



People. Passion. Purpose.

Department:	Compliance, Corporate	Policy No:	150
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Areas of Impact:	All P3 Employees and Departments	Supersedes P&P No.	N/A

CODE OF CONDUCT

P3 HEALTH GROUP HOLDINGS, LLC (“P3”)¹ strives to provide quality health care management, clinical and other healthcare services to its customers and patients. P3’s values and goals include the achievement of excellence in working with patients, providers, plans, and payors. A key part of that excellence is the strict compliance with all laws applicable to P3’s operations including all fraud, waste and abuse laws (“FWA”).

The operation of P3 in compliance with all laws shall take precedence at all times over any interest in generating profits. P3, its managers, members, employees and workforce² shall abide by the principles set forth in this Code in its business and clinical operations. However, this Code of Conduct is not intended to fully describe all the laws that apply to its workforce. P3’s Plan of Compliance and other policies and procedures expand upon the main purpose of this Code of Conduct: honest and ethical conduct, compliance with all laws and prompt internal reporting of violations or compliance concerns.

Implementing Compliance and Practice Standards: As a member of the P3 workforce, you are expected to abide by this Code of Conduct, P3’s Plan of Compliance and all other policies and procedures of P3.

In Healthcare Compliance you shall:

- Use best efforts to protect the confidential information of covered entities with which you work, including providers, payors and patients.

¹ When the term “**P3**” is used herein, it also includes the following entities, in addition to P3 Health Group Holdings, LLC (“**Holdings**”) – P3 Health Partners, LLC; P3 Health Group Management LLC; P3 Consulting, LLC; P3 Health Partners-Nevada, LLC; Kahan Wakefield Abdou, PLLC; Bacchus Wakefield Kahan, PC; as well as any direct or indirect subsidiaries of Holdings, whether now existing or hereafter formed.

² “Workforce” includes all P3 employees and independent contractors providing services to P3 or for the benefit of P3, including physicians, other healthcare providers, subcontractors, vendors, participating providers, suppliers, first-tier, downstream and related entities (“FDRs”); and agents (these entities and vendors are collectively referred to as “Business Partners”).



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- Abide by all policies applicable to your position with P3, as well as all state and federal laws and conditions of participation in federal health care reimbursement programs.
- Avoid encouraging or participating, directly or indirectly, in activities such as theft, bribery, kick-backs, misappropriation, submission of false claims, discrimination of any kind, price fixing, or violations of environmental or work place safety laws.
- Avoid making any payment, or offer to make any payment, whether in cash or in kind, to any physician, patient, hospital, facility, or other party in order to induce the referral of patients or other items or services to P3.
- Avoid entering into relationships with any person or entity that may refer business to P3 unless such arrangements involve compensation for fair market value and the arrangements are fully compliant with all laws. No such arrangement shall take into account the volume or value of referrals by such person.
- Bill only for medically necessary services in compliance with all state and federal laws and P3's Billing and Coding Policy and in adherence with the P3 Compliance Plan.
- As applicable, ensure patients are referred for services or procedures that are medically necessary.
- Treat all patients in a non-discriminatory manner in accordance with P3 policies regarding acceptance of patients.

In Business Relations you shall:

- Comply with all fair competition and anti-trust laws, policies, and regulations, and avoid conduct which could be construed as impeding fair competition, such as discussing fee schedules, fixing pricing, allocating markets, or revealing confidential P3 information.
- Avoid, and report when necessary, any conflicts of interest, including gifts from patients, their families, or business affiliates of P3; discounts directly or indirectly benefitting or influencing P3; outside employment that competes with P3 and/or affects performance or responsibilities at P3; and holding a direct or indirect personal or financial interest (including those of close family members) in any business transaction



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of P3.

- Notify P3 administration prior to responding to requests from any broadcast media outlet or any other news or media related organization.

