

CODE OF CONDUCT

Central City Community Health Center (Central City) is committed to integrity, ethical behavior, and professional conduct. This Code of Conduct (Code) outlines basic professional behaviors to help ensure legal and regulatory requirements are met regarding, but not limited to, preventing fraud, abuse, and waste.

In addition, it highlights obligations for everyone affiliated with Central City, including members of the Board, officers, employees, per diems, contractors, physician contractors, consultants, and volunteers. This Code of Conduct reviews Conflict of Interest, as an issue may arise regarding personal or family interests, involving some kind of gain, if it occurs in a manner that can harm Central City. This Code of Conduct also addresses the requirement of reporting actual or potential violations of the Code of Conduct as all associated with Central City have a duty to be aware and report wrongdoing.

This Code does not eliminate the necessity of individuals reading the Corporate Compliance Manual, which should be read in conjunction with the other work place rules such as in the Employee Handbook. The Code of Conduct includes the following key areas everyone at Central City must know:

I. COMPLIANCE WITH LAWS AND REGULATIONS

It is important that all understand the key terms, expectations and characteristics of the Code of Conduct everyone is expected to adhere to.

Ethics

This Code highlights some, not all, professional expectations. The core philosophy of Central City is reflected in its expectation that everyone affiliated with the organization be fair, honest, transparent, professional, and courteous to patients, consumers, coworkers, and in dealings with vendors or government officials.

Expectations of Professionalism

Professionalism includes, but is not limited to adhering to standard business behavior of respect, honesty, courtesy, punctuality, collegiality, and excellence in customer service.

Accurate Claims for Reimbursement

All claims for reimbursement to third party payers, including but not limited to Medi-Cal and Medicare must contain accurate, properly documented information only for services provided and supported by the patient's medical record.

Medical Necessity

No supplies or services will be billed unless reasonable and medically necessary.

Accurate Business Records

All business records completed by vendors, employees, contractors, or consultants must accurately reflect the subject matter.

Cost Reports

All cost report data, schedules, and work sheets must be truthful, accurate and complete. Only allowable costs necessary and reasonable are reportable.

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Refunds

If Central City has been overpaid by a government program, third party payer or any consumer, it will promptly refund the payment in accordance with policies/ procedures and applicable state and federal law.

Kickback Prohibition

No employee and/or independent contractor will offer, provide, or solicit anything of value, even nominal (i.e., a cup of gourmet coffee), in return for the referral of Medicare/Medicaid or other government-sponsored consumers, or in return for influencing or engaging in any related business transaction, directly or indirectly, involving the care provided to Central City patients.

Co-Payments/Discounts

The collection of insured co-payment obligations will not be waived unless it is consistent with the Central City sliding fee scale policy. A record of the consumer's financial hardship must be kept on file.

Certifications of Medical Condition

Evaluations of a consumer's medical condition and qualification for health care will never be misrepresented.

Honest Dealing with Government Officials

No one affiliated with Central City will attempt to improperly influence actions or decisions made by government officials, employees, vendors, consultants, or contractors.

Cooperation and Government Audit and Investigation

Central City will be truthful, cooperative, responsive, and transparent in its dealings with governmental inquiries including audits, surveys, and certifications reviews.

II. CONFLICT OF INTEREST

Conflict of Interest for Private Financial Gain

Conflict of Interest may arise when a person affiliated with Central City benefits directly and to the detriment of the organization. He or she may volunteer, work at another organization (perhaps part-time) or have an immediate family member working or volunteering at another organization in conflict or competition with Central City.

No employee, contractor, agent, officer or member of the Board of Directors may participate in the selection, award or administration of a contract in which government funds are used, in which he/she or his/her immediate family or partner has a financial interest or with whom he/she is negotiating or has any arrangement concerning employment.

All employees, contractors, agents, officers and members of the Board of Directors must disclose in writing all business and family relationships which might potentially create a conflict of interest. Employees, contractors and agents must disclose to the CEO (and the CEO must disclose to the Board of Directors) in writing the specifics of any plans to accept supplemental outside employment so that the Health Center may determine whether such outside employment has the potential to undermine the organization.

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If an employee, contractor, agent, officer or member of the Board of Directors believes that they, or a member of their immediate family or partner has a possible conflict of interest, he must immediately disclose this in writing to the CEO and Compliance Officer. Disclosures by members of the Board must also be made to the Board Chair. If the Board Chair has a possible conflict of interest, this disclosure must be made to the full Board.

No member of the Board may vote on any matter which may directly or indirectly result in financial gain to that member, or which may conflict with that member's obligations to another organization's Board of Directors or to his/her employer. Recusal and leaving the meeting during discussions is required. Nor may he/she advise Board members on the matter outside of the meeting.

