



Standards of Conduct

2025

I. Mission

Astrana Health is committed to conducting its business operations with the highest ethical standards and in full compliance with all applicable Federal, State, and local laws, rules, and regulations. Astrana Health expects its employees and first-tier, downstream, and related entities (FDRs) to perform their job duties and represent the organization in a manner that reflects and upholds this commitment. The Astrana Health Standards of Conduct is designed to clearly communicate the organization's expectations and provide guidance to its employees and FDRs in carrying out their daily activities within appropriate ethical and legal standards.

II. Purpose and Scope

All Astrana Health Associates and FDRs must comply fully with the standards set forth in the Astrana Health Standards of Conduct as well as any additional parameters documented in department-specific policies and procedures. Associates and FDRs who violate the Standards of Conduct will be subject to disciplinary actions.

The standards and requirements in the Standards of Conduct apply to all Astrana Health Associates -employees (temporary & permanent), including board members, chief officers, leadership team, directors, managers, and staff at all levels including volunteers, contractors, vendors, providers, and FDRs.

These Standards of Conduct are not intended to and shall not be deemed or construed to provide any rights, contractual or otherwise, to any employees of Astrana Health or to any third parties.

Astrana Health expects all Associates, downstream and related entities conduct themselves in an ethical manner; that issues of non-compliance and potential fraud, waste and abuse are reported through the appropriate mechanisms outlined; and those reported issues will be addressed and corrected effectively.

III. Standards of Conduct

General Principles

All Astrana Health Associates - employees (temporary & permanent), including board members, chief officers, leadership team, directors, managers, and staff at all levels including volunteers, contractors, vendors, providers, and FDRs shall conduct their daily activities in accordance with the following general principles of conduct:

- Job duties must be performed in full compliance with both Astrana Health and Federal and State law. Astrana Health associates shall take action that he or she believes is in violation of any statute, rule, or regulation. All employees are expected to have a practical working knowledge of Federal and State laws and regulations affecting their job responsibilities, and to inquire of their immediate supervisor when related questions arise.
- Conduct activities with integrity and honesty. Astrana Health associates shall strive for

excellence in performing their duties.

- Avoid any conduct that could reasonably be expected to reflect adversely upon the integrity of the company, its officers, directors, or other employees.
- Be a positive influence and good corporate citizens in the communities where the company provides services. Treat members, providers, vendors, and fellow employees fairly and with respect.
- Report to their supervisors or to the Astrana Health Compliance Officer any illegal or unethical practices of Astrana Health Associates and FDRs.
- Abide by the Astrana Health Compliance Program, Anti-Fraud Plan, Conflict of Interest Policy, and all other applicable Policies and Procedures.

Avoiding Conflicts of Interest

Astrana Health Associates and FDRs shall:

- Understand and abide by Astrana Health's *Conflict of Interest* policy.
- Avoid situations that could create, or appear to create, a conflict of interest unless such a situation has been reported to management, approved, and properly disclosed as required by the Conflict-of-Interest policy.
- Avoid any financial, business, or other activity that competes with Astrana Health's business interests, interferes, or appears to interfere with the performance of their duties, or involves the use of Astrana Health property, facilities, or resources, except to the extent consistent with the *Conflict-of-Interest* policy.
- Not have a financial or other personal interest, other than compensation provided by Astrana Health, in a transaction between Astrana Health or any of its business units and vendors, suppliers, providers, or customers.

Business and Financial Practices

Astrana Health Associates and FDRs shall:

- Conduct all Astrana Health business transactions in accordance with management's general or specific directives, as specified by applicable Astrana Health policies and procedures, and in full compliance with governing Federal and State laws, rules, and regulations.
- Avoid offering or accepting any form of bribe, payment, gift, or item of more than a nominal value to or from any person or entity with which Astrana Health has or is seeking a business or regulatory relationship.
- Avoid unfair competition or deceptive trade practices, including misrepresentation of Astrana Health's products or operations. Astrana Health employees and FDRs shall not make false or disparaging statements about competitors or their products.
- Comply with applicable antitrust laws. There shall be no discussions or agreements with competitors regarding price or other terms for products, prices paid to suppliers or providers, dividing up customers or geographic markets, or joint action to boycott or coerce certain customers, suppliers, or providers

Preventing, Detecting and Correcting Fraud, Waste and Abuse

Astrana Health is strongly committed to the detection and prevention of FWA. Astrana Health

maintains ultimate responsibility for adhering to and fully complying with all applicable State and Federal statutory and regulatory requirements. Astrana Health will work in an ongoing manner with the appropriate entities to detect and prevent FWA as required by the CMS Compliance Program Guidelines.

