



CODE OF CONDUCT

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Primary Care Associates of California Medical Group, (PCAC), and Unilogic Health Care Management, MSO (UHM) are dedicated to the highest ethical and business standards and is committed to upholding all federal and state laws and regulations related to our business practices. The company and its employees will at all times strive to achieve the utmost ethical and professional business standards in order to meet or exceed our commitment to the community, our patients, members, and business partners.

The Standards/Code of Conduct and Compliance Plan are an integral part of our business operations and are our guide to excellence in the performance of our jobs. These programs have been reviewed and accepted by the Board of Directors, and all are committed to meeting or exceeding all compliance goals and standards. The Standards of Conduct are provided to all employees upon hire and annually through mandatory Compliance Training, to include review of the Compliance Program. Employees are required to review all Compliance materials to include the Code of Conduct and Standards and to attend and complete all mandatory training in order to be compliant with federal and state regulations.

Areas of concern and of particular risk that require special attention include but are not limited to:

- Accurate financial and accounting record keeping
- Accurate and ethical billing and collection processes that focus on current Fraud, Waste, and Abuse laws
- The protection of protected healthcare information under HIPAA and HITECH

Should an employee have any questions regarding any compliance related information, they may contact their Human Resources or Compliance Officer. If an employee suspects any compliance or ethical standards that he or she believes have been violated, the employee is obligated to contact his or her Supervisor, Human Resources, the Compliance Officer and or Lighthouse 24/7 hotline **833-950-4540** or via the website at: E-mail: reports@lighthouse-services.com (must include company name with report), or Fax: 215-689-3885 (must include company name with report). UHM and PCAC do not condone retaliation or reprisal against employees who report in good faith.

Towards achieving that goal, UHM has employed the following Program to:

- Assist in carrying out our daily activities within appropriate ethical and legal standards,
- Provide oversight for compliance with laws, regulations, and special conditions imposed upon it by any licensing or regulatory authorities,
- Avoid irregularities in payment, reimbursement, and other transactions,
- Assist in maintaining our obligations to patients, affiliated physicians, third-party payors, subcontractors, independent contractors, vendors, consultants, and to our colleagues according to regulatory requirements; and
- Provide excellent patient care via our provider network.

Non-discrimination

Unilogic complies with Title VI of the Civil Rights Act of 1964, the Equal Employment Opportunity Act (Executive Orders 11246 and 11375) and The Americans with Disabilities Act of 1990 (Public Law 101-336), and the Age Discrimination Act of 1975 (45 CFR part 91). This

information is contained in multiple documents to include postings in employee lunchroom and the Employee Handbook.

Additionally, Unilogic Health Management (UHM) maintains documented guidance available to employees stating its intent to comply with: Rehabilitation Act of 1973, as amended, 29 U.S.C. 794, which prohibits discrimination on the basis of handicap. Title IX of the Education Amendments of 1972, as amended, 20 U.S.C. 1681 et seq., which prohibits discrimination on the basis of sex. Section 654 of the Omnibus Budget Reconciliation Act of 1981, as amended, 42 U.S.C. 9849, which prohibits discrimination on the basis of race, creed, color, national origin, sex, handicap, political affiliation or beliefs. The Medicare-Medicaid Fraud and Abuse Act of 1978. This information is maintained by the Human Resources Department and is posted in the employee lunchroom.

Unilogic only employs individuals who may legally work in the United States either U.S. citizens or foreign citizens who are authorized to work in the U.S. Proof of this verification is required as part of the employee application and screening process, which at a minimum requires 2 legal forms of identification.

Evaluation of Employee Performance

Employees are expected to comply with the Code of Conduct and UHM Compliance Plan by completing training. Employees are required to complete additional training as needed by individual job responsibilities. Annual evaluations will be based on several elements, including job performance, professionalism, Code of Conduct, and Compliance Plan criteria.

