



Subject: Code of Conduct
Department: Compliance
Authorized by: Board of Members
Procedure #: 03
Effective Date:
Last Revision:

Purpose:

The Employee Code of Conduct policy outlines our expectations regarding employees' behavior towards our members, their colleagues, and overall organization. This code of conduct also outlines our obligation to the federal government and the laws governing the Medicare program.

Policy:

The health care industry in the United State is one of the most complex and regulated. To ensure we have a common understanding of how our values apply to our business decisions and what legal requirements and ethical behaviors we are responsible for, this Code of Conduct ("Code") has been created. The Code applies to all employees and understanding and adhering to it is critical to the Medical Group/IPA's continued success and the fulfillment of our mission.

The Code of Conduct provides us with guiding principles and resources for when we need more information or assistance. By adhering to our Code, we exemplify what it means to do the right thing for our Medical Group/IPA, our members, each other, and our stakeholders.

This document is your guide in understanding and following MG's high standards of business conduct.

Scope:

This policy applies to all our employees, regardless of employment agreement or rank, business partners and Board Members.

Policy Elements:

A. The Basic

1. Legal, Regulatory, Accreditation, and Ethical Requirements

The Medical Group/IPA provides health care coverage options to members in its approved service area. Our business is subject to numerous federal, state, and local laws and regulations, which have specific licensure and other requirements.

Justifiably, we have immense pride in ourselves, each other, our business, our customer service, and our commitment to our community. Thus, we must conduct all of our business in a professional, legal, and ethical manner, complying with both the letter and the spirit of the law. Henceforth, all employees will receive a training (90) days from hire and annually thereafter with the materials within the Code of Conduct and attested through the Employee Handbook.

The purpose of our Code is to provide general guidance on subjects of wide interest within our company, but not everything can be covered in as much detail as is necessary in just one document. In our Code we have attempted to provide an overview of our general values and standards. Where applicable, we provide references to other resources, like the law, or the Medical Group/IPA's policies and procedures, so that you can get more detailed information.

2. How to Get Help

If you are faced with an issue or decision about which you are not sure, consult this Code, the Medical Group/IPA's policies, your supervisor, and/or the appropriate department, for example Compliance. Our Code is not intended to cover every situation. We must comply with all applicable laws, regulations, and our policies whether or not addressed in our Code. Wherever the Medical Group/IPA has an internal policy that is stricter than what is required by law, you should follow Medical Group/IPA's policies and procedures.

The Medical Group/IPA's leadership has an open-door policy and there are many resources available to help you attain information and do what is right. Look to the last page of the Code for a list of aids and contact information.

3. How to Make the Right Decision

If you are unsure of the right thing to do, ask yourself the questions below. Considering these questions will help you maintain your personal integrity and the best interests of the Medical Group/IPA.

- a. Do I have enough information to make a good decision?
- b. Is my action or inaction consistent with the Medical Group/IPA's Code, values, mission, policies, or the law?
- c. Is my decision honest and fair?
- d. Would my decision appear inappropriate to others?
- e. Would I be embarrassed to see my decision on the local news?
- f. Would I feel proud to tell my colleagues, family, or friends about my decision?

- g. Would my decision negatively affect our organization, my colleagues, or our stakeholders, including members, providers, vendors, or the community?
- h. Would my decision harm my reputation?

If you are still unsure of the right thing to do, feel free to ask the Compliance Department for advice.

4. Raising Concerns

We all have an obligation to report any suspected or observed misconduct, including violations of the Code, the Medical Group/IPA's policies and procedures, laws and regulations, and other ethical concerns. Reporting suspected or observed misconduct or other ethical concerns is a condition of employment. We must be committed to do the right thing, which means always speaking up when you have a concern, even if you are not sure your concern is valid.

All reports of an ethical violation must be made in good faith or without malice. Do not make an ethics report if you do not believe in good faith that the Code, policies and procedures, laws and regulations or ethics have been violated. Any colleague who deliberately makes a false accusation with the purpose of harming or retaliating against another colleague is subject to disciplinary action.

