

OUR CODE OF CONDUCT

This is your guide to the ethical and professional standards that Team Members adhere to on a daily basis that is consistent with our values and guiding behaviors.



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**PERFORMANCE
WITH PURPOSE**



Dear Colleagues,

Our commitment to ethics and compliance is paramount to the people we serve. We must act with integrity in everything we do, every day – as individuals, and as an organization. Ethical behavior earns the trust of our patients, physicians as well as our stakeholders, and that’s why our Code of Conduct is so important to our Company.

The following pages outline the key tenets of the Code in what we hope is an easy to navigate, user-friendly guide. In here, you will find business conduct policies to which all of us must strictly adhere, as well as examples of common questions that might arise in the workplace. We have also included tips, numbers to call and procedures to follow.

An integral part of maintaining our strong culture of compliance is the commitment by everyone in the organization to read, understand and follow the Code. If you have questions, reach out to your local compliance resource.

Thank you for your service to our communities, carried out with integrity every day.

Sincerely,

A handwritten signature in black ink, appearing to read 'S. Sutaria', written in a cursive style.

Saum Sutaria, M.D.

Chairman of the Board & CEO, Tenet Healthcare
Chairman, Conifer Health Solutions



**OUR VALUES
MATTER**



CONIFER
HEALTH SOLUTIONS®

SERVE FOR BETTER

Conifer's Core Values

Our values drive our relationships.

Conifer was founded on the core values of unity, integrity, service and respect. The values define how we interact with one another, with our third-party business partners, our clients and our patients.

UNITY

We all work hard to achieve common goals, together.

INTEGRITY

We manage our business with integrity and the highest ethical standards.

SERVICE

We have a culture of service that values teamwork and focuses on the needs of others.

RESPECT

We honor the needs and capabilities of our fellow team members and the clients and patients we serve.



Our values help us make decisions that are consistently in the best interests of our clients, patients, communities, team members, and Conifer.

Follow Our Code

All your actions must follow our Code, our policies, and the law.

We are committed to acting ethically and responsibly every day and with every interaction. Our Code, our policies, our clients' policies and the law give you the information you need to perform your job ethically. It is your responsibility to know and follow the policies and laws that apply to the work you do and the decisions you make.

This Code defines what it means to be a Conifer team member and the high standards we commit to follow.

Conifer relies on our leadership to reinforce the principles of our Code throughout all levels of our organization.

Lead by Example

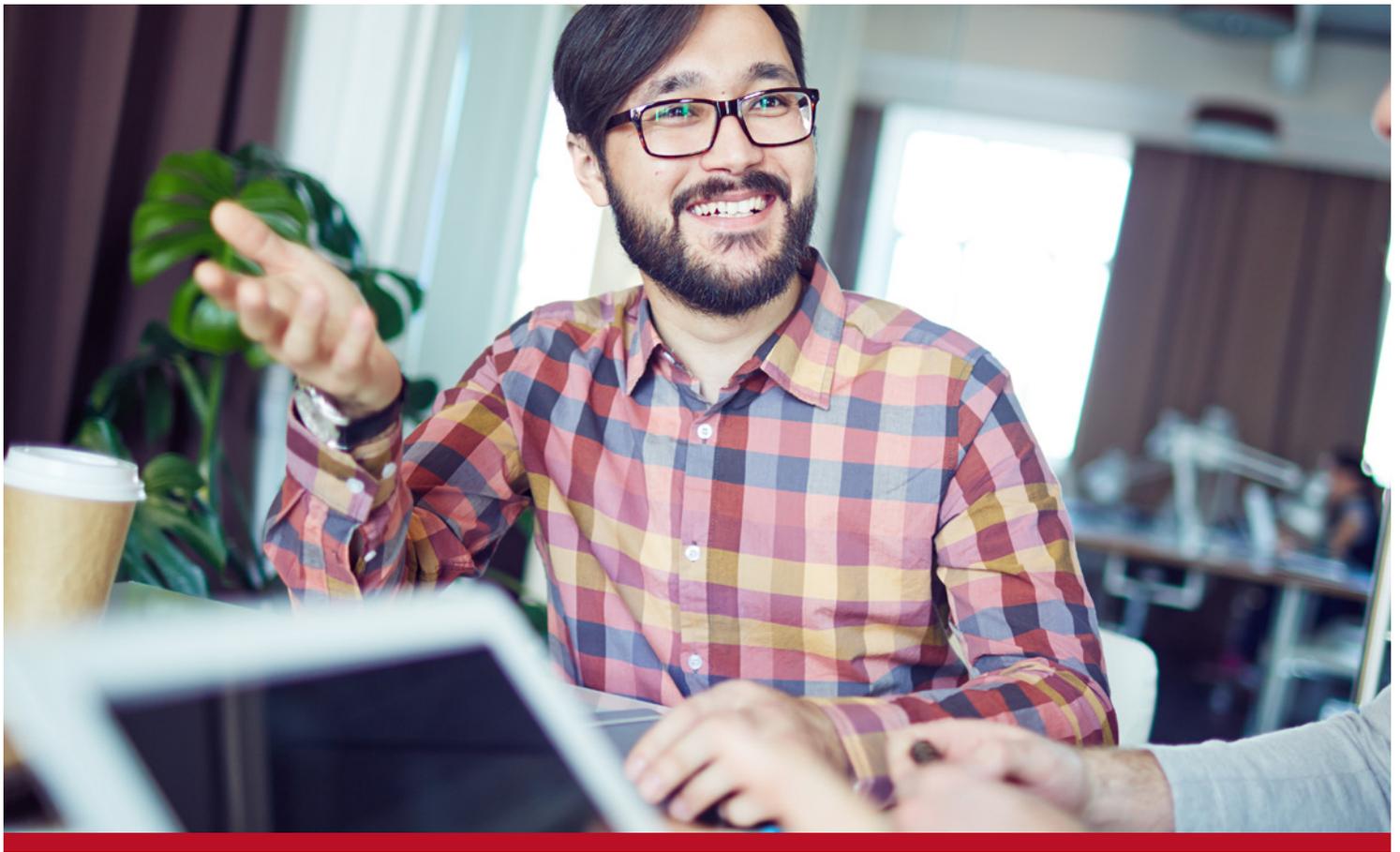
Each of us must act with integrity and inspire trust.

