



Standards of Conduct 2026

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Mission Statement

Standards of Conduct

LaSalle upholds strict ethical standards and complies with all federal and state laws. We are committed to maintaining high professional standards for our community, patients, members, and business partners.

Our Standards/Code of Conduct and Compliance Plan are essential to how we operate and guide us in achieving excellence at work. The Board of Directors (BOD) regularly reviews, approves, and updates these documents to reflect changes in laws, regulations, and other requirements. Both the BOD and Executive Leadership team are dedicated to surpassing all compliance goals and standards. Every employee receives the Standards of Conduct when they join and again each year through mandatory Compliance Training, which also covers the Compliance Program. Employees must review all compliance materials—including the Code of Conduct and Standards—and successfully complete all mandatory training to comply with federal and state regulations.

Key risks needing attention include:

- Maintaining accurate financial and accounting records,
- Ensuring ethical billing and collections are in compliance with Fraud, Waste, and Abuse laws,
- Safeguarding healthcare information as required by HIPAA and HITECH.

For compliance questions, employees should contact the Compliance Officer. Suspected violations must be reported to a Supervisor, Human Resources, the Compliance Officer, or Syntrio's 24/7 anonymous service. LaSalle does not tolerate retaliation against employees who report concerns in good faith.

Towards achieving our goals LaSalle has employed the following program elements:

- Assist in carrying out our daily activities within appropriate ethical and legal standards,
- Provide oversight for compliance with laws, regulations, and special conditions imposed upon it by any licensing or regulatory authorities,
- Avoid irregularities in payment, reimbursement, and other transactions,
- Assist in maintaining our obligations to patients, affiliated physicians, third-party payors, subcontractors, independent contractors, vendors, consultants, and to our colleagues according to regulatory requirements; and
- Provide excellent patient care via our provider network.

Non-discrimination

LaSalle complies with Title VI of the Civil Rights Act of 1964, Equal Employment.

LaSalle as well as its agents and employees, shall not, unlawfully discriminate, harass or allow harassment, against any employee or applicant for employment because of sex, race, color, ancestry, religious creed, national origin, physical disability (including Human Immunodeficiency Virus (HIV) and Acquired Immunodeficiency Syndrome (AIDS)), mental disability, medical condition (including health impairments related to or associated with a diagnosis of cancer for which a person has been rehabilitated or cured), age (40 or over), marital status, genetic information, sexual orientation, gender identity or use of family and medical care leave. LaSalle will not differentiate or discriminate against any Member because of his/her enrollment in a Health Benefit Plan.

Opportunity Act (Executive Orders 11246 and 11375) and The Americans with Disabilities Act of 1990 (Public Law 101-336), and the Age Discrimination Act of 1975 (45 CFR part 91). This information is contained in multiple documents including postings in employee lunchroom and the Employee Handbook.

Additionally, LaSalle **maintains** documented guidance available to employees stating its intent to comply with: Rehabilitation Act of 1973, as amended, 29 U.S.C. 794, which prohibits discrimination based on handicap. Title IX of the Education Amendments of 1972, as amended, 20 U.S.C. 1681 et seq., which prohibits discrimination on the basis of sex. Section 654 of the Omnibus Budget Reconciliation Act of 1981, as amended, 42 U.S.C. 9849, which prohibits discrimination on the basis of race, creed, color, national origin, sex, handicap, political affiliation or beliefs. The Medicare-Medicaid Fraud and Abuse Act of 1978. This information is maintained by the Human Resources Department and is posted in the employee lunchroom.

LaSalle only employs individuals who may legally work in the United States either U.S. citizens or foreign citizens who are authorized to work in the U.S. Proof of this verification is required as part of the employee application and screening process, which at a minimum requires 2 legal forms of identification.

Evaluation of Employee Performance

Employees are expected to comply with the Code of Conduct and LaSalle's Compliance Program by completing training. Employees are required to complete additional training as needed by individual job responsibilities. Annual evaluations will be based on several elements, including job performance, professionalism, Code of Conduct, and Compliance Plan criteria.

Employee's Obligation to Report

LaSalle employees and contracted affiliates have the responsibility to comply with the Code of Conduct and Compliance Program. It is their duty to immediately report any potential or suspected violations to Human Resources, the Compliance Officer, or via Lighthouse Syntrio's 24/7 hotline availability without fear of retaliation or reprisal. The LaSalle team remains committed to maintaining the highest level of accountability and all occurrences will be thoroughly investigated.

Compliance Hotline

Having a mechanism for reporting suspected compliance issues is one-way LaSalle detects fraud, waste and abuse, and other misconduct such as inappropriate billing, coding, and documentation, improper claims submissions, HIPAA and patient privacy issues, conflicts of interest, and violations of the Code or Program. Without assistance from the LaSalle' community, it is impossible for the organization to know about every compliance issue and take corrective action.