5. How to Report Concerns

If you are an employee, first, contact your manager for help. If you do not want to discuss the concern with your manager or if a concern raised with your manager has not been resolved or if a concern involved your manager, report your concern to the Compliance Department, using the options below.

The Medical Group/IPA's stakeholders, including members, providers, business partners, and others are also encouraged to report their concerns.

- a. **In-Person:** The Compliance and Human Resources Departments have open door policies. You should feel free to visit them any time to discuss your concerns in person.
- b. **Telephone:** The Medical Group/IPA has a Compliance Hotline at 1-888-304-3848. The Hotline is answered from 9:00 am – 4:00 pm Monday through Friday. Voice Mail is available 24/7 and after hours. The Compliance Officer keeps all records confidential, assuring anonymity.
- c. **Email:** Your concerns can be emailed to the Compliance Department at Compliance@hanahoumedicalgroup.com. Note that it may not be possible for you to remain anonymous when reporting through email.

6. Things to Remember When Making a Report

When you report a concern, please provide as many details as possible. The Medical Group/IPA must have enough information to investigate. If we do not have enough

information, we may not be able to conduct as thorough an investigation or fix the problem.

If you choose to provide your contact information when making a report but request confidentiality, the Medical Group/IPA will make every effort to maintain your anonymity, to the extent permitted by law; however, anonymity cannot be guaranteed.

Reporting your good faith concerns is right thing to do and will help our organization end or prevent misconduct.

7. How Reports are Handled

We are committed to investigating all reported concerns promptly and confidentially, to the best extent possible. Depending on the concern that is reported, the appropriate department will investigate the allegation.

We expect all employees to cooperate with both internal and external investigation efforts.

The results of investigations are handled in multiple ways. Where an investigation finds that there was a violation, it is the policy of the Medical Group/IPA to take appropriate action, including corrective actions, disciplinary measures, or implementing systemic changes to prevent similar violations in the future, among other things. The exact discipline that is utilized will depend on the nature, severity, and frequency of the violation. Possible disciplinary actions include but are not limited to corrective actions (including re-training or coaching, among others), oral warnings, written warnings, written reprimands, suspension, termination, and/or referral to law enforcement.

If you chose to obtain a confidential report number from our Medical Group/IPA's Hotline, you can check on the status of the investigation by calling the Hotline and providing that number.

If you provided your contact information when you made your report, the Medical Group/IPA will inform you, to the extent possible, whether the investigation was completed and if the issues were addressed. To protect your and other's confidentiality and privacy, we do not disclose the details of any personnel or disciplinary action.

8. Retaliation Not Tolerated

The Medical Group/IPA has a zero-tolerance policy for retaliation against those who make a report in good faith or participate in an investigation. We do not condone any act of retribution or retaliation against an individual who conscientiously seeks to follow and implement the Code, the Medical Group/IPA's policy, laws, and regulations. We take all claims of retaliation seriously, investigating each one thoroughly and taking appropriate action. If you think that you or someone you know has suffered retaliation, report it immediately.

9. The Special Responsibilities of Leadership

While the Code applies to all Medical Group/IPA employees, we expect leadership to set the example, the proper tone-at-the-top, and to be a model of integrity in every respect.

Those in leadership positions should create an environment where all team members are encouraged and feel empowered to raise concerns and propose ideas. We also expect that leadership will ensure their team has sufficient information, training, and resources to comply with applicable laws, regulations, policies, and to be able to resolve ethical dilemmas.

The Medical Group/IPA is committed to a culture that promotes the highest standards of compliance and ethics. That starts and ends with our leadership role models. We must never sacrifice ethical and lawful behavior in the pursuit of business objectives.

10. Waiver of the Code

Very rarely, requests for waiver of the Code may be granted. You may seek formal waiver of a specific requirement or obligation of the Code by submitting a written request to the Compliance Officer at Compliance@hanahoumedicalgroup.com. Do not take any action prohibited by the Code without first receiving a written waiver.