In the Workplace you shall:

- Conduct business with honesty, integrity and in a manner that protects P3's public image and reputation.
- Treat all patients, P3 personnel, and other members of the community with dignity, respect and compassion.
- Maintain a safe working environment, fulfill all duties in a safe manner, and notify the proper P3 personnel immediately of any hazard, injury, equipment problem, or other potential safety issue.
- Avoid the sale, purchase, use, consumption, or possession of alcohol (unless otherwise authorized or in connection with P3-sponsored events), controlled drugs (whether legal or illegal), or drug paraphernalia while on P3 premises, in P3 vehicles, or while engaged in P3 business, and avoid reporting to work under the influence of alcohol or any controlled substance, including prescription drugs which in P3's judgement influence ability to work.
- Abide by P3's prohibition against bringing weapons on any P3 premises, to any P3-affiliated event, or while conducting business on behalf of P3.
- Avoid, and report when necessary, conduct which contributes to a hostile or intimidating workplace, such as offensive verbal or physical behavior, bullying, slurs, name-calling jokes, and inappropriate touching.
- Abide by all policies and procedures of P3 as may be amended from time to time.

Training:

As a workforce member, you will receive compliance and position appropriate training at least once annually. Training is mandatory! You are encouraged to talk with the Compliance Officer about any topics to include in trainings that may be beneficial to you.

To fulfill your compliance training requirement, P3 requires all workforce members to complete



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Gorman University's fraud, waste and abuse and general compliance online training. To access Gorman University's fraud, waste and abuse training and general compliance training, please go to:

http://lms.gormanhealthgroup.com/login/80/P3_Health_Partners.aspx

Compliance Contact:

P3 has designated a Compliance Officer, and its Board of Managers has appointed a Compliance Committee. P3's Compliance Officer's duties include (i) providing leadership for compliance activities; (ii) assisting in updating P3's Plan of Compliance; (iii) conducting training for new and current workforce members; (iv) receiving reports of potential noncompliance; (v) coordinating investigations; and (vi) maintaining records related to compliance activities.

Internal Monitoring and Auditing: P3 shall conduct internal monitoring and auditing on a regular basis and at least annually. Policies and procedures shall be reviewed to assure they are effective and outdated policies shall be updated as needed.

Open lines of Communication:

As a member of the workforce, P3 encourages you to be proactive in seeking out information regarding compliance. Communication is key to an effective Plan of Compliance. As a member of the workforce you have direct access to P3's Compliance Officer. Remember, it is your duty to report any and all suspected occurrence if non-compliance.

If you believe you have an ethical dilemma or suspect inappropriate or illegal conduct, including violation of any FWA or other law, contact your supervisor, the Compliance Officer, management or legal counsel. P3 will report any non-compliance and FWA as required, including reporting to any plan or payor.

Detected Offenses and Corrective Action:

P3 will respond appropriately to any detected or suspected violation of compliance, including self-disclosure if required. The Compliance Officer, Compliance Committee and the Board of Managers implement the proper corrective action, depending on the compliance concern and/or violation.

No Retaliation or Intimidation

There will be no retaliation or intimidation including harassment or adverse employment consequences for reporting any illegal activity or unethical behavior or any suspicion of any illegal activity or unethical behavior. An employee or workforce member who retaliates or intimidates against someone who has reported any violation in good faith is subject to discipline up to and including



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termination of employment or termination of services.

The P3 Compliance Officer shall immediately and fully investigate any allegation of any retaliation or intimidation that might result from the reporting of any illegal activity or unethical behavior or suspicion of any illegal activity or unethical behavior.

If you believe you have been retaliated against you should report this immediately as described above.

Disciplinary Standards through well-publicized guidelines.

Failure to comply with this Code of Conduct, the Plan of Compliance, P3 policies or applicable law will subject workforce members to disciplinary action, up to, and including, termination of employment, to the extent permitted by applicable law. P3 may terminate the services of any Business Partner who fails to comply with this Code, P3's policies and/or applicable law.

If P3's policies and procedures do not provide enough direction and you have any question as to whether you are doing the right thing, ask your supervisor, the Compliance Officer, a member of the Compliance Committee or legal counsel.

The Compliance Officer may be reached at 702-307-4880 or via e-mail at mnutile@p3hp.org A toll-free line (844) 680-0872. is available 24 hours a day, 7 days a week and 365 days per year.

The Compliance Committee Chairperson may be reached via e-mail@abacchus@p3hp.org or call 702-910-3950.