We expect all team members to act ethically; however, each business leader has the expectation of leading by example. We expect our leaders to serve as positive role models and inspire others to embrace our Code by:

- Rewarding integrity
- Encouraging ethical decision-making
- Creating a transparent and open work environment
- Preventing retaliation against those who speak up
- Seeking help from Ethics and Compliance, Legal, and/or Human Resources in resolving and escalating issues



SPEAKING UP



BE THE VOICE OF INTEGRITY

Your Role

Speaking up is always the right thing to do.

Being the voice of integrity is not always easy, but when we raise integrity concerns, we make Conifer stronger and protect our fellow team members from harm. You have an obligation to promptly speak up when you see a situation in which our Values, our Code, our policies, our clients' policies or the law may not be followed. We respect confidentiality and your decision to remain anonymous. However, if you identify yourself, we can more easily follow up with you and provide feedback. We will only share your identity and information on a "need-to-know" basis. You should also be aware that you have an obligation to cooperate with any investigation into a potential violation of our Code, our values, our policies, our clients' policies, or the law.

Raising Questions

If unsure, ask!

The Code, by its very nature, cannot describe every situation that could arise in your daily work. If you cannot find an answer in the Code, or if you have questions on how to interpret the Code, ask for help.

Reporting Concerns

Raise potential violations.

If you believe something may be a violation of our Code, our values, our policies, our clients' policies, or the law, you should promptly report your concerns. Similarly, you should also report any instances where someone has asked you to violate the Code. All reports of potential violations must be made in good faith.

We take your concerns seriously and handle them with care. Reports not made in good faith may be subject to disciplinary action.

Q: How do I know when I should seek guidance?

- A: If a situation does not seem right, then it might not be right. Ask yourself:
- How would it look on the front page of the newspaper?
 - Am I sure this course of action is legal? Is it consistent with our values, Code, policies and client contract(s)?
 - Could it appear unethical or dishonest?
 - Could it hurt Conifer's reputation?
 - Will this hurt our team members, patients, or clients?

Reporting Channels

You have several channels to seek guidance or make a report.

Channels include:

- **YOUR MANAGER, OTHERS IN YOUR CHAIN-OF-COMMAND, OR HUMAN RESOURCES:** Your managers and Human Resources are excellent resources for guidance or concerns related to many Company and job-specific policies and processes, work responsibilities, co-worker issues, discipline disputes, promotion opportunities, and issues related to the work environment.
- **ETHICS AND COMPLIANCE DEPARTMENT:** For issues involving actual or potential Code or legal violations, conflicts of interest, fraud, waste, and abuse, privacy concerns, client/vendor concerns, contract compliance concerns and/or government investigations, you should seek guidance or raise concerns to the Ethics and Compliance Department by emailing ethics@coniferhealth.com.

