



CODE OF CONDUCT

2021 / 2022

A MESSAGE FROM THE CEO

Elevate ENT Partners is dedicated to managing all of its activities with excellence and integrity. We continuously strive to conduct our business affairs in a spirit of openness that reflects our desire to work within all state and federal regulations. To assure that we live up to these high standards, we have developed a Compliance Program and this Code of Conduct, which affirms and formalizes our commitment to ethical business practices.

Working together as a team, we can maintain the values set forth by the Compliance Program. All of us should become familiar with the contents of the Code of Conduct and understand the function of our Compliance Program. It will help to further strengthen our reputation as an ENT leader in the healthcare industry and reinforce our commitment to operate with integrity while providing quality ENT patient care.

Communication is very important. For this reason, I encourage you to contact the Chief Compliance Officer or me with any questions or concerns that you may have about our organization.

Thank you for your hard work and commitment to our providers and supporting quality ENT patient care.

Sincerely,

James D. Polfreman
Chief Executive Officer
786-662-3211

Jose Camps
Chief Compliance Officer
786-662-3226

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VISION AND MISSION STATEMENT

Preserve and elevate ENT in an increasingly complex healthcare landscape.

We provide scalable administrative support so ENT physicians can achieve a more secure financial future.

PURPOSE OF OUR CODE OF CONDUCT

Our Code of Conduct is the foundation of our commitment to excellence and communicates our ethical business standards. The code applies to all Elevate ENT Partners staff, affiliates practices, healthcare professionals, agents, officers, directors, physicians, representatives, contractors, vendors and any other person or organization engaged to provide products or services. The code provides guidance to all Elevate ENT Partners colleagues on how to conduct our daily business with integrity. We make decisions about how to conduct ourselves every day as we go about our work. Each of us is accountable for the actions that we decide to take. At Elevate, we are each stewards of the reputation we enjoy of ensuring ethical business practices and safe quality care. Accordingly, our Code of Conduct serves as a cultural compass for staff, management, vendors and others who interact with our organization. It is an essential element of our Compliance Program. The Compliance Program is a partnership among all of us to make the right choice every time.

Everyone associated with Elevate ENT Partners including staff, healthcare professionals, agents, officers, directors, physicians, representatives, contractors, vendors and other who provide services or products shall promptly report any suspected violations of this Code of Conduct, Organization Policies, or applicable law.

Failure to follow the Organizations Code, policies and procedures will result in disciplinary action up to and including termination.

COMPLIANCE PROGRAM

Elevate ENT Partners has developed a Compliance program which affirms and formalizes our commitment to ethical business practices. This commitment permeates all levels of the organization. Our Compliance program outlines the seven elements that are carried out in our organization and to comply with legal and ethical requirements which includes the following:

1. Setting compliance standards and ethical conduct through written policies, procedures and our Code of Conduct;
2. Communicating standards through, awareness, education and training programs for everyone at the Organization;
3. Conducting ongoing monitoring and auditing activities in areas of compliance risk;
4. Providing a process for confidential reporting potential violations of laws, policies or our Code of Conduct without fear of retaliation or retribution;
5. Identifying, investigating and responding to potential compliance problems;
6. Performing routine sanctions checking to ensure we are not conducting our business with individuals and entities ineligible to participate in federal health care programs;
7. Enforcing compliance standards and disciplining non-compliance actions;
8. Maintaining an organizational structure that supports the furtherance of the Compliance Program, including establishment of the Compliance Committee, an Audit and Compliance Committee of the Board of Directors and appointment of a Chief Compliance Officer who oversees the Program's functions.

DEPARTMENT OF COMPLIANCE

The Compliance Department is charged with supporting the Organizations departments assisting with developing policies, procedures and practices to ensure compliance with applicable laws and regulations; informing departments impacted by changes and updates in regulations; performing reviews and evaluations of all compliance matters at the Organization; developing positive relationships with regulatory bodies, and ensuring that appropriate and timely information is provided to the Boards and senior leadership regarding all aspects of the compliance program.