Astrana Health Associates and FDRs shall:

- Comply with applicable laws, regulations, guidelines and Astrana Health policy, including Astrana Health's Anti-Fraud Plan.
- Immediately report suspected FWA conduct to the Astrana Health Compliance Department.
- Cooperate fully with and disclose all pertinent information regarding any Astrana Health investigation of suspected FWA conduct.

Federal Health Care Fraud & Abuse Laws

- **The False Claims Act** – Statute: 31 U.S.C. §§3729-3733
- **The Anti-Kickback Statute** – Statute: 42 U.S.C. §1320a-7b(b) & Safe Harbor Regulations: 42 CFR §1001.952
- **The Physician Self-Referral Law** – Statute: 42 U.S.C. §1395nn & Regulations: 42 CFR §§411.350-.389
- **The Exclusion Authorities** – Statutes: 42 U.S.C. §§ 1320a-7, 1320c-5 & Regulations: CFR pts. 1001 (OIG) & 1002 (State agencies)
- **The Civil Monetary Penalties Law** – Statute: 42 U.S.C. §1320a-7a & Regulations: CFR pt. 1003
- **Criminal Health Care Fraud Statute** – Statute: 18 U.S.C. §§1347, 1349

Marketing and Sales / Enrollment Activities

Astrana Health is not delegated by Health Plans and does not pursue marketing, sales, and enrollment activities with members. However, if required, Astrana Health will take all appropriate steps to ensure that its marketing personnel present clear, complete, and accurate information to potential enrollees. This includes ensuring that the marketing information has been approved by, and complies with all requirements of, the Department of Managed Health Care, in the case of commercial business, or the Centers for Medicare and Medicaid Services, in the case of Medicare business.

Astrana Health Associates and FDRs shall:

- Comply with applicable Federal and State laws, regulations, guidelines and Astrana Health policy, including the Medicare Marketing Guidelines, with respect to all marketing, sales, and enrollment activities.
- Always place the best interests of potential enrollees and Astrana Health above personal monetary interests.
- Present clear, complete, accurate information, and ensure that potential enrollees could make a well-informed enrollment decision. This includes utilizing only marketing materials and information that have been approved by, and comply with all requirements of, Astrana Health and CMS.
- Avoid providing any information or engaging in conduct that might in any way misrepresent Astrana Health or its programs, or mislead, confuse, coerce, or pressure potential enrollees. An example of misrepresentation by an agent would be to tell potential enrollees that the agent works for or is contracted with Social Security Administration or CMS.
- Never offer cash payments, gifts, bribes or kickbacks to any person or entity to induce enrollment in Astrana Health plans or programs.
- Never engage in door-to-door solicitation of Medicare contracted products or programs

Quality and Accessibility of Health Care

Astrana Health Associates and FDRs shall:

- Comply with applicable Federal and State laws, regulations, guidelines and Astrana Health policy with respect to provision of quality health care to IPA members.
- Make every effort to ensure that all covered services are available, accessible, and appropriately delivered to IPA members, and that Astrana Health:
 - Contracts with providers in sufficient number and geographic location to service all IPA members.
 - Maintains reasonable, understandable utilization review procedures that facilitate rather than discourage access to covered services; and
 - Provides access to emergently needed services (according to the reasonable person standard) without prior authorization, and timely coordination of appropriate maintenance and post-stabilization care.
- Make all decisions regarding provision of care or payment for services in a timely manner and in accordance with professionally recognized standards, without regard for fiscal concerns. Inappropriate delay or withholding of services is a violation of IPA/ Astrana Health policy and will not be tolerated.
- Never create or contribute to situations, either through action or failure to act, that could promote underutilization or poor quality of care, and immediately report any such situation or circumstance to the appropriate manager.
- Ensure that contracts with providers meet all IPA/ Astrana Health and regulatory requirements, and that incentives to promote efficient utilization of services do not include payments to reduce or limit medically necessary services to any enrollee.
- Always ensure that providers are properly licensed and credentialed prior to providing services to IPA members.
- Avoid interference with health care providers' advice to their patients, including advice regarding health status, care and treatment options, risks, benefits, and consequences of treatment vs. non-treatment, or the opportunity for the patient to refuse treatment and express a preference for future treatment options.
- Ensure that IPA members who are high utilizers of care continue to receive appropriate access to services are not in any way encouraged to disenrollment from IPA.

Utilization Management and Fraud

In addition to the above, identification of common Health Care and utilization Fraud issues and examples are:

- Billing for services not rendered.
- Billing for a non-covered service as a covered service.
- Misrepresenting dates of service.
- Misrepresenting locations of service.
- Misrepresenting provider of service.
- Waiving of deductibles and/or co-payments.
- Incorrect reporting of diagnoses or procedures (includes unbundling).
- Overutilization of services.

- In Network Provider profiling specifically for Utilization Management Processes
- Corruption (kickbacks and bribery).
- False or unnecessary issuance of prescription drugs.

