



Standards of Conduct & Code of Ethics

Version History

Adopted by the Board of Directors on: December 22, 2017

We are committed to the highest standards of ethics, integrity and professionalism

Primary Care Associates of California (PCAC) is committed to educating and enforcing ethical and conduct standards for employees, agents, and any plan representatives, who are expected to adhere to these standards regardless of title, role and reporting structure; and are required to report breaches in ethical and professional conduct accordingly. PCAC is also committed to full compliance with all federal health care program requirements. These standards apply to all of our work and dictate how we conduct our business. They are vital to our success. These standards cannot address every situation that may come up. PCAC believes that good judgment, honesty and integrity should always guide us in our work.

Practice Honest and Ethical Behavior

Every employee, agent and representative of PCAC shall adhere to high ethical and professional standards of conduct when he or she acts on behalf of PCAC.

Practice Truthful Activities

Every employee, agent and representative of PCAC shall ensure that communications both within PCAC and to governmental agencies and representatives, accreditation agencies and representatives, and other required communications, are truthful, accurate, and complete. Representation is required to be accurate, and misrepresentation will not be tolerated and may, under certain circumstances, be punishable by law.

You are required to obey the Law

PCAC requires that every employee, agent and representative shall follow federal and state laws and regulations that govern the activities of PCAC: If they are not certain about what the law requires, they are advised to request help in understanding those requirements from the manager or from PCAC's Contracted Health Plans Compliance Department.

Be Astute in Honoring Confidences

Every employee, agent and representative shall be required to uphold and respect member confidentiality rights. This includes the appropriate and confidential processing of member private medical information.

Be Sure to Report Conduct That Concerns You

Every employee, agent and representative shall be required to report activities that they believe may be unethical or illegal to their immediate supervisor or PCAC's Contracted Health Plans Compliance Department as follow:

- | | | |
|---------------------|----------------|---------------------------------------|
| • Alignment | (844) 215-2444 | compliance@ahcusa.com |
| • Blue Shield | (855) 296-9083 | corporate-compliance@blueshieldca.com |
| • Brand New Day | (866) 255-4795 | |
| • Care First | (877) 837-6057 | ComplianceDepartment@care1st.com |
| • Easy Choice | (866) 364-1350 | |
| • Humana | (800) 614-4126 | siureferrals@humana.com |
| • SCAN | (877) 863-3362 | ethicspoint.com |
| • United Healthcare | (800) 455-4521 | |

Adhere to the Policies and Procedures

Every employee, agent and representative shall be required to uphold and follow the policies and procedures of PCAC that govern conduct, ethical behavior, professionalism and privacy. Failure to follow these requirements may result in disciplinary action or termination.

Bribes, Kickbacks and Illegal Inducements

PCAC complies with all federal and state anti-kickback laws and regulations. Under these laws a person generally may not:

- Give anything of value to influence or reward a patient referral for a service that may be paid for by a government health care program
- Receive anything of value to make a patient referral or as a reward for a past referral for a service that may be paid for by a government health care program
- Give anything of value to encourage someone to buy, rent or recommend an item or service that may be paid for by a government health care program
- Receive anything of value for buying renting or recommending an item or service that may be paid for by government health care program

You may not offer anything of value to a provider, member or other person that could be seen as a bribe or other improper inducement. You may not make any illegal or improper payment from Company funds or assets, whether directly or indirectly. Examples of such payments include political or commercial bribery and kickbacks.

Non-Retaliation

PCAC will not retaliate against you for reporting in good faith a possible violation of these Standards or of a law, rule or regulation. A report in good faith means that you honestly believe that a violation of these Standards or of a law, rule or regulation has happened. PCAC will not take or threaten any action against you in retaliation for making a complaint or disclosing or reporting information in good faith.

Standard of Conduct & Code of Ethics Acknowledgment

I hereby acknowledge that I have read, understand and will comply with:

PCAC's Standards of Conduct and Code of Ethics

I will seek guidance from and raise concerns about possible violations of these Standards with my manager, or through PCAC Contracted Health Plan's Hotlines or Compliance Department.

I will complete all required training provided by PCAC throughout the course of the year.

Print Name

Date

Signature

Provider's Office