Employee's Obligation to Report

UHM employees and contracted affiliates have the responsibility to comply with the Code of Conduct and Compliance Plan. It is their duty to immediately report any potential or suspected violations to Human Resources, the Compliance Officer, or Lighthouse compliance vendor without fear of retaliation or reprisal. The UHM team remains committed to maintaining the highest level of accountability and all occurrences will be thoroughly investigated.

Lighthouse/Syntrio Contracted Compliance Vendor

Compliance Hotline

Having a mechanism for reporting suspected compliance issues is one-way UHM detects fraud, waste and abuse, and other misconduct such as inappropriate billing, coding, and documentation, improper claims submissions, HIPAA and patient privacy issues, conflicts of interest, and violations of the Code or Program. Without assistance from the UHM community, it is impossible for the

organization to know about every compliance issue and take corrective action.

UHM utilizes an independent third-party vendor to operate a designated toll-free telephone line, also known as UHM’s “Compliance Hotline”, for reporting suspected health care fraud and other misconduct. The Compliance Hotline is available 24 hours a day, 7 days a week.

The vendor is Lighthouse by Sentrio. All notifications/reports both external and internal are maintained in a Case Management System (CMS) specific to Unilogic. This is accessed by specific designated UHM staff (Compliance Officer). The system is a comprehensive audit trail from time of notification to outcome to follow-up.

**Toll Free Compliance Hotline:
(833) 950-4540
(Caller May Remain Anonymous)**

UHM Workforce members may also report compliance concerns online using a secure web intake tool managed by the same third-party vendor. The online reporting can be accessed as indicated in the table below.

UHM’s Workforce members are encouraged to use the number to report suspected health care fraud and other non-compliant activity as soon as they become aware of a potential violation. Reports of compliance concerns may also be made directly to a supervisor (who should immediately refer the matter to the Compliance Officer (CO), directly and to Lighthouse via the confidential hotline, email, or fax. writing, via email or to Human Resources or the Information Security Officer as appropriate.

<p>Call Lighthouse Services/Syntrio: Compliance line 833-950-4540</p>	<ul style="list-style-type: none"> • Website: https://www.lighthouse-services.com/unilogichealthcare • Anonymous Reporting App: Keyword: unilogichealthcare <ul style="list-style-type: none"> ○ Detailed app instructions here • Toll-Free Telephone: <ul style="list-style-type: none"> ○ English speaking USA and Canada: 833-950-4540 ○ Spanish speaking USA and Canada: 800-216-1288 ○ Spanish speaking Mexico: 01-800-681-5340 ○ French speaking Canada: 855-725-0002
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	<ul style="list-style-type: none">○ Contact us if you need a toll-free # for North American callers speaking languages other than English, Spanish or French● E-mail: reports@lighthouse-services.com (must include company name with report)● Fax: 215-689-3885 (must include company name with report)
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Reporting mechanisms are promoted on the Lighthouse public website, and internally they are included in training, internal signage, Compliance communications, and other outreach materials.

Copyrights

UHM employees must respect and follow all copyright rules and regulations. Under no circumstance does the Company condone unauthorized use or reproduction of materials pursuant to copyright laws.

Harassment and Workplace Violence

UHM is committed to providing a work environment free of discrimination and harassment. The Company's anti-harassment and discrimination policy applies to all persons involved in the operations of the Company and prohibits harassment or discrimination based on a protected characteristic by any employee of the Company, including supervisors and managers, as well as vendors, independent contractors, customers, and any other persons. It also prohibits harassment and discrimination based on the perception that anyone has any of the protected characteristics or is associated with a person who has or is perceived as having any of those characteristics.

Harassment covers a range of behaviors, including subtle and not-so-subtle verbal and non-verbal behavior. It can be engaged in or experienced by both males and females. Harassment may include, but is not limited to, any of the following:

- Epithets, derogatory jokes, comments, slurs, or verbal or physical innuendoes,
- Making verbal or physical conduct of a sexual nature, or the refusal to engage in such conduct, the basis of any employment decision or a condition of an employee's continued employment,
- Subjecting others to obscenity or offensive language,
- Commentary about an individual's body or sexual matters, and
- Retaliation for reporting or threatening to report harassment.

