



Code of Conduct and Compliance Program

Last Updated: 7/20, 12/22, 3/23, 6/23, 7/24

Letter from the Founders:

PM Pediatric Care was founded on the belief that there is a better way to deliver acute medical care to children and young adults. Since we first opened our doors in 2005, we have challenged the status quo in the healthcare industry, provided superior quality urgent care services to patients and their families, and sought to uphold the highest business and ethical standards in all of our operations. In order to achieve our goals, it is imperative that each member of the PM Pediatric Care team demonstrate integrity, honesty and ethical values. This is because the actions of our team reflect on the Company as a whole.

This is where we are relying on you. The principles outlined in this Code of Conduct and Compliance Program are intended to provide you with a framework of the core values that we expect from every employee, contractor, volunteer, or individual associated with PM Pediatric Care. We recognize that this Code of Conduct and Compliance Program cannot anticipate every scenario that you may encounter during your association with PM Pediatric Care. However, the principles embodied in this Code of Conduct and Compliance Program can be applied to a range of situations, and you may use the methods set forth herein to contact appropriate personnel in case you encounter a situation not covered in this Code of Conduct and Compliance Program or where you are otherwise unsure how to act. When in doubt, raise your question or concern to your supervisor, Regional Medical Officer, Operations Manager, or a member of the Compliance Department. Our doors are always open to address your compliance concerns.

Similarly, we depend on you to encourage and foster compliance at PM Pediatric Care. We rely on you to report compliance concerns you may encounter so that the Company can adequately address them and ensure that, going forward, we continue to operate our business in compliance with all applicable laws and regulations and in accordance with our high standards.

We encourage you to read this Code of Conduct and Compliance Program carefully and to keep a copy for future reference. Familiarizing yourself with the policies contained in this Code of Conduct and Compliance Program and the compliance resources that we make available to you will guide your day-to-day behavior and will provide you with a blueprint of our compliance expectations. We appreciate your role in helping us achieve our goal of maintaining a culture of ethics and compliance at PM Pediatric Care.

Sincerely,

Jeffrey Schor, M.D. and Steven Katz

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Introduction:

At PM Pediatric Care¹, we take pride in our professional approach to health care and are fully committed to conducting business in compliance with federal, state and local laws and regulations. This Code of Conduct and Compliance Program was developed to underscore PM Pediatric Care’s commitment to compliance and to serve as a guide for its employees, senior leadership, executives, officers, directors, managers, contractors, subcontractors, agents, independent contractors (herein referred to collectively as “contractor” or “contractors”), volunteers, trainees, interns, students, vendors, and all other persons associated with PM Pediatric Care (“Staff”) to ensure that their conduct adheres to the standards set forth in this Code of Conduct and Compliance Program and with applicable law.

This Code of Conduct and Compliance Program outlines the structure, policies, and systems adopted by PM Pediatric Care to ensure compliance and to prevent, detect, and address non-compliant behavior. All Staff must follow the standards of conduct set forth herein and participate in the activities of the Code of Conduct and Compliance Program. The Code of Conduct and Compliance Program applies to the following key areas of PM Pediatric Care’s operations, among others: billings, payments, ordered services, medical necessity and quality of care, governance, mandatory reporting, credentialing, contractor oversight, and other risk areas that are or should reasonably be identified through organizational experience.

Remember, compliance is everyone’s responsibility. All Staff are expected to read, understand, and abide by the Code of Conduct and Compliance Program. Adherence to the Code of Conduct and Compliance Program is a requirement for continued employment and/or affiliation with PM Pediatric Care. Failure to comply may result in disciplinary action up to and including termination and/or referral to law enforcement. The Code of Conduct and Compliance Program cannot address or anticipate every situation that Staff may face at PM Pediatric Care. Staff members encountering circumstances not covered in the Code of Conduct and Compliance Program should apply to the situation the concepts, standards, and overall philosophy discussed herein and seek advice from appropriate personnel. If a Staff member has a question about the Code of Conduct and Compliance Program or how to act in a given situation, he or she should contact the Compliance Officer or any member of the Compliance Department at the contact information listed below.

Compliance Officer: Craig D. Bloom, Esq.

Privacy Officer: Christine DeMarco

Security Officer: Paul Knight

¹ For purposes of this Code of Conduct and Compliance Program, the term “PM Pediatric Care” or the “Company” refers to PM Pediatrics Management Group, LLC, its affiliates and subsidiaries, as well as all medical practices under management by PM Pediatrics Management Group, LLC.

Mailing Address: One Hollow Lane, Suite 301
Lake Success, NY 11042
Attn: Compliance

24-Hour Anonymous Reporting Compliance Hotline: Dial (516) 953-4600 or submit a report online at reportinghotline.pmpediatriccare.com.

