

# VillageMD Code of Conduct

## What is the Code of Conduct?

The VillageMD (“VMD”) Code of Conduct is made up of standards, each of which give you information on appropriate conduct to follow and suggestions for handling problems that could arise. These guidelines are not exhaustive, and you should consult VMD policies or the Compliance Officer for further information.

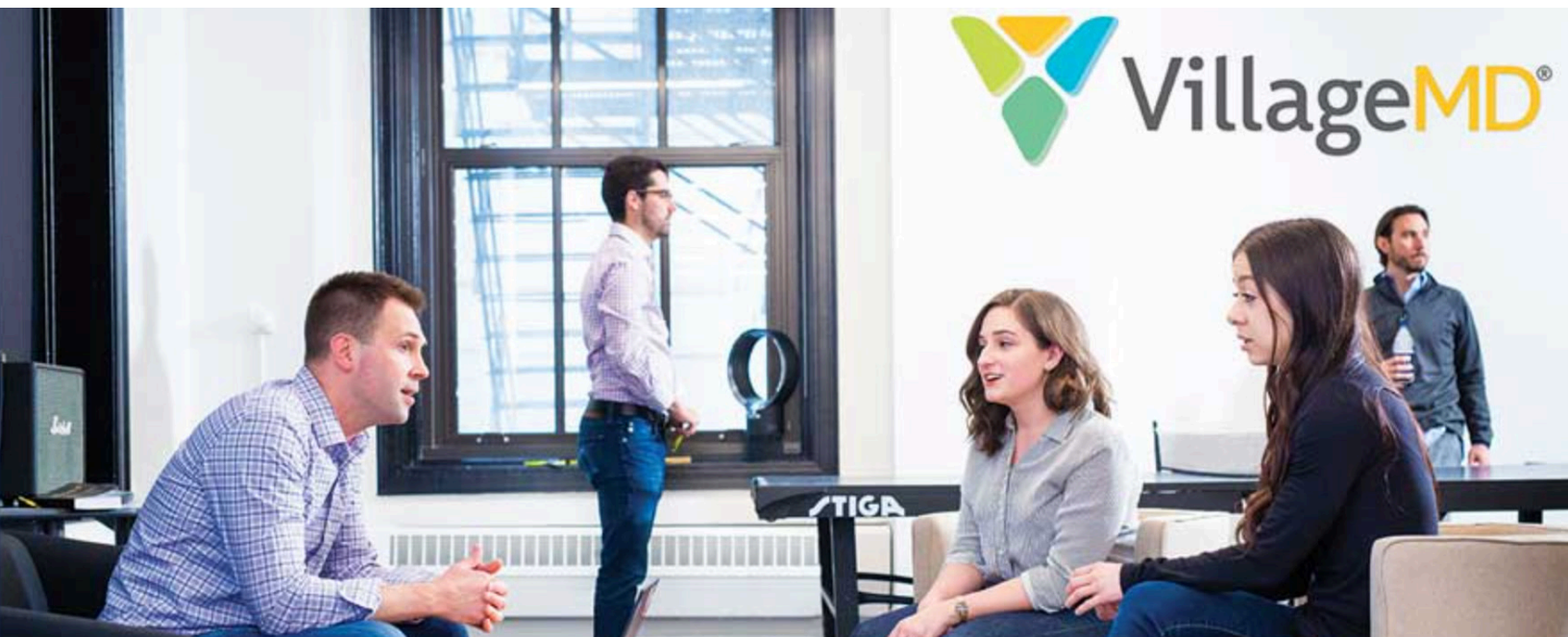
## Does the Code of Conduct Apply to Me?

The VillageMD Code of Conduct applies to all members of the VMD workforce, including employees, vendors, contractors, providers and trainees/students. If you perform or support a clinical or administrative service, for or on behalf of VMD, you are responsible for knowing the Code of Conduct and following it. You are also responsible for following and understanding all federal and state laws, regulations, policies and procedures that apply to your area of work.

## What Are My Responsibilities?

It is the responsibility of everyone in the VillageMD workforce to:

- Know and comply with the Code of Conduct and VillageMD policies and procedures.
- Understand and support VillageMD’s Program as it applies to your job.
- Avoid involvement in illegal, unethical or otherwise improper acts.
- Seek guidance as provided by the Compliance Officer when in doubt about your responsibilities.
- Report any violation of VillageMD’s Code of Conduct or policies, or non-compliance with state and/or federal laws immediately.
- Fully cooperate in any internal review or investigation of misconduct, non-compliance or other violations.



## Code of Conduct Standards

### Standard 1: Maintain the Highest Standards of Professional Ethics and Personal Behavior

This Code of Conduct contains general guidelines for how we conduct ourselves at VillageMD consistent with the standards of professional ethics and personal behavior. The Code is intended to deter wrongdoing and promote honest and ethical behavior, compliance with applicable laws and regulations, and prompt internal reporting of violations.

### Standard 2: Quality of Care

VillageMD is committed to providing the highest quality, safest care, and best value to our patients. All workforce members must provide quality health care in a manner that is appropriate, medically necessary, efficient and promotes the culture of safety. In addition, healthcare professionals are expected to carry all required licenses and follow the ethical and professional standards dictated by their respective professional organizations and licensing boards.