All employees must promptly report any incidents of harassment or discrimination to Human Resources, the Compliance Officer, or Lighthouse hotline to ensure complaints are resolved quickly and fairly. Employees should also be aware that the Equal Employment Opportunity Commission and the California Department of Fair Employment and Housing investigate and prosecute complaints of harassment, retaliation, and discrimination in employment.

Harassment also includes incidents of workplace violence. It is the intent of UHM to provide a safe workplace for employees and to provide a comfortable and secure atmosphere for customers and others with whom we do business. UHM has zero tolerance for violent acts or threats of violence.

All employees are expected to conduct themselves in a non-threatening, non-abusive manner at all times. No direct, conditional, or veiled threat of harm to any employee or to UHM property is acceptable. Acts of violence or intimidation of others will not be tolerated. Any employee who commits or threatens to commit a violent act against any person while on Company premises will be subject to immediate termination.

Employees share the responsibility in the identification and alleviation of threatening or violent behavior in the workplace. Any employee who is subjected to or threatened with violence, or who is aware of another individual who has been subjected to or threatened with violence, should immediately report this information to his or her supervisor, a member of management, or Human Resources. All reports of violence or threats of violence will be investigated and communicated to law enforcement.

Treat All Employees with Respect, Dignity and Fairness

To maintain an environment that is respectful and fair, UHM encourages employees to utilize the company's open-door policy to voice concerns of possible inequitable or unfair conduct. UHM values diversity as an asset and encourages equal opportunity, development, and advancement for all employees. Should an employee feel an issue remains unresolved, they may contact Human Resources or the Compliance Officer.

Health & Safety

Each employee is expected to obey safety rules and to exercise caution in all work activities. Employees must immediately report any unsafe condition to Human Resources. Employees who violate safety standards, who cause hazardous or dangerous situations, or who fail to report or, who do not remedy such situation appropriately, may be subject to disciplinary action, up to and including termination.

To assist in providing a safe and healthful work environment for employees, patients and members, and visitors.

In the case of accidents that result in injury, regardless of how insignificant the injury may appear, employees should immediately notify the supervisor on site. Such notifications are necessary to

comply with laws and initiate insurance and workers' compensation benefits procedures.

Such work injuries or other occurrences may include, but are not limited to any injury, loss of personal property, medication error, serious complaints regarding patient care, failure to carry out a physician's order, questionable medical practice, unexpected cardiac arrest, equipment failure, robbery, vandalism, threats of violence.

Human Resources and the Compliance Officer will be responsible for investigating all health and safety matters.

Personal Use of Resources

UHM resources must be maintained and utilized according to company rules and regulations. The Company reserves the right to inspect all property to ensure compliance with its rules and regulations, without notice to the employee or consent and/or in the employees' absence at any time consistent with applicable law. Prior written authorization must be obtained from Human Resources or Administration before any UHM property may be removed from the premises.

Employees are prohibited from using Company facilities or equipment including Company computers, copiers, facsimile machines, and other equipment for personal use without prior authorization from their supervisor.

Company equipment purchased for employee use is the property of UHM. All equipment must be returned upon termination or at any time upon the request of the Company.

Payments, Discounts and Gifts

General

As part of our continued compliance regarding "fraud, waste, and abuse" and "anti-kickback" laws, UHM prohibits any of its employees, physicians, or other business affiliates from receiving or providing "remuneration" in exchange for referrals of patients. Furthermore, UHM prohibits the payment or receipt of such remuneration in return for directly purchasing, leasing, ordering, or recommending the purchase, lease, or ordering of any goods, facilities, services, or items. Employees involved with finance functions, purchasing, and facilities operation, medical staff administration, and any activity that includes entering into a personal service contract are expected to be vigilant in identifying potential anti-kickback violations and bringing them or any related questions to the attention of the Compliance Officer.

