

CODE OF CONDUCT/APPROPRIATE BEHAVIOR IN THE WORKPLACE

Policy Statement

All associates are expected to conduct themselves professionally and to perform their duties diligently. Associates are expected to maintain appropriate and respectful working relationships with one another, as well as with patients, vendors, and others. Rules of appropriate conduct help protect everyone's rights and safety. When these policies are followed, they lead to efficient, pleasant, and productive working environments.

Scope

This policy applies to all associates.

Policy

Associates are expected to promote and maintain a high level of personal conduct and a high standard of performance. Physician Health Partners (PHP) expects and requires all associates to adhere to the guidelines described below.

Conduct that threatens or adversely affects the security, personal safety, or welfare of an associate, patients, or PHP's operations, is prohibited and will not be tolerated. Such conduct will subject an associate to corrective action, up to and including termination of employment.

It is not possible to list all the forms of behavior that are considered unacceptable in the workplace. The following are examples of infractions of rules of conduct that may result in corrective action, up to and including termination of employment:

- Theft or inappropriate removal or possession of property belonging to others without authorization
- Falsification of employment or timekeeping records or entering time for another associate
- Possession, distribution, sale, transfer, or use of alcohol or illegal drugs in the workplace, while on duty, or while operating PHP-owned or -leased vehicles or equipment
- Reporting to work in an impaired state due to the prior consumption of alcohol or drugs, including prescription drugs
- Sleeping or the appearance of sleeping on the job
- Fighting or threatening violence in the workplace including but not limited to punching, scratching, shoving, pushing, slapping, or biting
- Loud, unruly or disruptive activity in the workplace including but not limited to the use of profanity (cursing, cussing, swearing, obscenities or expletives) that can be overheard by others
- Negligence or improper conduct leading to damage of PHP-owned or client-owned property
- Insubordination (refusal to follow a job-related direct order from a supervisor)
- Disrespectful conduct toward any other associate(s), patient(s) or vendor(s)
- Violation of safety or health rules
- Smoking in prohibited areas
- Sexual harassment or other unlawful harassment or discrimination
- Possession of dangerous or unauthorized materials, such as explosives or firearms in the workplace
- Excessive absenteeism or any absences without proper notice

- Unauthorized absence from the work area during the workday
- Unauthorized use of telephones, computers, mail system, or other PHP-owned equipment
- Removing PHP property without authorization
- Unauthorized disclosure of business secrets or confidential information
- Violation of PHP policies
- Unsatisfactory job performance or misconduct

Associates should keep in mind that they are employed at-will and may be terminated at any time, without cause or advance notice.

Off-Duty Conduct

Illegal or inappropriate off-duty conduct by an associate that adversely affects PHP's legitimate business interests or an associate's ability to perform their job may result in corrective action, up to and including termination of employment.

CODE OF ETHICS

Policy Statement

PHP expects associates and representatives to conduct business ethically and to comply with all applicable laws and regulations.

Scope

This policy applies to all associates.

Policy

To promote and maintain a high level of personal conduct and high standard of performance, PHP expects and requires all associates to adhere to the guidelines described below.

Associates and all others involved with PHP's activities must adhere to and advocate for the following principles and responsibilities governing professional and ethical conduct:

- To act with honesty and integrity, avoiding actual or apparent conflicts of interest.
- To provide information that is accurate, complete, objective, relevant, timely and understandable.
- To comply with the laws of federal, state and local governments and the rules and regulations of other appropriate private and public regulatory agencies.
- To act in good faith, responsibly, with due care, competence and diligence, without misrepresenting material facts or allowing independent judgment to be compromised.
- To safeguard and protect patients' medical information, keep it confidential, and only release it to appropriate parties when authorized to do so. All associates are required to notify PHP of any unauthorized disclosures, inadvertent or otherwise, that may potentially violate HIPAA.
- To share knowledge and maintain skills important and relevant to PHP's needs.
- To demonstrate professional conduct, and to show proper respect and consideration for everyone.
- To maintain a working environment free from all forms of discriminatory treatment, harassment, abuse or intimidation.
- To promote ethical behavior among peers.

- To responsibly use and control all PHP assets and resources. To be responsible stewards of our funds and our relationships with donors, externs, funders and other supporters.
- To communicate PHP's services in a manner that is respectful of the patients receiving services and upholds the integrity of PHP.

Conduct that is contrary to our Code of Ethics may be grounds for corrective action, up to and including termination of employment.

Member Relations

At PHP, members are to be treated courteously and given proper attention at all times. Never regard a member's question or concern as an interruption or an annoyance. Associates must respond to inquiries from members, whether in person or by telephone, promptly and professionally.

If an associate encounters a situation that the associate does not feel comfortable handling, the associate's manager should be contacted immediately.

CONFIDENTIAL REPORTING

Policy Statement

PHP provides a reporting process to allow all associates the ability to report concerns in a confidential manner.

Scope

This policy applies to all associates.