An employee involved in any of the types of relationships or situations described in this policy should immediately and fully disclose the relevant circumstances to his or her immediate supervisor, or any other appropriate supervisor for a determination about whether an actual conflict exists. If an actual conflict is determined, CCCHC may take whatever corrective action appears appropriate according to the circumstances. Failure to disclose facts shall constitute grounds for disciplinary action.

Compensation to Members of the Board of Directors

Within the limits of available funds, directors may be reimbursed for reasonable expenses incurred by their Board activities, travel expenses, meals and incidentals. Board members will not be compensated for services rendered in the ordinary course of service as members of the Board.

Gifts/Gratuities

No personnel will engage, either directly or indirectly, in any corrupt business practice, including bribery, kickbacks or payoffs, intended to influence or reward favorable decisions of any patient, physician, employee, government representative, contractor, vendor, or any other person able to benefit the organization or the employee in any way. Few exceptions fall under the safe harbor of No employee or Board member will make or offer any payment or provide any other thing of value to another person with the understanding or intention that such payment is to be used for an improper purpose.

Personnel may provide, however, gifts of nominal value (cup of coffee, homemade cookies, small holiday or birthday gift like a book or piece of clothing of low monetary value). No such gifts, even of minimal or nominal value, can be given or accepted for influencing business behavior.

Cash gifts to physicians, their employees, or other referral sources are strictly prohibited. No gift of any value may be offered to any governmental official. Such gifts can be misinterpreted as an attempt to improperly influence the official.

The exception to this policy will be for group activities sponsored by a vendor that has been approved by the CEO. Violation of this policy may lead to disciplinary action, up to and including suspension and or termination of employment.

Any questions regarding whether an item or situation falls within the scope of this section must be immediately brought to the Compliance Officer to assess and make a recommendation.

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Competition

All procurement transactions are conducted to provide, to the maximum extent practical, open and free competition. Organizational conflicts of interest or non-competitive practices among contractors are to be avoided. Consultants who want to bid for a contract from Central City are prohibited from drafting the contract's specifications, request for proposals and the like.

Awards will be made to the bidder whose proposal is responsive to the solicitation and most advantageous to the organization, which includes price and quality of services. Central City retains the right to reject any bid not in its best interest. It retains the right to determine with respect to procurement, whether a sole source procurement is justified.

Bribery

Any employee or Board member will be removed and a contract terminated if a bribe or other wrongdoing is discovered.

III. PROHIBITED CONDUCT

To ensure orderly operations and provide the best possible work environment, Central City expects all to follow rules of conduct that will protect the interests and safety of all employees, supervisors, co-workers, guests, vendors and the organization.

It is not possible to list all the forms of behavior that are considered unacceptable in the workplace; however, a comprehensive list can be found in the Employee Handbook. Any infractions of rules of conduct or other types of conduct that threaten security, personal safety, employee welfare and organization's operations are prohibited and may result in disciplinary action, up to and including termination of employment.

IV. CONFIDENTIAL INFORMATION

Employees, contractors, agents, officers and Board members may gain access to confidential (i.e., non-public) information by his/her position within Central City. Anyone affiliated with Central City must maintain strict confidentiality that limits the context in which, and persons to whom, confidential information may be communicated. This is not limited to patient information, but includes everything of a business or proprietary nature.

Board members may not communicate confidential information about Central City to anyone who is not also an officer or Board member, absent the explicit authorization of the full Board of Directors. If, because of negotiations in which the organization is engaged, an officer or Board member gains access to confidential information of another entity, the officer or member of the Board may not communicate this information about the other entity to anyone who is not also an officer or member of the Board, without the authorization of the full Board. If the organization executes an agreement with another entity and the agreement includes provisions governing confidentiality of information, all officers and Board members are bound by those provisions.

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Confidentiality of Office and Patient Information

No one can make verbal, signed, or recorded statements to outside parties regarding the office, fellow employees, any client, client's provider, contractor or any patient's treatment without the knowledge and proper consent.

All shall hold information concerning the condition, care, or treatment of any patient in strict confidence. Under no circumstances shall this information be discussed with anyone, even the patient's family and friends, unless the CEO or his/her designee determines it necessary.

Issues are not to be discussed outside the office in the hallways, or break areas. Any provider, patient or any employee's record is a confidential and legal document, and employees shall not access these records unless required to do so as part of their normal job duties.

Violation of this policy will result in disciplinary action, up to and including discharge. Any unauthorized violation of confidentiality is considered a misdemeanor and is punishable by a fine of \$500 or three times the amount of actual damages, if any, sustained by the plaintiff.

All inquiries or requests from news media must be referred directly to the CEO or his/her designee.

This policy does not apply to the general business affairs of the office such as routine reporting and inquiries by our client's third-party payers, routine accreditation and licensing activities, properly executed patient release of records or information, or standard admission, transfer, and discharge communications.