11. Disciplinary Action

Whether you are an associate, leader, or officer, you may be disciplined or lose your job if you:

- a. Do not follow this Code of Conduct
- b. Break any laws or regulations that apply to the Medical Group
- c. Tell an associate to violate the Code, a Medical Group policy, a law, or a regulation.
- d. Fail to share information or provide false information in connection to an investigation.
- e. Intimidate or retaliate against an associate who reports a suspected violation regardless of whether the report is made within Medical Group or to outside law enforcement or government agency.
- f. Neglect to address or report a violation of the Code, or a law or regulation, committed by you, a colleague or someone you manage.

B. Our Responsibilities to our Medical Group/IPA and Each Other

We all learned the golden rule as children, and it still applies today. We should treat each other as we want to be treated. It is as simple as that.

1. Workplace Matters

- a. Diversity, Discrimination, and Equal Opportunity

We actively seek the diverse participation of all those we work with to achieve success. We value every member of the Medical Group/IPA team and are committed to providing an inclusive environment where everyone is treated with fairness, respect, and dignity. We are accountable to one another because we treat each other and for the manner in which people around us are treated.

We recognize our differences and respect that everyone is unique. We understand and appropriately respond to the unique combination of variables that we embody, such as ability, age, ethnicity, experience, gender, race, sexual orientation, and socioeconomic status.

We are committed to recruiting and retaining a diverse staff reflective of the communities we serve. We strive to create and maintain a setting in which we celebrate cultural and other differences and consider them strengths of our organization. The Medical Group/IPA demonstrates cultural competency in that we are respectful of others with diverse values, beliefs, and behaviors.

The Medical Group/IPA's goal is to create an environment in which we can all grow, develop professionally, and work in a team environment in which all ideas are considered.

The Medical Group/IPA is an equal opportunity employer and no one shall discriminate against any individual with regard to race, color, creed, ancestry, religion, gender, national origin, age, sex, disability, sexual orientation, gender identity or expression, genetic information, veteran status, marital status, disability status, or medical conditions, including AIDS/HIV, pregnancy, or any other status or characteristic that is protected under law. All employment is decided based on competencies, merits and business need.

We ensure our discrimination and equal opportunity policies are followed during hiring, promotion, termination, or any other aspect of employment. The Medical Group/IPA is committed to assisting with reasonable accommodations for those with specific religious requirements or disabled employees with known physical or mental limitations.

Acting in accordance with these guidelines shows respect, humility, and integrity while helping to create a positive work environment for everyone. Discrimination not only contradicts our values, it's also against the law.

b. Harassment and Bullying

We are committed to a workplace free from harassment and bullying. We forbid discriminatory harassment with respect to race, color, religion, sex, gender, gender identity, age, national origin, marital status, sexual orientation, veteran

status, disability, genetic information, or any other characteristic protected by federal, state, or local laws.

Sexual harassment is absolutely prohibited. It may take many forms, including unwelcome sexual advances, requests or demands for sexual favors or in conjunction with employment decisions, and other visual, verbal, or physical conduct of a sexual or gender-based nature. Degrading or humiliating jokes, slurs, intimidation, or other harassing conduct that creates an intimidating, hostile, or offensive work environment is not acceptable in our workplace. The Medical Group/IPA has a zero-tolerance policy for this behavior.

Abusive, bullying conduct, including insults; derogatory remarks and epithets; threatening, intimidating, or humiliating verbal or physical conduct; and other similar behaviors are not tolerated and will be dealt with in the same manner as any other types of prohibited harassment.

c. Substance Use

Our workplace must remain free of the influence of alcohol, marijuana, illegal drugs, misused prescription drugs and over-the-counter medications, and any other substance that may impair our ability to act safely and effectively while at work. Additionally, Medical Group/IPA employees shall not be under the influence of drugs, alcohol, or any other substance that may impair their abilities while engaged in Medical Group/IPA matters outside of the workplace. The Medical Group/IPA may administer drug testing as a means of enforcing this policy under certain circumstances including:

- As part of pre-employment screening
- As part of a physical examination
- Under reasonable suspicion, based on evidence
- During post-accident testing

We are prohibited from possessing, selling, manufacturing, or distributing illegal drugs on company property and during work time at any location. In addition, we are not allowed to keep illegal substances in our vehicles while on company-owned property.