The Department coordinates multiple activities of the Compliance Program, including preparing and distributing this Code of Conduct, annual and special-purpose compliance training, chairing the Compliance Committee, managing the Confidential Hotline program, generating monthly compliance updates, policy and procedure reviews, the patient privacy program and providing compliance information on the Organizations intranet, newsletters and elsewhere. The Department of Compliance reports to the Chief Executive Officer and directly to the chairman of the Audit and Compliance Committee of the Board. Please contact the Chief Compliance Officer at 786-662-3226 with any questions or concerns.

ETHICS AND COMPLIANCE TRAINING

Every employee receives Ethics and Compliance training including training on the Code of Conduct, during “orientation” or within the first 30 days of the date of hire. During this training, each new employee will receive a copy of the Code of Conduct, participate in Code of Conduct training, and complete an acknowledgement card. Each year we conduct Code of Conduct “refresher” training for all of our employees and providers. Compliance training is incorporated into the employee evaluation process. Annual compliance training provides continuing education and updates on topics related to ethics and compliance. This training is mandatory for all employees, providers and associates, and is available in the English and Spanish languages.

COMPLIANCE COMMITTEE

The Compliance Program is supported and monitored by the Compliance Committee. The Committee meets quarterly to review and discuss compliance information, including regulatory developments, departmental audits and reviews, compliance news, and reported incidents of non-compliance.

OUR COMPLIANCE HOTLINE WORKS

1-800-585-0375 (English and Spanish)

What is the Compliance Hotline?

The Compliance Hotline is a simple way for Elevate employees, providers and associates to confidentially report activities that may involve ethical violations or unlawful conduct in the Organization. The Compliance Hotline is managed and operated by an independent third-party operator to ensure effective communication, integrity and confidential reporting. It is available toll-free, 24 hours a day, seven days a week in the English and Spanish languages. A trained operator takes each call, gathers the needed information, and ensures that the report is immediately sent to the Compliance Department for investigation and appropriate action.

Who May Utilize the Compliance Hotline?

The Compliance Hotline is available for use by any employee, provider or associate of the Organization. Everyone has a responsibility for reporting any activity that appears to violate applicable laws, rules, regulations, credentialing standards, Organizational policy or this Code of Conduct.

What should be reported to the Hotline?

Users may call the Compliance Hotline to report suspected violations of the Code of Conduct, policies and regulations related to but not limited to:

- Fraud, Waste and Abuse
- Emergency Treatment – EMTALA
- Quality Care
- Conflicts of Interest
- Confidentiality, Privacy and Security of Health Information
- Identity Theft or Fraud

- Environmental Health and Safety
- Coding and Billing practices for patient care services
- Patient Rights and Choice
- Business and Professional Ethics
- Ineligible Persons or Entities
- Research Concerns
- Gifts and Gratuities
- Social Media
- Workplace violence and safety

Reporting Compliance Concerns

There are several options which an employee or associate may use to report a compliance concern. As a first step, an employee, provider and associate has the choice to report any concerns to a manager or supervisor, the compliance department, or to the Chief Compliance Officer at 786-662-3226. Any person who feels uncomfortable reporting via these means is encouraged to call the confidential Compliance Hotline.

All reports must be made in good faith with a belief that the standards have been violated. Appropriate disciplinary action will be taken if information has not been provided in good faith.

Investigation of Hotline Reports

All concerns raised are reviewed and investigated by the compliance department. Callers are provided a case number and may call back to check on the status of the concern or provide additional information. To protect your confidentiality and privacy, we do not disclose the details of the investigation or any disciplinary action. However, callers will be informed of whether the investigation is complete and if the issues were addressed. Investigation results are used to correct or prevent any improper behavior revealed by the report. Results of the investigations are shared with the Compliance Committee, senior leadership and the governing Board.

Non-Retaliation

When someone raises a good faith concern, calls the hotline or cooperates with an investigation or corrective action, retaliation against that person is not permitted. Elevate ENT takes reports of retaliation seriously. If you feel that you have experienced retaliation immediately report it to the appropriate manager who is not involved in the issues or contact the compliance department or the compliance hotline. Any allegation of retaliation, the allegation will be investigated and appropriate steps will be taken to protect those who report retaliation.

