



All reports of illegal, dishonest, unethical or violations of company policy activities will be promptly submitted to management, which is responsible for investigating and coordinating corrective action.

As with all concerns raised to Inteli-Care, information will be documented and responded to with an appropriate level of urgency based on all other information available.

Reports may be submitted by the public, members, or employees. Reports received anonymously will be handled confidentially to protect the person making the report.

### **False Claims Act**

IC adheres to the federal False Claims Act which was designed to identify various types of fraudulent actions that might result in financial losses to the State of New Mexico or the United States government. There are seven types of actions by individuals or agencies that can be defined as fraud violations: 1) false claims for payment; 2) false statements that could result in false claims; 3) conspiracy to violate the Act; 4) failing to return government property; 5) making or providing false receipt; 6) purchasing public or government property from someone not authorized to sell; 7) conceal or decrease payment due the US government. IC employees are paid for documented services performed, billing for those services with the belief that the employee performed those services as documented. None worked but paid, and subsequently billed hours, could fall under the Act. These acts allow for the safety of whistleblowers to be free of retaliation or retribution. Anyone reporting violations of the False Claims Act is protected from discharge, demotion, suspension, or harassment. All Inteli-Care, LLC employees are trained on the purpose and the various types of fraudulent misconduct covered by the Acts.

If an employee has knowledge of or concern about illegal, dishonest, unethical or violations of company policy activities, the employee is to contact his/her immediate supervisor or the human resources director. The employee must exercise sound judgment to avoid baseless allegations. An employee who intentionally files a false report of wrongdoing will be subject to discipline up to and including termination.

Inteli-Care, LLC (IC), has a mechanism for employees or non-employees to report illegal, dishonest, unethical or violations of company policy activities as part of the Federal and State law which requires employers to investigate all inquiries. All reported inquiries receive the same amount of attention and urgency. This policy underlines how any individual can raise any concerns to Inteli-Care by using the Anonymous Report Compliance Concerns/Violations link located in the Inteli-Care website. <https://forms.office.com/r/RQ5zkPV0Gn>

The policy outlined applies to all individuals (employee and non-employees).