While alcohol may be consumed on the premises or served at company events, we expect the Medical Group's employees to use good judgment and never drink to the point where their professional conduct or any aspect of our Code is compromised.

d. Health and Safety

Do not tolerate any threats, threatening language or any other acts of aggression or violence made toward or by any the Medical Group's employee. Colleagues who observe or experience any form of work-related harassment or violence should report the incident to their manager and the Human Resources

Department immediately. In emergency situations or if you perceive a threat to be imminent, call the police, fire, or emergency medical services first by dialing 9-1-1, then contact your manager and others.

e. Relationships and Personal Causes

The Medical Group/IPA's facilities comply with all applicable government regulations and rules that promote the protection of workplace health and safety. Our policies have been developed to protect ourselves and our stakeholders from potential workplace hazards.

We must familiarize ourselves with and understand how our safety policies apply to our specific job responsibilities and seek advice from leadership whenever there is a question or concern. It is important that we immediately advise our supervisor and the Human Resources Department of any serious workplace injury or any situation presenting a risk of injury so timely corrective action may be taken to resolve the issue. If a safety issue is an emergency or imminent threat of health or safety, call the police, fire, or emergency medical services first by dialing 9-1-1, then contact your manager and others.

Workplace health and safety also encompasses incidents of workplace violence. The Medical Group/IPA will not tolerate violence or threats of violence in any form in the workplace, at work-related functions, or outside of work if it impacts the workplace. In addition, weapons of any kind are not allowed in the workplace or on workplace property unless a specific waiver is granted.

Your immediate family members, significant others, and individuals in your household must never improperly influence your business decisions. These relationships require extra sensitivity to conflicts of interest and confidentiality.

The Medical Group/IPA is committed to supporting our community in several ways and is proud that many of our employees give back to our community through donations and volunteer work. While it may seem natural to ask those that we know to donate or participate, we should recognize that it may be uncomfortable or even offensive to be subjected to pressure to support our colleagues' personal causes. Thus, we may not solicit other employees or distribute non-work-related literature or materials during work time and in work areas. Requiring Medical Group/IPA employees or other stakeholders to participate in non-work-related activities, whether inside or outside the office, is not permitted.

Solicitation or distribution for any purpose by non-Medical Group/IPA employees is not allowed on company property unless prior approved by senior leadership. Distribution includes distributing or posting literature, pamphlets,

chain letters, personal business cards or any other written or printed material of any kind, include e-mail. In addition, the use of office supplies for non-company sponsored solicitation activities is not allowed.

2. Confidentiality and Privacy

Confidential information about the Medical Group/IPA, its strategies and operations, and information about our colleagues, customers, and business partners, must be protected and is of utmost importance. We should protect the company's confidential and proprietary information, including nonpublic information entrusted to us as employees by our members, providers, and other business partners. Only access, use, or disclose confidential and proprietary information, whether or not it is classified as confidential or proprietary, as needed to perform your job responsibilities.

The Medical Group/IPA's facilities comply with all applicable government regulations and rules that promote the protection of the workplace health and safety. Our policies have been developed to protect ourselves and our stakeholders from potential workplace hazards.

We must familiarize ourselves with and understand how our safety policies apply to our specific job responsibilities and seek advice from leadership whenever there is a question or concern. It is important that we immediately advise our supervisor and the Human Resources Department of any serious workplace injury or any situation presenting a risk of injury so timely corrective action may be taken to resolve the issue.

3. Fraud and Waste

At the Medical Group/IPA, we are honest and truthful in all of our dealings. While anyone can make an honest mistake, fraud is different. Fraud is not a mistake and involves deliberate deception. Not only is fraud unethical, it is also illegal. We will not falsify information, submit false reports or information, or improperly change company records, among other fraudulent activities, to the government or anyone else.

The Medical Group/IPA has a fraud and waste program that is designed to prevent, detect, and reduce fraud, waste, and abuse among employees, providers, Business Partners, and others. We are entrusted with the monies and resources of our stakeholders, including the government, and must safeguard and use all these resources effectively, conservatively, and wisely.

