

Shadowfax

Title	Compliance Policy
Policy Number	ORG.1004.000.000
Policy Owner	Policy Committee
Approved By	Compliance Committee 7-14-21
Origin Date	6/25/2021
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Effective Date	July 2021
Next Review Date	July 2022
Associated Policies	All Shadowfax Policies
Associated Procedures	All Shadowfax Procedures
Associated Forms	All Shadowfax Forms

I. POLICY STATEMENT

Shadowfax recognizes our responsibility to good corporate governance, compliance with applicable laws, regulations, program requirements, and our own organizational standards, and building a culture of transparency and accountability.

II. PURPOSE

This policy is intended to provide the requirements and framework for Shadowfax's compliance program.

III. SCOPE

This policy applies to the development and administration of all Shadowfax compliance-related activities.

IV. GENERAL

This policy is based on standards for compliance programs as set out in federal regulations including, but not limited to, the Affordable Care Act, and standards included in the US Federal Sentencing Guidelines Chapter 8.

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V. POLICY

Compliance Officer

Shadowfax shall select an individual in a high-level management position to act as the organization's Compliance Officer. This individual shall be selected by the Chief Executive Officer and ratified by a resolution of Shadowfax's Board of Directors.

Compliance Committee

Shadowfax will maintain a cross-program Compliance Committee responsible for Shadowfax's compliance program. Shadowfax's Compliance Officer is a member and the chairperson of the Committee; the other members of the Committee include, at a minimum, each member of the Executive Team and the Director of Nursing. The Compliance Committee will review membership annually.

The Compliance Committee will meet quarterly, at a minimum, and more frequently if requested by the Shadowfax's CEO, Board of Directors or as determined by the Compliance Committee. Each Compliance Committee meeting will have a written agenda and post-meeting minutes in a location accessible to all Compliance Committee members.

Compliance Committee responsibilities include directing, creating, and maintaining the following compliance capabilities throughout Shadowfax:

1. Written policies, procedures, and standards of conduct.
2. Proper oversight of the program, including designating a Compliance Officer who will have day-to-day responsibility for program functions.
3. Care in delegating authority.
4. Staff training and education as specified by regulation as well as to establish and promote compliance expectations and compliance resources available to staff.
5. Two-way communications throughout the organization, including providing mechanisms to raise compliance-related questions or report concerns

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anonymously or non-anonymously to the organization without fear of retaliation.

6. Monitoring, auditing, and responding to reports of potential issues.
7. Discipline to promote and enforce standards.
8. Prompt responses to detected vulnerabilities or offenses and actions to prevent future offenses.
9. Analyzing the regulatory and legal requirements applicable to Shadowfax.
10. Developing internal systems and controls to ensure compliance with standards, policies, and procedures during daily operations.
11. Risk analysis, risk reviews, and creation and maintenance of Shadowfax's Compliance Plan.

VI. OVERSIGHT

Shadowfax's Compliance Committee or their designee(s) (the "Approved By") shall be in charge of the administration of this Policy. The Approved By responsibilities include:

1. Identifying the action steps to come into compliance and directives to maintain compliance and implement the action steps.
2. Periodically reviewing this Policy and monitoring compliance to it.
3. Training responsible parties on their obligations under the Policy.

Revision History

Name	Date	Reason for Changes	Version