

Code of Conduct

Vohra Wound Physicians

2026



OUR COMMITMENT
TO COMPLIANCE,
QUALITY & INTEGRITY



Empowerment • Partnership • Service

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Our Mission

To improve the health and quality of life of the individuals and communities we serve through exceptional wound care, optimized outcomes, and the prevention of unnecessary hospitalizations.

Our Core Values



Empowerment

We equip our clinicians, staff, and partners with the tools and support to deliver exceptional care.



Partnership

We collaborate with facilities, patients, and one another to create shared success.



Service

We serve patients and communities with dedication, responsiveness, and compassion.

A Message from Leadership

Since our founding in 2000, Vohra Wound Physicians has grown to become the nation's most trusted wound care specialty practice. Today, we proudly serve nearly 3,000 skilled nursing facilities across the country. Our mission remains constant: to improve the health and quality of life of the individuals and communities we serve through exceptional wound care, optimized outcomes, and the prevention of unnecessary hospitalizations.

As a patient-first organization, we are guided by innovation, compassion, and clinical excellence. Through advanced treatment modalities and interdisciplinary collaboration, our clinicians deliver superior wound healing and meaningful results for our patients and partners alike.

We also ground our work in the core values that shape who we are: Empowerment, Partnership, and Service.

The Vohra Wound Physicians Code of Conduct reflects our shared commitment to integrity, accountability, and ethical behavior. It is more than a policy — it is a pledge to uphold the highest standards in every aspect of our work. Compliance is not simply a program we follow; it is a daily practice rooted in respect for the laws, regulations, policies, and procedures that govern our profession.

By managing ourselves and our business with honesty and transparency, we strengthen the trust that patients, partners, and colleagues place in us. Together, we will continue to build upon our reputation as a leader in wound care and as an organization that does what is right.

Thank you for your dedication to clinical excellence, integrity, and the patients we are privileged to serve.

Sincerely,



Peter Winn
CEO, Vohra Wound Physicians

Our Compliance Program

The Vohra Wound Physicians (VWP) Compliance Program:

- Demonstrates VWP's commitment to the highest standards of compliance and ethics among all workforce members, physicians, contractors, and agents.
- Advances the prevention of fraud, waste, and abuse, while furthering our mission of providing exceptional wound care to the communities we serve.
- Is supported by this Code of Conduct, which applies to all Board members, officers, employees, independent contractors, and anyone doing business on behalf of VWP.

Reinforces that every covered person has an affirmative duty to report actual or suspected compliance issues and is protected from retaliation for reporting timely and in good faith.



Compliance in action

Compliance is everyone's responsibility. When in doubt about whether something is legal, ethical, or consistent with this Code, stop and ask before proceeding.

VWP Compliance & Ethics Resources Are Always Available to You

- Talk to your Supervisor or Regional Medical Director
- Contact the Compliance Officer directly
- Report anonymously via the Compliance Hotline, available 24/7

Our Code at a Glance

The Vohra Wound Physicians (VWP) Code of Conduct is part of our Compliance Program and sets clear expectations for ethical, compliant, and patient-centered conduct. It applies to everyone who works for or on behalf of VWP, including employees, clinicians, board members, vendors, contractors, consultants, officers, and directors. Supporting policies and procedures provide additional guidance for specific operational areas.

Commitment to Ethical and Legal Conduct

Vohra Wound Physicians is committed to conducting business in accordance with applicable laws, regulations, and ethical standards. This commitment includes:

- Providing patient care that is medically necessary, appropriate, and delivered with respect for patient rights and dignity
- Conducting all business activities with honesty, integrity, and professionalism
- Maintaining respectful and lawful relationships with patients, employees, contractors, and business partners
- Protecting confidentiality, privacy, and security of protected health information in compliance with HIPAA and other applicable laws
- Identifying, disclosing, and mitigating actual or potential conflicts of interest
- Complying with all federal and state healthcare program requirements, including accurate and complete documentation and claims submission

Leadership Responsibilities

Vohra Wound Physicians leadership is responsible for establishing, supporting, and maintaining an effective compliance program that is informed by ongoing risk assessment and oversight. In addition to complying with this Code of Conduct and all applicable policies and procedures, leaders are expected to:

- Actively participate in the identification and assessment of compliance risks relevant to their operational or clinical areas, including risks related to billing and coding, documentation, medical necessity, quality of care, privacy and security, and federal healthcare program requirements.
- Communicate identified risks, emerging issues, and compliance concerns to the Compliance Officer in a timely manner to support the organization's enterprise-wide risk assessment and compliance work planning processes.
- Implement and support compliance controls within their areas of responsibility that are reasonably designed to mitigate identified risks, including adherence to policies, monitoring activities, and corrective actions.
- Ensure individuals under their supervision receive appropriate education and guidance regarding compliance expectations, identified risk areas, and related policies and procedures applicable to their roles.
- Promote a culture of accountability and transparency, encouraging the reporting of compliance concerns without fear of retaliation and reinforcing the importance of early issue identification.

