements and applicable federal and state laws.

### **Scope**

This policy applies to all staff, contractors, and agents of Neighbor Care Pharmacy Inc. who engage in any aspect of pharmacy operations related to MedImpact or its affiliated plans (e.g., EmblemHealth).

### **Code of Conduct Standards**

- Compliance with Laws & Regulations: Employees must comply with all applicable federal, state, and local laws, as well as PBM-specific rules, especially those related to Medicare Part D.
- Ethical Behavior: All staff must conduct themselves professionally, honestly, and with integrity in every interaction with patients, providers, PBMs, and regulators.
- Fraud, Waste & Abuse (FWA) Prevention: Employees must not engage in or tolerate fraudulent or abusive billing practices, including false claims, upcoding, or inappropriate substitutions.
- Patient Confidentiality (HIPAA): Protected Health Information (PHI) must be accessed only for legitimate business purposes and handled with full compliance with HIPAA regulations.
- Conflict of Interest Disclosure: Employees must report any personal or financial relationships that could improperly influence pharmacy decisions or PBM dealings.
- No Kickbacks or Inducements: Staff must not accept or offer gifts, incentives, or kickbacks in return for business referrals or PBM contract benefits.
- Reporting Concerns: All staff are encouraged to report suspected violations of this policy to the Pharmacy Manager or Compliance Officer without fear of retaliation.
- Training & Attestation: Employees must complete annual compliance training and sign an attestation acknowledging their understanding and commitment to this Code of Conduct.

**Oversight**

The Pharmacy Manager and Compliance Officer are responsible for ensuring this policy is implemented, reviewed annually, and followed by all pharmacy personnel.

Approved By: Joseph Lasker

Title: Pharmacy Manager

Date: 01/01/2024