



**Code of Ethics and Business Conduct 2020**  
**Compliance Program Plan 2020**

Dear Team,

Welcome to CityMD's **Code of Ethics and Business Conduct** ("Code"). The Code, along with our policies and procedures, will help you do your jobs the right way and guide you when you are presented with compliance-related issues.

This Code 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 the 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 and 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 you suspect or know to be a violation.

If you become aware of any such activity, you should report it immediately to Michelle O'Neill, VP, Corporate Compliance and Privacy at [compliance@citymd.net](mailto: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](https://lighthouse-services.com/CityMD). You will not experience retaliation or intimidation 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 the communities we serve, 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,

Jeffrey Le Benger, MD  
Chief Executive Officer

Michelle O'Neill  
VP, Corporate Compliance and Privacy

## CityMD Code of Ethics and Business Conduct Compliance Program Plan

The CityMD Code of Ethics and Business Conduct and the Compliance Program Plan (collectively, the “Code”) capture our commitment to our values and ethical business behavior. We recognize that our success depends in large part on the trust patients, government regulators, and the public place in us, and we are committed to live and work by this Code to ensure that we, our business partners, and everyone associated with us live up to this reputation and continue to deserve that trust.

That commitment extends not only to providing patients with high quality and caring medical services, but to conducting ourselves in all we do according to the highest ethical, business, and legal standards. We understand our obligation to know and comply with the requirements of our jobs and our professions, the policies that define and guide our work, and the laws and regulations that govern them. Compliance is everyone’s responsibility.

We are committed to being honest, trustworthy, fair, and maintaining a high level of integrity in all we do, both in our business dealings and personal matters. We avoid even the appearance of impropriety, live by not only the letter but the spirit of this Code, and avoid any conduct that could reasonably be expected to reflect negatively upon our integrity or reputation, or that of CityMD.

This Code creates a duty for all of us to encourage everyone we work with to meet the expectations of the Code, and to fully participate in the mandatory Compliance Program detailed in the Compliance Program Plan. That participation requires us to promptly raise, without fear of retaliation or intimidation, any issue we believe in good faith may not be consistent with the Code with supervisors, managers, the VP of Corporate Compliance and Privacy, or through our anonymous Hotline at 833-To Comply.

Meeting the expectations and standards of conduct as set forth in this Code and the requirements of our mandated Compliance Program is central to all we do that failure to comply can result in serious consequences to employees, business partners, or CityMD. Those consequences include disciplinary action against employees, including termination of employment, or being charged with a crime; the termination of contracts or relationships with business partners; or CityMD being charged with a crime, fined substantial amounts of money, and most importantly, losing of our reputation for honesty and integrity.

We believe in and understand the importance of the expectations and standards of conduct in the Code and commit to meet them in all we do.