Part I: Code of Conduct

PM Pediatric Care's mission is to ensure that patients receive superior quality healthcare when they need it. PM Pediatric Care is committed to the following values in the delivery of medical services to patients and in all interactions with others:

- Provide patients and their families with high quality medical care in a respectful and compassionate manner;
- Adhere to the highest ethical, business and legal standards in all interactions with patients and their families, other providers, vendors, government entities, public and private payors, and all members of the community;
- Avoid even the appearance of impropriety, dishonesty or wrongdoing;
- Create an environment where questionable or non-compliant activity may be challenged without intimidation, retaliation or harassment; and
- Enforce the standards of conduct set forth herein and all applicable laws and regulations through the operation and enforcement of the Code of Conduct and Compliance Program as an integral part of PM Pediatric Care's business.

Staff shall adhere to the following standards of conduct and avoid all conduct that could reflect poorly on the Company's integrity or reputation:

Standard #1: Compliance with Laws, Regulations, and PM Pediatric Care's Policies

Staff shall comply with all company policies and federal, state and local laws and regulations governing PM Pediatric Care's operations. Staff shall not participate in, encourage, facilitate or permit conduct that violates this Code of Conduct and Compliance Program, company policies, or the law. Staff are responsible for understanding and complying with this Code of Conduct and Compliance Program and all applicable laws and regulations. Staff who are unsure as to whether a certain activity is legal or proper are responsible to ask for clarification before engaging in the activity. Staff must cooperate with the Compliance Department in carrying out the policies and objectives of this Code of Conduct and Compliance Program.

Standard #2: Professional Ethics and Fair Business Dealings

PM Pediatric Care seeks to uphold the highest standards of business ethics in all of its activities. Staff shall be honest and truthful in all interactions with others and avoid conduct that creates even an appearance of impropriety, dishonesty or wrongdoing. Staff will ensure that PM Pediatric Care represents itself fairly and accurately in its business relationships and will not engage in any fraudulent, improper or illegal business activity. All communications, information and records transmitted to a government agency or third-party payor shall be accurate and truthful. Staff shall forego any business opportunity or transaction that may be obtained only by improper or illegal

means and shall not make any unethical or illegal payments to receive referrals or generate business.

Standard #3: Protection of PM Pediatric Care's Assets

PM Pediatric Care must preserve and protect its assets by promoting efficient use of its resources and by ensuring that assets are used only for legitimate business purposes. Staff may only use PM Pediatric Care assets for performing their job responsibilities and may not use company assets for personal benefit. Staff shall assist in preserving PM Pediatric Care's assets including, but not limited to, its time, materials, supplies, equipment and communication systems such as telephones, computers, electronic mail, internet access and voicemail. Staff must adhere to the standards set forth in the PM Pediatric Care Information Technology Security Awareness and Acceptable Use Policy with respect to the Company's information systems.

Staff shall not steal from PM Pediatric Care or misappropriate company assets including, but not limited to, its financial assets, proprietary business information, supplies, medicine, materials, intellectual property, or equipment. Staff may only seek reimbursement for expenses to the extent such expenses were incurred in the course of carrying out their job duties and were prepared and submitted in accordance with PM Pediatric Care's expense reimbursement policies. A violation of this standard may lead to termination of the Staff member and PM Pediatric Care reporting the incident to the appropriate government agencies or law enforcement.

Standard #4: Equal Opportunity

PM Pediatric Care is committed to diversity, equity and inclusion, including equal employment opportunities and medical care to all persons without regard to such person's race, religion, color, national origin, ancestry, sex, gender identity and expression, sexual orientation, pregnancy or pregnancy-related medical condition, marital status, age, physical or mental disability, genetic information, veteran status, military service, application for military service, or any other characteristic protected by law. This standard applies to all aspects of employment, including selection, compensation, discipline, termination, and benefits. Staff must treat all others with dignity and respect.

Standard #5: Prevention of Harassment

PM Pediatric Care is committed to maintaining an environment that is free of harassment based on sex or any other personal characteristic protected under federal or state law. In keeping with this commitment, PM Pediatric Care will not tolerate sexual or other harassment by anyone, including any Staff member, supervisor, vendor, or client of PM Pediatric Care and also requires that all employees undergo training to recognize and respond to sexual harassment. All Staff are responsible to ensure that PM Pediatric Care prevents and avoids harassment. If a Staff member feels that he or she has experienced or witnessed harassment, the Staff member should immediately report the incident. Reports may be made to the Compliance Officer directly, by calling the 24-

hour Compliance Hotline at (516) 953-4600 or by submitting an online report at reportinghotline.pmpediatriccare.com. Staff members may review PM Pediatric Care's Employee Handbook and/or may refer to PM Pediatric Care's sexual harassment training materials for alternative mechanisms for reporting harassment.