Entertainment and Gifts

UHM will maintain compliance with federal and state regulations as it pertains to accepting and receiving entertainment and gifts. Employees of UHM are prohibited from accepting or asking for bribes, kickbacks, gratuity, or other forms of payment made to influence a business decision. Additionally, employees or other business affiliates of UHM may not offer anything of value to a

government official or other third party in an effort to influence business or to gain special treatment as an individual or an organization. UHM maintains a strict “gift” policy and all gifts of significance or of monetary value (exceeding \$25.00) are forbidden. For further clarification on receiving/providing gifts, please consult with the Compliance Officer.

Receiving Gifts from Patients

Employees of the Company should not accept gifts from members or member’s family members and under no circumstances should UHM employees solicit gifts from patients. The Company acknowledges that there are certain circumstances that arise regarding the receipt of gifts; however, employees are strictly forbidden from accepting any individual gift of gratuity valued in excess of \$25.00 from any patient, vendor, supplier, or other person doing business with the Company. Gifts include, but are not limited to, acceptance of cash, gift certificates, or lavish entertainment and free travel and lodging. Violations of this policy will not be tolerated, and may lead to disciplinary action, up to and including termination.

Receiving Business Courtesies

PCAC and UHM MSO area professional healthcare organizations that are dedicated to rendering quality medical service to members. Employees and other business affiliates of UHM are expected to follow the Compliance Plan guidelines as they pertain to receiving business courtesies. Under no circumstance should an employee receive or solicit events, travel, overnight accommodations, or other business courtesies that would adversely affect an ethical business decision or relationship. Prior to accepting such invitations, employees should confirm that doing so is consistent with the UHM Compliance Plan and is approved by the Compliance Officer.

Extending Business Courtesies

It is critical to avoid the appearance of impropriety when giving gifts to individuals who do business or are seeking to do business with UHM. The corporate policy on business courtesies may from time to time provide modest flexibility in order to permit appropriate recognition of the efforts of those who have spent meaningful amounts of time on behalf of UHM.

UHM’s policy is to not provide any gifts, entertainment, meals, or anything else of value to any employee of the Executive Branch of the federal government, except for minor refreshments in connection with business discussions or promotional items with the UHM logo valued at no more than permitted by federal or state law.

Fair Dealing

UHM is dedicated to providing quality healthcare services to our community by maintaining the utmost ethical, legal, and business standards. We are committed to maintaining the highest levels of integrity and fairness within our Company and industry. Employees are expected to conduct business honestly and fairly without misrepresentation of material facts. Employees are prohibited from manipulation, concealment, and misuse of privileged information, fraud, or other unfair business practice.

Relationships with Healthcare Constituents

Member

The goal of UHM is to provide excellent service and quality medical care to all our members. Members are consistently treated with respect and dignity, and care is provided only for both medically necessary and appropriate healthcare services. UHM makes no distinction in the high-quality care it provides based on age, color, disability, marital status, national origin, race, religion, sex, sexual orientation, or payment source. Moreover, medical treatment is not based on race, ethnicity, national origin, religion, sex, age, mental or physical disability or medical condition, such as ESRD, sexual orientation, claims experience, medical history, evidence of insurability (including conditions arising out of acts of domestic violence), genetic information or source of payment. Moreover, medical treatment is not based on patient or organization economics, but rather on identified Member healthcare needs. UHM ensures that patients are involved in all aspects of their care and have the necessary information to make informed decisions regarding their health care decisions.

Furthermore, in accordance with HIPAA and HITECH rules and regulations, the Company maintains strict privacy and confidentiality guidelines to protect our patients' privacy.

Employees

UHM promotes camaraderie, teamwork, and professional relationships. In an effort to maintain a positive work environment, gift giving and fundraising campaigns among team members should be reasonable and moderate. Under no circumstances should an employee feel compelled or coerced to participate.