LaSalle utilizes an independent third-party vendor to operate a designated toll-free telephone line, also known as LaSalle's "Compliance Hotline", for reporting suspected health care fraud and other misconduct. The Compliance Hotline is available 24 hours a day, 7 days a week.

All notifications/reports, both external and internal, are maintained within a designated compliance Case Management System (CMS) specific to LaSalle. This is accessed by the LaSalle Compliance Officer and specific designated staff assigned by the Compliance Officer. The system is a comprehensive audit trail from time of notification to outcome to follow-up.

Toll Free Compliance Hotline:
(855) 888-2226
(Caller May Remain Anonymous)

LaSalle workforce members may also report compliance concerns online using a secure web intake tool managed by the same third-party vendor. The online reporting can be accessed as indicated in the table below on page 6.

LaSalle's Workforce members are encouraged to use the number to report suspected health care fraud and other non-compliant activity as soon as they become aware of a potential violation.

Reports of compliance concerns may also be made directly to a supervisor (who should immediately refer the matter to the Compliance Officer (CO), directly and to Lighthouse via the confidential hotline, email, or fax, writing, via email or to Human Resources or the Information Security Officer as appropriate.

Lighthouse Syntrio's Compliance line 855-888-2226	• Vendor Website: https://report.syntrio.com/LaSallemedicalassociates_ • Toll-Free Telephone: 855-888-2226 • E-mail: reports (must include company name with report) • Fax: (must include company name with report)
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Information pertaining to Compliance reporting mechanisms are promoted on the LaSalle public website, and internally are included in training, internal signage, Compliance communications, and other outreach materials.

Copyrights

LaSalle employees must respect and follow all copyright rules and regulations. Under no circumstances does the Company condone unauthorized use or reproduction of materials pursuant to copyright laws.

Harassment and Workplace Violence

LaSalle ensures a workplace free from discrimination and harassment. The Company's policy covers everyone involved in operations and forbids harassment or discrimination based on protected characteristics, perceived characteristics, or association with someone who has them, by employees, supervisors, vendors, contractors, customers, and others.

Harassment covers a range of behaviors, including subtle and not-so-subtle verbal and non-verbal behavior. It can be engaged in or experienced by both males and females. Harassment may include, but is not limited to, any of the following:

- Epithets, derogatory jokes, comments, slurs, or verbal or physical innuendoes,
- Making verbal or physical conduct of a sexual nature, or the refusal to engage in such conduct, the basis of any employment decision or a condition of an employee's continued employment,
- Subjecting others to obscenity or offensive language,
- Commentary about an individual's body or sexual matters, and
- Retaliation for reporting or threatening to report harassment.

All employees must promptly report any incidents of harassment or discrimination to the Compliance Officer, or the Lighthouse Syntrio hotline to ensure complaints are resolved quickly and fairly. Employees should also be aware that the Equal Employment Opportunity Commission and the California Department of Fair Employment and Housing investigate and prosecute complaints of harassment, retaliation, and discrimination in employment.

Harassment also includes incidents of workplace violence. It is the intent of LaSalle to provide a safe workplace for employees and to provide a comfortable and secure atmosphere for customers and others with whom we do business. LaSalle has zero tolerance for violent acts or threats of violence.

All employees are expected to conduct themselves in a non-threatening, non-abusive manner at all times. No direct, conditional, or veiled threat of harm to any employee or to LaSalle property is acceptable. Acts of violence or intimidation of others will not be tolerated. Any employee who commits or threatens to commit a violent act against any person while on Company premises will be subject to immediate termination.

Employees share the responsibility in the identification and alleviation of threatening or violent behavior in the workplace. Any employee who is subjected to or threatened with violence, or who is aware of another individual who has been subjected to or threatened with violence, should immediately report this information to his or her supervisor, a member of management, or Compliance Officer. All reports of violence or threats of violence will be investigated and communicated to law enforcement.

Treat All Employees with Respect, Dignity and Fairness

To maintain an environment that is respectful and fair, LaSalle encourages employees to utilize the company's open-door policy to voice concerns of possible inequitable or unfair conduct. LaSalle values diversity as an asset and encourages equal opportunity, development, and advancement for all employees. Should an employee feel an issue remains unresolved, they may contact Human Resources or the Compliance Officer.

Health & Safety

Each employee is expected to obey safety rules and to exercise caution in all work activities. Employees must immediately report any unsafe condition to Human Resources. Employees who violate safety standards, who cause hazardous or dangerous situations, or who fail to report or who do not remedy such situation appropriately, may be subject to disciplinary action, up to and including termination. To assist in providing a safe and healthy work environment for employees, patients and members, and visitors.

In the case of accidents that result in injury, regardless of how insignificant the injury may appear, employees should immediately notify the supervisor on site. Such notifications are necessary to comply with laws and initiate insurance and workers' compensation benefits procedures.

