



management
INCORPORATED

CODE OF CONDUCT

EFFECTIVE JUNE 1, 2018

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INTRODUCTION

The S & S Management, Inc. Code of Conduct (“Code”) is a guide for members of our Board of Directors, personnel (executives, employed clinical and non-clinical staff), affiliated physicians, other contracted providers, vendors, and all third parties conducting business on behalf of S & S Management, Inc. and its IPA/MG clients. The Code is intended to help you make the right choices and is meant to help us conduct business in a legal, ethical manner. The standards described in this Code of Conduct apply everywhere we conduct business.

We hold our business partners, affiliated physicians, vendors and other third parties to the same standards and expect them to comply with S & S Management, Inc. policies and procedures, all applicable laws and regulations and this Code. S&S Management, Inc. will distribute the Code of Conduct within 90 days of hire, upon update and annually (this only applies to S&S Management, Inc.’s new employees)

YOUR RESPONSIBILITIES

We believe compliance is everyone’s responsibility and we expect you to conduct your responsibilities in compliance with this Code to ensure we are complying with the applicable federal and state standards, statutes, regulations, sub-regulatory guidance and contractual commitments. It is your responsibility to:

- Read, understand and follow the Code and the Compliance Program.
- Notify S & S Management, Inc. immediately if the government sanctions or excludes you from participation in any government-funded program.
- Seek guidance when in doubt.
- Avoid illegal, unethical or otherwise improper acts.
- Assist authorized teammates with compliance inquiries, audits, investigations and other activities.
- Take responsibility and accountability for your actions.

EXPECTATIONS OF MANAGERS AND LEADERS

Individuals who are in management or leadership positions have a heightened obligation to the organization and to those they lead. We expect managers and leaders to:

- Exhibit integrity, respect and do the right thing at all times.
- Make sure that staff complete all required training and properly record completion of trainings pursuant to company policy.
- Create an environment that makes staff feel comfortable raising issues.
- Promptly act upon and address issues that are brought up by staff.
- Report any Code, policy, regulatory, or legal violations to the Compliance Officer

COMPLIANCE PROGRAM

The Code serves as the foundation of the S & S Management, Inc. Compliance Program, which helps to ensure there are policies, processes and systems in place to be compliant with laws, regulations, regulatory guidance and contract provisions that we are required to follow. It also provides guidance on how to do the right thing and foster a safe environment to report any issues, concerns and violations of the Code.

S & S Management, Inc. monitors and audits internal processes and conducts oversight of all first tier, downstream and related entities (“FDRs”) as part of its Compliance Program to identify and address any risks.

COMPLIANCE TRAINING

Training is an important part of the Compliance Program. All S & S Management, Inc. personnel, business partners, affiliated physicians, vendors and other third parties are required to complete compliance training as new hires, new relationships and on an annual basis thereafter.

This training is the foundation of our Compliance Program and provides guidance on our daily activities. The better trained you are, the better you will be able to spot potential compliance issues and know what to do once you see them.

If you do not complete the required trainings set forth in S & S Management, Inc.’s Compliance Program, you may be subject to disciplinary action, up to and including termination of employment or contractual business arrangement, to the extent permitted by law.

COMPLIANCE OFFICER

The Compliance Program is administered by the Compliance Officer, who is responsible for overseeing all Compliance activities and initiatives. This includes, but is not limited to, answering any Compliance related questions or concerns and providing oversight to the entire Compliance Program. The Compliance Officer also works closely with managers and leaders across the organization and collaborates with health plans, regulatory agencies and other parties, as appropriate.

HOW TO REPORT A COMPLIANCE RISK, ISSUE OR VIOLATION

If you find yourself in an ethical dilemma or suspect inappropriate or illegal conduct, you can use any of these reporting resources that you prefer or feel most comfortable with:

- Informing S & S Management, Inc. leadership, e.g. your manager, HR, etc.
- Informing S & S Management, Inc. Compliance Officer: **Orlando Mendoza, CPCO**
- The following are accessible 24 hours a day, 365 days a year:

- Calling the anonymous toll-free Compliance Hotline: **1-855-662-SAFE**
- Submitting a report through the anonymous Compliance Reporting Website:
<https://www.safehotline.com/SubmitReport>
Company ID: 4237443530
- Emailing the S & S Management, Inc. Compliance Mailbox:
4compliance@sandsmanagement.com

A specialized third-party company manages our anonymous Compliance Hotline and anonymous Compliance Reporting Website. All Compliance Hotline and Compliance Reporting Website reports are sent to the Compliance Officer for review and follow-up.

