



OrthoAtlanta, LLC

IntraHealth Group, LLC

OrthoAtlanta Surgery Center of Fayetteville, LLC

OrthoAtlanta Surgery Center of Austell, LLC



Piedmont
Orthopedics

ORTHO ATLANTA

Code of Conduct

ORTHOATLANTA | CODE OF CONDUCT

Overview

As a leading physician group dedicated to providing exceptional care across our network of surgery centers and medical practices, we pride ourselves on the commitment, expertise, and integrity that define our organization. This Code of Conduct serves as a guiding framework for every member of our team—from physicians and surgeons to support staff, affiliated partners, and third-party vendors and suppliers—to ensure that our actions consistently reflect our core values and the high standards our patients expect. By adhering to these guidelines, we affirm our dedication to maintaining a respectful, fair, and collaborative environment where every individual is empowered to deliver the highest quality of care.

At the heart of our mission is a steadfast commitment to patient-centered care, ethical decision-making, and transparent operations. We recognize that every decision, no matter how small, impacts not only the well-being of our patients but also the trust that our communities place in us. It is through our dedication to these principles that we continue to foster a culture of excellence, safety, and respect.

This document applies to IntraHealth Group, OrthoAtlanta, OASCA, and OASCF (collectively, “OrthoAtlanta”). You will be required to sign an acknowledgement confirming that you received this Code of Conduct, that you understand that it represents policies of OrthoAtlanta, and that you agree to abide by its terms.

Corporate Compliance Program

Our Corporate Compliance Program is the cornerstone of our commitment to ethical practices, regulatory adherence, and patient-centered care. This program is designed to identify, prevent, and address any deviations from our legal and ethical obligations. Our program includes comprehensive training, ongoing monitoring, and accessible channels for reporting concerns, ensuring that every team member is equipped to uphold our core values. Through continuous evaluation and improvement, we strive to foster an environment of transparency, accountability, and excellence across all our surgery centers and medical practices.

Leadership Responsibilities

Leaders at OrthoAtlanta are entrusted with the critical role of setting the tone for a culture of integrity and compliance. They are expected to lead by example, embodying the principles of ethical conduct in every action and decision. In their role, leaders must:

- Clearly communicate our Code of Conduct and compliance policies to all team members.
- Provide the necessary resources and support to ensure that compliance and ethical standards are consistently met.

- Encourage open dialogue and create a safe environment for reporting concerns or potential issues without fear of retaliation.
- Act promptly and decisively to address any deviations from our standards, ensuring that corrective actions are taken when necessary.

By upholding these responsibilities, our leadership reinforces our collective commitment to ethical practices, ensuring that every decision and interaction reflects our dedication to exceptional patient care and the highest standards of professional conduct.

How to Report Concerns or Violations

Maintaining a safe and ethical work environment is everyone's responsibility. If you observe or suspect any behavior that may violate our Code of Conduct, you are encouraged to report your concerns promptly. Please contact your manager, the Compliance Department, or a Human Resources representative. You may also report any concern through our Compliance Hotline. All reports to the hotline are confidential as appropriate, and the reporter may remain anonymous. To ensure confidentiality, the Hotline is operated by an organization not affiliated with OrthoAtlanta, and calls are answered 24/7.

Callers, or anyone who reports compliance issues, will not be retaliated against in any manner for making reports as long as the information reported is, to the best of their knowledge, truthful.

You can submit an **anonymous** Hotline report by phone, or online. You can also submit a report via email, but this would not be anonymous:

- For English, dial **844-910-0077**
- For Spanish, dial **800-216-1288**
- Online portal at **www.lighthouse-services.com/orthoatlanta**.
- Email to **reports@lighthouse-services.com**. Please be sure to include the company name in your email to ensure proper routing and follow-up.

Scope

OrthoAtlanta's Code of Conduct is designed to provide overall guidance and it does not address every situation. More specific guidance is available in OrthoAtlanta's policies and procedures. If you have questions or need additional information, please contact any OrthoAtlanta leader or contact our Compliance Department.