Such work injuries or other occurrences may include, but are not limited to any injury, loss of personal property, medication error, serious complaints regarding patient care, failure to carry out a physician's order, questionable medical practice, unexpected cardiac arrest, equipment failure, robbery, vandalism, threats of violence.

Human Resources and the Compliance Officer will be responsible for investigating all health and safety matters.

Personal Use of Resources

LaSalle resources must be maintained and utilized according to company rules and regulations. The Company reserves the right to inspect all property to ensure compliance with its rules and regulations, without notice to the employee or consent and/or in the employees' absence at any time consistent with applicable law. Prior written authorization must be obtained from Human Resources or Administration before any LaSalle property may be removed from the premises.

Employees are prohibited from using Company facilities or equipment including Company computers, copiers, facsimile machines, and other equipment for personal use without prior authorization from their supervisor. Company equipment purchased for employee use is the property of LaSalle. All equipment must be returned upon termination or at any time upon the request of the Company.

Payments, Discounts and Gifts

General

As part of our continued compliance regarding "fraud, waste, and abuse" and "anti-kickback" laws, LaSalle prohibits any of its employees, physicians, or other business affiliates from receiving or providing "remuneration" in exchange for referrals of patients. Furthermore, LaSalle prohibits the payment or receipt of such remuneration in return for directly purchasing, leasing, ordering, or recommending the purchase, lease, or ordering of any goods, facilities, services, or items. Employees involved with finance functions, purchasing, and facilities operation, medical staff administration, and any activity that includes entering into a personal service contract are expected to be vigilant in identifying potential anti-kickback violations and bringing them or any related questions to the attention of the Compliance Officer.

Entertainment and Gifts

LaSalle will maintain compliance with federal and state regulations as it pertains to accepting and receiving entertainment and gifts. Employees of LaSalle are prohibited from accepting or asking for bribes, kickbacks, gratuity, or other forms of payment made to influence a business decision. Additionally, employees or other business affiliates of LaSalle may not offer anything of value to a government official or other third party in an effort to influence business or to gain special treatment as an individual or an organization. LaSalle maintains a strict “gift” policy and all gifts of significance or of monetary value (exceeding \$25.00) forbidden. For further clarification on receiving/providing gifts, please consult with the Compliance Officer.

Receiving Gifts from Patients

Employees of the Company should not accept gifts from members or members’ family members and under no circumstances should LaSalle employees solicit gifts from patients. The Company acknowledges that there are certain circumstances that arise regarding the receipt of gifts; however, employees are strictly forbidden from accepting any individual gift of gratuity valued more than \$25.00 from any patient, vendor, supplier, or other person doing business with the Company. Gifts include, but are not limited to, acceptance of cash, gift certificates, lavish entertainment and free travel and lodging. Violations of this policy will not be tolerated, and may lead to disciplinary action, up to and including termination.

Receiving Business Courtesies

LaSalle is dedicated to rendering quality medical service to members. Employees and other business affiliates of LaSalle are expected to follow the Compliance Plan guidelines as they pertain to receiving business courtesies. Under no circumstance should an employee receive or solicit events, travel, overnight accommodation, or other business courtesies that would adversely affect an ethical business decision or relationship. Prior to accepting such invitations, employees should confirm that doing so is consistent with the LaSalle Compliance Plan and is approved by the Compliance Officer.

Extending Business Courtesies

It is critical to avoid the appearance of impropriety when giving gifts to individuals who do business or are seeking to do business with LaSalle. The corporate policy on business courtesies may from time to time provide modest flexibility in order to permit appropriate recognition of the efforts of those who have spent meaningful amounts of time on behalf of LaSalle.

LaSalle policy is to not provide any gifts, entertainment, meals, or anything else of value to any employee of the Executive Branch of the federal government, except for minor refreshments in connection with business discussions or promotional items with the LaSalle logo valued at no more than permitted by federal or state law.

Fair Dealing

LaSalle is dedicated to providing quality healthcare services to our community by maintaining the utmost

ethical, legal, and business standards. We are committed to maintaining the highest levels of integrity and fairness within our Company and industry. Employees are expected to conduct business honestly and fairly without misrepresentation of material facts. Employees are prohibited from manipulation, concealment, and misuse of privileged information, fraud, or other unfair business practices.

