

ARGUS MEDICAL MANAGEMENT AND PROHEALTH PARTNERS

CODE OF CONDUCT

The purpose of this Code of Conduct is to reinforce Argus Medical Management and ProHealth Partners (Argus and ProHealth) corporate values and to serve as a guide for moral, ethical, and legal behavior. Adherence to the Code of Conduct promotes our reputation for integrity and honesty in the community and also ensures that we are compliant with applicable laws, rules, and regulations.

Professional and ethical conduct: We display and promote the highest standards of professional and ethical conduct. We act with the competence, skill, and integrity expected of our professions. We behave with dignity and courtesy toward our patients, clients, coworkers, learners, and others in business-related activities. We are honest, fair, reasonable, and objective in our professional relationships.

Patient's Rights: As healthcare providers, we have an ethical responsibility to make our patients feel secure in our care and to treat patients respectfully and with dignity. In addition to an ethical responsibility, we have a legal responsibility to comply with all applicable laws and regulations related to patients' rights. We must also comply with our policies, including policies regarding informed consent, advance directives, discharge planning, and patient participation in the care plan.

Provide Quality Care: We are committed to following all applicable policies, laws and licensing / accreditation requirements relating to quality of care and patient safety. We uphold the professional standard of care, report patient safety concerns, and engage in quality improvement activities.

Medically Necessary Care: We will provide care that is medically necessary. Medical necessity requires us to be prudent in the utilization of our resources, being mindful not to over-utilize or under-utilize the services provided to our patients.

Preserving Confidentiality and Information Security: Protecting confidential information is a priority. Confidential information includes health information about our patients, information in employee records, and proprietary information about Argus and ProHealth business. We access confidential information and share it with others only when authorized to do so and for the purpose of doing our job. We follow applicable laws and policies when releasing confidential information and report concerns to appropriate parties. We investigate and report breaches of patient information and take steps to secure our systems from unauthorized access and comply with information security policies.

Record and Report Information Accurately: We keep accurate records about our patients, our employees, our physicians, clinical procedures, research trials, and financial transactions. It is the responsibility of each of us, when engaged in record keeping on behalf of Argus and ProHealth (including employee time cards, medical records, and patient bills), to be accurate and honest. For example:

- We do not sign another person's name to documents or share each other's passwords.
- We amend the medical record only in accordance with Argus and ProHealth policy and applicable law.
- We do not fabricate, falsify or plagiarize when proposing, conducting or reporting research.
- Our financial records conform to applicable accounting principles.
- We retain documents for the length of time described in our document retention policies.

Document, Code, Bill and Collect Appropriately: We handle claims for payment of services with integrity to avoid fraud, waste and abuse in healthcare. All Argus and ProHealth personnel are expected to comply with federal healthcare program requirements, including, but not limited to, Medicare / Medicaid rules and federal and state False Claims Acts. We bill only for medically necessary services rendered by eligible providers and properly documented and coded. We respond to patient and payer questions concerning charges in an accurate and timely manner. We correct any billing errors of which we have knowledge and refund payments received in error to third party payers and patients, with appropriate documentation. If you become aware of inaccuracies, notify your supervisor so that the error can be corrected. If you see problems with claims that are not being corrected, contact the Compliance Office or Compliance Hotline.

Do Not Do Business With Excluded Individuals or Entities: We expect all individuals and entities associated with Argus and ProHealth to be appropriately credentialed, licensed and otherwise qualified to perform their duties. Argus and ProHealth does not do business with, employ, or bill for services rendered by individuals or entities that are excluded or ineligible to participate in federal healthcare programs. Argus and ProHealth personnel and vendors have a responsibility to report to their supervisor, Human Resources, Credentialing, or Purchasing (as applicable) if they are excluded, debarred, or otherwise ineligible to participate in healthcare programs.

Cooperate With Inquiries, Audits, and Investigations: We cooperate with government inquiries as well as internal and external audits and investigations. When receiving non-routine requests, we consult with the Legal Department or Compliance Office to ensure that requests are handled properly. We are truthful in what we say. We never alter or destroy records in violation of the law or Argus and ProHealth policy.

Work Safely: The health and safety of our patients and employees is an Argus and ProHealth priority. We comply with workplace health and safety laws and report safety concerns. We follow Argus and ProHealth policies for handling and disposing of hazardous materials and equipment. We only access, handle or prescribe controlled substances in accordance with Argus and ProHealth policy. We comply with fitness for duty policies. We maintain a work environment free from violence and disruptive behavior.