Policy

For reporting serious and sensitive issues related to financial reporting, discrimination, harassment, retaliation, unethical or illegal conduct. The sooner a concern is expressed, the easier it is for PHP to take action.

Confidential Reporting Hotline

For reporting serious and sensitive issues please contact:

Hotline number: (833) 254-2025

REPORTING COMPLAINTS AND CONCERNS

Policy Statement

PHP is committed to the highest standards of ethical, moral, and legal business conduct. In line with this commitment, and in accordance with applicable laws, rules, and regulations, it is the policy of PHP that all reported financial information be accurate and complete in all material respects and that PHP and all its officers, representatives and associates comply with all applicable state, federal and local laws, rules and regulations.

This policy is adopted to ensure achievement of this goal, to encourage proper individual associate conduct, and to provide a means for early detection and correction of problematic situations before they can have serious consequences.

Scope

This policy applies to all associates.

Policy

This policy provides a process for the submission of reports by PHP associates regarding suspected wrongdoing ("whistleblowing"). PHP encourages its associates to utilize this policy's internal reporting procedures whenever possible.

Information to Report

The types of information that may be reported under this policy include, but are not limited to, the following:

- Violation of state or federal statute or local ordinance;
- Violation of or noncompliance with a local, state, or federal rule or regulation;
- Fraud, including financial or healthcare fraud, or deliberate error in the preparation, evaluation, review, or management of any financial statement of PHP;
- Fraud or deliberate error in the recording or maintaining of PHP's financial records;
- Deficiencies in or noncompliance with PHP's internal accounting controls;
- Misrepresentations or false statements to or by an officer of PHP or an accountant regarding a matter contained in the financial records, financial reports, or management reports of PHP;
- Bribery;
- Potential money laundering activity; or
- Deviation from reporting of PHP's financial condition as required by applicable laws, rules, and regulations.

Please note that this policy is not intended to restrict or prohibit associates from:

- Making external complaints to governmental agencies, law enforcement agencies, or regulatory authorities;
- Making complaints to people with supervisory authority over the associate or to another associate who has authority to investigate, discover, or correct the violation or noncompliance; or
- Providing information to, or testifying before, any public body conducting an investigation, hearing or inquiry.

Confidential Submission and Receipt of Complaints

PHP shall maintain the confidentiality or anonymity of any person(s) making a complaint under this policy, to the extent reasonably practicable.

Complaints should be submitted as follows:

- Any associate who has knowledge of or suspects unethical or unlawful conduct is responsible for reporting such activity immediately to Human Resources.
- Complaints may be submitted in person, by US mail, inter-office mail, telephone, or email.
- Any supervisor or other associate who receives a report of such concerns, or otherwise becomes
 aware of such concerns, should refer the information received to one of the individuals to whom
 reports are to be given in accordance with this policy.

Complaints may also be reported to the Confidential Reporting Hotline

• Hotline number: (833) 254-2025

Complaints should, to the extent possible, contain the following information:

- A description of the alleged event, matter, or issue that is the subject of the complaint;
- The name(s) of the person(s) involved;
- If the complaint involves a specific event or events, the approximate date, time, and location of each event; and
- Any additional information, documentation, or other evidence available to support the complaint.

Protection from Retaliation

PHP is committed to maintaining a workplace where it can receive information concerning possible illegal or unethical conduct and where associates can raise their good faith concerns free of retaliation. Associates are afforded protection against retaliation if they report in good faith, even if they are in error.

Retaliation against an individual who, in good faith, and acting in an appropriate manner, has made a complaint, disclosed information relating to a complaint, or otherwise participated in an investigation relating to a complaint, is prohibited, regardless of the outcome of the investigation.

This means that neither PHP nor any of its associates shall terminate employment, demote, suspend, threaten, harass, or in any manner discriminate or retaliate against an associate for participating in these activities. This anti-retaliation provision applies both to internal and external complaints.

However, deliberately making a false complaint is against this policy, and may result in corrective action, up to and including termination of employment.

Defend Trade Secrets Act

Please be aware that, pursuant to the Defend Trade Secrets Act of 2016, an individual may not be held criminally or civilly liable under any federal or state trade secret law for the disclosure of a trade secret that: (a) is made (i) in confidence to a federal, state, or local government official, either directly or indirectly, or to an attorney; and (ii) solely for the purpose of reporting or investigating a suspected violation of law; or (b) is made in a complaint or other document that is filed under seal in a lawsuit or other proceeding.

Further, an individual who files a lawsuit for retaliation by an employer for reporting a suspected violation of law may disclose the employer's trade secrets to the attorney and use the trade secret information in the court proceeding if the individual: (a) files any document containing the trade secret under seal; and (b) does not disclose the trade secret, except pursuant to court order.

Reporting Other Concerns

For reporting serious and sensitive issues related to financial reporting, discrimination, harassment, retaliation, unethical or illegal conduct. The sooner a concern is expressed, the easier it is for PHP to take action.