INVESTIGATIONS

The Compliance Officer is responsible for thoroughly reviewing, evaluating and responding to all allegations of misconduct reported. We will conduct investigations impartially and without predetermined conclusion as promptly and confidentially as possible. When a violation is substantiated, S & S Management, Inc. will initiate corrective action including, as appropriate, resolving overpayments, making required notifications to health plan partners and government agencies, implementing systemic changes to prevent recurrences, and instituting disciplinary action.

It is expected that we all cooperate with audits, investigations and any corrective action plans, which may include areas for continued monitoring and assessment. We will respond to, and not interfere with, any lawful government inquiry, audit or investigation. Any attempts made to conceal, alter or destroy any relevant documents, cause another individual to provide inaccurate information or obstruct, mislead or delay the communication of information or records relating to a possible violation of law Intentionally misleading a government investigator and/or destroying or hiding documents and information that are the subject of an investigation will result in corrective action, up to and including termination of employment, and could include criminal sanctions.

Any issues reported that are determined to be non-compliance related will be addressed by the appropriate S & S Management, Inc. department. For example, if the reported issue has to do with non-compliance with the Employee Handbook, then it will be directed to Human Resources.

DISCIPLINARY ACTIONS

S & S Management, Inc. will take disciplinary actions, to the extent allowed by law, against any teammate who fails to act in accordance with its policies and procedures, applicable laws and regulations or this Code.

Circumstances where S & S Management, Inc. may take disciplinary actions for are, but not limited to, the following:

- Violating the Code or Compliance Program
- Violating state or federal law
- Failing to report a violation of the Code
- Refusing to cooperate in the investigation of a potential violation
- Failing to take appropriate action
- Disclosing confidential information about an investigation
- Retaliating against an individual for reporting a potential violation
- Making intentional false reports of misconduct

Discipline may result in any or all of the following actions:

- Verbal counseling
- Written reprimand
- Corrective action plan
- Suspension of employment or contract
- Termination of employment or contract

NON-RETALIATION POLICY

S & S Management, Inc. maintains a strict policy of non-intimidation and non-retaliation for reporting a compliance risk, issue or violation, or for participating in an investigation, and will not tolerate any form of retaliation towards individuals for good faith actions. We understand you may be reluctant to report misconduct. We will protect you.

If you feel that you have experienced retaliation, immediately report your concern to a manager who is not involved in the issue, senior management, Human Resources or the Compliance Hotline. All allegations of retaliation will be investigated and appropriate steps will be taken to protect those who report retaliation.

WORKPLACE CONDUCT

At S & S Management, Inc., our goal is to promote quality care and services above and beyond community standards which exceed patients' expectations. We ensure patient care is provided regardless of race, religion, gender, gender identity, national origin, age, disability, sexual orientation, payer source or ability to pay. S & S Management, Inc. recognizes and respects the diverse backgrounds and culture of our patients and makes every effort to equip our providers with the knowledge and resources to respect each patient's cultural heritage and needs.

DIVERSITY & EMPLOYMENT PRACTICES

As an employer, we respect and value the diversity reflected in our backgrounds, experiences and ideals. S & S Management, Inc. is committed to providing equal opportunity in all employment practices and makes decisions in compliance with local, state and federal law. We do not discriminate based on race, ancestry, gender, sexual orientation, age, marital status, gender identity pregnancy, medical condition, national origin, veteran status or any other classification protected by law.

DRESS CODE

To ensure all personnel portray a professional appearance for patients, business partners and vendors, S & S Management, Inc. has implemented policies and procedures to address attire.