Code of Conduct

Above all else, OrthoAtlanta is committed to the care and well-being of the people we serve. In recognition of this commitment, we will strive to deliver excellent, appropriate healthcare in the community we serve. OrthoAtlanta will never sacrifice ethical and compliant behavior in the pursuit of business objectives.

Your fulfillment of the standards in this Code of Conduct supports OrthoAtlanta's Compliance Program, our policies and procedures, and laws that govern our operations, including federal healthcare programs (e.g., Medicare and Medicaid). In accordance with this Code, all members of our organization must:

1. Quality of Care

We are dedicated to delivering safe, effective, and compassionate care. Every team member must work to ensure that services are appropriate, evidence-based, and continuously improved. Should any concern arise regarding patient care quality, it must be reported and addressed promptly.

2. Fair and Respectful Treatment

Every individual connected with our group deserves to be treated with courtesy and respect. We foster an inclusive environment that upholds equal opportunity. We do not tolerate discrimination based on race, religion, gender, national origin, age, disability, sexual orientation, socioeconomic standing, or other any other protected class in connection with providing services to the public and in our employment practices.

Further, we prohibit harassment, discrimination, or abuse against employees in any form by supervisors, co-workers, customers, and vendors. For more information, consult OrthoAtlanta's non-discrimination policy and internal Teammate Grievance Policy.

3. Legal and Regulatory Compliance

Our practice is built upon strict adherence to applicable federal, state, and local laws. This includes proper billing practices, and compliance with all healthcare-related regulations that govern our operations. OrthoAtlanta will not contract with, employ, or bill for services provided by an individual or entity that is excluded or ineligible to participate in federal or state healthcare programs.

4. Confidentiality and Privacy

Protecting the privacy of patient information, employee records, and other sensitive data is a fundamental responsibility. We adhere to all privacy standards, including HIPAA and applicable state laws, ensuring that personal and proprietary information is accessed only by authorized individuals. We do not access patient information or share it with others unless authorized to do so. Relatedly, protecting our IT systems is crucial. All personnel

must keep confidential passwords and access credentials, following best practices to must keep confidential passwords and access credentials, following best practices to prevent unauthorized access and promptly reporting any security breaches. For more information, consult OrthoAtlanta's HIPAA Privacy and Security Policies.

5. **Accurate Documentation and Recordkeeping**

Integrity in recordkeeping is essential. All clinical, administrative, and financial records must be maintained accurately (without unauthorized alterations or destruction) and comprehensively in accordance with legal and regulatory requirements, ensuring transparency and accountability. You should never make false or misleading entries in reports or other records. Every team member is responsible for ensuring that all records are timely, accurate, and complete. OrthoAtlanta will also store records (medical, business, and other) in accordance with applicable legal requirements. For more information, consult OrthoAtlanta's Record Retention Policy.

6. **Ethical Billing Practices**

We commit to ethical billing and reimbursement practices by accurately documenting and coding all services provided. All billing activities must reflect the true nature of the services rendered and comply with regulatory standards. All individuals involved in the coding of services (including providers who code their own services) shall ensure that the codes used to bill accurately describe the services and/or tests that were ordered and performed. Any diagnosis codes or procedure descriptions reported on the reimbursement claims should be based on the medical record and other documentation and shall be supported by a provider order where appropriate.

7. **Intellectual Property Rights and Trade Secrets**

OrthoAtlanta: You must protect OrthoAtlanta's intellectual property, trade secrets, and other confidential information. In addition, any intellectual property created during employment is the exclusive property of OrthoAtlanta. Employees are required to disclose innovations or creative works promptly and comply with policies protecting these assets.