Relationships with Healthcare Constituents

Member

The goal of LaSalle is to provide excellent service and quality medical care to all our members. Members are consistently treated with respect and dignity, and care is provided only for both medically necessary and appropriate healthcare services. LaSalle makes no distinction in the high- quality care it provides, nor will it differentiate or discriminate, based on age, ancestry, color, creed, disability, gender identity, marital status, national origin, need for health services, race, religion, sex, sexual orientation, state of health, status as a litigant, status as a Medicare or Medicaid beneficiary, payment source, any other basis prohibited by law, or as a result of their enrollment in a Health Benefit Plan. Moreover, medical treatment is not based on race, ethnicity, national origin, religion, sex, age, mental or physical disability or medical condition, such as ESRD, sexual orientation, claims experience, medical history, evidence of insurability (including conditions arising out of acts of domestic violence), genetic information or source of payment. Moreover, medical treatment is not based on patient or organization economics, but rather on identified Member healthcare needs.

LaSalle ensures that patients are involved in all aspects of their care and have the necessary information to make informed decisions regarding their health care decisions.

Furthermore, in accordance with HIPAA and HITECH rules and regulations, the Company maintains strict privacy and confidentiality guidelines to protect our patients' privacy.

Employees

LaSalle promotes camaraderie, teamwork, and professional relationships. In an effort to maintain a Positive work environment, gift giving and fundraising campaigns among team members should be reasonable and moderate. Under no circumstances should an employee feel compelled or coerced to participate. Any violations of this directive should be reported to his or her immediate supervisor, Human Resources or the Compliance Officer.

Subcontractors and Suppliers

LaSalle is committed to the highest ethical and business standards in the selection of our subcontractors and suppliers. Selection criteria will be objectively based upon quality, service, price, technical excellence, and the overall ability to meet our business needs and will not be determined by personal relationships, friendships, or other discriminatory/ selective biases.

Substance Abuse and Mental Acuity

To protect the interests of all individuals working on behalf of LaSalle, we are committed to providing a drug and alcohol-free work environment. The use of alcohol, illegal drugs, or controlled substances, whether on or off the job, can adversely affect an employee's work performance, efficiency, safety, and health. In addition, the use or possession of these substances on the job constitutes a potential danger to the welfare and safety of other employees and exposes the Company to the risks of property loss or damage, or injury to other people.

Conflicts of Interest

A conflict of interest occurs when a LaSalle employee, a supervisor, or someone at the management level exploits professional or official capacity in some way to gain personally, in terms of money or other material advantage, at the expense of the employer or organization. Conflicts of interests may include but not limited to using your position to receive a benefit or to refer a service to a friend or relative, receive a payment, gift, or improper entertainment in exchange for a contract.

For example, a conflict of interest may occur if:

- The employees outside activities influence or appear to influence the employee's ability to make objective decisions in the course of his or her job responsibilities.
- The demands of an outside activity cause the employee to use LaSalle resources for personal purposes.
- An employee or close relative can personally profit from a transaction involving LaSalle and the employee or a third party.
- The employee does not act solely in the best interest of LaSalle whenever acting as an agent of LaSalle in dealings with suppliers, customers or government agencies.

LaSalle expects and requires all employees, including Senior Management and the Board of Directors, to act honestly and ethically, and to avoid both actual and potential conflicts of interest with LaSalle.

Therefore, the safest course of conduct is to avoid all business relationships, activities, associations, or interests in which the employee, his or her family, a close friend, or a business associate benefits materially at the expense of LaSalle. It is the employee's obligation to ensure that he or she remains free of conflicts of interest in the performance of his or her responsibilities at LaSalle. A conflict of interest can have a severe negative impact even though the conflict may not be so obvious.

If any employee has suspicion that a conflict of interest exists, they are obligated to notify and present all material facts to the Compliance Officer and/or Lighthouse Syntrio, for investigation. If the employee has any question about whether an activity might constitute a conflict of interest,

the employee should consult with the Compliance Officer, Human Resources, or Lighthouse Syntrio.

Upon disclosure or discovery of a potential or actual conflict of interest (COI), an evaluation will be conducted for immediate resolution. Depending on the level of the position involved, the LaSalle Compliance Officer in collaboration with Lighthouse Syntrio will conduct an independent investigation and determine mitigation of the COI. The resolution may include disciplinary actions as outlined under Correction Action Plan and may also include re-evaluation or modification of the working relationship, up to and including termination.

Conflict of Interest policies are reviewed upon hire and annually to staff, management, the Compliance Officer, and the Board of Directors.

Outside Employment and Activities

LaSalle employees will not, directly, or indirectly, engage in any conduct that is disloyal, disruptive, or damaging to the company. Employees must avoid outside employment or business activities that materially detract from the time or attention they should devote to their duties. Such activities adversely affect the quality of their work performed, and/or adversely affect LaSalle's reputation. An employee should not have a direct or indirect financial interest in competitors of LaSalle. Outside business activities can only be allowed if they do not directly or indirectly compete with LaSalle's business.

Misuse of Company Resources

LaSalle Employees shall not use or access LaSalle's property, information, or position to benefit themselves for personal gain. Employees have a duty to always advance the interests of LaSalle and to act on its behalf with regard to such property, information, or position when the opportunity arises.