Standard #6: Confidentiality

Staff are prohibited from disclosing any confidential information they may learn about PM Pediatric Care. This confidential business information includes, without limitation, trade secrets, staff data, financial data, development plans, proprietary research data, managed care and other contract rates, marketing strategies, information about pending or contemplated business deals, and information about other strategies, all of which belongs exclusively to PM Pediatric Care. This information may not be used for personal benefit or disclosed to others for their use under any circumstances during or following the Staff member's employment or affiliation with PM Pediatric Care. Staff are responsible for safeguarding the privacy and security of such information.

If unsure of the rules governing the access to, release or use of any business information, Staff are responsible to seek clarification of the rules before they access, release or use such information.

Standard #7: Patient Privacy

PM Pediatric Care takes patient privacy very seriously and is obligated to protect the confidentiality of all patient information consistent with applicable federal and state laws including, but not limited to, the Health Insurance Portability and Accountability Act of 1996 ("HIPAA"). Disclosure of any patient information, whether intentional or unintentional, including information about a patient's medical condition, history, treatment, payment or financial status is prohibited.

All Staff members are responsible for patient privacy. Care must be taken to ensure that medical records are not visible to third parties and that conversations concerning a patient's condition or treatment are not overheard by others. Staff are responsible for understanding and complying with PM Pediatric Care's privacy policies governing the release and transmission of patients' protected health information ("PHI") and may be subject to PM Pediatric Care Corrective Action Guidelines for HIPAA violations in the event of a breach. If a Staff member becomes aware of an actual or suspected breach of patient PHI, he or she should report the incident by: (i) notifying the Privacy Officer, Compliance Officer or any member of the Compliance Department directly, (ii) submitting a report through PM Pediatric Care's intranet, the same way Staff would report any quality or safety concern, (iii) emailing compliance@pmpediatrics.com, (iv) calling the 24-hour Compliance Hotline at (516) 953-4600, or (v) submitting an online report at reportinghotline.pmpediatriccare.com.

If unsure of the rules governing the access to, release or use of any patient information, Staff should seek clarification of the rules by contacting the Privacy Officer, Compliance Officer or the Compliance Department before they access, release or use such information.

Standard #8: Coding and Billing for Patient Services

PM Pediatric Care and its Staff shall comply with all applicable federal, state and local laws and regulations governing the provision of medical services, coding and billing activities and the documentation of such services and activities.

Patient Responsibility: Patients and/or their personal representatives (e.g., parents) shall be informed of their responsibility to pay for services rendered by PM Pediatric Care. All patients or their representative shall sign a Consent to Treat and Guarantee of Payment Form at the time of service agreeing to pay for services or, if they have insurance, to pay for any amount of services not covered by their insurance. PM Pediatric Care and its Staff shall charge patients a fee in accordance with the Company's charge schedule for procedures and services. Patients may have a claim submitted to their health plan or pay a fee for services at the time of service. Although PM Pediatric Care requires that patients pay for medical services rendered, PM Pediatric Care will stabilize or otherwise provide medical treatment to any individual experiencing a medical emergency, regardless of his or her ability to pay for such services.

All patients shall be billed in accordance with PM Pediatric Care's customary billing procedures. PM Pediatric Care and its Staff shall not offer discounts to patients, including discounts used as an incentive for patients to obtain services. PM Pediatric Care may under certain circumstances, however, accept less than the amount owed for prompt payment or as a professional courtesy, and may offer uninsured or out-of-network patients a one-time courtesy visit free of charge. Authorized Staff members may offer professional courtesy discounts to providers and their families as a true courtesy and not as an inducement for referrals or to generate business reimbursable by any federal or state health care program. At times, PM Pediatric Care may waive a patient's financial responsibility to resolve a patient dispute with regard to the quality of the patient's experience at any PM Pediatric Care location.

Billing and Coding. PM Pediatric Care and its Staff shall bill only for services actually rendered and documented and services that are consistent with applicable standards of medical care. Bills must be truthful and accurately reflect the services rendered. Billing codes, including CPT and ICD-10-CM diagnostic codes, shall be selected to correspond to the medical services actually rendered and documented. Billing codes shall not be selected for the sole purpose of enhancing or guaranteeing reimbursements. PM Pediatric Care does not provide any financial incentive to Staff to upcode billing claims.

All medical services, coding and billing shall be supported by documentation that shows a medical justification for services rendered and bills submitted. All documentation shall be truthful, and accurately reflect the nature, scope and complexity of the services. The treating provider shall

review medical charts to ensure proper documentation and that the services rendered are consistent with applicable standards of medical care before any claims for reimbursement are submitted in connection with the chart. Staff may never falsify a claim or documentation pertaining to a claim.