Business attire is required during regular business hours and when representing the company at events and meetings. Business attire is defined as:

- Women: suit, pants/slacks, dress, skirt, blouse/top, sweater set, shoes (high heels and flats; either closed or open-toe).
- Men: suit, pants/slacks, sports coat, long-sleeved button shirt (no tie required if not wearing a suit), shoes (close-toe).

Tattoos should be covered while on the premises and/or promoting S&S Management. Similarly, any body piercing (other than earrings) should be removed.

Reasonable accommodations for employees' religious beliefs and disabilities will be made whenever possible.

Any personnel who violates the S & S Management, Inc. dress code policy may face disciplinary action, up to and including termination of employment.

CELL PHONE USE AND INTERNET BROWSING

Excessive personal phone calls and internet browsing interferes with productivity and can be distracting to others. S & S Management, Inc. encourages employees to limit internet browsing and use of cellular phones for personal use to break times, meal periods, or emergency situations.

BEHAVIOR STANDARDS

We want to create an environment to build collaborative relationships between team members and all parties we conduct business with. We are committed to serving patients and hold our team

members to high standards when it comes to behavior and job performance. As an employee of S & S Management, Inc., we expect you to exhibit, at minimum, the following:

- 1) Follow and abide by the Code and all company policies and procedures
- 2) Be punctual
- 3) Have a positive attitude
- 4) Produce quality work consistently
- 5) Provide good customer service
- 6) Respect business partners, team members, providers and patients

HARASSMENT

S & S Management, Inc. prohibits unlawful harassment of any shape or form, including sexual harassment or harassment based on any classification protected by law. Harassment includes any inappropriate conduct, including both physical actions and verbal remarks, that creates a hostile, offensive or intimidating work environment.

We do not tolerate any type of harassment and require all members of our Board of Directors, personnel (executives, employed clinical and non-clinical staff), affiliated physicians, other contracted providers, vendors, and all third parties conducting business on behalf of S & S Management, Inc. and its IPA/MG clients to treat everyone with dignity and respect at all times.

If you experience, observe or learn of harassment, report it to your manager, Human Resources or the Compliance Officer.

HEALTH & SAFETY

At S & S Management, Inc., we follow health and safety policies and procedures that are designed to ensure we are meeting all applicable laws and regulations as they apply to our workplace. If you witness an injury, accident or dangerous situation, it should be reported to management and in accordance with risk management policies and procedures immediately so that action may be taken to resolve the issue.

If you witness or are a victim of any violent behavior or threats, they should be reported to management or Human Resources immediately. Any personnel who engage in violence or threats will be submitted to disciplinary action, up to and including termination of employment as well as criminal prosecution, if appropriate.

DRUGS AND ALCOHOL

It is our intent to maintain a workplace that is free of drugs and alcohol to provide a safe, healthy and productive work environment. During business hours while on company premises, conducting or performing company business regardless of location, operation or responsible for the operation,

custody or care of company equipment or other property, or responsible for the safety of others, you are prohibited from:

- The unauthorized use, possession, purchase, sale, manufacture, distribution, transportation or dispensation of alcohol
- Being under the influence of alcohol
- The use, possession, purchase, sale, manufacture, distribution, transportation or dispensation of any illegal drug or other controlled substance
- Being under the influence of any illegal drug or other controlled substance
- The abuse of any legal drug
- The purchase, sale, manufacture, distribution, transportation, dispensation or possession of any legal prescription drug in a manner inconsistent with the law
- Working while impaired by the use of a legal drug whenever such impairment might:
 - Endanger the safety of the employee of some other person;
 - Pose a risk of significant damage to Company property or equipment
 - Substantially interfere with the employee's job performance
 - The efficient operation of the Company's business or equipment

While there may be alcohol served at a company event, it is up to you to use good judgment when deciding to consume alcohol in social situations. The Code and other policies and procedures continue to remain in effect and will be enforced regardless of where the company events are held.

If you are found to be in violation of our policies at any time, you will be subject to corrective action, up to and including termination of employment, to the extent permitted by law.

