

**CODE OF CONDUCT & ETHICS** 

#### Dear Colleagues,

We know you have a choice when deciding where to direct your talent and abilities, and we appreciate that you have chosen to work with Healogics to provide best-in-class care to our patients. Our company is dedicated to doing the right thing every day, in everything we do, and with every patient we serve. The care you provide to patients makes a lasting difference in their quality of life. You are vital to maintaining Healogics' culture of compliance. This Code of Conduct and Ethics is designed to promote our dedication to this culture of compliance and to provide you with guidelines on how to do your job in a manner in keeping with our ethical principles. You are expected to review this Code and perform your job functions in accordance with the requirements in this Code, Healogics' policies and procedures, federal health care program requirements, and all laws and regulations.

We are also committed to addressing all identified compliance concerns and providing you with mechanisms to report your compliance concerns to us. You are expected to report any suspected violations of federal health care program requirements, violations of Healogics' policies and procedures, and violations of this Code. You may report these concerns through our anonymous compliance hotline at 888.999.9460, emailing us at compliance@healogics.com, or completing the reporting form available at hotline.healogics.com. Company policy prohibits retaliation against anyone for reporting a compliance concern. Any violations of this policy must be reported.

You play a part in this, and we thank you for doing your part to ensure Healogics operates ethical and compliant workplaces. We ask you to lead by example. Be proactive and ask questions when you do not know the answer. Promptly report problems or concerns about unethical or inappropriate conduct to the Compliance Department.

Sincerely,

**Frank Williams** 

Chief Executive Officer

162W

Noelle Valentine

Chief Compliance Officer

Mosso Valentene



This code describes the company's values, standards and expectations and how we operate in relation to our patients, employees, customers, contractors and communities. We must make every effort to address any concern of non-compliance. The Code supports these efforts by promoting ethical and legal behavior as well as transparency across all aspects of the organization. It is never acceptable for any Healogics officer, employee or contractor to ask or to be asked to act in any manner that is not in accordance with these standards. The Code of Conduct and Ethics, as well as all statutes, regulations, guidelines, and Healogics policies and procedures, must be observed by all employees, contract labor, members of the Board of Directors, and anyone else acting on behalf of the Company. Failure to comply with the Code, statutes, regulations, guidance, and policies and procedures can result in a negative impact on the quality of care we provide to our patients, not to mention serious damage to our standing in the community and regulatory action against the Company and individual employees. Failure to abide by this Code or Healogics' policies and procedures will lead to disciplinary action up to and including immediate termination of employment or contract.

Healthcare is a highly regulated business. Laws and regulations are complex. The Code reviews many areas of potentially unethical and illegal behavior, but it is not possible to list all activities that could raise compliance concerns. If you have a question or concern about any potential compliance matter, you should consult a supervisor, manager, director, or the Compliance Department to be sure decisions made and actions taken reflect our values and commitment to doing the right thing.

Each Officer and Employee is responsible for knowing and understanding the laws, regulations, and Company policies affecting his or her role within the Company. We need the cooperation of all to comply with these laws and regulations, identify any violations or suspected violations of such, and to implement any corrective action necessary to align our behavior to applicable laws and regulations. Our continued ability to serve our customers depends on each person's full commitment to legal and regulatory compliance.

The Code is designed to provide general guidance. Healogics policies and procedures provide more specific details on our operations.

Each Officer and Employee is expected to comply with all legal and ethical standards affecting his or her role within the Company, regardless of whether the standard is specifically addressed in this Code. Questions and concerns regarding ethical and legal compliance and your obligations under the Code should be directed to the Chief Compliance Officer or to the Ethics and Compliance Hotline at (888) 999-9460 or hotline.healogics.com.

