

## Code of Conduct

An important component of the Compliance program is a Code of Conduct. The Code of Conduct sets out basic principles which all Physician Health Partners (PHP) and its associates must follow. This Code applies to all business operations. Non-employed representatives of PHP, such as external advisors and consultants, providers and business associates are also directed to conduct themselves in a manner consistent with this Code of Conduct.

One of PHP's strongest assets is a reputation for integrity and honesty. Achieving business results by illegal acts or unethical conduct is not acceptable. PHP depends upon and requires its associates to bring compliance issues to the attention of their supervisors or a member of the Compliance team. If uncertainty exists, individuals should err on the side of reporting the issue so that it can be resolved. Failure by management to report any compliance issues brought to their attention will result in disciplinary action.

If any associate would prefer to report the problem anonymously, they may do so by making a report to the Compliance Hotline via phone: 833-254-2025. No action will be taken against any employee for reporting potential violations.

The following general principles apply to every employee. Employees shall apply the principles set forth in this plan in determining whether their conduct meets the standards adopted by PHP.

### **Promote a Culture of Compliance**

PHP is committed to fostering a culture of ethics and legal compliance. Retaliation against any participant for reporting a suspected compliance violation is strictly prohibited. Participants are expected to:

- Learn and follow the laws, regulations, contracts, and PHP policies and procedures applicable to job functions and PHP activities
- Be proactive to prevent and detect any compliance violations
- Report suspected violations to supervisors or other PHP officials
- Ensure that reports of violations within their area of responsibility are properly resolved
- Ask questions

### **Act Ethically and with Integrity**

Ethical conduct is a fundamental expectation for every participant. In practicing and modeling ethical conduct, participants are expected to:

- Act according to the highest ethical, personal, and professional standards of conduct
- Be personally accountable for individual actions
- Conscientiously fulfill obligations
- Communicate ethical standards of conduct through questions, instruction, and example

## **Be Fair and Respectful to Others**

PHP is committed to tolerance, diversity, and respect. When working with others, participants are expected to:

- Embrace diversity and respect others without regard to race, color, religion, sex, gender, national origin, age, disability, sexual orientation, or political affiliation
- Speak candidly and truthfully, while also being fair, respectful, and civil in interaction
- Promote conflict resolution
- Reject and advocate against all forms of harassment, discrimination, threats, and violence
- Advocate for underrepresented individuals
- Promote inclusion, equity, and compassion

## **Manage Responsibly**

Managers and supervisors are expected to:

- Ensure access to and delivery of proper training and guidance on applicable workplace and educational rules, policies, and procedures, including this Code of Conduct
- Ensure compliance with applicable laws, policies, and workplace rules
- Review performance conscientiously and impartially
- Foster intellectual growth and professional development
- Remind employees that compliance and ethics are integral in primary in day-to-day work
- Lead by example: model ethics and integrity in all interactions
- Promote a healthy, innovative, and productive atmosphere that encourages dialogue and is responsive to concerns

## **Protect and Preserve PHP Resources**

PHP is dedicated to responsible stewardship of its reputation and assets. Participants are expected to:

- Use property, equipment, finances, materials, systems, and other resources only for legitimate business purposes
- Prevent and identify waste and abuse
- Promote efficient operations
- Follow sound financial practices including accurate financial reporting, asset protection processes, and responsible fiscal management
- Engage in appropriate accounting and monitoring

## **Avoid Conflicts of Interest**

Participants have an obligation to be objective and impartial in making decisions on behalf of PHP. To ensure this objectivity, participants are expected to:

- Identify and avoid individual or company conflicts of interest
- Disclose potential conflicts of interest and adhere to any management plans created to eliminate these and other conflicts
- Ensure personal or professional relationships do not interfere with objective judgment in decisions affecting PHP

### **Carefully Manage Confidential Information**

Participants are the creators and custodians of many types of information. The right to access this information and an individual's right to privacy are both governed by laws and PHP policies. To meet these responsibilities, participants are expected to:

- Learn and follow laws, policies, and agreements regarding access, use, protection, disclosure, retention, and disposal of confidential information
- Follow document preservation and retention guidelines
- Maintain data security using electronic and physical safeguards
- Follow document preservation and retention guidelines

### **Promote Health and Safety in the Workplace**

Participants have a shared responsibility to ensure a safe, secure, and healthy environment for all PHP patients, customers, and visitors. Participants are expected to:

- Follow safe workplace practices and report accidents, injuries, and unsafe situations
- Report suspicious activities