4. Protecting Assets

Any use of the Medical Group/IPA's resources for personal or financial gain unrelated to the Medical Group/IPA's business is prohibited. Employees must protect all of the Medical Group/IPA's assets, both tangible and otherwise. Assets include time, supplies, money, and equipment. For instance, falsifying your time sheet or submitting bogus reimbursement requests is fraudulent and prohibited.

Among the Medical Group/IPA's most valuable assets are its stakeholder and proprietary information and intellectual property. These assets provide the Medical Group/IPA with a competitive advantage and help us provide excellent service. We will protect these assets against theft, loss, or other misuse. We also respect the intellectual property rights and information of third parties.

Company assets must be maintained for business related purposes only. As a general rule, the personal use of the Medical Group/IPA's assets is not allowed. On occasion, and with prior leadership approval, the minimal use of resources, such as copying or telephones, where the cost to the Medical Group/IPA is insignificant, is permissible.

While it is not possible to define all the circumstances, examples of areas to follow include:

- a. Company Equipment and Communications — Computers, including use of email and internet, slack/instant messaging, as well as phones and cell phones, are for business use. While we recognize employees may use these tools occasionally for non-work out of convenience, we expect that you use your good judgment and that it never interferes with your ability to perform your job. Keep in mind that communications are not private and there should be no expectation of privacy.
- b. Any information (including personal information) on Company devices or systems is potentially recoverable by the Medical Group in the event of legal action or investigations.
- c. All use of company-provided communications systems, including e-mail and internet use (includes social media), as well as any other information the Medical Group employees create, transmit, or possess, must adhere to our Code of Conduct. This includes but is not limited to our policies of Unlawful Discrimination and Harassment; Restricted, Confidential and Proprietary Information; and Conflicts of Interest.
- d. Social Media — If you post something on your own blog, webpage, social networking, Twitter or similar site or on someone else's, and you mention the Medical Group and also express either a political opinion or an opinion regarding the Medical Group's actions that could pose an actual or potential conflict of interest with the Company, you must include a disclaimer. You should specifically state that the opinion expressed is your personal opinion and not the Company's position. Content must adhere to our Code of Conduct.
- e. Follow all IT Security Policies. If you lose your laptop, cell phone or think IT Security is compromised in any way, immediately report it to IT.
- f. Follow the PHI and Office Security Policies — Keep laptops and other company equipment secure. Adhere to building security entry process, wear your id badge while on the premises and register and host all the Medical Group visitors. You

must properly handle PHI. Do not enter any protected health information in any system that is not approved by the company as HIPAA compliant. Immediately report any suspicious activity or potential breaches to the privacy officer.

- g. Financial Integrity — Use good judgment regarding company finances, including how you spend money, contracts you enter and adherence to internal Financial controls and Travel and Expense policies.
- h. All items such as the Medical Group’s manuals, reports, records, and statements are the property of the company and must be kept at the company, unless removal has been properly authorized. Paper business records should be avoided whenever possible and shredded as soon as no longer needed.
- i. To maintain building security and in connection with any investigation, the Medical Group reserves the right to search company property such as desks, cabinets, or other storage areas and inspect items found inside such areas. The Medical Group also reserves the right to inspect any and all packages entering and/or leaving our premises.

C. Our Responsibilities to our Medical Group/IPA and our Stakeholders

The Medical Group/IPA has multiple stakeholders, including our Board of Directors, owners, colleagues, members, providers, business partners (including brokers, vendors, and contractors), the government, and our community. We are committed to each of our stakeholders in many ways.

1. Subscribers and Members

The Medical Group/IPA has the privilege of serving a diverse population of stakeholders, including our members. With this privilege comes the responsibility of considering and respecting their cultural and communication needs and values.

a. Discrimination, Diversity, and Cultural Competency

The Medical Group/IPA has the privilege of serving a diverse population of stakeholders, including our members. With this privilege comes the responsibility of considering and respecting their cultural and communication needs and values.

Our goal is to provide culturally appropriate health care coverage and customer service that incorporates the diversity of health beliefs, practices, and communication preferences of our membership. The Medical Group/IPA does not discriminate against members based on their sex, age, economic status, educational background, race, color, religion, ancestry, national origin, sexual

orientation, gender identity, marital status, coverage type, source of payment, or any other protected characteristic.

