

COMP 6: Standard of Conduct	
Lines of Business: Medicare, Medi-Cal, and Commercial	
Original Effective Date: 01.01.2018	Written By: Deanna McQuillan
Date of Last Revision: 03.28.2022	Revised By: Linette Roe
Date of Last Review (Without Changes): 08.16.2023	Reviewed By: Linette Hughes
Approved Date: 03.30.2022	Approved By: Compliance Committee
☒ Compliance ☐ Utilization Management ☐ Quality ☐ Credentialing ☐ Provider Network ☐ Claims and Finance ☐ Eligibility and Benefits ☐ IT ☐ Administration	

I INTRODUCTION

Nivano Physicians, Inc. 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 Nivano, 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.

II POLICY

- A. Compliance with Laws and Regulations - By making it the responsibility of all entities doing business with Nivano 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 a Nivano 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. Nivano holds all entities doing business with Nivano responsible for carrying out and monitoring compliance with this commitment.

- Mail: Attn: Compliance
 Nivano Physicians, Inc.
 1420 River Park Drive, Suite #200
 Sacramento, CA 95815
 - E-Mail: Compliance@nivanophysicians.com

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

RECORD OF CHANGES:

Complete the table below when making any changes to the Policy and Procedure. All columns are mandatory. The record of changes went into effect on 11/1/2022.

Version Number	Date	Revised Section	Revised/Reviewed By	Description of Change
V1	01.01.2018	All	Deanna McQuillan	P&P Creation
V2	03.28.2022	All	Linette Roe	Updated to the new template
V2	03.30.2022		Compliance Committee	Compliance Committee reviewed and approved
V2	08.16.2023		Linette Hughes	Reviewed, no changes needed.