CONFIDENTIALITY, PRIVACY AND SECURITY

We Protect the Privacy of Our Patients and the Confidentiality of Patient and Employee Information

Confidential information includes:

- Patient Medical records
- Billing and financial records;
- Employee records; and
- Sensitive business and financial information of the Organization, whether stored in electronic or “hard copy” format.

Employees, providers and associates must dispose of confidential information in “hard copy” form in the special, locked consoles or shredders, and must dispose of electronically-stored confidential information according to procedures approved by the Information Security Officer.

Employees, providers and associates whose duties bring them into contact with electronically stored patient information are expected to observe all security rules regarding safeguarding confidential patient information in electronic form. Approval is required for the use of portable electronic storage devices which use, store or transmit patient records and other confidential information. Such devices must be secure at all times, and must utilize software and other controls (e.g., encryption) methods approved by the Organization's Information Security Officer. For additional information, please contact the Information Security Officer at (786-662-3215).

Information that is used by the Organization is private. This includes business strategies, costs, financial data, and other economic information. Business information about the Company may not be disclosed to anyone outside our organization; such disclosure may also violate federal law.

Privacy of Patient Information

Our ENT patients trust us to keep their information confidential. This means we should share records or patient information only with authorized persons who have a legitimate need for the information. Providers and Employees must ensure that all de-identified protected health information is not legible. Inappropriate use or disclosure of patient information may be a violation of federal law and Elevate ENT policy and may subject the offender to significant penalties.

Conversations which concern our ENT patients must occur in a place that protects patient privacy and confidentiality. Providers and Employees may not expose private information where it may be seen or taken by unauthorized persons. Only the minimum confidential health information may be shared which is necessary for the purpose.

Providers and Employees are required to observe all privacy & security rules regarding electronic information. Providers Employees may never share password or logon information. Users must sign off electronic systems when not in use, and at the end of each working day. Electronic emails that seem suspicious employees are not to open or follow any links provided in the email. The employee must contact the Information Security Officer and report it immediately. Providers and Employees should ensure that all patient information is secured from access by unauthorized individuals, and notify management staff of any suspicious individuals or behavior in their work areas.

Patient registration records must be protected at all times and utilized as uses and disclosures for Treatment, Payment, and Healthcare Operations.

- Only office staff member directly involved in the care of an ENT patient may print a patient's registration record for Treatment, Payment and Healthcare Operations.
- Office staff members shall ensure the security of printed registration records and any other printed record at all times. Once completed with the records the office staff member must dispose in a locked bin or shredded.

Identity theft has become an increasing concern. It is important for all Provider and Employees who encounter or have a suspicion of identity theft to report the matter immediately to the Privacy Officer or Information Security Officer.

Requests for record information concerning our ENT patients should be directed to our Office Managers.

For additional information, please contact the Privacy Officer at 786-662-3226.

Company Center Information and Media

Only authorized employees of Elevate ENT may share or discuss Company information with the news media. All calls must be referred to the Marketing Department at 786-662-3218. Requests for information about an employee should be directed to the Human Resources Department, including requests for employment references and personal information.

Social Media Usage

We expect all employees to conduct themselves appropriately on the Social Media network(s) in which they participate

Elevate ENT expects that all provider, employees and associates who use social media (such as Facebook®, Twitter®, and similar services) will do so in accordance with applicable laws. No patient information of any kind or confidential Company information may be placed on social media sites for any reason. Any patient images must have prior authorization to posting on any social media. Employees may not access personal social media accounts using the Elevate ENT network or e-mail system. Access to Social Media sites during work hours may only take place during an authorized break period and outside of public areas of the Head Office and Care Centers. Unauthorized employees may not make statements on social media sites which are (or which may reasonably be seen to be) made on behalf of Elevate ENT.

CLINICAL QUALITY

We strive to provide Quality health care to all ENT patients

Elevate ENT and Providers promote health care quality, patient safety, and cost efficiency. Furthering Elevate ENT's mission which provides an opportunity for ENT Providers to make a positive difference in several diverse communities. The Company's Clinical quality assessment and improvement processes are integrated into overall policies and operations. The results of the evaluations are reviewed by the Medical Director and shared with the Physician Advisory Committee.