V. SEXUAL HARASSMENT

All must read, understand and comply with the Company's anti-harassment policy (to include sexual harassment) as detailed in the employee handbook. Managers will be expected to undergo required training as mandated by state and federal law and to ensure that all are aware of Central City's anti-harassment policies.

VI. POLITICAL ACTIVITIES

CCCHC is a non-profit tax-exempt organization which receives federal and state funding. As such, none of the funds, materials, property or services provided directly or indirectly by CCCHC may be used for or to promote any partisan or non-partisan political activity, to support or defeat any legislation or for any sectarian purpose or activity.

The law prohibits employees from taking part in support or opposition of a candidate for public office, any federal, state or local legislation or political management and campaigning and from using their position to influence or affect an election and from engaging in certain other activities while on duty. No employee, contractor, or agent to Central City may engage in political activities during business hours. No employee, contractor, agent, officer or member of the Board of Directors may use the organization's name, facility, or resources relating to political activities.

No federal grant or related funds may be used to support the costs, if any are incurred, of prohibited lobbying activities as defined variously in OMB Circular A-122, Department of Health and Human Services (DHHS') rules implementing the Byrd Amendment and DHHS appropriations riders.

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Employees, contractors, agents, officers and Board members may not solicit political support in any manner, which might suggest that Central City supports any political party or candidate. No employee, contractor, agent, officer or Board member shall, in any manner, solicit financial assistance or subscription for any political party, candidate, fund, publication, or for any other political purpose from employees in the workplace or in an employment-related setting.

CCCHC employees are prohibited from using their authority, position with or employment by the company for the purpose of interfering with or affecting the result of an election, soliciting, accepting or receiving a political contribution, running for the nomination or as a candidate for election to a partisan political office, soliciting or discouraging the participation in any political activity by any person who has business involving the employer, engaging in any political activity while on CCCHC's premises or any building involving CCCHC's business or while using any of the CCCHC's vehicles.

VII. NEPOTISM

Central City will not hire any individual who is related to an employee or contractor of the organization if, in the position being applied for, the applicant will supervise, or be supervised by, the related employee or contractor.

Every applicant for employment with the organization must disclose all family and business relationships with employees, contractors, agents, officers and members of the Board of Central City. In addition, if someone is hired who has a relative already working at Central City, both parties must disclose this in the annual conflict of interest survey.

VIII. PERFORMANCE MANAGEMENT

Central City believes all employees need to know what is expected of them and be informed of how well they are performing their job duties.

Our approach to managing performance includes regular formal and informal verbal and written performance reviews, performance improvement and possible disciplinary action. None of these activities change the nature of at-will employment and employment may be terminated by the team member or by CCCHC at any time, with or without prior notice, with or without cause, and with or without following any system of performance improvement. CCCHC may decide, in its sole discretion, to utilize forms of action that may include, but are not limited to, documented supervisor/employee conversations, verbal coaching/counseling, verbal or written warnings, development plans, and suspension with or without pay, demotion, or transfer.

Although one or more of the above steps may be taken in connection with a particular performance issue, it is not progressive, there is no formal order or system, and action taken will be based on the situation. CCCHC reserves the right, in its sole discretion, to use any or none of these performance improvement measures, as it may deem appropriate. CCCHC will carefully review all steps taken, and facts concerned, before any termination.

Managers and employees must be aware of our protocols regarding these practices as outlined in the employee handbook.

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IX. OFF-DUTY CONDUCT

While CCCHC does not seek to interfere with the off-duty and personal conduct of its employees, certain types of off-duty conduct may interfere with the Company's legitimate business interests. For this reason, employees are expected to conduct their personal affairs in a manner that does not adversely affect the Company's or their own integrity, reputation or credibility. Off-duty conduct by an employee that directly conflicts with the Company's essential business interests and disrupts business operations will not be tolerated.

Reporting Violations of Code of Conduct

Violations, or suspected violations of the Code of Conduct must be reported promptly. Central City takes all reports of fraudulent, abusive, or other improper conduct and non-compliance with the Code seriously.

Reports may be made as follows:

- To a Central City manager or supervisor
- Directly to Central City's Corporate Compliance Officer
 - In person: 1000 San Gabriel Blvd, Suite 200, Rosemead, CA
 - By phone: (323) 724-0019
 - By e-mail: compliance@centralcityhealth.org
- Anonymously by contacting the toll-free Compliance Hotline
 - By phone: (844)740-4187
 - By website intake: www.centralcityhealth.ethicspoint.com

Employees, contractors and agents who violate the Code of Conduct may, depending on the severity of the violation, be subject to oral admonishment, written reprimand, reassignment, demotion, contract termination, suspension or separation, in addition to legal penalties which might apply.

Officers and members of the Board of Directors who violate these standards may, depending on the severity of the violation, be subject to oral admonishment or removal from the Board.