QUALITY OF PROVIDERS

Only providers who are properly trained with appropriate professional credentials will be permitted to provide patient care services as outlined in S & S Management, Inc. policies and procedures, laws and regulations and this Code of Conduct. Prior to being allowed to care for patients, we will ensure that all contracted physicians, mid-level providers (advanced nurse practitioners, physician assistants, certified nurse midwives, certified nurse specialists), other contracted providers and employed clinical staff, are appropriately credentialed as required by applicable laws and regulations. Only those healthcare providers who carry and keep current all required licenses, follow the ethical professional standards dictated by their respective professional organizations and licensing boards, and who agree to comply with S & S Management, Inc.'s policies and procedures, applicable laws and regulations, and this Code of Conduct are qualified for employment or participation in any of its contracted managed healthcare network.

OIG/GSA EXCLUSIONS

Federal laws prohibit excluded individuals and entities from receiving payments for services, equipment or drugs prescribed or provided by a provider, supplier, employee or FDR if on exclusion lists maintained by the DHHS OIG or GSA. In addition, these excluded providers and entities are prohibited from being employed by, contracted with or receive any monies from organizations such as S & S Management, Inc. and its IPA/MG clients.

To ensure compliance, exclusion lists are reviewed prior to the hiring or contracting of employees, temporary workers, volunteers, consultants, Board members or FDRs. Monthly screenings are completed to prevent inappropriate authorizations for services and payments.

In the event any S & S Management, Inc. team members or FDRs appear on the OIG/GSA exclusion list, health plan partners will be immediately notified. We may alter job responsibilities or terminate employment or contracts, as appropriate.

CONFLICTS OF INTEREST

A conflict of interest exists when our loyalties or actions appear to influence our ability to make objective, sound business decisions in the best interest of S & S Management, Inc. and its IPA/MG clients. All possible conflicts of interest must be reported and discussed with management or Human Resources for clarification. Any exceptions to a conflict of interest must be approved in writing by the Human Resources Department.

OUTSIDE EMPLOYMENT AND OTHER ACTIVITIES/ARRANGEMENTS

A conflict of interest may exist if the demands of any outside activities hinder or distract your performance of the job or cause you to use S & S Management, Inc. resources for outside purposes.

Outside employment and other activities/arrangements with S & S Management, Inc. business partners, vendors, contractors, patients, competitors, referral sources, governments or other third parties must not interfere with your job responsibilities and may be prohibited. All outside jobs, relationships, or transactions that may create a conflict of interest must be discussed with and approved by management. Part-time employees may engage in employment outside of S & S Management, Inc. provided such employment is disclosed and written approval is obtained from management.

BUSINESS OPPORTUNITIES

Any business opportunities you discovered through your employment with S & S Management, Inc. belongs to S & S Management, Inc. As team members, we owe S & S Management, Inc. an

undivided duty to advance its legitimate business interests when opportunities arise. If you become aware of a business opportunity that may be of interest to S & S Management, Inc., you just disclose it to your manager.

We may never compete with S & S Management, Inc. or its IPA/MG clients by aiding a competitor. You are prohibited from using S & S Management, Inc. confidential or proprietary information, resources, equipment or business partners for personal gain or to the company's detriment.

FAMILY AND FRIENDS

When we interact with family members, close friends or romantic partners in a business setting, there is the potential for a conflict of interest. If you, your spouse, family member or close friend have a personal stake in a company that competes with, does business with or may do business with S & S Management, Inc., a conflict of interest may arise. To ensure that we make business decisions based on merit and in the best interest of the organization, you must promptly notify management or Human Resources of any relationships that may be a conflict of interest.

GIFTS AND ENTERTAINMENT

It is a customary practice to exchange gifts and entertainment to build good working relationships and create goodwill. However, certain gifts and gratuities may pose ethical issues where actual or perceived conflicts of interest may arise. No employee is authorized to accept or solicit any gift that could be perceived to improperly influence S & S Management, Inc.'s business or purchasing decisions, or any decisions on behalf of any client or business partner.