Here are a few things we can do to improve the service we provide to our patients:

- Report medication or treatment errors according to Company policy.
- Be polite to ENT patients and loved ones
- Maintain a safe patient care environment.
- Report problems with medical equipment to the Vice President of Operations and the Medical Director.
- Inform ENT patients about their role in patient safety.
- Reporting of events that are not consistent with routine care or that result in real or potential patient injury.

PATIENT RIGHTS

We respect all patients' rights

Elevate ENT believes that recognizing and respecting ENT patient rights is an important aspect of care that encourages ENT patients to become more involved in and informed about their care. Care, treatment and services should be provided in a way that respects and fosters the patient's dignity, autonomy, positive self-regard, civil rights and involvement in his or her care. The Company believes that care, treatment, and services should also be carefully planned and provided with due regard to the ENT patient's personal values, beliefs, and preferences.

Care includes addressing processes and activities as they relate to patient rights by:

- Informing ENT patients of their rights and responsibilities
- Helping ENT patients understand and exercise their rights

- Respecting ENT patients' values, beliefs, and preferences
- Informing ENT patients of their responsibilities regarding their care, treatment, and services

Some of the ways we meet standards of care related to patient rights include:

- Honoring the ENT patient's right to give or withhold informed consent
- Informing ENT patients about advance directives
- Respecting the ENT patient's right to receive information in a manner he or she understands.
- Respecting the ENT patient's rights during research, investigation and clinical trials.
- Providing a process to have complaints reviewed by the Organization.

FRAUD, WASTE AND ABUSE

We believe in educating our ENT providers and employees on how to prevent and detect fraud, waste, and abuse.

Elevate ENT is committed to full compliance with all federal, state and local health care program requirements.

"Fraud" involves the making of a false statement in order to receive some benefit to which one is not entitled. "Waste" and "Abuse" include practices which directly or indirectly result in unnecessary costs to a government health care program or patients. Examples of fraud and abuse include:

- Billing for services or supplies which were not provided or furnished;
- Altering claims forms or receipts in order to receive higher payments;
- Duplicate billing to the government health care program and the patient or another insurer; and
- Offering, paying, soliciting, or receiving bribes, kickbacks or rebates, directly or indirectly, to induce referrals of patients or the purchase of goods or services paid for by government health care programs.

Elevate ENT expects that all individuals associated with the Company will avoid fraudulent, wasteful or abusive practices and promptly report these practices when they occur.

Fraud and abuse may be prosecuted under state and federal law and can result in requirements for restitution, fines, and, in some cases, jail time. Such cases can also result in exclusion of individuals or institutions from participation in government health care programs. Fraud and abuse guidelines state that we must:

- Provide only those services that are documented as being medically necessary.
- Document accurately and completely the ENT services that are provided.
- Perform complete, accurate and consistent coding of medical records in accordance with regulatory requirements and guidelines.
- Report all costs according to generally accepted accounting practices and according to Company policy.
- Maintain internal accounting controls.
- Maintain accurate billing to government payers, commercial insurance, and ENT patients, as well as conform to pertinent Federal and state laws and regulations.

For additional guidance or information regarding fraud, waste and abuse, you may consult Elevate's written policies on these topics, or contact the Department of Compliance.

INELIGIBLE PERSONS/ENTITIES

We initiate appropriate inquiries against exclusion databases prior to hiring

Elevate ENT will not contract with, employ, or bill for services rendered by a person or organization which has been excluded from or is ineligible to participate in government healthcare programs, or who has been convicted of a crime related to the provision of healthcare items or services. In addition, Elevate ENT conducts monthly screening of staff, physicians and vendors to ensure excluded individuals are addressed appropriately.

Employees, Physicians, contractors, vendors providing services or working with Elevate ENT must report if they become excluded or otherwise ineligible for participation in a government healthcare program, or if they have been charged with, or convicted of, a crime involving the provision of healthcare items or services.

RECORDKEEPING

We ensure the accuracy and confidentiality of records

Elevate ENT maintains and receives many types of records. These may include medical records, documents, patient billing and financial records and electronic information.

State and federal regulations impose specific requirements for keeping and destroying specific types of records. Because departments maintain various types of records, please take the time to become familiar with document retention rules that apply to the documents which your department uses, manages or creates.