# **Compliance Issues**

#### **Reporting Issues**

Reporting issues is an important part of the effectiveness of Healogics' Compliance Program. Healogics has established a Disclosure Program, often known as the Compliance Hotline, to allow individuals to report suspected instances of unethical or improper conduct. Employees, patients, customers, and vendors have the right to use this Disclosure Program to report issues or have questions addressed regarding Healogics' policies or practices. It is not acceptable to overlook actual or potential wrongdoing. Employees are required to report – through one of the ways listed below – any activities they suspect:

- are harmful to a patient, family member, or staff member;
- are illegal or unethical;
- violate any state or federal health care program requirements; and/or
- violate this Code of Conduct and Ethics or any policy or procedure.

Reports under the Disclosure Program can be made anonymously, 24 hours a day, 7 days a week, 365 days a year. The Compliance Department protects the identity of those who report compliance issues to the fullest extent possible. Information disclosed to the Compliance Department is maintained confidentially within the Department and is only shared on an as-needed basis.

By mail to Healogics 5220 Belfort Rd, Ste 130 Jacksonville, Florida 32256 Attn: Compliance Department

By telephone at 888.999.9460

By email at compliance@healogics.com

Online at hotline.healogics.com

An outside vendor administers The Ethics and Compliance Hotline. A live person will answer all telephone calls. Calls are not recorded and are not traced. Callers may choose to remain anonymous regardless of how the report is made. Once the call is completed, a report will be generated and sent to the Compliance Department for review under department policies and procedures.

No disciplinary action or retaliation will be taken against someone who reports in good faith a perceived issue, problem, concern, or violation through the Disclosure Program. Reporting in good faith means the reporter actually believes the information reported to be true regardless of whether the allegation is substantiated or found to be improper.

The integrity of the Hotline requires that it be used only for legitimate purposes. Improper use of the hotline, including filing a report you know to be false, is not acceptable. Individuals who knowingly file false reports are subject to disciplinary action, up to and including termination of employment.

# **Addressing Issues**

The Compliance Department reviews all Disclosure Program reports it receives. Concerns are addressed following department policies and procedures. Based on that review, the concern may be addressed through guidance or may be investigated.

Outcomes of compliance investigations are not available to Hotline representatives. Disciplinary action taken in response to a complaint is not disclosed in order to protect the rights of those parties. Employees may see education provided in the center to address any problems or may see changes in the way the center operates.

You should not investigate a compliance issue on your own. The Compliance Department, using internal and external resources such as Human Resources or legal counsel as appropriate, will investigate and resolve all reports.

# **Protection Against Retaliation**

Retaliation, retribution, intimidation, or harassment of anyone who makes a good faith report through the Disclosure Program is not tolerated. Any employee who engages in or condones retribution, retaliation or harassment is subject to disciplinary action, up to and including termination of employment.

# **Obligation to Cooperate**

Healogics board members, officers, and employees are required to cooperate with internal investigations. Healogics prohibits destroying, creating, or altering documents (whether paper or electronic) that are part of a current or potential investigation. Lying to or misleading an investigator or taking steps to obstruct an investigation is prohibited and could result in disciplinary action.

# Complying with Legal Requirements

Healogics is reimbursed for services performed under state and federal health care programs. Receiving reimbursement under these programs requires compliance with a number of laws and regulations enacted to protect the programs against fraud, waste, and abuse. Some of these laws are summarized below, but this list is not comprehensive. Anyone providing services or submitting claims on



behalf of Healogics is expected to comply with all laws and regulations regardless of whether discussed in this Code. Healogics' policies and procedures are designed to protect against violating these laws and regulations.

Healogics is responsible for reimbursing a health care program for any claims that have been submitted in error, including claims submitted in violation of federal statutes. Timeframes for reporting erroneous claims are short, and penalties for not submitting timely are significant. It is critical that you report any suspected violations immediately to the Compliance Department to ensure reporting time frames are met.

Please keep in mind that in addition to these federal laws, there may be similar state laws that apply to payments made under government health care programs. There also may be state or federal laws that apply to patients paying with other insurance or paying out of pocket. If you have questions about whether a particular practice is acceptable, please contact the Compliance Department or Legal Department for guidance.