Confidentiality, HIPAA/Privacy & Security, and Maintenance of Records

Astrana Health Associates and FDRs shall:

- Ensure timely and appropriate creation, distribution, retention, storage, retrieval and destruction of records and documents, in any form (paper or electronic), in accordance with generally accepted accounting standards and other applicable Federal and State laws, regulations and policies, including but not limited to the Health Insurance Portability & Accountability Act (HIPAA) and the Confidentiality of Medical Information Act (CMIA).
- Maintain the confidentiality and security of financial, medical, personnel, and other sensitive or proprietary information belonging to IPA/ Astrana Health, and/or information belonging or related to IPAs suppliers, FDRs, regulators, or customers.
- Maintain the privacy and security of protected health information covered by HIPAA or other applicable patient/consumer privacy laws and regulations.

Workplace Conduct and Safety

Astrana Health Associates and FDRs shall, always while on the job or otherwise representing Astrana Health:

- Conduct themselves professionally and treat all fellow employees, members, FDRs, or other individuals they encounter in the course of their duties, with appropriate courtesy, dignity, and respect.
- Avoid any type of behavior or conduct that could be construed as discrimination or harassment due to age, ethnicity, gender, religion, national origin, disability, sexual orientation, or covered veteran status. Any form of harassment, sexual or otherwise, including the creation of a hostile working environment, is completely prohibited.
- Follow safe work practices and comply with all applicable safety standards and health regulations.

Department-Specific Compliance Standards and Operational Policies and Procedures

In addition to the standards and requirements described in these Standards of Conduct, compliance standards and operational policies and procedures specific to each Astrana Health department will continue to be incorporated into department-specific manuals (and/or other appropriate media) and kept current with applicable Federal and State laws and regulations.

The department-specific policies and procedures are a resource for the employees of each department, designed to enhance their ability to perform their duties in accordance with Astrana Health's policies and applicable Federal and State laws and other requirements. Each department has defined and assigned responsibility for (i) the timely updating of the policies and procedures, (ii) the necessary training and education of affected personnel, and (iii) the completion of monitoring and audit work plans as designated by the Compliance

Officer to ensure ongoing compliance.

IV. Reporting and Investigation

Astrana Health considers adherence to these Standards of Conduct to be of paramount importance, because establishing and maintaining a reputation for honest, ethical business practices is a key Astrana Health corporate value. Furthermore, engaging in illegal activity or improper conduct may subject Astrana Health to severe civil and criminal penalties, including large fines and exclusion from certain types of business. It is therefore crucial that any suspected illegal activity or improper conduct, including violation of these Standards or any other Astrana Health policy, be promptly reported and thoroughly investigated

Duty to Report

- Astrana Health Associates and FDRs who become aware of any suspected illegal activity or improper conduct are required to immediately report compliance concerns and suspected or actual violations or conduct through appropriate channels.
- Astrana Health Associates should report suspected illegal activity or improper conduct to their supervisor, or directly to the Astrana Health Compliance Department.
- Astrana Health FDRs should report suspected illegal activity or improper conduct directly to the Astrana Health Compliance Department.
- Suspected illegal activity or improper conduct may be reported to the Astrana Health Compliance Department by
 - Sending an email to compliance@astranahealth.com
 - Filing an online report at <https://astranahealth.ethicspoint.com>
 - Calling the Compliance Hotline at 844-975-2651
 - Making direct report to Compliance Officer in person, email, in writing, or by phone
 - Compliance Officer: Khurram Shah
 - Phone: 626-282-0288 x6264
 - Fax: 626-943-6357
 - Mail: Astrana Health Compliance Officer,
1680 South Garfield Ave #201 Alhambra, CA 91801
- Failure to report suspected illegal activity or improper conduct is a violation of these Standards and may be a violation of Federal and/or State law.
- Astrana Health associates should understand and abide by Astrana Health's *FWA reporting* and *Internal Investigations of Alleged Violations* policies.

Anonymous Reporting

- Astrana Health Associates and FDRs may report suspected illegal activity or improper conduct anonymously.
- Astrana Health prohibits retaliation against any employee for disclosing information, or because the organization believes that the employee disclosed or may disclose information, to a government or law enforcement agency, or to a superior in Astrana Health, so long as the employee has **reasonable cause** to believe that the information discloses a violation of law or regulation¹.
- Whistleblowers are protected from retaliation for disclosing information that the employee or applicant reasonably believes provides evidence of a violation of any law, rule, regulation, gross mismanagement, gross waste of funds, an abuse of authority, or a substantial and specific danger to public health or safety.²
- To the extent permitted by Federal and State law, Astrana Health will take reasonable precautions to maintain the confidentiality of those individuals who report illegal activity or improper conduct, and of those individuals involved in the alleged violation, whether it turns out that improper acts occurred.
- Failure to abide by this confidentiality obligation is a violation of these Standards.