Staff shall comply with the terms of PM Pediatric Care's contracts with public and private payors including, but not limited to, managed care organizations. PM Pediatric Care and its Staff shall not misrepresent any charge to, or on behalf of, a patient or third-party payor. If a third-party payor denies a claim or requests additional information, any change to the code previously submitted shall have documentation to support the change. The Billing Department shall review denials of claims to facilitate the correction and resubmission of claims and to identify any patterns in the claims denied.

Overpayments. PM Pediatric Care and its Staff shall return any overpayment from a government agency or third-party payor when identified as required by applicable law or PM Pediatric Care's contractual obligations. Staff are responsible for promptly reporting any knowledge of overpayment to the Billing Department. Crediting a payor's account in accordance with a payor contract or PM Pediatric Care's normal billing practices shall constitute the return of an overpayment for purposes of this section.

Standard #9: Documentation Integrity and Document Retention

Staff members are responsible for maintaining true, complete, accurate and timely records. This standard applies to all records, such as medical records, financial reports, accounting records, expense reports, time sheets, legal documents, and any other documentation as may be required by PM Pediatric Care's business operations. Staff are required to prepare and retain such records in accordance with professional guidelines and with PM Pediatric Care's policies.

All business records shall be accurate, truthful and complete and contain no material omissions. Managers and supervisors are responsible for establishing internal controls and accounting methods to maintain the accuracy of records relating to his or her designated areas of oversight. Staff are expected to abide by established accounting principles when preparing records to ensure the accurate recording of all assets and transactions.

PM Pediatric Care is required by law to maintain certain medical and business records for a specified period of time. All documentation shall be retained in accordance with applicable laws, regulations and PM Pediatric Care's policies. Medical and billing records that show PM Pediatric Care's right to receive payment from third-party payors shall be retained for six years from the date of service or, if the patient is under eighteen years of age as of the date of service, six years from the date the patient turns eighteen.

Staff are responsible for familiarizing themselves with PM Pediatric Care's policies on document retention and applicable law and guidelines to ensure compliance with this standard. If a Staff member has a question about how to properly amend or correct a record or how to maintain documentation in accordance with this standard, he or she should contact the Compliance Officer.

Standard #10: Responding to Government Inquiries

PM Pediatric Care cooperates fully with governmental investigations or inquiries. Staff shall promptly direct any and all government requests for information, including any subpoena or other written request relating to a government inquiry, to the Compliance Department. PM Pediatric Care will not obstruct communications between Staff and a government agency. However, Staff are strongly encouraged to first speak with a member of the Compliance Department or a member of senior management before responding to a government inquiry.

Staff who receive a subpoena, court order, or other lawful request shall forward the request to the Compliance Department and/or Legal Department (legal@pmpediatrics.com). Staff shall not respond to any such request directly, unless they receive prior written approval. Only members of senior management, the Compliance Department or the Legal Department may respond in writing to a government inquiry. All written responses shall be accurate, truthful and complete. PM Pediatric Care and its Staff shall never destroy, alter or change any document or record in response to a governmental investigation or inquiry. Any such action constitutes a crime and will subject the Staff member involved to immediate discharge and potential criminal prosecution.

Standard #11: Credentialing and Exclusions

Current and prospective Staff, including contractors, shall be in good standing with the state and federal health care programs. PM Pediatric Care will confirm that its employees are not excluded from the government health care programs by checking the OIG LEIE and SAM.gov databases as well as available state exclusion lists before hiring or contracting with the employee and on a monthly basis thereafter. PM Pediatric Care shall disclose to the appropriate agencies the employment of an excluded person or entity in accordance with the law. Staff shall promptly inform the Company if they become excluded from any health care program.

Providers and other Staff in positions that require a license or registration are responsible for maintaining such license or other required registration in good standing. In the event any Provider or Staff member becomes the subject of a complaint or investigation by any regulatory authority, then such Provider or Staff member is required to immediately report the matter to the Chief Medical Officer and Legal Department (legal@pmpediatrics.com). Each Provider or Staff member is required to immediately notify the Company of: (i) any pending or actual restrictions on any license or registration, and (ii) any malpractice claim or complaints/inquiries by any professional licensing bodies or other regulatory agency.