#### Fraud, Waste, and Abuse

Healogics is dedicated to detecting and preventing financial fraud, waste, and abuse. Federal law and laws in some states protect government funds from fraud, waste, and abuse. Healogics has developed policies and procedures in accordance with these laws to detect and prevent fraud, waste, and abuse in its billing practices with government payors.

#### The False Claims Act

The False Claims Act imposes penalties for knowingly submitting or causing to be submitted claims for payment under federal programs, including Medicare and Medicaid, when the services were not actually performed or were not performed as claimed. Some examples of false claims in federal health care programs include:

- Billing for items or services not actually provided;
- Billing for items or services that were not documented;
- Billing for items or services that were not medically necessary;
- Billing for items services provided by an unlicensed or excluded individual;
- Providing and billing for substantially excessive amounts of medical items or supplies; and
- Improperly upcoding claims to receive higher reimbursement.

Violating the False Claims Act may lead to criminal, civil, and administrative penalties. These penalties may include imprisonment, monetary penalties, loss of license, and exclusion from participating in federal programs.

Federal law and some state laws allow private citizens to file a claim against an entity they believe has violated the False Claims Act. A party who files a false claims suit, sometimes called a relator or whistleblower, may be entitled to collect a portion of the money recouped by the government and other monetary awards or equitable relief, such as being reinstated to a former position. Healogics is prohibited from and does not retaliate against relators because of their initiation of or participation in a false claims investigation, report, or proceeding.

Healogics has established policies and procedures to help detect and prevent fraud, waste, and abuse. These

policies are available to employees, contractors, and vendors through the Hub or by contacting the Compliance Department.

As with all potential violations, employees are obligated to report to the Compliance Hotline any known or potential false or fraudulent billing or business practices.

# **Kickbacks and Bribes**

#### The Anti-Kickback Statute

The Anti-Kickback Statute prohibits knowingly and willfully giving or receiving or offering to give or receive anything of value, sometimes called remuneration, to encourage or reward referrals for any item or service payable under a federal health care program. Things of value can take many forms. They can take the form of money, rebates or discounts and can be made directly or indirectly. Even if there are legitimate business purposes for the remuneration, if one of the reasons you give or receive the remuneration is to influence referrals, it is a violation of the Anti-Kickback Statute.

Healogics prohibits accepting, giving, or offering anything of value in exchange for direct or indirect patient referrals in violation of the Anti-Kickback Statute. Some examples of Anti-Kickback Statute include:

- Giving gifts to a hospital customer with the expectation that the customer will refer more patients in return;
- Offering discounts or incentives on services ordered from the Company in order to obtain future orders;
- Entering into contractual arrangements with referral sources where the referral source provides few or unnecessary services on behalf of the Company;
- Paying a vendor or supplier rates that vary based on the number or value of referrals that vendor provides; or
- Paying a referral source more than fair market value for services in exchange for referrals.

Violating the federal Anti-Kickback Statute is a felony and can lead to fines, imprisonment for up to 5 years, exclusion from participating in federal health care programs, or any combination of these penalties. Penalties can be assessed against both individuals who violate the law and Healogics.

All agreements involving patient referral sources, including physicians, hospitals, managed care organizations and other healthcare organizations and services providers must be reviewed and approved by Healogics' Legal Department.



## Federal Physician Self-Referral Law (Stark Law)

The Physician Self-Referral Law, or Stark Law, prohibits referrals for certain Medicare and Medicaid items and services furnished by an organization with which the referring physician or the physician's immediate family member has a financial relationship, unless a specific legal exception applies. The financial relationship can be direct (e.g., between the hospital and physician) or indirect (e.g., between a third-party service company and physician). The financial relationship can mean an ownership interest in the provider, an investment in the provider, or compensation (monetary or non-monetary) from the provider. The Stark Law also prohibits an entity, such as a hospital, from filing a claim for payment for any referred service that violates the Stark Law. Referrals and claims are only permitted if the financial relationship with the physician fits within a specific Stark Law exception. Examples of potential Stark violations include:

• Payment to a referring physician for services that are greater than fair market value (FMV);



- A rental agreement with a referring physician where the physician pays less than FMV;
- Ownership interests by referring physicians in certain providers, such as clinical laboratories or Durable Medical Equipment companies; and
- Payments to referring physicians for services that exceed what are genuinely needed by the DHS provider.

