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Legal, Regulatory, Accreditation, and Ethical Requirements

MEDICAL GROUP/IPA provides health care coverage options to members in its approved service area. Our business is subject to numerous federal, state, and local laws and regulations, which have specific licensure and other requirements.

Justifiably, we have immense pride in ourselves, each other, our business, our customer service, and our commitment to our community. Thus, we must conduct all of our business in a professional, legal, and ethical manner, complying with both the letter and the spirit of the law. Henceforth, all employees will receive a training (90) days from hire and annually thereafter with the materials within the Code of Conduct and attested through the Employee Handbook.

The purpose of our Code is to provide general guidance on subjects of wide interest within our company, but not everything can be covered in as much detail as is necessary in just one document. In our Code we have attempted to provide an overview of our general values and standards. Where applicable, we provide references to other resources, like the law, or MEDICAL GROUP/IPA policies and procedures, so that you can get more detailed information.

How to Get Help

If you are faced with an issue or decision about which you are not sure, consult this Code, MEDICAL GROUP/IPA's policies, your supervisor, and/or the appropriate MEDICAL GROUP/IPA department, for example Compliance. Our Code is not intended to cover every situation. We must comply with all applicable laws, regulations and our policies whether or not addressed in our Code. Wherever MEDICAL GROUP/IPA has an internal policy that is stricter than what is required by law, you should follow MEDICAL GROUP/IPA's policies and procedures.

MEDICAL GROUP/IPA leadership has an open-door policy and there are many resources available to help you attain information and do what is right. Look to the last page of the Code for a list of aids and contact information.

How to Make the Right Decision

If you are unsure of the right thing to do, ask yourself the questions below. Considering these questions will help you maintain your personal integrity and best interests of MEDICAL GROUP/IPA.

- Do I have enough information to make a good decision?
- Is my action or inaction consistent with MEDICAL GROUP/IPA's Code, values, mission, policies or the law?
- Is my decision honest and fair?
- Would my decision appear inappropriate to others?
- Would I be embarrassed to see my decision on the local news?
- Would I feel proud to tell my colleagues, family, or friends about my decision?
- Would my decision negatively affect MEDICAL GROUP/IPA, my colleagues, or our stakeholders, including members, providers, vendors, or the community?
- Would my decision harm my reputation?

If you are still unsure of the right thing to do, feel free to ask the Compliance Department for advice.

# Raising Concerns

We all have an obligation to report any suspected or observed misconduct, including violations of the Code, MEDICAL GROUP/IPA policies and procedures, laws and regulations, and other ethical concerns. Reporting suspected or observed misconduct or other ethical concerns is a condition of employment. We must be committed to do the right thing, which means always speaking up when you have a concern, even if you are not sure your concern is valid.

All reports of an ethical violation must be made in good faith or without malice. Do not make an ethics report if you do not believe in good faith that the Code, policies and procedures, laws and regulations or ethics have been violated. Any colleague who deliberately makes a false accusation with the purpose of harming or retaliating against another colleague is subject to disciplinary action.

# How to Report Concerns

If you are an employee, first, contact your manager for help. If you do not want to discuss the concern with your manager or if a concern raised with your manager has not been resolved or if a concern involved your manager, report your concern to the Compliance Department, using the options below.

MEDICAL GROUP/IPA stakeholders, including members, providers, business partners, and others are also encouraged to report their concerns.

Ways to Report Concerns

In-Person

The Compliance and Human Resources Departments have open door policies. You should feel free to visit them any time to discuss your concerns in person.

Telephone

MEDICAL GROUP/IPA has a Compliance Hotline at 1-(415)-216-0095. The Hotline is answered from 9:00 am 4:00 pm Monday through Friday. Voice Mail is available 24/7 and after hours. The Compliance Officer keeps all records confidential, assuring anonymity.

Email

Your concerns can be emailed to the Compliance Department at <u>Compliance@aamgdoctors.com</u>. Note that it may not be possible for you to remain anonymous when reporting through email.

Things to Remember When Making a Report

When you report a concern, please provide as many details as possible. MEDICAL GROUP/IPA must have enough information to investigate. If we do not have enough information we may not be able to conduct as thorough an investigation or fix the problem.

If you choose to provide your contact information when making a report but request confidentiality, MEDICAL GROUP/IPA will make every effort to maintain your anonymity, to the extent permitted by law; however, anonymity cannot be guaranteed.

