

Code of Conduct

AMENDED — AUGUST 14, 2024

PRIVIA[™]
HEALTH





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HEALTH

At Privia, our mission is to transform healthcare – enabling doctors and their teams to focus on keeping people healthy.

Parth Mehrotra

Dana Fields

Our Mission is to transform healthcare to enable doctors and their teams to focus on keeping people healthy.

Our Values



WE DISRUPT THINGS

We are not afraid to take a stand; to challenge inertia and change the status quo.



FIND A WAY

We're scrappy, resourceful, and entrepreneurial; we look at processes and systems and ask "How can we do this better?"



CHANGE THE WORLD BY CHANGING OURSELVES

Our ambitions are grand, but we're smart enough to know we don't have all the answers; change starts with us and we're committed to constant personal growth to help us find better solutions to problems.



OUTCOME OBSESSED

We believe in holding ourselves accountable to the highest levels of performance, as our patients and providers deserve nothing less than the very best we can give.



DO THE RIGHT THING

Our business is all about earning (and keeping) trust; we don't cop out and take shortcuts just because the work is hard.



WE ARE THEY

We eat our own cooking; we're building a healthcare delivery system for ourselves, our neighbors, for our parents, and our children — this is highly personal.

The Purpose of our Ethics and Compliance Program and our Code of Conduct



● Use this framework to work through ethical decisions:



No
Stop



Unsure
Seek Guidance



Yes
Proceed

- **Is it legal?** Ask yourself if the action is allowed by the law.
- **Is it allowed?** Ask yourself if the action is allowed by our Code, policies and procedures.
- **Is it consistent with our values?** Ask yourself if the action aligns with our values.

Complying with the
Code of Conduct

EXPECTATIONS OF OUR LEADERS

THE IMPACT OF OUR FAMILY MEMBERS





How can my family member's conduct result in ethical or compliance issues?

EXAMPLE 1: INSIDER TRADING

- **Scenario** — Over a family dinner, you share a story about the big project you're working on this quarter. You mention that Privia plans to purchase another large organization. Your parents buy Privia stock the next morning based on this conversation.
- **Analysis** — In this example, your family member's conduct — and yours — violates Privia's Code and perhaps the law. The information you shared may not be readily available to the public but could be deemed to be material information that would impact an investor's decision about our stock. If your family member uses this information to buy or sell Privia stock or tells someone who uses that information to buy or sell Privia stock, this could be considered insider trading, and both you, your family member and anyone else who trades on the information may be liable.

EXAMPLE 2: CONFLICT OF INTEREST

- **Scenario** — Privia is accepting proposals for a special consulting project. You are on the team overseeing this project. Your spouse owns a consulting firm that performs these services and is submitting a bid.
- **Analysis** — Your spouse's ownership of the consulting firm proposing on services for Privia creates a conflict of interest. You should report this conflict and recuse yourself from participating in the vendor selection and contract negotiation process.

It is a special honor to work with our leading physicians and their clinical teams. Our high standards of honesty and integrity help us all improve the health of our communities.

KEITH FERNANDEZ, MD

OUR COLLABORATION WITH CLINICAL REPRESENTATIVES



Ask Questions to Understand the Code

Questions or concerns regarding interpretation of our Code or any portion of the Compliance and Ethics Program should be addressed to a supervisor, any member of the Executive Team, the Compliance Department, the Legal Department, your Compliance Liaison, or the Privia Chief Compliance Officer.

EVERYONE'S RESPONSIBILITIES

Every Representative has a responsibility to:

- 1 Read, understand, and follow the Code.
- 2 Ask for help if we are unsure about a decision.
- 3 Speak up if we see ethical concerns or misconduct.