There are a number of rules that commonly apply to everyone. Please keep the following in mind:

- Do not falsify facts or make false record entries.
- Do not remove any Company files or documents from the premises.
- Keep records confidential.
- Maintain and destroy records according to the applicable departmental document or Company retention policy.
- Give records only to those people who are authorized by policy and regulatory requirements to have access.

SAFEGUARDING COMPANY AND CARE CENTER PROPERTY

We protect Company and Care Center property and resources

All Elevate ENT Providers, Employees and associates are expected to use Offices and Care Centers property and resources responsibly and only for an appropriate purpose. In addition, Providers and Employees are expected to use facilities and equipment correctly to avoid injury. Company property may not be used for non-Company purposes without written permission. Company Offices and Care Centers time, facilities, or equipment may not be used for unapproved purposes. Ask your area Vice President if you have any questions about proper use of Company Offices and Care Centers property and resources.

WORKPLACE HEALTH AND SAFETY

We strive to maintain a safe and healthy workplace

Elevate ENT strives to maintain a working environment free from hazards or unsafe conditions. All of us must follow safety standards and regulations. Please take extra care to:

- Dispose environmentally sensitive and other hazardous material correctly.
- Use personal protective equipment to protect you and others from exposure to dangerous substances and viruses.
- Prepare and react timely to internal and external disasters, such as fires and hurricanes.
- Be familiar with Elevate Emergency Operations Plan and your role in the plan.

TOBACCO-FREE ENVIRONMENT

We believe in providing a working environment free of tobacco products to enhance the health status of our patients and employees.

It is the policy of Elevate ENT to educate staff and the public at large about the hazards of smoking and tobacco use in our Offices and Care Centers. As a health care provider and as an employer, the Company is committed to providing ENT patients, visitors, staff and providers with an environment that promotes healthy behaviors. For this reason, all Offices and Care Centers are Tobacco Free.

GIFTS

We establish guidelines for the offer and acceptance of gifts

It is inappropriate for Providers and Employees to give or receive, directly or indirectly, any gifts (including cash, services, favors, entertainment, offers of employment or other things of value) that may improperly influence, or appear to influence, business relationships. Small perishable items may be allowed. However, you must notify your supervisor before accepting a gift of any kind for evaluation.

Never request or accept gifts from a patient in exchange for services. If someone offers you cash, do not take it. If they insist, notify your supervisor, manager or area Vice President.

The giving of gifts to, or receiving gifts from, individuals or businesses who are doing business with (or who are seeking to do business with) Elevate, or who may represent a possible source of referrals for patients or other business, may be contrary to law. Please check with your Supervisor, Manager, area Vice President or the Department of Compliance with any questions about such gifts.

CONFLICTS OF INTEREST

We ensure that situations which could present a conflict of interest for Elevate ENT Providers and Employees are recognized and, if necessary, appropriately managed.

Providers and Employees of Elevate ENT sometimes have personal or financial interests which make it inappropriate for those persons to be involved in certain activities and transactions of the Company. These situations are called "conflicts of interest." Here are two examples of what may be considered a conflict of interest:

- A situation in which an employee or provider (or a member of that employee or provider's family) is employed by or has a financial interest in a company that does business with Elevate ENT.
- A situation in which an Elevate provider or employee also works part-time for a Company vendor, competitor, supplier or ENT patient.
- A situation in which a provider or employee works in the same care center or department with a family member or spouse that has a direct report to that provider or employee.

It is extremely important that any employee or provider of the Company promptly disclose any conflict of interest to the Vice President of Compliance, even if the conflict is just a possibility. Questions concerning conflicts of interest may also be directed to the Compliance Department at 786-662-3226.

DEALING HONESTLY WITH CUSTOMERS, VENDORS AND CONSULTANTS

We strive for accuracy and honesty in our public statements.

Showing respect for our ENT patients, guests and business associates requires that we only make statements that we know are honest and accurate. Written documents should be prepared in a timely manner. All business information, records and reports should be complete and truthful. Likewise, it is important that we abide by trademark and copyright laws, as well as all licensing requirements.