Standard #12: Avoidance of Fraud, Waste and Abuse

PM Pediatric Care is committed to detecting, preventing and addressing fraud, waste and abuse. Healthcare fraud is the intentional act of deception, misrepresentation or concealment in order to gain something of value. Examples of fraud include intentionally billing for services not rendered, billing at a higher rate than justified, or soliciting a bribe or kickback. Waste includes those

practices resulting in unnecessary costs or misuse of financial or medical resources, like using or expending resources carelessly, extravagantly, or to no purpose. Examples of waste include providing services not medically necessary or clinically indicated. Abuse includes practices (whether committed intentionally or unintentionally) that are inconsistent with accepted financial or medical practices and which result in unnecessary costs or reimbursements such as, for example, misusing billing codes on a claim or providing services that are not medically necessary.

Staff must report any activities that may constitute fraud, waste or abuse to the Compliance Officer through any of the lines of communication set forth in Part IV, below.

Standard #13: Gifts and Entertainment

PM Pediatric Care realizes that Staff members maintain relationships with suppliers, vendors, contractors, consultants and others which contribute to PM Pediatric Care's overall success and which may occasionally involve an invitation to a meal, entertainment, or the exchange of a gift of nominal value. Staff members may not accept gifts, favors, entertainment, special accommodations, services, event tickets, or anything of value ("Gifts") that will influence their decision-making or business behavior or which will create a conflict of interest. Similarly, Staff are prohibited from giving or offering Gifts to others in order to influence the recipient's decision-making or to make the recipient beholden to the Staff member or to PM Pediatric Care. PM Pediatric Care recognizes, however, that Staff members may occasionally offer patients a gift of nominal value for patient experience related purposes or to resolve perceived customer service issues.

Staff must not give or accept a gift or anything of value to or from a government employee, vendor or any person in a position to benefit our Company or attempting to influence our Company. Staff members must be careful to avoid the appearance of impropriety when it comes to gifts and entertainment. If a Staff member is uncertain about whether to accept or give a gift, he or she should contact a member of the Compliance Department for clarification.

Standard #14: Compliance with Anti-Kickback and Self-Referral Laws

PM Pediatric Care is prohibited by federal and state law from engaging in transactions intended to induce or reward referrals for items or services reimbursed by government health care programs. An inducement for items for services may come in many forms, such as a kickback, bribe or rebate made directly or indirectly, overtly or covertly, in cash or in kind. PM Pediatric Care is also prohibited from referring patients for designated health services payable by a federal or state health care program to an entity with which the provider, or a provider's immediately family member, has a financial relationship, unless certain legal exceptions apply.

Accordingly, PM Pediatric Care and its Staff shall not pay or receive payment or anything of value, including free services or items, from any physician, health care provider or other person or entity in exchange for referrals. Referrals must be based solely on medical necessity and quality of care.

All contracts, leases and other financial arrangements entered into by PM Pediatric Care with other providers shall be based on the fair market value of the services or items exchanged, and not on the volume or value of referrals between the parties. Marketing activities, including advertisements, shall be based on the services provided by PM Pediatric Care and not on any promise, express or implied, of remuneration for referrals.

Standard #15: Obligation to Report

Compliance is everyone's responsibility. Staff must immediately report any potential non-compliant behavior so that the Compliance Department can investigate the matter promptly and take any required remedial action. Failure to report compliance issues will result in disciplinary action up to and including termination of employment or affiliation with PM Pediatric Care. Reports can be made through any of the lines of communication described in Part IV below. All reports will be kept confidential to the fullest extent practicable. Reports may be submitted anonymously if desired.

Part II: Compliance Oversight

The standards outlined in the Code of Conduct comprise the foundation of PM Pediatric Care's Compliance Program. In order to effectively carry out the Code of Conduct and Compliance Program, PM Pediatric Care has designated a Compliance Officer and has formed a Compliance Committee to support and oversee the operations of the Compliance Program.

Compliance Officer. While every Staff member is responsible for abiding by and carrying out the Code of Conduct and Compliance Program, PM Pediatric Care's Compliance Officer is vested with responsibility for the day-to-day operations of the Compliance Program. Some of the Compliance Officer's main responsibilities include:

- Overseeing and monitoring the adoption, implementation and maintenance of the Code of Conduct and Compliance Program;
- Establishing methods, such as periodic audits, to improve PM Pediatric Care's efficiency and quality of services, and to reduce PM Pediatric Care's vulnerability to fraud, abuse, and other non-compliant activities;
- Developing, coordinating and participating in a training program that focuses on the components of the Code of Conduct and Compliance Program, and reviewing training materials;
- Reviewing and revising PM Pediatric Care's compliance policies, including this Code of Conduct and Compliance Program, and periodically assessing the adequacy of such policies in light of changes in the law or government standards;
- Identifying and addressing compliance risk areas through internal or external auditing, an annual risk assessment, and/or other appropriate methods;
- Assessing results from internal or external auditing and developing a work plan to remedy any compliance weaknesses or non-compliance;