The Stark Law can be violated whether or not you intend to violate the law. Claims that are submitted in violation of Stark must be refunded on a timely basis. Any person/entity that knowingly presents or causes the presentation of a claim in violation of Stark is subject to civil monetary penalties and exclusion from participating in federal health care programs. Employees are required to immediately report all knowns or suspected violations of any of these policies to Healogics' Compliance Department.

#### **Foreign Corrupt Practices Act**

The Foreign Corrupt Practices Act (FCPA) makes it illegal to offer or give anything of value to a foreign official for purposes of obtaining or retaining business with any person or directing business to any person. The business does not have to be with the government or a government-owned entity. The definition of foreign official is broad. Foreign officials include physicians who work for government-owned or -managed hospitals.



It is also illegal to offer or give something of value to someone who is not a foreign official if you know the payment will be passed on to a foreign official.

Healogics does not tolerate violations of the FCPA. Employees or contractors who are found to have violated the FCPA are subject to disciplinary action, up to and including termination of employment or contract.

Penalties for violating the FCPA include imprisonment and fines. You may also be subject to consequences such as exclusion from participating in federal programs, ineligibility to receive export licenses, and suspension or debarment from the securities industry.

## **Antitrust and Unfair Competition Laws**

Federal and state laws prohibit unfair methods of competition and unfair or deceptive acts and practices. Although Healogics intends to compete vigorously in the market place, we are committed to a free and open market. We expect our representatives, including our officers and employees, to comply with all applicable federal and state antitrust and unfair competition laws and to conduct themselves in a fair and honest manner at all times.

Examples of conduct which might violate these laws include:

- Collaborating with competitors, especially when taking actions that may result in price fixing, bid
  rigging, or boycotting or refusing to deal with particular persons or entities (such as vendors, payers,
  or health care providers);
- Sharing pricing, price formulas, bid formulas and other proprietary information with competitors, either directly or through a trade association;
- Collaborating with a vendor or customer to limit competition within a market or territory or to limit free and open pricing;
- Conditioning a customer's ability to purchase one product or service on the purchase of another product or service; and
- Misappropriating another's proprietary information or trade secrets.

This Code cannot list all situations in which antitrust and unfair competition laws apply. You must take special care in this area and promptly refer any questions to the Compliance Department or Legal Department.

Penalties for antitrust violations are substantial and can result in civil liability and criminal penalties.

#### **Environmental Laws**

Healogics manages and operates its business in the manner that respects our environment and conserves natural resources. Our representatives strive to utilize resources appropriately and efficiently, to recycle where possible, and to otherwise store, dispose of, and transport all waste in accordance with applicable laws and regulations. We work cooperatively with the appropriate authorities to remedy any environmental contamination for which Healogics is responsible.

Failure to prevent, report, or correct environmental problems can result in criminal and civil penalties as high as \$50,000 per day per violation, conviction of a felony with imprisonment for up to two years, or both. Even merely negligent violations can result in imprisonment and substantial fines if they pose a threat to human health.

## **Discrimination-Free and Harassment-Free Workplace**

Healogics, Inc. is an Equal Opportunity employer. Healogics, and its affiliates, comply with all federal, state, and local equal employment opportunity laws prohibiting discrimination against employees and applicants based on race, color, religion, sex, sexual orientation, gender identity, gender expression, age, national origin, citizenship status, disability, genetic information, or veterans' status. Equal opportunity extends to all aspects of the employment relationship, including hiring, promotions, training, working conditions, compensation, and benefits.