S & S Management, Inc. does not prohibit exchanging gifts and entertainment from competitors, customers or current/potential suppliers as long as the following standards are met:

- 1) Gift or entertainment is valued at one hundred dollars (\$100) or less
- 2) S & S Management, Inc. business is being conducted
- 3) There is nothing illegal, inappropriate or unethical
- 4) The gift or entertainment was unsolicited
- 5) All expenditures are appropriately authorized, expensed and documented

COMMUNITY AND POLITICAL INVOLVEMENT

While we support and encourage you to be involved in the political process and serve in the community, S & S Management, Inc. expects that your participation in these activities does not:

- 1) Create a conflict of interest
- 2) Commit S & S Management, Inc. to give its financial or other support to the organization or activity
- 3) Interfere with your performance at work

- 4) Embarrass, discredit or pose a liability to S & S Management, Inc.

We can only participate in these activities as a private citizen and cannot hold yourself out as a representative of S & S Management, Inc. We will not reimburse any expenses related to these activities and prohibit the use of any company equipment, facilities, and assets for them.

CONFIDENTIALITY AND PRIVACY

The security of company information is critical to the success of S & S Management, Inc. Everyone shares responsibility in protecting it and ensuring proper security is maintained at all times. We must not use or disclose any proprietary or confidential information obtained during employment with S & S Management, Inc. The written non-disclosure/confidentiality agreement we sign when we join the company continues to remain in effect even after our employment with S & S Management, Inc. ends.

PROTECTED HEALTH INFORMATION

S & S Management, Inc. is committed to maintaining privacy of all Protected Health Information (“PHI”) to comply with all laws and regulations. We are all obligated to take proactive measures to safeguard documents, computers and other data devices that contain patient information.

Patient information should:

- 1) Never be discussed in public and not with anyone other than those who are directly involved in the patient’s care.
- 2) Be protected through reasonable and appropriate technical and organizational security measures. Electronic files are encrypted and hard copy documents are secured in medical files or appropriately retired and destroyed.
- 3) Be used and disclosed minimally as necessary to serve the patient or is required by law.
- 4) Be released only to persons authorized by law or with the patient’s documented permission to receive the information, unless circumstances are subject to emergency exceptions.

All vendors used by S & S Management, Inc. to process patient information on our behalf are required to comply with our privacy and security policies and all applicable laws and regulations. Vendors are permitted to process PHI only at our direction while performing services on our behalf and are not authorized to access, use or disclose patient information unnecessary to perform their service or more than the minimum necessary amount of information needed to provide services to S & S Management, Inc.

Any unauthorized use or disclosure of patient information must be promptly reported to the Compliance Officer.

TECHNOLOGY

S & S Management, Inc. utilizes various technological resources to conduct business. Technological resources include, but are not limited to, the following: all electronic devices (e.g., computers, copiers, fax machines, etc.) and software which grant access to services such as internet, electronic mail, voicemails, etc.

We are each responsible for using computer systems and S & S Management, Inc.'s network for the purpose of conducting company business. Incidental personal use of technological resources is allowed as long as such use does not interfere with your duties, is not done for personal or financial gain, does not conflict with S & S Management, Inc.'s business and does not violate any policies and procedures. Although we do not wish to examine personal information, we reserve the right to monitor your use of our systems and review all files or messages on our systems at any time for any reason.

COMPANY ASSETS

Company assets include equipment, materials, technology, information, intellectual property, salary information, financial data and other forms of confidential and proprietary information. These assets should only be used to conduct business. We have an obligation to prevent damage, theft, unauthorized access to and misuse of all company assets which are critical to S & S Management, Inc.'s success, even if we leave the organization.

SOCIAL MEDIA

We frequently engage in communications through social media, such as Facebook, LinkedIn, Twitter, Instagram, blogs and many others that are now available. Everything we say or do is a reflection on S & S Management, Inc. As a result, we must always be clear that any opinions expressed on various platforms are our own, and not the opinion of the company. Participation on external social media sites should be done on your time. Any violations of the Code or company policies, such as but not limited to, harassment, inappropriate conduct and unauthorized disclosure of confidential information online will be handled in the same manner as violations offline.

