

CONFLICT OF INTEREST AND DISCLOSURE

PCOM has developed a disclosure program to assist in the effective implementation of its compliance objectives, by encouraging individuals to raise compliance concerns for internal investigation. The Institutional Compliance Committee and Chief Compliance Officer oversee PCOM's compliance with the legal and regulatory requirements, Code of Conduct and internal written standards of conduct applicable to PCOM operations. All PCOM community members are required to promptly report any conduct that a reasonable person would, in good faith, suspect to be fraudulent, unlawful, improper or erroneous, or in violation of the PCOM Code of Conduct, or other PCOM Standards of Conduct.

REPORTING HOTLINE

PCOM has established a Hotline for reporting suspected violations of the PCOM Code of Conduct or unlawful behavior. Reports may be made anonymously. The Hotline number is (844) 337-3613 or online at [pcom.ethicspoint.com](https://secure.ethicspoint.com/domain/media/en/gui/52917/) (<https://secure.ethicspoint.com/domain/media/en/gui/52917/>). (<https://secure.ethicspoint.com/domain/media/en/gui/52917/>) The PCOM Hotline is accessible 24 hours a day, 365 days a year, for any individual wishing to report a concern. The Hotline number is posted in conspicuous locations throughout the PCOM campuses and in the Healthcare Centers.

Concerns reported to the Hotline will be reviewed and investigated in accordance with PCOM policies. Individuals may also contact the PCOM Chief Compliance Officer directly at:

Philadelphia College of Osteopathic Medicine

4190 City Avenue

Philadelphia, PA 19131 215-871-6826

[pcom.ethicspoint.com](https://secure.ethicspoint.com/domain/media/en/gui/52917/) (<https://secure.ethicspoint.com/domain/media/en/gui/52917/>)com