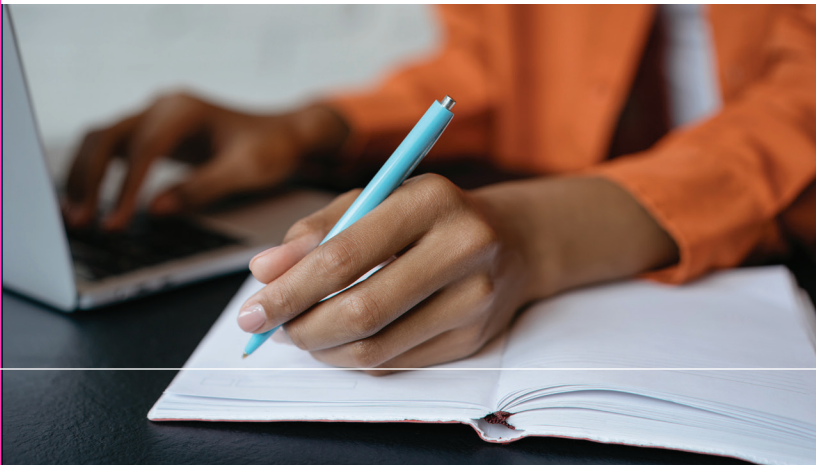
ADDITIONAL RESPONSIBILITIES FOR MANAGEMENT


If you supervise others, you have additional responsibilities to:

- 1 Make sure those you lead understand and follow the Code.
- 2 Model ethical behavior in your own work and leadership.
- 3 Provide resources needed for your staff and vendors to do their work ethically.
- 4 Take every report of misconduct seriously and follow up to ensure it is handled appropriately.

Sarbanes-Oxley Code of Ethics

Our Ethics and Compliance Program



 To obtain further guidance on an ethics and compliance issue or to report a suspected violation of our Code of Conduct:

- Discuss the situation with your supervisor.
- Discuss the situation with any member of the Executive Team, the Compliance Department, or Legal Department.
- Call or Text our secure Ethics Line at 877-851-8048 or create a report using our secure webform at PriviaHealth.com/EthicsLine.

What happens when I report an issue to the Privia Ethics Line?

- The Ethics Line is answered and managed by an independent third party.
- You will be given a confirmation number that can be used to access the status of your report. Your report is sent to Privia's Compliance Department.
- Privia's Compliance Department assigns your report to the necessary resources for investigation. This may be members of the Compliance Team, Legal Team, or other resources as considered necessary.
- Concerns raised about workplace conditions at Privia Health are referred to the People Operations Department for investigation and resolution.
- Concerns raised about Care Center employee matters or patient care at a Care Center are forwarded to that Care Center for investigation and resolution.
- Certain concerns will be reported to the Audit Committee of the Board of Directors.

Every report that raises compliance concerns will be investigated thoroughly. We all have a responsibility to cooperate honestly.


Upholding all laws, rules, and regulations is a key part of Privia's commitment to serving providers and patients with the highest degree of honesty and integrity.

ED FARGIS

Complying With Laws and Regulations

● As an ethical and law-abiding company, Privia and our Representatives never:

- Accept bribes
- Accept kickbacks
- Let gifts influence our business decisions
- Engage in behavior that could constitute fraud, such as:
 - Falsifying financial or medical records
 - Ordering unnecessary tests or procedures for personal gain
 - Billing for services not rendered
 - Stealing anything, including confidential information

 Some examples of false claims include knowingly:

- Billing for services not rendered or not provided as claimed;
- Billing for items, services, or diagnosis codes not supported by the medical record;
- Billing for items or services not medically necessary;
- Falsifying certificates of medical necessity;
- Filing duplicate claims;
- “Upcoding” to more complex procedures than were actually performed; and
- Billing for services where the service or item was not appropriately supervised by a Physician or other qualified non-physician extender (if allowed).