### Standard 3: Treat Others with Respect and Embrace Diversity and Inclusion.

VillageMD is committed to providing a work environment free from all forms of harassment and discrimination and prohibits offensive comments/actions, or any form of bullying. We believe in fostering, cultivating, and preserving a culture of diversity, equity, and inclusion. Team members are expected to treat other team members and patients with respect and the highest levels of professionalism at all times.

Our employees are the most valuable asset we have. The collective sum of the individual differences, life experiences, knowledge, inventiveness, innovation, self-expression, unique capabilities, and talent that our employees invest in their work represents a significant part of not only our culture, but our reputation and VillageMD's achievement as well.

### Standard 4: Privacy and Confidentiality

VillageMD is committed to protecting the privacy and health information of our patients. We also are committed to informing patients about their rights regarding PHI. VMD follows privacy and security laws and regulations that protect patient information, including protected health information ("PHI") under the Health Insurance Portability and Accountability Act of 1996 (HIPAA). You are expected to safeguard PHI of patients by using PHI only when it is necessary to serve the patient, or as permitted or required by law. Patients have certain rights regarding their PHI. You must familiarize yourself with VMD's policies, procedures, and Notices of Privacy Practices.



## Standard 5: Compliance with Laws, Rules, and Policies

VillageMD is committed to full compliance with all federal and state laws, and internal policies. VillageMD expects its workforce to understand internal policies and the federal, state, and local laws that apply each workforce member's area of responsibility and practice.

- **Compliance with Federal Health Programs:** VillageMD provides services governed by federal, state and local laws and regulations specific to the delivery of health care. The laws and regulations prevent the filing of false claims, illegal patient referrals, providing medically unnecessary services, and compliance with Medicare Conditions of Participation.
- **Documentation Standards:** A key part of providing ethical healthcare is documentation. Each team member is responsible for creating and maintaining accurate, complete and timely patient-care records.
- **Accuracy in Coding and Billing:** VillageMD is committed to accurate coding, billing and claims submission. There are numerous laws and regulations that govern how we maintain records and bill for our services. The federal False Claims Act (31 U.S.C. § 3729-3733) makes it a crime to knowingly make a false record or file a false claim with the government for payment. Entities and providers within the VillageMD community should only bill and submit claims for services that are actually provided and medically necessary. If we make an error in a bill or claim, this should be corrected by taking one or more of the following steps:
  - Refund overpayments or payments made in error
  - Resubmit claims
  - Provide additional training
  - Contact government authorities
  - Create new or revised policies and procedures
  - Discipline staff
- **Anti-kickback and Stark:** VillageMD staff must never offer or take compensation of any kind for patient referrals or the maintenance of vendor relationships. Physicians may not refer patients to entities with which they or their families have a financial relationship, unless the financial arrangement is one of the types permitted by law. One exception to Stark is non-monetary compensation. Non-monetary compensation is compensation in the form of items or services that does not exceed a specific dollar amount per year. Team members must strictly follow our organization's policies when being offered non-monetary compensation or other incidental benefits to themselves or their immediate family members. Anti-kickback, Stark and non-monetary compensation laws and regulations are very complicated. They often require interpretation by Compliance and/or Legal. If you face a situation that may violate these laws, contact the Legal Department.

## Standard 6: Conflicts of Interest

All VillageMD members are expected to always act in the best interest of the organization and its patients. All VMD members must avoid any outside activities that distract or negatively impact their job performance. A conflict of interest may occur if outside activities or personal interests influence the ability to make objective decisions while performing your VMD responsibilities. Employees are required to disclose situations where there is an actual and/or potential conflict of interest in accordance with VMD's policy and/or their employment agreement.



## Standard 7: Duty to Report

All employees have a duty to report any known or suspected violations of applicable laws, VillageMD policies or this Code. If you discover a potential violation, immediately report the conduct to your supervisor or the Compliance Department.

The following are different ways you may report concerns:

- Communicate with an immediate supervisor or manager
- Contact the Compliance Department and the Chief Compliance and Privacy Officer at: [compliance@villagemd.com](mailto:compliance@villagemd.com)
- Report using our online Incident Form
- Report anonymously via the Compliance Hotline at: 1.855.236.01714

## Standard 8: Non-Retaliation

VillageMD resolves all reports made in good faith and in a discrete and professional manner. We do not tolerate any type of retaliation. If you feel that you have experienced retaliation for reporting a concern, please contact: [HRSupport@villagemd.com](mailto:HRSupport@villagemd.com).

## What If I Have a Question or Concern?

The opportunity for you to ask questions and raise concerns is a cornerstone of a successful corporate compliance program. We support open discussion of ethical and legal questions and concerns regarding compliance issues and will not tolerate retaliation against any individual who, in good faith, raises questions or reports suspected violations. If you have questions or concerns with any area of compliance, please ask for help.

There are corresponding VillageMD policies and procedures for all Standards mentioned above. To further explore, visit the VillageMD Policies page.