Reporting your good faith concerns is right thing to do and will help MEDICAL GROUP/IPA end or prevent misconduct.

How Reports are Handled

We are committed to investigating all reported concerns promptly and confidentially, to the best extent possible. Depending on the concern that is reported, the appropriate department will look into the allegation.

We expect all MEDICAL GROUP/IPA employees to cooperate with both internal and external investigation efforts.

The results of investigations are handled in multiple ways. Where an investigation finds that there was a violation, it is the policy of MEDICAL GROUP/IPA to take appropriate action, including corrective actions, disciplinary measures, or implementing systemic changes to prevent similar violations in the future, among other things. The exact discipline that is utilized

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will depend on the nature, severity, and frequency of the violation. Possible disciplinary actions include but are not limited to corrective actions (including re-training or coaching, among others), oral warnings, written warnings, written reprimands, suspension, termination, and/or referral to law enforcement.

If you chose to obtain a confidential report number from MEDICALGROUP/IPA's hot line, you can check on the status of the investigation by calling the Hotline and providing that number.

If you provided your contact information when you made your report, MEDICAL GROUP/IPA will inform you, to the extent possible, whether the investigation was completed and if the issues were addressed. To protect your and other's confidentiality and privacy, we do not disclose the details of any personnel or disciplinary action.

Retaliation Not Tolerated

MEDICAL GROUP/IPA has a zero tolerance policy for retaliation against those who make a report in good faith or participate in an investigation. We do not condone any act of retribution or retaliation against an individual who conscientiously seeks to follow and implement the Code, MEDICAL GROUP/IPA policy, laws, and regulations. We take all claims of retaliation seriously, investigating each one thoroughly and taking appropriate action. If you think that you or someone you know has suffered retaliation, report it immediately.

The Special Responsibilities of Leadership

While the Code applies to all MEDICAL GROUP/IPA employees, we expect leadership to set the example, the proper tone-at-the-top, and to be a model of integrity in every respect.

Those in leadership positions should create an environment where all team members are encouraged and feel empowered to raise concerns and propose ideas. We also expect that leadership will ensure their team has sufficient information, training, and resources to comply with applicable laws, regulations, policies, and to be able to resolve ethical dilemmas.

MEDICAL GROUP/IPA is committed to a culture that promotes the highest standards of compliance and ethics. That starts and ends with our leadership role models. We must never sacrifice ethical and lawful behavior in the pursuit of business objectives.

Waiver of the Code

Very rarely, requests for waiver of the Code may be granted. You may seek formal waiver of a specific requirement or obligation of the Code by submitting a written request to the <u>Compliance Officer at Compliance@</u>aamgdoctors.com. Do not take any action prohibited by the Code without first receiving a written waiver.

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### II. Our Responsibilities to MEDICAL GROUP/IPA and Each Other

We all learned the golden rule as children, and it still applies today. We should treat each other as we want to be treated. It is as simple as that.

#### Workplace Matters

#### Diversity, Discrimination, and Equal Opportunity

We actively seek the diverse participation of all those we work with to achieve success. We value every member of the MEDICAL GROUP/IPA team and are committed to providing an inclusive environment where everyone is treated with fairness, respect, and dignity. We are accountable to one another for the manner in which we treat each other and for the manner in which people around us are treated.

We recognize our differences and respect that each individual is unique. We understand and appropriately respond to the unique combination of variables that we embody, such as ability, age, ethnicity, experience, gender, race, sexual orientation, and socioeconomic status.

We are committed to recruiting and retaining a diverse staff reflective of the communities we serve. We strive to create and maintain a setting in which we celebrate cultural and other differences and consider them strengths of our organization. MEDICAL GROUP/IPA demonstrates cultural competency in that we are respectful of others with diverse values, beliefs, and behaviors.

MEDICAL GROUP/IPA's goal is to create an environment in which we can all grow, develop professionally, and work in a team environment in which all ideas are considered.

MEDICAL GROUP/IPA is an equal opportunity employer and no one shall discriminate against any individual with regard to race, color, creed, ancestry, religion, gender, national origin, age, sex, disability, sexual orientation, gender identity or expression, genetic information, veteran status, marital status, disability status, or medical conditions, including AIDS/HIV, pregnancy, or any other status or characteristic that is protected under law.