- Coordinating with the Credentialing and People Operations Departments on performing exclusion and sanction screenings of prospective and current employees;
- Working with the Compliance Committee to develop processes and initiatives with the goal of promoting and maintaining a culture of compliance at PM Pediatric Care;
- Establishing and monitoring lines of communications for Staff to report compliance concerns confidentially and anonymously;
- Investigating any report or allegation concerning possible unethical or improper business practices, and independently acting on matters related to the compliance program, including designing and coordinating internal investigations and documenting, reporting, coordinating, and pursuing any resulting corrective action with all internal departments, contractors, and any federal or state agency;
- Enforcing PM Pediatric Care's non-intimidation and non-retaliation policies with respect to participation in the Compliance Program;
- Disciplining Staff members for non-compliant, illegal or unethical behavior that is contrary to PM Pediatric Care's standards as embodied in the Code of Conduct, including reporting the Staff member to law enforcement as appropriate; and
- Reporting on a regular basis, but no less frequently than quarterly, on the activities of the Compliance Program to the Compliance Committee, Board of Managers, and senior management, including reports on the status and resolution of any significant compliance investigations.

The Compliance Officer will work with and delegate responsibility to members of the Compliance Department to facilitate the effective implementation of the Code of Conduct and Compliance Program. The Compliance Officer maintains the authority to access and review any information or documentation necessary to investigate reported instances of potential non-compliance, to perform audits, and/or to carry out the Code of Conduct and Compliance Program.

Compliance Committee. PM Pediatric Care has established a Compliance Committee to facilitate the implementation of the Code of Conduct and Compliance Program across the Company's operations and to develop company-wide programs and policies that promote compliance. The Compliance Committee is comprised of individuals from the Company's various areas of operations, including, without limitation, People Operations, Quality, Billing, Legal, Finance, Clinical Operations, Information Technology, and Learning and Development.

The Compliance Committee's responsibilities include the following:

- Advising and assisting the Compliance Officer in the implementation of the Code of Conduct and Compliance Program;
- Analyzing compliance weaknesses and developing work plans and goals to address compliance risk areas;
- Reviewing and revising existing compliance policies to assure compliance with legal obligations;

- Reviewing aggregated data on compliance reports and other internal or external risk assessments to detect, prevent and remedy non-compliance;
- Developing policies and programs to encourage compliance and the reporting of suspected non-compliance;
- Assisting in the development and implementation of PM Pediatric Care’s annual compliance training;
- Ensuring that the compliance officer is allocated sufficient funding, resources and staff to fully perform their responsibilities;
- Advocating for adoption and implementation of required modifications to the compliance program; and
- Maintaining summaries of Compliance Committee meetings detailing the discussions and actions taken at such meetings.

Part III: Compliance Education and Training

All Staff members, including executives, employees, governing body members, and contractors, will receive a copy of this Code of Conduct and Compliance Program upon hire and will execute the attached acknowledgement of receipt appended hereto as Exhibit A. In the acknowledgement of receipt, the Staff member agrees that he or she has received, reviewed and understood this Code of Conduct and Compliance Program and will abide by the terms contained herein as a condition of continued employment or affiliation with PM Pediatric Care. The signed acknowledgement will be maintained in PM Pediatric Care’s personnel files.

Additionally, all Staff members are required to complete PM Pediatric Care’s compliance training upon hire and periodically thereafter as a condition of continued employment or affiliation with PM Pediatric Care. The compliance training provides an overview of PM Pediatric Care’s Code of Conduct and Compliance Program, reviews various compliance scenarios, describes the lines of communication for reporting compliance concerns, and describes PM Pediatric Care’s obligations under HIPAA and other applicable laws and regulations. PM Pediatric Care retains a copy of each Staff member’s certificate of completion of the compliance training in the Staff member’s file.

The Compliance Department collaborates with PM Pediatric Care’s Learning and Development and People Operations Departments to update the compliance training to address changes in the law, new reporting methods, and additional compliance topics. PM Pediatric Care also strives to educate Staff on compliance matters continually throughout the year. As such, it maintains an area on the Company’s intranet dedicated to compliance topics and where written policies, intranet posts, and other compliance materials shall be maintained.

Part IV: Lines of Communication

The effective implementation of this Code of Conduct and Compliance Program depends on the cooperation of each Staff member in identifying and reporting compliance concerns. Staff members are required to report actual or suspected non-compliant, illegal, or improper activities and any reports of such conduct from external sources to the Compliance Department using any of the methods set forth below:

1. Staff may report concerns to a supervisor, Operations Manager, Regional Operations Director, Regional Medical Officer, Vice President or other member of the senior leadership, who will then relay the report to appropriate compliance personnel;
2. Staff may make a report to the Compliance Officer or any member of the Compliance Department directly;
3. Staff may email compliance@pmpediatrics.com;
4. Staff may anonymously report concerns by calling the 24-Hour Compliance Hotline² at (516) 953-4600 or by submitting an online report to reportinghotline.pmpediatriccare.com;
5. Staff may submit a report online via the Company's intranet, the same way quality or safety concerns are reported; or
6. Staff may mail a letter to Compliance Department at One Hollow Lane, Suite 301, Lake Success, NY 11042.