APPLICABLE LAWS

As we strive to do the right thing, we are provided with guidance by several important laws and regulations.

ANTI-CORRUPTION, ANTI-BRIBERY LAWS AND ANTI-KICKBACK LAWS

We never exchange gifts or improper payments to obtain or retain any business favors or other advantages such as increased business or patients. Business partners, vendors and other parties S

& S Management, Inc. conducts business with are also prohibited from giving, offering, or promising anything of value to any individual in violation of anti-corruption and anti-bribery laws. To ensure there is no acceptance of and payments made that would violate these legislations, S & S Management, Inc. will include accurate, truthful and complete written documentation regarding the payment and the purpose of the payment for any and all payments made as well as received.

ANTITRUST LAWS

Antitrust laws are designed to encourage and protect free and fair competition in the marketplace. S & S Management, Inc. is committed to conducting business in a manner that competes in a fair, ethical and legal manner. We will not engage in any of the following:

- Abuse of market power to engage in unfair price discrimination and other unfair practices
- Agreements with competitors to collude
- Soliciting or exchanging intellectual or business information with competitors

Should you find yourself in a conversation that touches upon any of the above, you should immediately end the conversation and report the incident to the Compliance Officer.

FALSE CLAIMS ACT - FRAUD, WASTE AND ABUSE

The False Claims Act is one of several federal laws implemented to prevent and penalize fraud, abuse and waste in federal healthcare programs. It is illegal to knowingly present, or cause to be presented, a false or fraudulent claim or statement to the government. All members of our Board of Directors, personnel (executives, employed clinical and non-clinical staff), affiliated physicians, other contracted providers, vendors, and all third parties conducting business on behalf of S & S Management, Inc. and its IPA/MG clients receive training and education on the prevention of fraud, waste, and abuse when newly hired or contracted. Annual refresher trainings are conducted thereafter.

We do not retaliate against anyone for taking action under this regulation for reporting any potential compliance concern in good faith. S & S Management, Inc. has zero tolerance for any violations of this law and the company's policies and procedures for Fraud, Waste and Abuse.

CONCLUSION

We all have an obligation to use good judgment and to do the right thing as we conduct business each day. While the Code cannot anticipate every situation that may arise, it serves as a guide when we are in doubt and keeps us focused on our ethical and legal obligations.

COMPLIANCE CONTACT INFORMATION

The S & S Management, Inc. Compliance Hotline, Compliance Reporting Website and S & S Management, Inc. Compliance Mailbox are available 24 hours a day, 365 days a year.

- **Compliance Hotline (anonymous): 1-855-662-SAFE**

- **Compliance Reporting Website (anonymous):**
<https://www.safehotline.com/SubmitReport>
Company ID: 4237443530

- **S & S Management, Inc. Compliance Mailbox:**
4compliance@sandsmanagement.com

An outside company receives the Compliance Hotline and Compliance Reporting Website and will assist you in making your report. Callers/report submitters may remain anonymous.

GENERAL COMPLIANCE QUESTIONS

If you have any general compliance questions, email Orlando Mendoza, Compliance Officer:

omendoza@sandsmanagement.com



CODE OF CONDUCT ATTESTATION (EXTERNAL)

Provider Name: _____

Provider NPI: _____ **Provider Specialty:** _____

Provider Primary Address: _____

Provider Primary Phone #: _____

This applies to the following IPA/Medical Groups in which I have active contracts. Please check all boxes that apply:

AMDC, IPA **Sejong, IPA** **Stewart Medical Group**

I attest to the following:

1. My staff and I have received a copy of the S & S Management, Inc. Code of Conduct.
2. My staff and I have read and understand the S & S Management, Inc. Code of Conduct.
3. My staff and I will comply with the S & S Management, Inc. Code of Conduct.

I agree to provide requested documentation to substantiate training and compliance with the above.

PRINT NAME: _____ **TITLE:** _____

SIGNATURE: _____ **DATE:** _____

PLEASE RETURN COMPLETED ATTESTATIONS TO ORLANDO MENDOZA, CPCO
Email: omendoza@sandsmanagement.com Fax: (626) 458-8051