We ensure our discrimination and equal opportunity policies are followed during hiring, promotion, termination, or any other aspect of employment. MEDICAL GROUP/IPA is committed to assisting with reasonable accommodations for those with specific religious requirements or disabled employees with known physical or mental limitations.

Acting in accordance with these guidelines shows respect, humility, and integrity while helping to create a positive work environment for everyone. Discrimination not only contradicts our values, it's also against the law.

### Harassment and Bullying

We are committed to a workplace free from harassment and bullying. We forbid discriminatory harassment with respect to race, color, religion, sex, gender, gender identity, age, national origin, marital status, sexual orientation, veteran status, disability, genetic information, or any other characteristic protected by federal, state, or local laws.

Sexual harassment is absolutely prohibited. It may take many forms, including unwelcome sexual advances, requests or demands for sexual favors or in conjunction with employment decisions, and other visual, verbal, or physical conduct of a sexual or gender-based nature. Degrading or humiliating jokes, slurs, intimidation or other harassing conduct that creates an intimidating, hostile, or offensive work environment is not acceptable in our workplace. MEDICAL GROUP/IPA has a zero tolerance policy for this behavior.

Abusive, bullying conduct, including insults; derogatory remarks and epithets; threatening, intimidating, or humiliating verbal or physical conduct; and other similar behaviors are not tolerated and will be dealt with in the same manner as any other types of prohibited harassment.

#### Substance Use

Our workplace must remain free of the influence of alcohol, marijuana, illegal drugs, misused prescription drugs and over-the-counter medications, and any other substance that may impair our ability to act safely and effectively while at work. Additionally, MEDICAL GROUP/IPA employees shall not be under the influence of drugs, alcohol, or any other substance that may impair their abilities while engaged in MEDICAL GROUP/IPA matters outside of the workplace. MEDICAL GROUP/IPA may administer drug testing as a means of enforcing this policy under certain circumstances including:

- As part of pre-employment screening
- As part of a physical examination
- Under reasonable suspicion, based on evidence
- During post-accident testing

We are prohibited from possessing, selling, manufacturing or distributing illegal drugs on company property and during work time at any location. In addition, we are not allowed to keep illegal substances in our vehicles while on company-owned property.

Health and Safety

Medical Group/IPA's facilities comply with all applicable government regulations and rules that promote the protection of workplace health and safety. Our policies have been developed to protect ourselves and our stakeholders from potential workplace hazards.

We must familiarize ourselves with and understand how our safety policies apply to our specific job responsibilities and seek advice from leadership whenever there is a question or concern. It is important that we immediately advise our supervisor and the Human Resources Department of any serious workplace injury or any situation presenting a risk of injury so timely corrective action may be taken to resolve the issue. If a safety issue is an emergency or imminent threat of health or safety, call the police, fire, or emergency medical services first by dialing 9-1-1, then contact your manager and others.

Workplace health and safety also encompasses incidents of workplace violence. MEDICAL GROUP/IPA will not tolerate violence or threats of violence in any form in the workplace, at work-related functions, or outside of work if it impacts the workplace. In addition, weapons of any kind are not allowed in the workplace or on workplace property unless a specific waiver is granted.

Colleagues who observe or experience any form of work-related harassment or violence should report the incident to their manager and the Human Resources Department immediately. In emergency situations or if you perceive a threat to be imminent, call the police, fire, or emergency medical services first by dialing 9-1-1, then contact your manager and others.

**Relationships and Personal Causes** 

Your immediate family members, significant others, and individuals in your household must never improperly influence your business decisions. These relationships require extra sensitivity to conflicts of interest and confidentiality.

MEDICAL GROUP/IPA is committed to supporting our community in a number of ways and is proud that many of our employees give back to our community through donations and volunteer work. While it may seem natural to ask those that we know to donate or participate, we should recognize that it may be uncomfortable or even offensive to be subjected to pressure to support our colleagues' personal causes. Thus, we may not solicit other employees or distribute nonwork-related literature or materials during work time and in work areas. Requiring MEDICAL GROUP/IPA employees or other stakeholders to participate in non-work-related activities, whether inside or outside the office, is not permitted.