The False Claims Act (FCA) —



It is essential to be familiar with the laws, regulations, and policies that govern physician relationships. These are two overarching principles governing our physician relationships:

Anti-kickback Statute —

- 1 We do not pay for referrals.** Our medical groups and Clinical Representatives should accept patient referrals and admissions based solely on the patient's medical needs and our ability to render the needed services. We do not pay or offer to pay anyone — physicians or other persons or entities — for referral of patients.
- 2 We do not accept payments for referrals we make.** No Representative or any other person acting on behalf of the organization is permitted to solicit or receive anything of value, directly or indirectly, in exchange for the referral of patients. Similarly, when making patient referrals to another healthcare provider, we do not take into account the volume or value of referrals that the provider has made (or may make) to us.



Patient Rights —

Beyond HIPAA requirements,
Privia's commitment to protecting
patient data from unauthorized
access extends to our
security culture.

LESLEY ANNE DURANT





To protect patient privacy, keep these best practices in mind:

- Access, use, and disclose only the minimum amount of PHI necessary to perform your job.
- Do not discuss PHI with others who do not have a job-related need to know.
- Never share or post IDs or passwords.
- Always log off and lock computers when they are not in use.
- Visually protect PHI by using a computer screen or storing paperwork in a closed folder.
- Prior to discussing patient information, make sure you are in a private location and/or lower your voice to prevent others from overhearing.
- Do not mention, make reference to, or post any PHI, including documents, photos, videos, or audio recordings, on any social media sites or blogs.
- When faxing, emailing, or mailing PHI, double check the address and contents to ensure the correct patient's information is going to the correct person.

If you have questions or concerns related to access, use or sharing of patient information, contact our Privacy Office directly at Privacy@PriviaHealth.com.



Controlled Substances —

Ethics in Business Practices

Anti-Corruption —

Marketing and Advertising —

Antitrust and Unfair Competition —

Political Activities —

Protecting the Environment —

Maintaining Financial
Integrity, Books and
Records, and Protecting
Privia Information

International Business Laws —

Privia's coding and documentation teams work to maintain the integrity of our patient records with timely and accurate documentation of services. This helps improve patient outcomes and facilitate timely reimbursements for our doctors.

SARATH DEGALA

Information Security and data integrity are essential components of our mission to transform healthcare – enabling doctors and their teams to focus on keeping people healthy. Patients and families trust that they can securely access their confidential health information through our platform.

PAUL SHENENBERGER

We are responsible for maintaining detailed financial information that accurately reflects our business performance and the financial position of the company. This also helps senior leaders, investors, and analysts evaluate our financial performance and make appropriate economic decisions based on the information.

DAVID MOUNTCASTLE



Conducting Privia's Business

We conduct our business operations with honesty and integrity. Our strict adherence to the Code of Conduct helps us maintain our competitive advantage and protect the health of the communities we serve.

MARK FOULKE

● How do I know if I have a potential conflict of interest?



Do you have a personal financial interest with a company doing business with Privia?



Do you have secondary employment outside of Privia?



Does someone close to you work in the industry or have a personal relationship with a competitor?



Are you a member of an external entity's board of directors?



Are you profiting from knowledge acquired at Privia?



What is material non-public information?

Non-public information is considered “material” if a reasonable investor would consider it important in making a decision to buy, sell, or hold a security. If you have any questions about what constitutes insider trading, you should consult our Insider Trading Policy and consult with Privia’s General Counsel.

Our Work Environment

We treat everyone, both inside and outside Privia, with respect and dignity. Our strong commitment to Privia's value of 'Do the Right Thing' helps us follow the Code of Conduct and make good decisions every day.

JENNY HARDING

Diversity —

Equity —

Inclusion —

Waivers and Amendments

Personal Obligation to Report



● See something wrong?

**Call or text the secure
Ethics Line at
877-851-8048**

- You do not have to give your name.
- Your phone number will not be tracked or documented.
- The Ethics Line is managed by an independent third party.



**Or you can complete the
secure webform at
PriviaHealth.com/EthicsLine**

- You can type the information yourself.
- You will still remain anonymous.
- Remember: No one may retaliate against an employee who reports a problem or asks a question in good faith.

Acknowledgment
Process

Acknowledgment Card





For Questions or Concerns

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PriviaHealth.com/EthicsLine