# **BUSINESS ETHICS**

Officers and employees are expected to represent Healogics in both an ethical and compliant manner. Healogics is dedicated to clinical outcomes, reducing systemic waste, and ensuring patient engagement and satisfaction.

Healogics' integrity depends on the integrity of every Healogics officer and employee. Healogics standards are designed to reflect the highest standards of business ethics and integrity. Officers and employees are expected to deal honestly and fairly with the Company's customers, suppliers, competitors, and employees, as well as federal, state, and local governments. No officer or employee may take unfair advantage of anyone through manipulation, concealment, abuse of proprietary information, misrepresentation of material facts, or any other unfair-dealing practice. Officers and employees are expected to act in accordance with both letter of these standards as well as their general spirit.

When confronted with choices or behavior that may not be consistent with our Code or may not be ethical, consider the options carefully and ask:

- Is it the right thing to do?
- Is it legal?
- Does it comply with Healogics' Code, policies, and procedures?
- Is it in line with Core Values?
- Have I considered all the consequences?

- Does it expose Healogics to any unacceptable risks?
- Will I be comfortable telling others about my decision?
- Would my supervisor or management agree with my decision?

If the answer to any of the above is "No" or "I am not sure," do not proceed without seeking advice or approval from the Compliance Department.

#### **Accuracy of Business Records**

Healogics expects its officers and employees to record and report information accurately, contemporaneously, and honestly. This includes accurate reporting of time worked, disclosure of conflicts, business expenses incurred, purchase and sales documents, patient outcomes, key performance metrics, and all other business-related activities. Officers and employees are expected to use good judgment and common sense when preparing any Company document so that it objectively and accurately reflects the reality of the situation.

Any Healogics officer or employee who is found to have knowingly misrepresented or falsified any business record is subject to disciplinary action, up to and including termination of employment or contract.

#### **Political Activity and Contributions**

Healogics works with several hospital entities that may be considered tax-exempt entities. Tax-exempt entities are prohibited from conducting political activities under Internal Revenue Service (IRS) regulations. In an effort to deter any activities that may reflect negatively on our hospital customers, Healogics does not engage in political activities prohibited under IRS regulations for tax-exempt entities. Healogics encourages employees to participate in political process on personal time. Employees are prohibited from engaging in political activities during work hours and no Healogics resources may be used to distribute statements supporting or opposing any candidate. Personal political activity should not reference Healogics or the employee's position at Healogics.

- Do not enter or cause to be entered any political contribution on an expense report, either directly or indirectly, that causes Healogics to reimburse you for a prohibited expense. This prohibition includes the cost of fundraising tickets for political functions and fundraising dinners even if business is discussed.
- Do not use Healogics property, facilities, time, or resources for any political activity. Examples of
  prohibited actions include using work time to send invitations for political fundraising events, using
  Healogics telephone systems to make political solicitations, and allowing a political candidate to use
  any Healogics meeting rooms for campaigning.
- Healogics electronic mail may not be used to communicate personal opinions to other individuals, elected representatives, newspapers, periodicals, or other external organizations. Your personal opinions might be construed as official Healogics policy.

This policy is in no way intended to interfere with employee rights protected under the National Labor Relations Act or under any other federal or state law regarding political activities. When protected by law, Healogics will not infringe on an employee's right to engage in such protected activities.