Solicitation or distribution for any purpose by non-MEDICAL GROUP/IPA employees is not allowed on company property unless prior approved by senior leadership. Distribution includes distributing or posting literature, pamphlets, chain letters, personal business cards or any other written or printed material of any kind, include e-mail. In addition, the use of office supplies for noncompany sponsored solicitation activities is not allowed.

### Confidentiality and Privacy

Confidential information about MEDICAL GROUP/IPA, its strategies and operations, and information about our colleagues, customers, and business partners, must be protected and is of utmost importance. We should protect the company's confidential and proprietary information, including nonpublic information entrusted to us as employees by our members, providers, and other business partners. Only access, use, or disclose confidential and proprietary information, whether or not it is classified as confidential or proprietary, as needed to perform your job responsibilities.

Fraud and Waste

At MEDICAL GROUP/IPA, we are honest and truthful in all of our dealings. While anyone can make an honest mistake, fraud is different. Fraud is not a mistake and involves deliberate deception. Not only is fraud unethical, it is also illegal. We will not falsify information, submit false reports or information, or improperly change company records, among other fraudulent activities, to the government or anyone else.

MEDICAL GROUP/IPA has a fraud and waste program that is designed to prevent, detect, and reduce fraud, waste, and abuse among employees, providers, Business Partners, and others. We are entrusted with the monies and resources of our stakeholders, including the government, and must safeguard and use all these resources effectively, conservatively, and wisely.

### Protecting Assets

Any use of MEDICAL GROUP/IPA resources for personal or financial gain unrelated to MEDICAL GROUP/IPA's business is prohibited. Employees must protect all of MEDICAL GROUP/IPA's assets, both tangible and otherwise. Assets include time, supplies, money, and equipment. For instance, falsifying your time sheet or submitting bogus reimbursement requests is fraudulent and prohibited.

Among MEDICAL GROUP/IPA's most valuable assets are its stakeholder and proprietary information and intellectual property. These assets provide MEDICAL GROUP/IPA with a competitive advantage and help us provide excellent service. We will protect these assets against theft, loss, or other misuse. We also respect the intellectual property rights and information of third parties.

Company assets must be maintained for business related purposes only. As a general rule, the personal use of MEDICAL GROUP/IPA's assets is not allowed. On occasion, and with prior leadership approval, the minimal use of resources, such as copying or telephones, where the cost to MEDICAL GROUP/IPA is insignificant, is permissible.

### III. Our Responsibilities to MEDICAL GROUP/IPA and our Stakeholders

MEDICAL GROUP/IPA has multiple stakeholders, including our Board of Directors, owners, colleagues, members, providers, business partners (including brokers, vendors, and contractors), the government, and our community. We are committed to each of our stakeholders in many ways.

Members

A large part of MEDICAL GROUP/IPA's mission is commitment to improving the health and well-being and responding to the changing needs of our members.

Discrimination, Diversity, and Cultural Competency

MEDICAL GROUP/IPA has the privilege of serving a diverse population of stakeholders, including our members. With this privilege comes the responsibility of considering and respecting their cultural and communication needs and values. Our goal is to provide culturally appropriate health care coverage and customer service that incorporates the diversity of health beliefs, practices, and communication preferences of our membership. MEDICAL GROUP/IPA does not discriminate against members based on their sex, age, economic status, educational background, race, color, religion, ancestry, national origimage 1 sexual orientation, gender identity, marital status, coverage type, source of payment, or any other protected characteristic.

MEDICAL GROUP/IPA demonstrates cultural competency in that we are respectful and responsive to others with diverse values, beliefs, and behaviors. We consider the individual social, cultural, and linguistic needs of our members to interact effectively, and provide the highest quality of service and communication options, including interpretation and translations in multiple languages, resources for the visual and audio impaired, and other auxiliary aids.

### Providers

MEDICAL GROUP/IPA is proud to partner with its network providers and seeks to support them so that they can focus on providing excellent care to our members.

MEDICAL GROUP/IPA does not discriminate against providers based on their sex, age, economic status, educational background, race, color, religion, ancestry, national origin, sexual orientation, gender identity, marital status, or any other protected characteristic.

### **Business Partners**

We are committed to fair competition among our existing and potential business partners, including First Tier, Downstream, and Related Entities, such as brokers, vendors, suppliers, and contractors. We strongly encourage our business partners to adopt this Code or a comparable code for their industry and comply with it in performing their obligations under our contracts.

