

April 1, 2024

**Sunbridge Home Health Care, Inc.**

Effective: April 1, 2024

**Alabama False Claims and Whistleblower Protection Policy**

**Scope:** Applies to all Sunbridge employees and management

**Purpose:** To comply with certain requirements set forth in the Deficit Reduction Act of 2005 with regard to federal and state false claims laws.

**False Claims Law:** One of the primary purposes of false claims laws is to combat fraud and abuse in government health care programs.

**Federal False Claims Law:** Under the Federal False Claims Act, any person or entity that knowingly submits a false or fraudulent claim for payment of United States Government funds, or knowingly retains an overpayment of such funds more than 60 days, is liable for significant penalties and fines.

One of the unique aspects of the federal False Claims Act is the “qui tam” provision, commonly referred to as the “whistleblower” provision. This provision allows a private person with knowledge of a false claim to bring a civil action on behalf of the United States Government to recover the funds paid by the Government as a result of the false claim.

**Alabama Anti-Fraud Statute:** Under Alabama law, it is unlawful for any person to, with the intent to defraud or deceive, make or cause to be made or assist in the preparation of any false statement, representation, or omission of a material fact in any claim or application for any payment, regardless of amount, from the Medicaid Agency, knowing the same to be false; or with the intent to defraud or deceive, make, or cause to be made, or assist in the preparation of any false statement, representation, or omission of a material fact in any claim or application for medical benefits from the Medicaid Agency, knowing the same to be false. Violations of this law are criminal offenses, and the violator shall be guilty of a Class C felony. See Ala. Code §§ 22-1-11, 13A-5-6 & 13A-5-11.

**Reporting Concerns Regarding Fraud, Abuse and False Claims:** The Company takes issues regarding false claims and fraud and abuse seriously. The Company encourages all employees, management, and contractors or agents of the Company's affiliated facilities to be aware of the laws regarding fraud and abuse and false claims, and to identify and resolve any issues immediately.

Therefore, the Company encourages its employees, managers, and contractors to report concerns to their immediate supervisor, when appropriate. If the supervisor is not deemed to be the appropriate contact or if the supervisor fails to respond quickly and appropriately to the concern, then the individual with the concern should be encouraged to discuss the situation with the Company's Chief Operating Officer and/or another member of management.

\* This is a reduced version of the full policy. If you would like a copy of the full policy, please contact your immediate supervisor. \*