PM Pediatric Care takes all good-faith reports of non-compliance very seriously. Reporters are encouraged to disclose as much information as possible in order to assist the Compliance Officer and Compliance Department in investigating and resolving the issue(s). Anonymous reports will be investigated to the fullest extent possible under the circumstances. The Compliance Department will generally make no effort to discover an anonymous reporter's identity unless the reporter admits to having engaged in illegal or non-compliant activities. No adverse or retaliatory actions will be taken against any Staff member for reporting a compliance concern.

The Compliance Officer, with the assistance of the members of the Compliance Department, will ensure that reports are documented, investigated and resolved. The Compliance Officer shall present reports of non-compliance on a regular basis, but no less frequently than quarterly, to the Compliance Committee, senior leadership, and/or the Board of Managers.

Part V: Investigating and Resolving Compliance Issues

² The 24-Hour Compliance Hotline is a dedicated, confidential telephone number and online portal maintained by a private outside vendor which is monitored 24 hours a day, seven days a week by trained hotline associates. The hotline associates will gather information about the reporter's concern(s) and generate a report to be sent to the Compliance Department for investigation and resolution. The reporter will receive a unique PIN which he or she can use to request status updates on the report and to confidentially and anonymously communicate with the Compliance Department through the outside vendor's online hotline portal.

In response to a report of actual or suspected misconduct, or in the event that potential non-compliance is detected in an audit, the Compliance Officer will promptly review the report or audit findings and determine whether further investigation is necessary. The Compliance Officer may collaborate with the Compliance Department and/or internal or outside legal counsel to investigate compliance issues.

Compliance investigations generally involve interviews with Staff; a review of PM Pediatric Care's policies and procedures and applicable law; and a review of company reports, documents and/or data related to the suspected misconduct. The Compliance Officer may document his or her findings in a written report summarizing the compliance issue investigated, the circumstances leading to the investigation, the investigation findings, and any remedial actions taken. The Compliance Officer is responsible for ensuring that appropriate documentation regarding the issues investigated are maintained and stored in a confidential file and in accordance with PM Pediatric Care's document retention guidelines.

Any detected non-compliance or misconduct will be addressed and corrected through a corrective action plan. The corrective action plan will be developed by the Compliance Officer and will be aimed at addressing the misconduct and reducing the risk of recurrence. Corrective action plans will be formulated on a case-by-case basis considering the facts and circumstances of each given scenario and may be developed in consultation with the Compliance Committee, senior leadership, and/or the Board of Managers. The advice of internal or outside legal counsel may be sought in determining how to correct and address discovered non-compliance.

Staff are required to fully cooperate with the Compliance Officer, Compliance Department, and/or legal counsel with respect to the investigation and resolution of any internal, external or governmental investigation into the Company's compliance activities. Failure to cooperate will result in disciplinary action up to and including termination of employment or affiliation with PM Pediatric Care.

After implementing the corrective action plan, the Compliance Officer may collaborate with the Compliance Committee or senior leadership to develop and implement routine systems aimed at reducing the risk of recurrence going forward. These systems may include ongoing monitoring of a given compliance risk area to assure the adequacy of the corrective action plan. The Compliance Officer will determine whether there is a need for ongoing monitoring of a certain compliance risk on a case-by-case basis.

If the Compliance Officer determines after consultation with legal counsel that there is credible evidence of non-compliant behavior that violates federal, state or local law or regulations, then PM Pediatric Care will report such misconduct to the appropriate governmental authority as required by law. PM Pediatric Care will promptly refund any identified overpayment in accordance with applicable law and regulations.

Part VI: Routine Identification of Compliance Risks

PM Pediatric Care engages in internal and external risk assessments to identify compliance risk areas. PM Pediatric Care also reviews past reports of compliance issues, enforcement trends, and governmental and regulatory guidance to highlight potential areas of non-compliance to focus on in a self-assessment. In addition to the targeted compliance concerns identified in an annual or routine review, PM Pediatric Care will periodically conduct internal audits of the following risk areas to ensure adherence with applicable law and company policies: (1) billings, (2) payments, (3) ordered services (4) medical necessity and quality of care, (5) governance, (6) mandatory reporting, (7) credentialing (8) contractor oversight, and (9) other risk areas that are or should reasonably be identified through organizational experience. The Compliance Officer will develop a compliance work plan and/or audit plan in conjunction with the Compliance Committee to monitor and mitigate compliance risk areas and improve compliance systems.