Just as MEDICAL GROUP/IPA employees are expected to treat our business partners fairly, business partners are expected to conduct business professionally and to follow applicable laws, regulations, and applicable MEDICAL GROUP/IPA policies and requirements.

Only those employees that are authorized to enter into contracts on behalf of MEDICAL GROUP/IPA may do so. Additionally, selecting business partners must be done fairly and objectively. Factors to consider include MEDICAL GROUP/IPA purchasing policies, the best interests of MEDICAL GROUP/IPA, affordability, and quality, among other aspects.

When you contract with a business partner on behalf of MEDICAL GROUP/IPA, you are responsible for making sure they follow MEDICAL GROUP/IPA's applicable policies and other requirements and that they are providing MEDICAL GROUP/IPA the promised goods or services. If you have concerns about a business partner, speak to your manager and/or the Compliance Department.

Procurement

MEDICAL GROUP/IPA has negotiated contracts with business partners that enable us to purchase products and services that provide consistent quality at a discounted rate. Where MEDICAL GROUP/IPA has identified select business partners, using only those will help reduce costs and improve quality. See the Human Resources Department for more information about approved business partners.

Supporting Small and Local Businesses

As a proud local business itself, MEDICAL GROUP/IPA seeks to support other small local businesses whenever possible.

**Industry Relations** 

MEDICAL GROUP/IPA does not compete against others unfairly. We do not seek to gain an edge through unfair competition. We comply with all antitrust laws and never make agreements with competitors that create monopolies or stifle competition. We do not illegally obtain or use proprietary information from competitors, nor do we use deceptive or illegal means to gain such information.

### **Government Relations**

Health care is a highly regulated industry and MEDICAL GROUP/IPA embraces the additional legal and compliance responsibilities placed on us as a health plan. Our culture is one on honesty and doing the right thing, the first time, every time.

Government Requests and Inquiries

MEDICAL GROUP/IPA must cooperate with government officials and must always provide accurate, complete, and timely information to all government entities. Types of government reporting include but are not limited to claims, cost reports, corrective action plans, and other filings. All requests for information, subpoenas, and filings from the government must be coordinated with the Compliance Department and/or Legal Counsel unless prior approval has been provided.

If you discover or suspect that information that was provided to the government was in error or there was an omission, you should immediately report this to your manager and to the Compliance Department so that MEDICAL GROUP/IPA can quickly correct the situation.

Nothing in our Code of Conduct or policy prohibits you from reporting to, or responding to an inquiry from, a governmental authority about a suspected violation of law.

## Doing Business with the Government

MEDICAL GROUP/IPA has a contract to provide health care coverage to government health care program beneficiaries. This contract and other laws must be complied with not only because it is required, but also because it is the right thing to do. The risks of non-compliance are very high. If you are unsure of what your responsibilities are related to the government contract or have concerns about misconduct, please speak to your supervisor or reach out to the Compliance Department.

# Government Employees

Recruiting and hiring former and/or current government employees are subject to changing rules that can vary based on the rank of the employee. MEDICAL GROUP/IPA must exercise good judgment to ensure that no conflict of interest law is violated when considering employing or contracting with a government employee. The Human Resources and/or Compliance Departments should be consulted when considering employment or contracting with government employees and contractors.

### Professional Licensure Requirements

If you are professionally licensed or certified, you are responsible for all requirements, keeping these credentials up to date, and ensuring you timely meet all continuing education requirements.

### Media Relations

In order to avoid confusion and ensure accurate information is provided, only designated MEDICAL GROUP/IPA senior leadership may communicate with the media or in a public relations capacity. Any media inquiries or requests should be referred to the Marketing Department.

### Social Media

We are responsible with social media. We never post member or other information or photographs to a Web site, social media page, or public forum even if that information cannot be personally identified.

We do not use our personal devices, phones, or email to send MEDICAL GROUP/IPA confidential and member private information for any reason unless prior approved by leadership and only for specific short-term purposes.

## Our Community

MEDICAL GROUP/IPA has a responsibility to have a meaningful and lasting impact and to better our community.

### Charitable Contributions and Community Service

MEDICAL GROUP/IPA is committed to providing monetary, in-kind, and volunteer charitable contributions to multiple organizations in our community. We have a special focus on issues and organizations concerning health and wellness. MEDICAL GROUP/IPA provides funding through donations and community grants. For more information see the Marketing Department.