- Respond promptly to compliance findings within their areas of responsibility, including cooperating with investigations, implementing corrective action plans, and addressing root causes to prevent recurrence.
- Model ethical decision-making and compliance-conscious behavior, demonstrating a commitment to lawful conduct and risk mitigation through actions, leadership communications, and operational decisions.

Duty to Report

The VWP Compliance Program is designed to prevent, detect, and address potential violations of law, regulation, or policy. All VWP Workforce members share responsibility for reporting concerns that may indicate noncompliance or unethical conduct.



Speak Up

If something seems inconsistent with our Code, policies, laws, or values, report it promptly. Speaking up helps protect patients, colleagues, partners, and VWP.

Reporting a Violation

All VWP Workforce members are required to promptly report known or suspected violations of this Code of Conduct, VWP policies, or applicable law. Failure to report compliance concerns may result in disciplinary action, up to and including termination, and may expose the individual and the organization to civil or criminal liability or exclusion from federal healthcare programs. While individuals are encouraged to raise concerns through their supervisory chain when appropriate, alternative reporting channels are available if that is not feasible or appropriate.

Reports may be made to Human Resources, the Compliance Officer, or through the Compliance Hotline.

Compliance Hotline

The Compliance Hotline is a confidential and, if desired, anonymous reporting mechanism available to all VWP Workforce members. The Hotline may be used to report suspected violations, compliance concerns, or activities inconsistent with VWP's policies, values, or legal obligations. To facilitate an effective review, reports should include relevant details such as dates, locations, individuals involved, and a description of the concern.

Confidentiality

VWP makes every reasonable effort, consistent with applicable law, to maintain the confidentiality of compliance reports and the identities of individuals who report concerns. Information is shared only on a need-to-know basis to conduct an appropriate review or investigation.

Non-Retaliation

VWP strictly prohibits retaliation against any individual who reports a compliance concern or participates in an investigation in good faith. Retaliatory conduct will result in disciplinary action. Individuals who knowingly make false reports or allegations in bad faith may also be subject to disciplinary measures.



Speak Up

Retaliation of any kind against someone who reports a concern in good faith will not be tolerated.

Internal Investigations and Corrective Actions

All reported compliance concerns are promptly reviewed and, when appropriate, investigated by the Compliance Department. Where an investigation substantiates a violation, VWP will implement corrective action as warranted. Corrective action may include disciplinary measures, repayment of overpayments, disclosure to governmental authorities when required, and the implementation of process improvements to prevent recurrence.

We Act Responsibly Toward Each Other, Our Patients, and Our Partners

Workplace Conduct and Integrity

We create a respectful, professional, and lawful workplace so every team member can support high-quality patient care and ethical business conduct. Each Workforce member is expected to act with integrity, use sound judgment, communicate respectfully, and follow VWP policies and applicable laws.

Our expectations:

- Treat one another with respect.
- Support and comply with VWP's substance-free workplace expectations.
- Comply with equal employment opportunity requirements and prohibit discrimination in employment opportunities or practices based on race, color, national origin, age, sex, disability, gender identity, sexual orientation, or any other status protected by law.
- Refrain from and report intimidating, threatening, harassing, or violent behavior, including:
 - Offensive comments, jokes, disparaging language, or slurs.
 - Unwelcome conduct that is sexual in nature when such conduct interferes with an individual's work performance or creates an intimidating, hostile, or offensive work environment.
 - Workplace violence or threats of violence.

Confidentiality of Patient Records



Compliance in action

Access, use, and share patient information only when authorized and necessary for your VWP responsibilities.

All VWP Workforce members have a responsibility to protect the confidentiality, privacy, and security of patient information. Workforce members may access, use, or disclose patient information only when authorized and necessary to perform their job responsibilities or as otherwise permitted by law. VWP safeguards protected health information, including patient medical records and related communications, in accordance with applicable federal, state, and accreditation requirements.

Except where emergency or other legally permitted exceptions apply, patient-specific information may be released only to individuals authorized by law or by the patient's written authorization. Workforce members who are uncertain about whether patient-related data may be released must seek guidance and confirm the applicable requirements before disclosing information.

We Strive to Comply with Laws and Regulations

Fraud, Waste and Abuse

Vohra Wound Physicians is committed to preventing, detecting, deterring, and correcting fraud, waste, and abuse in accordance with federal and state laws, healthcare program requirements, and VWP policies and procedures.

Fraud includes knowingly making false statements or misrepresenting material facts to obtain payment or benefit to which a provider is not entitled.

Waste includes overuse, misuse, or mismanagement of resources, including government program resources.

Abuse includes practices that are inconsistent with sound fiscal, business, or medical practices and that may directly or indirectly result in unnecessary costs to a federal healthcare program.

Federal and state laws, including the Federal False Claims Act and applicable state false claims laws, prohibit the submission of false claims for payment and other fraudulent activity. Violations may result in civil actions, penalties, and other consequences. Additional laws and regulations governing Medicare, Medicaid, and other healthcare programs are intended to protect program integrity and reduce fraud, waste, and abuse.