The Medical Group/IPA demonstrates cultural competency in that we are respectful and responsive to others with diverse values, beliefs, and behaviors. We consider the individual social, cultural, and linguistic needs of our members to interact effectively, and provide the highest quality of service and communication options, including interpretation and translations in multiple languages, resources for the visual and audio impaired, and other auxiliary aids.

2. Providers

The Medical Group/IPA is proud to partner with its network providers and seeks to support them so that they can focus on providing excellent care to our members.

The Medical Group/IPA does not discriminate against providers based on their sex, age, economic status, educational background, race, color, religion, ancestry, national origin, sexual orientation, gender identity, marital status, or any other protected characteristic.

3. Business Partners

We are committed to fair competition among our existing and potential business partners, including First Tier, Downstream, and Related Entities, such as brokers, vendors, suppliers, and contractors. We strongly encourage our business partners to adopt this Code or a comparable code for their industry and comply with it in performing their obligations under our contracts. Just as Medical Group/IPA employees are expected to treat our business partners fairly, business partners are expected to conduct business professionally and to follow applicable laws, regulations, and applicable Medical Group/IPA policies and requirements.

Only those employees that are authorized to enter contracts on behalf of the Medical Group/IPA may do so. Additionally, selecting business partners must be done fairly and objectively. Factors to consider include the Medical Group/IPA's purchasing policies, the best interests of the Medical Group/IPA, affordability, and quality, among other aspects.

When you contract with a business partner on behalf of the medical group, you are responsible for making sure they follow the Medical Group/IPA's applicable policies and other requirements and that they are providing the Medical Group/IPA the promised goods or services. If you have concerns about a business partner, speak to your manager and/or the Compliance Department.

a. Procurement

The Medical Group/IPA has negotiated contracts with business partners that enable us to purchase products and services that provide consistent quality at a discounted rate. Where the Medical Group/IPA has identified select business partners, using only those will help reduce costs and improve quality. See the Human Resources Department for more information about approved business partners.

b. Supporting Small and Local Businesses

As a proud local business itself, the Medical Group/IPA seeks to support other small local businesses whenever possible.

4. Industry Relations

The Medical Group/IPA does not compete against others unfairly. We do not seek to gain an edge through unfair competition. We comply with all antitrust laws and never make agreements with competitors that create monopolies or stifle competition. We do not illegally obtain or use proprietary information from competitors, nor do we use deceptive or illegal means to gain such information.

5. Government Relation

Health care is a highly regulated industry, and the Medical Group/IPA embraces the additional legal and compliance responsibilities placed on us as a health plan. Our culture is one on honesty and doing the right thing, the first time, every time.

a. Government Requests and Inquiries

The Medical Group/IPA must cooperate with government officials and must always provide accurate, complete, and timely information to all government entities. Types of government reporting include but are not limited to claims, cost reports, corrective action plans, and other filings. All requests for information, subpoenas, and filings from the government must be coordinated with the Compliance Department and/or Legal Counsel unless prior approval has been provided.

If you discover or suspect that information that was provided to the government was in error or there was an omission, you should immediately report this to your manager and to the Compliance Department so that the Medical Group/IPA can quickly correct the situation.

Nothing in our Code of Conduct or policy prohibits you from reporting to, or responding to an inquiry from, a governmental authority about a suspected violation of law.

b. Doing Business with the Government

The Medical Group/IPA has a contract to provide health care coverage to government health care program beneficiaries. This contract and other laws must be complied with not only because it is required, but also because it is the right thing to do. The risks of non-compliance are very high. If you are unsure of what your responsibilities are related to the government contract or have concerns about misconduct, please speak to your supervisor, or reach out to the Compliance Department.

c. Government Employees

Recruiting and hiring former and/or current government employees are subject to changing rules that can vary based on the rank of the employee. The Medical Group/IPA must exercise good judgment to ensure that no conflict-of-interest law is violated when considering employing or contracting with a government employee. The Human Resources and/or Compliance Departments should be consulted when considering employment or contracting with government employees and contractors.

d. Professional Licensure Requirements

If you are professionally licensed or certified, you are responsible for all requirements, keeping these credentials up to date, and ensuring you timely meet all continuing education requirements.