## Conflicts of Interest

Conflicts of interest can occur when you, your immediate family, a household member or other relationship, outside activity, or financial or private interest interferes or appears to interfere with, your ability to make objective decisions in your role at MEDICAL GROUP/IPA. MEIDCAL GROUP/IPA maintain a robust conflicts of interest policy that provides guidance on how to handle these kinds of situations. For more information, see leadership or the Compliance Department.

# Privacy and Confidentiality

Protecting personal information is of the utmost importance to our business. We have an obligation to comply with all applicable privacy and information security laws at all times.

For guidance on what information should be guarded and how it should be guarded, review the applicable privacy and security policies and procedures. Never hesitate to ask your manager, other leadership, and/or the Compliance Department if you have any concerns or suspect information has been mishandled.

We must ensure we understand specifically how we should handle information as part of our day-to-day responsibilities. When we must access private information as part of our job duties, we always access or use only the minimum amount of information needed to do our job.

We have an obligation to report any concerns about compliance with privacy and information security. If your laptop or other items with private information are lost or stolen, you must report

it immediately to your supervisor. If you suspect an incident or breach of information has occurred, you must report it immediately to your supervisor and the Compliance Department. Never use personal email, your phone, or other non-work devices to conduct company business or send confidential or private information.

Always safely store, access, and disclose private information only in compliance with MEDICAL GROUP/IPA policies and procedures and the law.

Gifts and Entertainment

Giving or receiving gifts, entertainment, or other business courtesies, such as tickets, meals, travel expenses, gift cards, and gift baskets is generally inappropriate and in some cases unethical or illegal.

In some cases, items may need to be refused or returned. Items that are perishable such as food or flowers may be donated to a charity or shared in the workplace.

We must avoid the perception that we allow these kinds of perks to influence our decisions. See the gifts and entertainment policies and procedures for information or your supervisor or the Compliance Department for guidance before giving or receiving these items.

Sustainability and the Environment

MEDICAL GROUP/IPA is dedicated to environmental sustainability. A healthy environment has a direct impact on our individual and community health. We should reduce our environmental impact when possible by reducing waste, participating in recycling programs, conserving energy and water, using renewable sources, and supporting businesses that hold the same beliefs.

Dispose of surplus, obsolete, or inoperable property in accordance with applicable health and safety requirements.

IV. Our Responsibilities to Conduct Business Ethically

Marketing, Advertising, Sales, and Promotions

Special trust is placed on those in the health care industry. We must continue to deserve that trust by conducting all marketing, pricing, and sales activities in an honest, fair, and straightforward manner that represents our integrity and is compliant with all applicable laws.

All MEDICAL GROUP/IPA information is presented in an informative, educational, and nondeceptive manner. We are committed to truth in advertising. All applicable advertising and other materials will be reviewed and approved by regulators as appropriate prior to distribution.

Additionally, we do not offer or give discounts, incentives, gifts, or other unallowable items of value for referrals, enrollment, or continued enrollment.

Political Activities and Contributions

MEDICAL GROUP/IPA is subject to certain rules under Internal Revenue Service and other regulations. While serving in your role as a MEDICAL GROUP/IPA employee, you must seek the advice of the Compliance Department and/or Plan Legal Counsel prior to making political campaign contributions in the name of MEDICAL GROUP/IPA or in your role as an employee of MEDICAL GROUP/IPA.

If you are an employee of MEDICAL GROUP/IPA and are personally involved in politics, you must be sure to express your political views as an individual and not as a representative of MEDICAL GROUP/IPA. Your personal political activities or donations must occur on your own time and at your own expense, away from MEDICAL GROUP/IPA property.

### **Record Retention**

The integrity of our books, records, and financial and other reporting information is a high priority. MEDICAL GROUP/IPA maintains a record creation, retention, and destruction policy that complies with all applicable laws, regulations, and best practices.

Documents and records you handle must be created, retained, and deleted according to the processes defined in our policy. Special rules apply when Legal Counsel asks you to hold on to certain records. Always err on the side of caution and do not delete or destroy information if you are unsure. See your manager and/or MEDICAL GROUP/IPA's Legal Counsel for guidance.