PM Pediatric Care may hire external auditors to conduct the risk assessment(s) and audits described above or may choose to conduct internal audits. If the routine audits or risk assessment demonstrates a risk of non-compliance, the Compliance Officer will further investigate the cause of such suspected non-compliance and correct the issue pursuant to the systems described in Part V for investigating and resolving compliance concerns.

Part VII: Disciplinary Policies to Encourage Reporting and Compliance

Each Staff member is required to abide by and implement the Code of Conduct and Compliance Program and is responsible for creating a culture of compliance at PM Pediatric Care. Accordingly, PM Pediatric Care has developed disciplinary policies to encourage reporting and participation in the Code of Conduct and Compliance Program. Failure to comply with the Code of Conduct and Compliance Program or engaging in unethical or illegal conduct may result in disciplinary action up to and including termination from employment at PM Pediatric Care and a referral to law enforcement, as applicable.

Staff may be subject to the following disciplinary actions for failing to abide by the Code of Conduct and Compliance Program or for engaging in non-compliant conduct: (1) verbal or written warning/reprimand, (2) immediate retraining on the Code of Conduct and Compliance Program, (3) final written warning, (4) demotion, (5) temporary suspension of employment, (6) termination of employment or affiliation with PM Pediatric Care, and/or (7) referral to a professional licensing body or to law enforcement, as applicable.

These disciplinary actions may be enforced if a Staff member fails to report a known or suspected compliance violation; fails to assist in the resolution of a compliance issue; participates in non-compliant behavior in contravention of this Code of Conduct and Compliance Program; or encourages, directs, facilitates, or permits non-compliant behavior. The disciplinary action imposed will depend in part on the severity of the non-compliant conduct, whether the Staff member engaged in such conduct knowingly, recklessly or negligently, and whether the Staff member has repeatedly failed to abide by the Code of Conduct and Compliance Program.

These disciplinary policies may be implemented in conjunction with the People Operations Department and will be firmly and fairly enforced across the Company.

Part VIII: Non-Intimidation and Non-Retaliation Policy

As noted throughout, PM Pediatric Care relies on each Staff member to participate in the Company's compliance efforts. Accordingly, PM Pediatric Care is committed to providing an environment where Staff can freely participate in the Code of Conduct and Compliance Program without intimidation or fear of retaliation. Under no circumstances will any adverse or retaliatory action be taken against a Staff member for reporting a compliance concern in good faith or for assisting with a compliance investigation, audit, or remedial measure. Similarly, no retaliatory action will be taken against a Staff member for engaging in any of the compliance-related activities set forth in this Code of Conduct and Compliance Program.

Anyone who engages in conduct intended to intimidate or retaliate against a Staff member for participating in the Code of Conduct and Compliance Program will be subject to discipline, up to and including termination from employment. The right to report compliance concerns—both internally through the lines of communications discussed in Part IV or to an external regulatory or law enforcement agency—is protected by law and no retaliatory action will be taken as a result.

Conclusion:

PM Pediatric Care is committed to maintaining a culture of compliance. The cooperation of each Staff member is essential in achieving this goal. Through the implementation of this Code of Conduct and Compliance Program, PM Pediatric Care aims to continue delivering high quality medical care to patients while adhering to the highest ethical standards and minimizing the risk of potential non-compliant or illegal practices, as such practices may tarnish PM Pediatric Care's reputation and detract from its mission. This Code of Conduct and Compliance Program is intended to provide Staff with a blueprint of PM Pediatric Care's compliance expectations and underscore the importance of compliance in the Company's daily operations.

Exhibit A

Acknowledgement of Receipt of the Code of Conduct and Compliance Program

By signing below, I hereby acknowledge that I have received the Code of Conduct and Compliance Program. I further acknowledge that I have read and understood the Code of Conduct and Compliance Program and that I have been given the opportunity to ask any questions I may have about it. I agree to abide by all laws, rules and regulations governing PM Pediatric Care, the Code of Conduct and Compliance Program, and all of PM Pediatric Care's policies and procedures. I also agree to report any suspected misconduct or violation of the Code of Conduct and Compliance Program through the designated lines of communication for reporting compliance concerns.

I recognize and understand that adhering to the terms of the Code of Conduct and Compliance Program is a condition of my employment or affiliation with PM Pediatric Care and that violating the Code of Conduct and Compliance Program may subject me to disciplinary action, up to and including termination and, in certain cases, a referral for prosecution by local, state and/or federal authorities.

Signature: _____

Print Name: _____

Date: _____