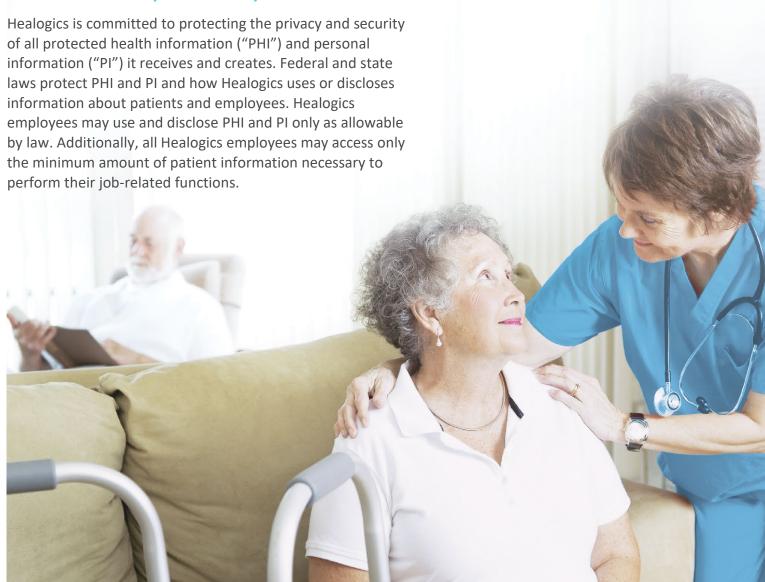
# **Confidential and Proprietary Information**

Healogics, its officers, and employees have access to confidential, sensitive, and proprietary information. Officers and employees have an obligation to protect and safeguard confidential, sensitive, and proprietary information.

Healogics officers and employees may not steal or misuse confidential or proprietary information belonging to another person or entity. Officers and employees may not copy documents or computer programs in violation of applicable copyright laws or licensing agreements. Officers and employees may not use proprietary business information or trade secrets, including customer lists, price lists, contacts, or other information in violation of applicable laws, regulations, or contractual obligations.

Confidential information includes all non-public information that, if disclosed, may either be helpful to competitors or harmful to Healogics or its customers. Obligations to protect confidential or proprietary information continue as required by applicable laws, regulations, and contractual obligations even when an individual is no longer employed by, or otherwise associated with, Healogics.

## **Information Privacy and Security**



Healogics employees are required to maintain the privacy and security of patient information by

- Keeping account information, like passwords, confidential;
- Not opening attachments or clicking links on emails that appear suspicious;
- Protecting paper documentation, such as by keeping it out of plain view; and
- Complying with all Healogics privacy and security policies.

Any known or suspected violations of privacy laws must be reported to the Compliance Department promptly, either directly or through the Hotline. The Compliance Department ensures breaches of information are reported when required by law.

# **Conflicts of Interest**

Transparency in business dealings is critical and helps protect the integrity and reputations of both Healogics and employees. Officers and employees have a responsibility to put Healogics' business interests ahead of other business interests. A conflict of interest occurs when an individual's private interest interferes, or appears to interfere, with the interests of Healogics. A conflict situation can arise when an officer or employee has interests that may make it difficult to perform his or her role impartially. Conflicts of interest may also arise when an officer, employee, or a member of his or her family receive improper personal benefits as a result of his or her position in the Company. Officers and employees must disclose conflicts of interest on hire or when the conflict occurs. The conflict must be reviewed as required by Healogics' policy before the officer or employee may continue to act where the potential conflict arises.

#### Gifts and Gratuities

Healogics prohibits giving or receiving, or offering to give or receive, any gift if the value of the gift is more than nominal value and is intended to influence or could be construed to be for influencing business opportunities. Giving or receiving cash or cash equivalents (like gift cards or gift certificates) is not permissible regardless of value or purpose. Gift cards given by Healogics to bona fide employees of Healogics are not prohibited, but these gifts must be reported as required by the Internal Revenue Service. Non-monetary gifts of nominal value, such as mugs and pens, may be given so long as they do not otherwise violate Healogics gift policies and are given infrequently. Gifts that do not violate these parameters may be permissible. Employees must comply with all policies regarding gifts in addition to these general guidelines.

# **Gifts and Gratuities to Physicians**

Gifts to physicians not employed by Healogics are permissible under certain circumstances. In order for a gift to be permissible, the gift must not be cash or a cash equivalent, must not have been solicited by the physician or physician's practice, must not be tied to the value or volume of referrals received from the physician, must not violate the Anti-Kickback Statute or other similar laws, and must not exceed the annual statutory limit for physician gifts. Healogics policy provides additional details on gifts to physicians.

