



Origination 03/2023

Last Approved 03/2023

Effective 03/2023

Last Revised 03/2023

Next Review 03/2024

Owner James Garner:  
Sr. Director, Audit  
& Compliance

Area Compliance  
Applicability Privia Health and  
All Markets

References Anti-  
Retaliation,  
Non-  
Retaliation

## Non-Retaliation Policy

### A. Purpose:

Establish guidance for reporting ethics or compliance concerns or other inappropriate behavior while providing protection against retaliation for reporting in good faith.

### B. Scope:

This policy applies to the officers, directors, and workforce of (1) Privia Health Group, Inc., its subsidiaries, and affiliates (collectively "Privia"), (2) any entity for which Privia is contractually obligated to manage such entity's compliance program, including Non-Owned Medical Groups, and (3) Care Centers who access Privia's Technology Platform.

### C. Definitions

**Workforce:** Employees, volunteers, trainees, students, and any other person whose conduct, while performing work for Privia or an affiliated Care Center, is under the direct control of Privia or the Care Center, regardless of whether, or by whom, they are paid and regardless of whether they are full-time, part-time, permanent or temporary.

### D. Policy:

1. Privia is committed to maintaining compliance with all applicable laws, rules and regulations in order to prevent misconduct and correct inappropriate behavior wherever it may occur in our organization.

2. Privia is committed to providing a workforce environment free from unlawful retaliation. As such, Privia will not tolerate retaliation against any member of its workforce.
3. Complaints of retaliation made pursuant to this policy will be thoroughly and promptly investigated. While Privia will take appropriate measures to maintain the confidentiality of the participants to the extent possible, a thorough investigation may require divulging certain information. Privia will limit information disclosed to only those individuals with a need to know of the complaint or of the investigation.
4. Workforce members have an individual responsibility to report any activity by another workforce member or any other person doing business with or for our organization that appears to violate applicable laws, rules, regulations, accreditation standards, Privia Code of Conduct or policies.
5. If Privia determines that conduct in violation of this policy has occurred, the offending individual(s) will be subject to corrective action, including formal discipline, up to and including termination from the workforce.
6. Any violation of this policy by a member of the medical staff or another practitioner with clinical privileges will be handled in accordance with the applicable Medical Group policies and bylaws.

## E. Procedure:

### 1. Reporting a Concern

- A. Any workforce member, who in good faith, reasonably suspects a violation of applicable laws, rules, regulations, accreditation standards, Privia Code of Conduct or policies, or any other inappropriate behavior should report such incidents to one of the following:
  1. Immediate Supervisor;
  2. Privia Human Resources Business Partner;
  3. Deputy General Counsel, Kristen Hall (by email: [kristen.hall@priviahealth.com](mailto:kristen.hall@priviahealth.com));
  4. Privia's Chief Compliance Officer, Dana Fields (telephone 615.830.8241/email: [dana.fields@priviahealth.com](mailto:dana.fields@priviahealth.com));
  5. Privia Compliance Department : (telephone 571.371.0679/ email: [compliance@priviahealth.com](mailto:compliance@priviahealth.com)); or
  6. Privia Ethics Line (also provides an anonymous option): (telephone 871.851.8048 /webform <https://www.priviahealth.com/ethicsline>)

## F. References

- A. Privia Health [Code of Conduct](#)
- B. False Claims Act, 31 U.S.C § 3729
- C. Anti-Retaliation Policy, Privia Health Employee Policy Guide

# Approval Signatures

Step Description	Approver	Date
Chief Audit & Compliance Officer Approval	Dana Fields: SVP, Internal Audit & Chief Compliance Officer	03/2023
Compliance & Audit Leadership #1	James Garner: Sr. Director, Audit & Compliance	01/2023
	James Garner: Sr. Director, Audit & Compliance	01/2023

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