Compete Fairly: Argus and ProHealth is committed to antitrust compliance and fair competition. We do not make unlawful agreements with competitors about prices or charges, services that we provide, or who to buy from. We do not discuss related matters, such as pricing policies, purchasing practices, costs, salaries, marketing plans, or surveys with those outside of Argus and ProHealth. We comply with marketing policies and laws related to truth in advertising.

Conflicts of Interest: We disclose and appropriately manage conflicts of interest. Employees must report any actual or potential conflict of interest. Conflicts of interest are situations in which personal considerations may affect, or have the appearance of affecting, our loyalty and ability to fulfill our responsibilities to Argus and ProHealth. Depending on the circumstances, a "conflict of interest" might include: employment outside of Argus and ProHealth with a competitor or in violation of our policies, supervising a close relative, purchasing stocks based on confidential information, accepting gifts from a vendor, patient, or fellow provider, or causing Argus and ProHealth to contract with vendors with whom you have a personal or financial interest. If you have questions about what might be a conflict of interest, review Argus and ProHealth policies and speak with your supervisor or the Compliance Office.

Political Activity and Fundraising: Argus and ProHealth respects employees' rights to participate in or refrain from political and fundraising activities on personal time. Employees must follow applicable policies relating to use of Argus and ProHealth resources for political activity, engagement in political activity while on work time, and similar issues. Employees may not inappropriately force, direct or encourage coworkers to support or contribute to a political cause, candidate, or party in violation of the law or applicable policies.

Use Resources Responsibly: We use Argus and ProHealth resources responsibly for Argus and ProHealth business purposes, not for personal gain. We spend Argus and ProHealth funds wisely, eliminate waste, and control operational costs without compromising patient care. We use physical assets like computers, vehicles, machinery, and work space for Argus and ProHealth business, and we protect those assets from loss, damage, and theft. We don't waste supplies, equipment, space, or time. We protect intellectual property and respect patents, software licensing, copyright, and other IP agreements.

Prohibit Bribes, Kickbacks, or Payment for Referrals: We do not offer or accept bribes or kickbacks. Bribes and kickbacks are money, gifts, or special treatment given to someone in exchange for a favor. The favor may be many things, from a promise to make patient referrals to a promise to use a particular vendor's product. We also do not offer or accept "something of value" for patient referrals. "Something of value" includes money, services, gifts, entertainment, or anything else of value to the recipient. As this is a highly complex area of the law, employees must take special care and promptly refer any questions to the Compliance Office or the Legal Department.

Prohibit Certain Inducements Affecting Patient Choice: The law prohibits Argus and ProHealth and its employees from offering certain inducements that may affect a patient's decision about where to seek care. For instance, it may be illegal to offer copayment waivers, free services, gifts, and other inducements to encourage patients to receive care at Argus and ProHealth. As this is a highly complex area of the law, employees must take special care and promptly refer any questions to the Compliance Office.

Responsible Use of Social Media and Other Technology: Argus and ProHealth encourages an online and social media culture that complies with the law, internal policies, procedures, and ethical values. Argus and ProHealth employees may not disclose confidential or proprietary information about Argus and ProHealth, its patients, or its employees on social media (including, but not limited to, communications over the Internet, on personal websites or web pages, or in online communities). We do not take or transmit photographs or recordings of patients, visitors or staff in the workplace except as permitted by our policies. Any questions concerning the appropriate use of social media and technology should be directed, as applicable, to the Privacy Office or the Public Affairs and Marketing department.

Report Compliance Concerns Without Fear of Retaliation: Employees are encouraged to contact the Compliance Office whenever they need clarification or direction regarding Compliance issues (including this Code of Conduct). Employees are required to report suspected violations of the Code of Conduct, policies, procedures, the law, and regulations to a supervisor, the Compliance Office, or the confidential Compliance Hotline. Retaliation is not permitted against anyone who seeks advice, raises a concern, or reports misconduct in good faith. Such retaliation should be reported immediately to the Compliance Office.

COMPLIANCE OFFICE: Everyone is encouraged to contact the Compliance Office for clarification or direction regarding the Code of Conduct. Supervisors may be contacted for assistance with questions about the Code of Conduct. Please contact the Compliance Office with unresolved questions and concerns about fraud, waste and abuse.

CONTACT THE COMPLIANCE TEAM

1. Place a phone call with the Compliance Team at 562-299-5273;
2. Email the Compliance Office at Compliance@prohealthpartners.com ; or
3. Mail questions or concerns to: Compliance Office, 5150 E. Pacific Coast Hwy. #500, Long Beach CA 90804.

Codes of Conduct resources are available on the www.argusmso.com, ArgusLink website.