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| <b>POLICIES AND PROCEDURES<br/>NIVANO PHYSICIANS MEDICAL<br/>GROUP (NPMG)</b> | <b>COMP6<br/>Original Effective Date: 1/1/18<br/>Revised Date:<br/>Review Date:</b> |
| <b>DEPARTMENT</b>   | <b>Compliance</b>   |
| <b>SUBJECT</b>  | <b>Standard of Conduct</b>  |

**NIVANO PHYSICIANS MEDICAL GROUP (NPMG)** is firmly committed to comply with its legal and ethical obligations under all state and federal laws. As a result, we expect employees, Members of the Board and any entity doing business with NPMG, including business associates, first tier and downstream entities, to comply strictly with all legal and ethical obligations. The Board of Directors will review and approve this policy annually.

- A. Compliance with Laws and Regulations - By making it the responsibility of all entities doing business with NPMG to regulate compliance with our strict ethical standards and commitment to comply with all legal responsibilities, we can continue to maintain the highest level of moral, ethical and legal standards in conducting our business.
- B. Reporting Potential Violations - If any vendor, Business Associate, First Tier and/or Downstream Entity, becomes aware of any fraud, waste, abuse, any violation of a legal or ethical obligation, or any unfair or improper treatment of an NPMG Member, they must immediately report the matter so it can be investigated. The Federal False Claims Act and similar state laws make it a crime to present a false or fraudulent claim to the government for payment. NPMG holds all entities doing business with NPMG responsible for carrying out and monitoring compliance with this commitment.

- Mail: Chief Compliance Officer  
NIVANO PHYSICIANS MEDICAL GROUP  
1420 River park Drive, Suite #200,  
Sacramento, CA 95815

- E-Mail: [bbryson@nivanophysicians.com](mailto:bbryson@nivanophysicians.com)

NPMG will take all necessary steps to investigate any potential violations of our policy and will take appropriate action to correct any violations or incorrect perceptions that are found to exist.

- C. Non-Retaliation Policy - Individuals should feel free to report any information regarding this policy without fear of reprisal or retaliation of any kind. NPMG will treat such information as confidential to the extent it can do so without failing to fulfill its legal

obligations. In addition, those who do not wish to identify themselves can report information anonymously.

- D. Gifts and Business Courtesies - NPMG discourages its vendors from providing gifts, meals, entertainment, or other business courtesies to its employees. NPMG is a public entity and required to comply with the rules set forth by the California Fair Political Practices Commission.