6. Media Relations

To avoid confusion and ensure accurate information is provided, only designated the Medical Group/IPA's senior leadership may communicate with the media or in a public relations capacity. Any media inquiries or requests should be referred to the Marketing Department.

a. Social Media

We are responsible with social media. We never post member or other information or photographs to a Web site, social media page, or public forum – even if that information cannot be personally identified.

We do not use our personal devices, phones, or email to send the Medical Group/IPA confidential and member private information for any reason unless prior approved by leadership and only for specific short-term purposes.

7. Our Community

The Medical Group/IPA has a responsibility to have a meaningful and lasting impact and to better our community.

a. Charitable Contributions and Community Service

The Medical Group/IPA is committed to providing monetary, in-kind, and volunteer charitable contributions to multiple organizations in our community. We have a special focus on issues and organizations concerning health and wellness. The Medical Group/IPA provides funding through donations and community grants. For more information see the Marketing Department.

8. Conflicts of Interest

Conflicts of interest can occur when you, your immediate family, a household member or other relationship, outside activity, or financial or private interest interferes or appears to interfere with, your ability to make objective decisions in your role at the Medical Group/IPA.

While it is not possible to define all the circumstances and relationships that might create a conflict of interest, examples of areas to avoid include:

- a. Simultaneous employment — including Board seats and advisory roles, by another company that is a competitor, client-of or vendor-to the Medical Group.
- b. Business relationships — carrying on Medical Group business with a company in which you, or a close relative, has a substantial ownership or interest; or holding a substantial interest in, or participating in the management of, a vendor to which Medical Group makes sales or from which it makes purchases.
- c. Civic duties — participating in activities in a manner that divulges confidential Medical Group information; voting/deliberating as an elected official on a decision affecting Medical Group.
- d. Borrowing money — from customers or firms, other than recognized loan institutions, from which Medical Group buys services or supplies.
- e. Accepting or giving substantial gifts (over \$50 cash value per individual) or excessive entertainment (over \$300) from/to an outside organization or agency.
- f. Speculating or dealing in materials, equipment, supplies, services, or property purchased by the company.
- g. Misusing privileged information or revealing confidential data to outsiders.
- h. Using your position at Medical Group or knowledge of its affairs for personal gain.
- i. Engaging in practices or procedures that violate antitrust laws, commercial bribery laws, copyright laws, discrimination laws, campaign contribution laws, or other laws regulating the conduct of company business.
- j. Giving preferential treatment to family, friends, or individuals you may be romantically involved with who work at Medical Group.

If you face a situation where you are in doubt about how to proceed or there is the potential to create a personal incentive or the appearance of a personal incentive at the expense of the Medical Group, you should discuss immediately with your manager and Compliance.

9. Privacy and Confidentiality

Protecting personal information is of the utmost importance to our business. We have an obligation to always comply with all applicable privacy and information security laws.

For guidance on what information should be guarded and how it should be guarded, review the applicable privacy and security policies and procedures. Never hesitate to ask your manager, other leadership, and/or the Compliance Department if you have any concerns or suspect information has been mishandled.

We must ensure we understand specifically how we should handle information as part of our day-to-day responsibilities. When we must access private information as part of our job duties, we always access or use only the minimum amount of information needed to do our job.

We have an obligation to report any concerns about compliance with privacy and information security. If your laptop or other items with private information are lost or stolen, you must report it immediately to your supervisor. If you suspect an incident or breach of information has occurred, you must report it immediately to your supervisor and the Compliance Department. Never use personal email, your phone, or other non-work devices to conduct company business or send confidential or private information.

Always safely store, access, and disclose private information only in compliance with the Medical Group/IPA's policies and procedures and the law.