Elevate ENT supports ethical business behavior by properly representing ourselves to the public. In order to effectively control both internal and external printed materials, all proposed printed material to be used by the Company and/or shared with any outside audience must be presented to the Vice President of Marketing at 786-662-3218 for consultation and approval prior to production.

RESPECT AND DIGNITY IN THE WORKPLACE

We strive for a workplace free of all forms of unlawful harassment.

It is the policy of Elevate ENT to maintain a work environment free from all forms of unlawful harassment. Comments or conduct relating to age, race, creed, color, national origin, sex, religion, veteran status, disability, marital status, sexual orientation or any other classification protected by federal, state or local laws. Providers and Employees, patients, associates and visitors are to be treated with dignity, respect, and courtesy.

Sexual harassment is a violation of the law and will not be tolerated or condoned. This behavior is defined as unwanted sexual advances, requests for sexual favors and all other verbal or physical conduct of a sexual nature, especially where it:

- Becomes a term or condition of employment.
- Is used to make decisions affecting someone's job.
- Creates an intimidating, hostile, or offensive work environment.

Sexual harassment also includes comments, jokes, suggestions, sexually oriented statements or other remarks or actions that are offensive.

Behavior such as intimidation, verbal (including any profanity language) or physical abuse, sexual misconduct, or the creation of a hostile or offensive work environment will not be tolerated. Individuals working at all levels of the Company, including management, clinical and administrative staff, licensed independent practitioners, and governing body members are expected to conduct themselves in a professional manner so that the workplace is free from behaviors that could have a negative impact on ENT patients.

Elevate will do everything possible to prevent discrimination and harassment of any kind. All of us have the right to work in an environment of mutual respect and professionalism. Please report any activities involving discrimination or harassment to your supervisor, manager, area vice president, Human Resources department at 786-662-3214, or the Compliance Hotline.

DRUG-FREE WORKPLACE

Elevate ENT is committed to a drug-free workplace.

It is the policy of the Company to foster an environment of zero tolerance for the unlawful manufacture, distribution, dispensing, possession, or use of alcohol, controlled substances or illegal drugs in the workplace.

DEPARTMENT/RESOURCES

HUMAN RESOURCES

The objective of the Human Resources department is to support the Company's effort in attracting, retaining, developing and engaging a high performing and high ethical standards with the utmost respect for our ENT patients.

- To recognize our employees, physicians and associates are our most valuable assets.
- To build a positive working environment which contributes to a high quality of work life
- To respond timely and accurately to all customers
- To be fair and equitable in all our interactions with customers

- To promote a competent and diverse workforce

Please contact the Vice President of Human Resources at 786-662-3214 with any questions or concerns.

New. 05/2021



Name (Print) _____

Provider / Employee Number/I.D. Number

Department Name / Care Center Number / Name of Vendor Company

STATEMENT OF UNDERSTANDING
AND COMPLIANCE WITH
OUR COMPLIANCE PROGRAM

I have read Elevate ENT Partners Code of Conduct. I understand what is expected of me, and I promise to comply with my responsibilities under the Code.

Unless I've written an explanation below, I hereby certify that I have complied with the requirements of the Compliance Program, and I am not aware of any violations of the Compliance Program, and that I will comply with the requirements of the Program for the entire time that I am associated with the Company.

I understand that if I violate this Code of Conduct, I may be subject to disciplinary action by Elevate ENT, up to possible termination of employment or the revocation of my contractual or other relationship with the Company.

I certify that I have not been charged with, convicted of, or entered a plea of no contest in connection with any criminal offense that was in any way related to health care. I have not been listed by a federal agency as debarred, excluded or otherwise ineligible for participation in any federally funded healthcare program or federal contracting. I will promptly notify the Company if I am debarred, excluded or suspended from participation in any governmental healthcare program, or if I am charged with or convicted of any conduct which may result in debarment, exclusion or suspension.

Signature _____

Date _____

This form must be completed, signed, and returned to the Elevate ENT Compliance Department.
New. 05/2021



Important Phone Numbers

Compliance Hotline
1-800-585-0375 (English and Spanish)

Compliance Officer / Privacy Officer
786-662-3226

Human Resources
786-662-3214

Information Security Officer
786-662-3215

Marketing
786-662-3218