Third Parties: It is not unusual to obtain information about other organizations, including our competitors, through legal and ethical means such as public documents, public presentations, journal and magazine articles, and other published and spoken information. However, you must not obtain proprietary or confidential information about a competitor through illegal means. Additionally, you must not seek or use any proprietary or confidential information you obtained from a previous employer that could cause you to breach any confidentiality obligations you owe that employer.

8. **Appropriate Interactions and Gift Policies**

While small tokens of appreciation may be acceptable under defined guidelines, the solicitation or acceptance of gifts or personal gratuities beyond nominal expressions of

thanks is strictly prohibited, ensuring all interactions remain professional and unbiased. Do not accept gifts or gratuities from any current or potential vendor or supplier without obtaining approval from the Compliance Department.

9. **Avoidance of Conflicts of Interest, Outside Activities**

To maintain the trust of our patients and partners, any potential conflicts of interest—whether personal, familial, or professional—must be disclosed immediately to your supervisor and the Compliance Department. Decisions must always be made in the best interest of our organization and those we serve. In addition, all external contracts and business arrangements must be documented, pre-approved, and free from personal conflicts of interest. For more information, consult OrthoAtlanta's Outside Activities policy.

10. **Political Activities and Advocacy**

Employees are free to participate in political activities on a personal basis; however, using one's position within OrthoAtlanta to influence political contributions or campaigns is not permitted. Our stance ensures that our professional decisions remain unbiased, and patient centered.

11. **Workplace Safety and Health**

We are committed to providing a secure and healthy work environment for all. Compliance with all applicable workplace safety standards is mandatory, and the necessary training and resources will be provided to protect the well-being of our staff and patients.

12. **Responsible Use of Assets**

All resources and assets, whether physical or intellectual, must be used solely for organizational purposes. Misuse or unauthorized personal use of these assets is prohibited, and all OrthoAtlanta property must be returned upon termination of employment or affiliation.

13. **Ethics in Research and Clinical Trials**

When conducting research or clinical trials, we adhere to rigorous ethical standards and legal requirements. Patient rights, informed consent, and regulatory approvals (such as from an Institutional Review Board) are fundamental to all investigative activities.

14. **Ethics in Marketing**

OrthoAtlanta's marketing initiatives are solely focused on raising awareness of our goals, objectives, and mission within the community. We use these efforts to recruit exceptional employees and educate the public about our commitment to high-quality patient care and

and ethical practices. In all our communications, we are dedicated to presenting only truthful, accurate, and nondeceptive information. Further, we unequivocally prohibit any practice that involves paying kickbacks to patients or potential referral sources, ensuring that our promotional activities reflect the integrity and transparency that underpin our organization.

15. Cooperation with Investigations

We fully support and cooperate with internal or external audits and investigations. Team members must provide accurate information and assist promptly in any inquiry, reporting potential irregularities as soon as they are identified. Team members must never lie to an investigator conducting an audit. Penalties for making untrue statements can be severe.

16. Preventing Waste, Fraud, and Abuse

We are committed to preventing waste, fraud, and abuse within our operations. All employees must be familiar with the regulations governing healthcare claims and billing practices and must report any suspected fraudulent activities. Robust whistleblower protections support those who come forward. For more information, consult OrthoAtlanta's compliance policies and training program.

17. Reporting Concerns and Violations

Every team member is responsible for reporting potential violations of this Code. Secure and confidential reporting mechanisms are in place to ensure that all concerns are addressed promptly, thereby safeguarding the integrity and trust that underpin our organization.

YOUR COMPLIANCE RESOURCES AND CONTACT INFORMATION

Should you have any questions about our Code of Conduct, require further clarification on any compliance matters, or wish to report a concern, our dedicated compliance team is here to help. You can reach out using the following resources:

Lighthouse Hotline -- 844-910-0077 | www.lighthouse-services.com/orthoatlanta

OrthoAtlanta Compliance Department | Compliance@Intrahealthgroup.com

OrthoAtlanta Chief Compliance Officer | Richie.Lopez@Intrahealthgroup.com