- a. The Medical Group keeps confidential and proprietary information about our organization, health plans, our Members, associates, and all those who do business with us safe from inappropriate access, use or disclosure. Restricted information includes:
 - Our member payment card information (credit card/bank account numbers)
 - Member information, including: Name, address, date of birth, gender, Social Security or ID number, member ID number, Medicare unique identifier, financial, health or other information about the member that is not public
 - Proprietary and nonpublic information about the Medical Group or its associates, customers, suppliers, and providers.
 - Any information that could help or harm our ability to meet our business goals.
 - System credentials (user ID and password).
 - Confidential information about Medical Group that is nonpublic sensitive information. If you are unsure if information is not for public consumption or sensitive, ask your manager or the Medicare Compliance Officer
 - Comply with the Medical Group's Information Security Policy and Standards

- b. The Medical Group employees are responsible for protecting such information. To ensure the security of such information, the Medical Group should:
- Access, use, view or send confidential information within the Medical Group only if we are authorized and there is a valid and approved business reason to do so.
 - Do not reveal restricted, confidential, or proprietary information to anyone outside the Medical Group unless required for legitimate business reasons and approved by management, internal legal counsel, or the Privacy Officer
 - Share only the minimum information necessary to meet business needs.
 - Lock up paper documents when not in use.
 - Encrypt all restricted and confidential information sent or stored electronically outside of the Medical Group
 - Comply with Medical Group's Information Security Policy and Standards
 - Properly dispose of all information when information is no longer needed.

10. Gifts and Entertainment

Giving or receiving gifts, entertainment, or other business courtesies, such as tickets, meals, travel expenses, gift cards, and gift baskets is generally inappropriate and, in some cases, unethical or illegal.

In some cases, items may need to be refused or returned. Items that are perishable such as food or flowers may be donated to a charity or shared in the workplace.

We must avoid the perception that we allow these kinds of perks to influence our decisions. See the gifts and entertainment policies and procedures for information or your supervisor or the Compliance Department for guidance before giving or receiving these items.

11. Sustainability and the Environment

The Medical Group/IPA is dedicated to environmental sustainability. A healthy environment has a direct impact on our individual and community health. We should reduce our environmental impact when possible by reducing waste, participating in recycling programs, conserving energy and water, using renewable sources, and supporting businesses that hold the same beliefs.

Dispose of surplus, obsolete, or inoperable property in accordance with applicable health and safety requirements.

D. Our Responsibilities to Conduct Business Ethically

1. Marketing, Advertising, Sales, and Promotions

Special trust is placed on those in the health care industry. We must continue to deserve that trust by conducting all marketing, pricing, and sales activities in an honest, fair, and straightforward manner that represents our integrity and is compliant with all applicable laws.

All Medical Group/IPA information is presented in an informative, educational, and non-deceptive manner. We are committed to truth in advertising. All applicable advertising and other materials will be reviewed and approved by regulators as appropriate prior to distribution.

Additionally, we do not offer or give discounts, incentives, gifts, or other unallowable items of value for referrals, enrollment, or continued enrollment.

2. Political Activities and Contributions

The Medical Group/IPA is subject to certain rules under Internal Revenue Service and other regulations. While serving in your role as a Medical Group/IPA employee, you must seek the advice of the Compliance Department and/or Plan Legal Counsel prior to making political campaign contributions in the name of the Medical Group/IPA or in your role as an employee of the Medical Group/IPA.

If you are an employee of the Medical Group/IPA and are personally involved in politics, you must be sure to express your political views as an individual and not as a representative of the Medical Group/IPA. Your personal political activities or donations must occur on your own time and at your own expense, away from Medical Group/IPA's property.

3. Record Retention

The integrity of our books, records, and financial and other reporting information is a high priority. The Medical Group/IPA maintains a record creation, retention, and destruction policy that complies with all applicable laws, regulations, and best practices.

Documents and records you handle must be created, retained, and deleted according to the processes defined in our policy. Special rules apply when Legal Counsel asks you to hold on to certain records. Always err on the side of caution and do not delete or destroy information if you are unsure. See your manager and/or the Medical Group/IPA's Legal Counsel for guidance.

The Medical Group/IPA is accountable for maintaining delegated functions and employee documents (i.e. exclusion screening, training, etc..) for a period of 10 years.

Referenced Documentation:



