



Code of Ethics and Business Conduct 2018

Dear Team,

Welcome to CityMD's new **Code of Ethics and Business Conduct ("Code")**. As with all of our policies and procedures, it will help you do your jobs the right way each day, and we hope that it will also help you when you need guidance on compliance-related issues.

This Code further exemplifies our commitment to honesty, integrity and ethical behavior in everything that we do. We always strive to provide the highest quality medical care, protect patient privacy, and work honestly and fairly with our partners and state and federal governments. We value the contributions of everyone affiliated with our offices and urgent care centers. And, we're very proud of what we've achieved together, including our NCQA Patient-Centered Connected Care Recognition as well as our UCAOA accreditation, which is the highest level of distinction for urgent care centers and demonstrates our commitment to excellence in areas meaningful to our patients, communities and employees.

The commitment we make to each other as teammates is important, and we promise to provide all of you with a workplace that is free from discrimination, harassment and retaliation. This Code provides tools to help ensure that our work is done in an ethical and legal manner, and contains resources that can help you get assistance when you believe the Code may have been violated, because as a CityMD team member you are required to know the Code and to report any activity that may be a violation.

If you become aware of any such activity, you should report it immediately to Ernie at compliance@citymd.net. You can also make a confidential, anonymous report by calling **The CityMD Ethics and Compliance Hotline**, 24 hours a day, 7 days a week, at **833-TO-COMPLY** (833-862-6675) or by visiting lighthouse-services.com/CityMD. You will not experience retaliation for asking questions or reporting concerns in good faith about the Code or about conduct you have observed in the workplace.

Compliance is the responsibility of every member of the CityMD community, and an integral part of quality. Only when we follow all the rules and comply with all the relevant state and federal laws governing healthcare, can we truly continue to provide high-quality care.

This Code establishes the foundation we need to maintain the trust of our patients, team members and communities, as well as those who do business with us. Everyone's professional conduct should reflect the ethical standards defined in the Code.

A compliance program will never be successful if only the leaders believe in it; we cannot do it without you. Please join us in working to maintain CityMD's reputation as a leader in the healthcare industry.

Thank you,

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- Rich and Ernie



Richard Park
Chief Executive Officer



Ernesto Marrero, Jr.
Chief Compliance Officer

This Code of Ethics and Business Conduct (“Code”) sets forth standards of conduct that all personnel employed by or associated with City Medical of Upper East Side, PLLC, City Practice Group of New York, LLC, City Medical of New Jersey, PC, City Practice Group of New Jersey, LLC, City Management of Washington, LLC, and their related entities and business associates, (“CityMD”) are expected to follow.

The standards of conduct set forth in the Code often exceed those required by law. This is consistent with our commitment to uphold the highest standards of ethical conduct.

CityMD is committed not only to providing patients with high quality and caring medical services, but also to providing those services *faster, better, easier* and pursuant to the highest ethical, business, and legal standards. These high standards must apply to our interactions with everyone with whom we deal. This includes our patients, the community, other healthcare providers, companies with whom we do business, government entities to whom we report, and the public and private entities from whom reimbursement for services is sought and received by CityMD. In this regard, all personnel must not only act in compliance with all applicable legal rules and regulations, but also must strive to avoid even the appearance of impropriety. While the legal rules are very important, we must hold ourselves up to even higher ethical standards.

In short, we do not and will not tolerate any form of unlawful or unethical behavior by anyone associated with CityMD. We expect and require all personnel to be law-abiding, honest, trustworthy, and fair in all of their business dealings. To ensure that these expectations are met, the Code an integral part of our corporate culture and business operations.

First and foremost, it is essential that we ensure that we are operating pursuant to the highest ethical standards and in conformity with all applicable legal rules. This is not only **the right thing to do**, but is also important for our continuing reputation for honesty and integrity in all of our business and medical dealings with others. That reputation has been achieved and maintained through the integrity of our officers and employees, and it is one of our greatest assets; our success depends in large measure upon the trust patients, government regulators, and the public place in us. Our Code will help ensure that we live up to this reputation and continue to deserve that trust.

This Code sets forth the standards of conduct that all personnel are expected to follow. Everyone should adhere both to the spirit and the language of the Code, maintain a high level of integrity in their business conduct and avoid any conduct that could reasonably be expected to reflect adversely upon the integrity or reputation of CityMD.

All personnel associated with CityMD, including physicians, and licensed professionals who may treat patients at our practice sites, must avoid illegal conduct, both in business and personal matters. No personnel will take any action that he or she believes is in violation of any law, rule, or regulation. In addition, all personnel must strive to avoid even the appearance of impropriety, and must never act in a dishonest or misleading manner when dealing with others, both within and outside CityMD.

Remember, always to use good judgment and common sense. This Code is intended to reflect the collective good judgment and common sense of all of us. Whenever you see a situation where this purpose does not appear to be served by the Code, you have the responsibility to bring your concerns to the attention of the Chief Compliance Officer.

Our Code reflects our collective commitment and our responsibility to uphold our organization's reputation, practice ethical business behavior, meet rigorous professional standards, and comply with the laws, regulations and policies that govern our work. The Code applies to every individual associated with CITYMD and its Affiliates, whether employee, volunteer, or member of Medical Staff.

The Code articulates our commitment to our values and ethical business behavior while reminding us that our overriding responsibility is to use sound judgment and personal integrity. It is the responsibility of each of us to understand and comply with the organizational policies and procedures emanating from our Code.

We are committed to knowing and adhering to our organizational policies, performing our work in compliance with all applicable state/federal laws, regulations and our organization's policies and procedures, knowing and complying with the legal requirements relevant to our jobs, reporting any suspected wrongdoing, cooperating with activities and investigations that are conducted to ensure compliance, avoiding conflicts of interests, keeping accurate and complete records, and respecting patient confidentiality.

In order to assist in complying with laws and regulations, CITYMD and its Affiliates have implemented a Compliance Program and adopted corporate compliance policies. Our Compliance Program is designed to enhance our understanding of acceptable behavior and appropriate decision-making, and everyone must at all times act in a way to meet the requirements of the mandatory Compliance Program. Every individual is required to cooperate fully in the implementation of the Compliance Program and comply with all compliance policies. It is everyone's duty to promptly report any activity that appears to violate the Code or any laws, regulations or organizational policies.

The Compliance Program will work effectively only if everyone works together to ensure its success, understands what is required under the law and our own Code, and works to ensure that those standards are being followed in all of our business dealings. Failure to comply with the standards of conduct set forth in this Code or the requirements of our mandated Compliance Program will result in serious consequences both to the employee, such as being disciplined, being fired, or even being charged with a crime, and to CityMD, such as criminal prosecution, substantial monetary fines and, of primary importance, the loss of our reputation for honesty and integrity.