



Code of Conduct Pertaining to Compliance with Industry Laws and Practices

An essential part of Physician Select Management's (PSM) mission and conduct is to provide services in compliance with applicable laws and industry practices. Of paramount importance is the privacy and security of protected health information that is entrusted to us by our customers. The conduct of PSM and its employees is critical to carrying out this mission.

In addition, PSM strives to meet ethical standards in conducting its business, including that PSM employees can be considered reliable, honest, fair and responsible, acting in the best interests of our customers, business partners and the communities in which we live, work and serve.

A requirement of all PSM employees is to understand the rules and practices regarding appropriate privacy and security measures to protect personal and confidential information. PSM provides education and other resources to ensure that employees are informed of these requirements. All employees are obligated to perform their jobs meeting these legal, ethical and company standards. Employees are encouraged to contact their manager, PSM Director of Operations or the PSM Privacy Officer if they are not sure of these standards or are concerned about specific instances.

In addition to complying with laws, practices and company policies, each employee is obligated to raise concerns if it is felt a standard of policy may be breached. The employee's manager, the company Privacy Officer, Director of Operations, or the PSM Compliance Hotline are resources that can be deployed in these instances:

The anonymous and **confidential compliance toll-free reporting hotline maintained by Lighthouse, which is a contracted outside organization is: 855-400-7003**. Also available for anonymous and confidential reporting is the following web site: available www.lighthouse.services.com/psmnv.

PSM will not penalize an employee who is making reports in good faith. In order to maintain its credibility with customers, business partners and its reputation in general, PSM in fact encourages employees to raise such issues and make reports if there are concerns or questions. Any reports or concerns will be handled promptly and appropriately. Reports will be investigated thoroughly, and information will be disclosed only to those who need it to resolve the issue.

Standards of practice and conduct are described in the PSM Employee Handbook and related documents, applicable to all employees in all job classifications. Violations of these policies, practices and conduct are subject to disciplinary action up to and including termination and possible legal action, including referral to law enforcement agencies, where applicable.

PSM provides services to a wide range of customers, including but not limited to, the following: private physician practices; federally qualified health clinics; publicly-traded for-profit companies; public health departments; entities owned by private equity companies; not-for-profit hospitals and health systems. PSM must respect the needs of various such customers and business partners. An example of these needs is OptumCare, a subsidiary of United Health Group. As an example, PSM includes the UHG Code of Conduct in its education and orientation of new and existing employees (at least annually). The current UHG Code of Conduct in digital form is available for access by PSM employees with other HR and Compliance resources.

Because PSM customers are engaged in providing healthcare services of some sort, with most if not all providing services to federal or state programs, including Medicare and Medicaid, PSM provides educational resources to its employees about these programs. Such education includes fraud, abuse, waste and legal/ethical requirements of major federal and state laws. Education is provided at least annually for all employees and within three months of hiring new employees.

PSM performs screenings as a condition of hiring in order to ensure that employees are not excluded from applicable federal and state programs, such as DHHS and OIG. Screenings of hired employees are performed annually thereafter. PSM may use a qualified third-party to conduct these screenings, in which reports are made in writing to PSM.

All documentation for compliance activities is to be maintained for a period of 10 years.