#### **Gifts and Gratuities to Government Officials**

Federal law and the laws of most states prohibit giving anything to a government official when the gift is intended to influence the decisions of the official or the government. Healogics employees may not give anything of value to a government official or employee.

Federal and state law place certain limits on how much a corporation may give to a political candidate or party. Healogics does not contribute cash or in-kind donations unless allowable under applicable law.

#### **Gifts and Gratuities to Patients**

Offering valuable gifts to beneficiaries may inappropriately influence a patient's choice of provider. The government allows de minimis transfers of value, which are defined as non-cash gifts of less than \$15 per item, and no more than \$75 per patient per year.

## **Accepting Gifts and Gratuities**

Employee may not solicit or accept any gift, favor, loan, gratuity, reward, promise of future employment, or any other thing of monetary value that might influence, or appear to influence, the employee's judgment or conduct in performing their job. Employees may accept occasional, unsolicited courtesy gifts or favors (such as business lunches or holiday baskets) so long as the gifts or favors are modest as judged by local standards, and do not influence or appear to influence the judgement or conduct of the employee in Healogics business. Gifts should not exceed \$50 per person per event or \$150 per person per calendar year, and meals should not exceed \$150 per person per calendar year.

Patients at a center may wish to express their gratitude and appreciation for the help they received by giving the center or individual employees gifts such as gift cards, gift baskets, or homemade goods. These gestures are well intentioned, but accepting these gifts can put employees in a situation, whether real or perceived, of favoring a particular patient or providing special treatment. Gifts of nominal value that can be shared among employees may be kept so long as they are shared. Gifts of cash, gift cards, or other gifts that cannot be easily shared must be returned with a thank you and polite decline of the gift, citing company policy.



#### **Document Retention**

Retention of certain documents is required by law. The Company is committed to compliance with all applicable laws and regulations relating to document retention. Healogics has established policies and procedures related to preserving, retaining, and destroying documentation. These policies serve as reference for all retention matters. Contact the Legal Department with any questions related to document retention.

## **Safe and Healthy Work Environment**

All employees, contractors, and visitors to Healogics facilities have the right to expect a safe and healthy environment.

Healogics' commitment to safety and health in the workplace means more than simply obeying safety rules. All employees and business partners are expected to understand and follow our safety and health policies and procedures.

To accomplish our goal of a safe and healthy work environment, we all must:

- Be alert to health and safety risks;
- Follow Healogics' safety and workplace procedures and expect third parties and visitors to do the same;
- Only undertake work that you are qualified to perform;
- Stop work if you consider it unsafe;
- Speak up if you observe an unsafe working environment, and listen to others who may speak up;
- Report any accident, injury, illness, or unsafe condition immediately. Never assume that someone else has reported a risk or concern;
- Know the emergency procedures that apply where you work;
- Maintain a neat and safe working environment by keeping work stations, aisles, and other work spaces free from obstacles, wires, and other potential hazards;

#### **Licensure and Certification**

Some positions require an employee to maintain a particular license or certification in order to comply with state or federal law. Employees are required to maintain any required license or certification in good, active standing. Employees are responsible for renewals with their respective licensure and certification boards. In the event disciplinary action is taken against a license or certification, employees are responsible for reporting that action or potential action to their supervisor. Disciplinary action will be taken against an employee if their license lapses or if action is taken against their license during employment.

# **Exclusion Programs**

Healogics does not employ, contract with, grant privileges to, or otherwise conduct business with individuals and entities who have been excluded from participating in federal health care programs, including state Medicaid exclusion lists, the Office of Inspector General's List of Excluded Individuals and Entities, and the General Services Administration's System for Awards Management. Individuals and entities must be screened against these exclusion lists prior to employing or contracting with that party. Individuals and entities are responsible for immediately notifying Healogics if they receive notice they have been or will be placed on an exclusion list.