Any violations of this directive should be reported to his or her immediate supervisor, Human Resources or the Compliance Officer.

Subcontractors and Suppliers

UHM is committed to the highest ethical and business standards in the selection of our subcontractors and suppliers. Selection criteria will be objectively based upon quality, service, price, technical excellence, and the overall ability to meet our business needs and will not be determined by personal relationships, friendships, or other discriminatory/ selective biases.

Substance Abuse and Mental Acuity

To protect the interests of all individuals working on behalf of UHM, we are committed to providing a drug and alcohol-free work environment. The use of alcohol, illegal drugs, or controlled substances, whether on or off the job, can adversely affect an employee's work performance, efficiency, safety, and health. In addition, the use or possession of these substances on the job constitutes a potential danger to the welfare and safety of other employees and exposes the Company to the risks of property loss or damage, or injury to other persons.

Conflicts of Interest

A conflict of interest occurs when a UHM employee, a supervisor, or someone at the management level exploits professional or official capacity in some way to gain personally, in terms of money or other material advantage, at the expense of the employer or organization. Conflict of interests may include but not limited to using your position to receive a benefit or to refer a service to a friend or relative, receive a payment, gift, or improper entertainment in exchange for a contract.

For example, a conflict of interest may occur if:

- The employee's outside activities influence or appear to influence the employee's ability to make objective decisions in the course of his or her job responsibilities.
- The demands of an outside activity cause the employee to use UHM's resources for personal purposes.
- An employee or close relative can personally profit from a transaction involving UHM and the employee or a third party.
- The employee does not act solely in the best interest of UHM, whenever acting as an agent of UHM, in dealings with suppliers, customers or government agencies.

UHM expects and requires all employees, including Senior Management and the Board of Directors to act honestly and ethically, and to avoid both actual and potential conflicts of interest with UHM. Therefore, the safest course of conduct is to avoid all business relationships, activities, associations, or interests in which the employee, his or her family, a close friend, or a business associate benefits materially at the expense of UHM. It is the employee's obligation to ensure that he or she remains free of conflicts of interest in the performance of his or her responsibilities at UHM. A conflict of interest can have a severe negative impact even though the conflict may not be so obvious.

If any employee has suspicion that a conflict of interest exists, they are obligated to notify and present all material facts to the Compliance Officer, Human Resources, and/or Lighthouse, for investigation. If the employee has any question about whether an activity might constitute as a conflict of interest, the employee should consult with the Compliance Officer, Human Resources, or Lighthouse.

Upon disclosure or discovery of a potential or actual COI, an evaluation will be conducted for immediate resolution. Depending on the level of the position involved, the UHM Compliance Officer in collaboration with Lighthouse will conduct an independent investigation and determine mitigation of the COI. The resolution may include disciplinary actions as outlined under Correction Action Plan and may also include reevaluation or modification of the working relationship, up to and including termination.

Conflict of Interest policies are reviewed upon hire and annually to staff, management, the Compliance Officer, and the Board of Directors.

Outside Employment and Activities

UHM employees will not, directly, or indirectly, engage in any conduct that is disloyal, disruptive, or damaging to the company. Employees must avoid outside employment or business activities that materially detract from the time or attention they should devote to their duties. Such activities adversely affect the quality of their work performed, and/or adversely affect UHM’s reputation. An employee should not have a direct or indirect financial interest in competitors of UHM. Outside business activities can only be allowed if they do not directly or indirectly compete with UHM’s business.

Misuse of Company Resources

UHM Employees shall not use or access UHM’s property, information, or position to benefit themselves for personal gain. Employees have a duty to always advance the interests of UHM and to act on its behalf with regard to such property, information, or position when the opportunity arises.

STANDARDS OF CONDUCT AND CODE OF ETHICS acknowledgment

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

Unilogic’s Standards of Conduct and Code of Ethics to include Conflicts Interest

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

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

Signature

Date

Print Name

Unilogic Staff Position