Workforce members who know of or suspect fraud, waste, abuse, false claims, or other improper activity must report the concern promptly to Compliance. When uncertain whether an activity may be improper, Workforce members should contact Compliance for guidance. Individuals who lawfully report false claims or other fraudulent conduct, or who assist in an investigation, action, or testimony, are protected from retaliation under applicable federal and state laws and VWP policy. VWP does not tolerate discrimination or retaliation against any individual who makes a good-faith report or participates in a VWP investigation.

VWP prepares and submits claims accurately, completely, and in accordance with applicable laws, regulations, documentation standards, and payer requirements.

This commitment includes maintaining processes to monitor and verify that claims are coded and submitted appropriately and that documentation supports the services billed. Workforce members involved in billing, coding, documentation, or claims submission are expected to follow applicable federal and state requirements and to raise questions or concerns promptly when uncertainty exists.

Screening of Covered Persons

VWP does not knowingly employ, contract with, or bill for services furnished by any individual or entity that is excluded or ineligible to participate in federal healthcare programs, suspended or debarred from federal government contracts, or convicted of a criminal offense related to healthcare items or services. VWP screens covered persons performing functions or services on its behalf against applicable government exclusion lists monthly, including lists maintained by the U.S. Department of Health and Human Services Office of Inspector General, the General Services Administration, and applicable state agencies.



Compliance in action

Accurate documentation, appropriate claims, and timely reporting are essential to protecting patients, federal healthcare programs, and the trust placed in VWP.

We Avoid Conflicts of Interest



Speak Up

Disclose actual or potential conflicts early so they can be reviewed and managed appropriately.

Conflicts of Interest

Vohra Wound Physicians expects Workforce members to act in the best interests of the organization and to avoid situations in which personal, financial, professional, or family interests could interfere, or appear to interfere, with objective decision-making. Workforce members must conduct business with honesty, fairness, and professionalism, and must comply with applicable laws, policies, and employment obligations. Workforce members may not use their positions, access to information, or organizational resources in a manner that creates an actual or potential conflict between their personal interests and the interests of VWP.

Examples of actual or potential conflicts of interest include:

- A direct reporting relationship between family members.
- Using VWP property, information, or resources for non-VWP purposes.
- Making business decisions that could benefit family or friends.
- Having a financial or ownership interest in an entity that competes with Vohra Wound Physicians.
- Having financial relationships that could potentially, or appear to, influence the independence of patient care decisions.
- Issuing testimonials, endorsing, or promoting a vendor, payor, provider, product, or service.

We Protect Company Property



Compliance in action

Protect records, information, and company resources as carefully as you protect patient trust.

Company Property, Records, and Information

Vohra Wound Physicians is committed to protecting company property, records, confidential information, and patient information through accurate documentation, appropriate use of resources, and compliance with record retention requirements. Workforce members are expected to safeguard VWP assets and maintain records in accordance with applicable laws, policies, and procedures.

- Maintaining records for the legally required timeframe.
- Destroying records in a timely and appropriate manner after the applicable retention period has been met, in accordance with corporate policy.
- Disposing of records containing patient, financial, or other confidential information only through corporate-approved secure destruction methods. These documents must not be placed in regular trash.

VWP also expects patient and business records to be accurate, clear, complete, and reflective of the services provided, decisions made, or actions taken. Documentation must be created and maintained in a manner that supports patient care, business integrity, and compliance with applicable requirements.

Documentation expectations include:

- Do not falsify facts or create false records.
- Do not sign another person's name on any document.
- Do not document information under another person's identity or credentials.
- Create only records that are necessary and required.
- Provide records and information only to individuals with a legal or authorized need to know.
- Preserve confidentiality, privacy, and security of patient and team member information.

Resources to Help You Do the Right Thing

Need Help?

If you are unsure what to do, contact Compliance, Human Resources, Legal, Privacy/Security, or the Compliance Hotline. Asking early helps prevent issues and protects the people we serve.

You are never expected to navigate an ethics or compliance concern alone. The Compliance Department, led by the Chief Compliance Officer, provides guidance, training, monitoring, auditing, and reporting support to help Workforce members make sound decisions and raise concerns appropriately.

- Developing current compliance policies, procedures, and training
- Monitoring, auditing, and reporting compliance issues
- Managing the Compliance Hotline and responding to employees' questions



Compliance Hotline

Answered and staffed 24 hours a day, 365 days a year by an independent hotline company specializing in healthcare compliance. Callers may remain anonymous, and callers who give their names will be protected to the extent allowed by law.

Phone: (888) 829-5150

Reporting Portal: [Verifihotline.com](https://verifihotline.com)

Company ID: 40151

Other Resources



Noelle Temple
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Elia Cueva
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Questions are welcome. **Concerns** should be reported.
Integrity is everyone's responsibility.

This Code of Conduct does not create a contract of employment, nor is it intended to provide any expressed or implied rights of continued employment. Conduct, contrary to the Code of Conduct, will result in an investigation and possible disciplinary action, up to and including termination.