

## Code of Conduct & Ethics

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### **Mission Statement**

Managed Dental Care of Oregon’s Mission Statement embodies its foundational beliefs and commitments—and it informs all of its operations, plans, and goals:

*Managed Dental Care of Oregon is committed to preventing dental disease and improving the oral and systemic health of children and low income patients. We create access to quality care, use evidence-based methods and provide dental leadership within the communities we serve.*

### **Code of Conduct & Ethics**

The Mission Statement is MDCO’s destination, and the Code of Conduct is its traveling instructions. MDCO is committed to getting to the right places, but it is also committed to getting to them in the right way.

### **About**

MDCO’s Code of Conduct has been developed as part of its compliance program in order to promote a culture of compliance with all federal and state law, rules, and regulations that apply to MDCO’s business.

Additionally, the Code was developed to promote ethical integrity beyond the base requirements of the law. Going above and beyond is something that not only applies to our work performance.

The Code is applicable to all MDCO employees, managers, board members, contracted dental professionals and other service providers, and any other people or entities acting on behalf of MDCO. The Code is intended to provide these individuals and entities with MDCO’s expectations of behavior in the everyday course of business.

### **Compliance—The Cornerstone**

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In order to achieve its goal of having a culture of compliance—MDCO encourages everyone to feel comfortable and free to report compliance concerns without fear of retaliation or disciplinary action. We don't tolerate retaliation. We understand that it takes courage to come forward with concerns. This is one of the cornerstones of the Code of Conduct.

Each individual within the organization is integral to the prevention, detection, and resolution of noncompliance.

### **Ethics**

MDCO believes in achieving a culture of compliance through ethical behavior—through doing the right things. Ethical action is foundational to maintaining compliance throughout the company. Each individual plays a unique role in supporting ethics within the company.

### **Respect**

We are one team at MDCO, but we come from different backgrounds and life experiences. We value each other's contributions, and we all must do our part to maintain a respectful workplace that is positive and acknowledges the strengths and talents that each of us brings.

This includes avoiding all forms of harassment and inappropriate discrimination. If you feel like you have been a victim of harassment or discrimination, please bring this to our attention.

MDCO serves many members of the OHP population—and those members deserve our respect as we assist them in obtaining dental services. MDCO also interfaces with many other organizations in accomplishing its work. Each individual that acts on behalf of MDCO should ensure that they are demonstrating the respect that MDCO believes it owes to those around us.

### **Privacy and Security**

We deal with many people's personal information at MDCO. This includes their personally identifiable information as well as their personal health information. MDCO acts in accordance with HIPAA requirements in the accessing, storing, disseminating, and using of this information as well as all other applicable rules, laws, and regulations.

## **CODE OF CONDUCT AND STANDARDS OF CONDUCT**

The Company has established a Code of Conduct to help define acceptable and unacceptable behavior and conduct for our team members. All team members are required to acknowledge the Code of Conduct, and if you need to review it periodically, it can be found on the intranet. When each team member is aware that they can fully depend upon fellow workers to follow the Code of Conduct, then our Company will be a better place for everyone to work. Our team members are expected to work in a mature and responsible manner at all times. We value honesty in communication and personal responsibility in all our team members. Conduct that interferes with operations, brings discredit to the Company, or is offensive to patients, guests, or co-workers will not be tolerated.

Additionally, during patient interaction, all team members are expected to conduct themselves in a manner as to maintain and elevate the esteem of the dental profession. The dental profession holds a special position of trust within society. As such, the profession makes a commitment to society that its members will adhere to high ethical standards of conduct. Everyone working for the Company will be held to this high ethical standard including, but not limited to, those standards articulated by the Company, in the American Dental Association's Principles of Ethics and of Professional Conduct, and all applicable state Codes of Ethics.

The standards set forth below are examples of inappropriate or problematic conduct that may lead to disciplinary action, possibly including immediate termination. However, this list is not intended to be exhaustive and does not identify every type of conduct that may be deemed unacceptable by the Companies. Conduct not specifically listed below may also result in disciplinary action, up to and including termination at the sole discretion of the Company.

- Unsatisfactory work quality or quantity
- Poor personal interaction (for example, rudeness or lack of cooperation with coworkers)
- Frequent or excessive absenteeism, tardiness, early departures, no call/no shows, abuse of break or lunch privileges, or violation of break and/or lunch requirements
- Conducting work outside your license scope
- Failure to follow Company policies and/or procedures

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- ~~Failure to follow established safety or OSHA regulations or HIPAA policies and/or regulations~~
  - Unauthorized referral of patients to non-Company offices;
  - Taking photos or videos of patients or team members without consent or authorization;
  - Insubordination
  - Dishonesty
  - Gambling on the premises
  - Theft, embezzlement, violation of Cash Handling Policy
  - Fraud or other unethical behavior –
  - Vulgarity or profanity aimed at a coworker, patient, customer, vendor, supplier, etc.
  - Stealing, misusing or destroying Company property or property of another on Company premises
  - Violating conflict of interest rules
  - Falsification, alteration, or dishonesty regarding medical information, records, or any other document(s)
  - Making malicious, false, or derogatory statements that may damage the integrity or reputation of the Company, its patients or team members
  - Violation of any other policy set forth in this Handbook or any other policy otherwise communicated to team members
  - Any other actions deemed inappropriate in the workplace as determined by the Company, in its sole discretion.

Nothing in this section, including Company's enforcement of this section, is designed to or intended to, interfere with, limit or relinquish a team member's rights under any federal or state law.

If a team member has knowledge of or suspects any illegal or unethical behavior by another team member or individual, they are required to report such activity immediate to the Human Resources Department or Legal Department, or they may contact the Ethics Hotline at **844-688-0097** or [www.interdent.ethicspoint.com](http://www.interdent.ethicspoint.com). Please ask your supervisor or the Human Resources Department if you have any questions about any work or safety rule or any of the unacceptable conduct listed.