Investigations and Duty to Cooperate

It is Astrana Health's policy to investigate all reports of illegal activity or improper conduct promptly and thoroughly. Detection of potential or actual issues related to compliance, ethical conduct, or other measurable areas of performance shall result in the initiation of appropriate corrective action. Any action, or lack of action, that prevents, hinders, or delays discovery and full investigation of suspected illegal activity or improper conduct is a violation of these Standards, and may be a violation of Federal and/or State law.

- Internal investigations will include interviews and review of relevant documents. Astrana Health Associates and FDRs are required to cooperate fully with and disclose all pertinent information regarding any Astrana Health investigation of suspected illegal activity or improper conduct.
- Astrana Health Associates and FDRs shall cooperate with appropriate government investigations into possible civil and criminal violations of Federal and/or State law. It is important, however, that in this process Astrana Health can protect the legal

¹ California Labor Code §1102.5 and Labor Code §6310.

² The **Whistleblower Protection Act of 1989**, 5 U.S.C. 2302(b)(8)-(9), Pub.L. 101-12 as amended

rights of the Company and its personnel. To accomplish these objectives, any governmental inquiries or requests for information, documents, or interviews must be promptly referred to the Astrana Health Compliance Officer.

Protection from Retaliation

Astrana Health ensures that its Associates and FDRs may report or assist investigation of suspected illegal acts or improper conduct without threat of negative consequences.

- No retaliation, reprisals or disciplinary action will be taken or permitted against Astrana Health Associates or FDRs for good faith participation in the Compliance Program, including but not limited to reporting potential issues to appropriate authorities, cooperating in the investigation of suspected illegal activities or improper conduct, and conducting self-evaluations, audits, and remedial actions.
- Failure to abide by this prohibition against retaliation or reprisals is a violation of these Standards and may be a violation of Federal and/or State law.
- Non-intimidation and non-retaliation for good faith participation in the compliance program, including, but not limited to, reporting potential issues, investigation issues, conducting self-evaluations, audits, and remedial actions, and reporting to the appropriate officials.

V. Disciplinary Action

Astrana Health Associates and FDRs who engage in illegal activity or improper conduct, including violation of these Standards or any other Astrana Health policy, are subject to disciplinary action including oral or written warnings or reprimands, suspensions, termination, financial penalties, and potential reporting of the conduct to law enforcement. If Associates or FDRs self-report their own illegal actions or improper conduct, Astrana Health will take such self-reporting into account in determining appropriate disciplinary action

VI. Medical Record Retention

Astrana Health and all our downstream providers and related entities will maintain records for a period of 10 years for all compliance violation disciplinary actions.

VII. Training for Code of Conduct and Fraud Waste and Abuse

Training includes:

- An overview of health care fraud, a summary of the applicable fraud and abuse laws (e.g., False Claims Act, Anti-Kickback statute,
- Training on how to identify potentially fraudulent claims (including indicators of fraud),

- Examples of fraudulent activity that have been uncovered for other operational areas including and not limited to Quality and Accessibility, provider Network management, Utilization Management, Credentialing,
- The procedure for referring suspected fraudulent activity to the Compliance Officer,
- All protections (whistle blower protections) for those who report suspected fraud, waste, and abuse,
- Non retaliation and Whistle blower protections and anonymous reporting processes.
- In the case of contractors, their obligation to have appropriate policies and procedures to address fraud, waste, and abuse.

VIII. Distribution of Compliance Program, Code of Conduct/Ethics and Fraud Waste and Abuse Information to Employees

- To be effective, compliance policies and procedures and Standards of Conduct are distributed to employees who support all Astrana Health’s IPA Clients for all lines of businesses.
- Distribution occurs at least within 30 days of hire, when there are updates to the policies, and annually thereafter.

SAMPLE NEW EMPLOYEE HIRE TRAINING NOTICE:

Astrana Health’s Overview of Company Functions:

This training is to provide you with an overview of Astrana Health, the functions of each of our departments, and our Healthcare system.

In addition, you will have 30 days to complete the following trainings on ComplianceWire, as mentioned during orientation.

1. Harassment Avoidance Training for California
 2. Recognizing and Avoiding Insider Trading
 3. HIPAA: General Awareness
 4. Astrana Health Cultural Competency Training
 5. Astrana Health Compliance Training
 6. Astrana Health FWA Training
 7. Astrana Health Standard of Conduct
- Astrana Health provides electronic copies, emailing a links or posting on the company intranet.
 - Astrana Health retains evidence to demonstrate that the Compliance Standards of Conduct and policies and procedures were distributed to employees.

IX. Approval Of Code of Conduct

Code of Conduct is approved by the Board of Directors and reviewed and updated as needed to incorporate changes in applicable laws, regulations, and other requirements.