Overview

DoxApply, Inc. (“DoxApply” “Organization” or “our”) takes hospital applications fraud, misrepresentations, or other inappropriate acts or omissions in connection with an application using our services seriously. DoxApply monitors instances of alleged fraud perpetrated on our websites, our mobile phone applications, our portals, our application and privileging forms, our recommender forms, and across all the services that DoxApply provides (collectively, the “Solution”). This includes but may not be limited to alleged fraud that DoxApply identifies, allegations of fraud by a Reporting Individual or Reporting Member, misrepresentations, or other inappropriate acts or omissions in connection with hospital privileging application by a Registered User.

DoxApply’s Terms of Use Policy expressly prohibits Registered Users from using our Solution for any fraudulent, unlawful, deceptive, or other harmful or injurious purposes, including but not limited to the transmission of materially inaccurate or untrue information through the Solution. Consistent with DoxApply’s Terms of Use and Privacy Policy, in our sole discretion, DoxApply reserves the right to limit, restrict, or terminate access to the Solution by any Registered User alleged to have engaged in Fraud or other misuses on a temporary or permanent basis. DoxApply also reserves the right to disclose information from or about a Registered User or in connection with an application as required by law and consistent with our Privacy Policy, which can be accessed elsewhere in the DoxApply website.

Scope

This policy applies to all Registered Users, Reporting Individuals, and Reporting Members of DoxApply’s Solution.

Fraud

DoxApply defines Fraud as an intent to deceive, mislead, or otherwise perpetuate misinformation upon a DoxApply member regarding the application of privileges. An alleged act of Fraud generally occurs, for example, when information is entered by a Registered User into the Solution intending to deceive or mislead a hospital or healthcare organization. Fraud may occur in the following circumstances, without limitation:

- Submitting fabricated or materially misleading letters of recommendation; • Submitting fabricated, untrue, or otherwise inaccurate transcripts;
- Materially misrepresenting an individual’s background, role, job title, or other qualifications;
- Perpetuating a false identity and/or using fictitious or materially inaccurate applicant,

peer, or contact information;

Registered User

An individual who opts to register an account using the DoxApply Solution and agrees to provide accurate, complete, and up-to-date information submitted through the DoxApply Solution. Registered Users may include, for example, first time privileging or reappointment applicants.

Reporting Individual

An individual who reports to DoxApply an instance of Fraud or alleged Fraud by an applicant or other Registered User in connection with an application.

Reporting Member

A hospital or healthcare organization that reports to DoxApply an alleged Fraud by an applicant or other Registered User in connection with an application.

Identification and/or Report of Alleged Fraud

DoxApply is committed to creating a hospital/healthcare organization privileging application Solution that ensures access, equity, and integrity in the privileging process for DoxApply members, applicants, and recommenders. DoxApply also recognizes the emotional and practical challenges of the privileging process for many applicants. As such, DoxApply provides education and reminders to applicants regarding the risks and consequences of Fraud.

When DoxApply identifies or receives a report of alleged Fraud from any Reporting Individual or Reporting Member, DoxApply will adhere to the following steps:

- DoxApply will provide written notice to the Registered User alleged of fraud. This notice shall state that DoxApply received an allegation of fraud from [the source identified by name] in connection with an application and is taking reasonable efforts to determine if DoxApply's Terms of Use have been violated.
- Upon such reasonable efforts to investigate whether the alleged fraud occurred, DoxApply may communicate with the Reporting Member or the Reporting Individual to share information about the investigation, as appropriate under the circumstances.
- DoxApply will subsequently share our determination regarding the investigation of the alleged fraud with the accused Registered User. If DoxApply determines that Fraud has occurred, DoxApply will notify the Registered User and provide the basis for the fraud determination.
- A Registered User who receives notice that DoxApply has determined a violation of our Terms of Use occurred shall be provided an opportunity to appeal DoxApply's decision within ten (10) business days from the date of DoxApply's written notice by submitting a

written statement and any relevant supporting documentation refuting the Fraud determination or otherwise explaining the circumstances around the misconduct. • Within fourteen (14) business days of receiving a Registered User's statement and supporting documentation, DoxApply will review the Registered User's submission and, as applicable, contact relevant parties for additional information or take other actions as deemed appropriate.

- Subsequent to the conclusion of the 14-day review period, DoxApply will make a final determination regarding whether the Registered User has violated our Terms of Use or committed Fraud as defined in this Policy and will communicate its findings to the Registered User and Reporting Individual in writing.

Other Considerations

DoxApply does not guarantee confidentiality or anonymity to any Reporting Individual. In making reasonable efforts to investigate if an alleged Fraud occurred, DoxApply will maintain confidentiality to the greatest extent possible. In DoxApply's sole discretion, DoxApply may disclose or withhold the name of a Reporting Individual or Reporting Member from disclosure to the Registered User who is alleged of Fraud and/or other relevant parties.

Upon request by a Reporting Member or on our own volition, DoxApply may, in our sole discretion and consistent with our Privacy Policy, disclose to the member hospitals or healthcare organizations on the Registered User's "hospitals list" that Registered User's name and DoxApply's findings regarding the Registered User's alleged conduct.

DoxApply will not facilitate dialogue or information sharing amongst the Reporting Member or Reporting Individual, other members, or related third parties.

DoxApply does not require members to report to us every instance of alleged Fraud, but members may do so consistent with the member's own internal fraud detection protocols.

DoxApply also will not independently judge, evaluate, conduct any verification of, or perform an investigation on any information provided on or about a applicant and/or application from a Reporting Member, except to the extent required to address misuse of the DoxApply Solution consistent with this Policy and our Terms of Use. Any determination made or action taken with regard to the disposition of an application by a Hospital/Healthcare Organization for any reason is undertaken solely at the discretion and risk of the member.

Actions Subsequent to a Fraud Determination

Registered Users who have been determined to have engaged in Fraud will be immediately notified by DoxApply in writing, via their registered email account of the Fraud determination and subsequent actions resulting from such a determination.

DoxApply in its sole discretion may take action as a result of a Fraud determination which may include permanent suspension, temporary suspension, or termination of their DoxApply user account, and disclosure of the Fraud to the Registered User's "Hospitals List."