

COMPLIANCE HOTLINE Q&A

Diplomat Pharmacy, Inc. (“Diplomat”) believes that an essential element of any effective compliance program is providing any person a means to anonymously report non-compliance, illegal or unethical conduct or other questionable activities.

To that end, Diplomat has contracted with eni to provide a secure, confidential hotline any person can call to report non-compliance, illegal or unethical conduct, or other questionable activities anonymously.

Q: *What is the Diplomat Compliance Hotline?*

A: The Diplomat Compliance Hotline is a toll-free number at which any person may report, in a convenient and completely confidential manner, violations of law or Diplomat policy. Diplomat recognizes the need for any person to have access to this resource; therefore, the Diplomat Hotline is available 24 hours a day, seven days a week.

Q: *What types of concerns should be reported to the Diplomat Compliance Hotline?*

A: Call the hotline to express concerns or report suspected violations related to:

- Bribes & Kickbacks
- Fraud, Waste & Abuse
- Conflicts of Interest
- Fraudulent Billing
- Privacy of Employee & Patient Records
- Confidentiality of Diplomat Information & Trade Secrets
- Alteration or Destruction of Diplomat Records or Financial Documents
- Potential Criminal Violations
- Theft
- Harassment
- Discrimination
- Safety Concerns
- Questionable Accounting or Auditing Matters
- Other Violations of Law or Diplomat Policy

Q: *What concerns should **not** be referred to the Diplomat Compliance Hotline?*

A: The Diplomat Compliance Hotline is not to be used to report an immediate threat to person, property or environment. If you are a Diplomat employee these conditions must immediately be reported as outlined in Diplomat’s Emergency Management Policy & Procedure. If you are not an employee of Diplomat, please call emergency services at 9-1-1.

Q: *Do I have to provide my name?*

A: No. You may give your name if you desire, but it is not required. There are no recorders on the telephone lines or any devices that can identify or trace the number from which you are calling.

Additionally, no Diplomat personnel will ever hear your message, as it is transcribed into a text document before it is provided to Diplomat for assessment. Diplomat is interested in resolving your concerns, not identifying the person reporting the issue.

However, if you would like follow-up information regarding your report you must identify yourself. Reports of violations may be made without fear of retribution and will be handled in a manner that protects the privacy of the caller. The confidentiality and other rights of all personnel involved, including anyone who is the subject of a compliance investigation, are protected to the extent permissible by law.

Q: *How does the Diplomat Compliance Hotline work?*

A: The Diplomat Compliance Hotline works as follows:

1. Call the toll-free number at **1-866-494-3161**.
2. Enter Diplomat's access code: **4200**.
3. Provide the name, spelling and location of Diplomat.
4. Provide a detailed report in a secure and completely confidential voicemail.
5. Your message is then transcribed into a text document by eni's DirectAccess team.
6. The anonymous report is provided to Diplomat's Compliance Officer for assessment.

Q: *Are callers limited in the number of times they can report?*

A: No. You may call as often as you wish to report information.

Q: *Will there be a review process after each report is made?*

A: Each report is taken seriously. Whether there is a review depends on a number of factors including the information provided, the details, documentation, if any, and Diplomat policy.