- **SPEAK UP LINE:** The Speak Up Line is an anonymous reporting mechanism. The Speak Up Line is answered 24 hours a day, 7 days a week by a third party and can be reached at **1-833-7COMPLY (726-6759)**. You may also seek guidance or report concerns by filling out the Conifer online forms:

 [General Compliance Allegation Reporting Form](#)

 [Privacy & Security Compliance Allegation Reporting Form](#)

Examples of issues involving actual or potential Code or legal violations:

- Accounting or financial misrepresentations
- Fraud, theft, bribery, and other corrupt practices
- Discrimination or harassment
- Actual or potential conflicts of interest
- Payment to a physician based on the value or volume of referrals
- Inappropriate sharing or accessing confidential information

If you believe a reported concern has not been adequately addressed, **report it again in a different way**. We all have a responsibility to timely escalate matters that appear to remain unresolved.

Q: What should I do if my manager asks me to perform a task that I believe might violate our Code, our values, our policies, our clients' policies, or the law?

A: If you feel comfortable doing so, raise your concerns openly and honestly with your manager. If you are not satisfied with your manager's response, or otherwise feel uncomfortable speaking to your manager, raise the issue through any other reporting channel. You should never knowingly violate our Code, a policy, or a law simply because a manager directs you to do so or because you did not ask for guidance.

Consequences of Non-Compliance

Non-compliance can have serious repercussions.

- **FOR CONIFER:** Damage to reputation; prosecution, fines, disclosures to government agencies; or loss of business
- **FOR OUR TEAM MEMBERS:** Prosecution, fines, or imprisonment; disciplinary actions; damage to personal reputation; or severe injury or illness
- **FOR OUR CLIENTS:** Loss of confidence in our work and their investment; damage to reputation; prosecution, fines and/or, disclosures to government agencies; or loss of business
- **FOR OUR PATIENTS:** Loss of patient trust or damage to our patients' overall health



Share Your Concerns Without Fear of Retaliation

We do not retaliate against those who raise concerns or cooperate with an investigation.

Conifer has a commitment to non-retaliation and protecting the rights of individuals reporting issues in good faith or cooperating in an investigation. Any retaliation—whether direct or indirect—against team members who raise a concern in good faith or cooperate in an investigation, is grounds for discipline up to and including termination.

Conifer takes reports of retaliation seriously. If you feel that you have experienced or witnessed retaliation, immediately report it to your manager or contact the Speak Up Line, Conifer will investigate it and take the proper steps to protect those who report retaliation.

How We Handle Concerns Involving Our Systems, Practices, Vendors, Clients and/or Team Members

We examine every integrity concern.

At Conifer, every concern is examined thoroughly through the process outlined below. Managers must escalate team member concerns to a compliance professional. The following process displays what happens after you submit a report through the Speak Up Line:

Regardless of how you submit a report, **you will receive a case number** so you may check the status at any time, and/or provide additional information.

1

WRITTEN REPORT IS CREATED

When you file a report through the Conifer Speak Up Line, a third-party vendor will provide the Investigations Team with a written report. The Conifer Speak Up Line does not use Caller ID, so your calls can remain anonymous if you wish.

When you file a report via email, you will receive a response within one business day.

2

YOUR CASE IS INVESTIGATED

Once a report is received, the case is assigned to an investigator and appropriate subject matter experts conduct an investigation. Human resources related concerns are referred to an employee relations advisor for resolution through our employee relations investigation process.

3

RESOLUTION ACHIEVED

All cases remain open until each allegation has been addressed for resolution. Once a case is closed, the Ethics investigation system provides an automated response back to the third-party vendor.

This ensures the vendor is informed that the case is closed in the event the person who reported the incident seeks a status update.



**Speak Up Line –
24 hours a day, 7 days a week**

1-833-7COMPLY or 1-833-726-6759
(you can choose to remain anonymous via phone)
ethics@coniferhealth.com



**RESPECT IN THE
WORKPLACE**

BE CONSIDERATE OF YOURSELF AND OTHERS

Human Rights

We respect team member rights.

We recognize the importance of supporting and promoting fundamental human rights in all our operations. We have programs and policies that:

- Provide fair wages, benefits, and other conditions of employment
- Recognize team member rights to freedom of association
- Provide humane and safe working conditions
- Prohibit forced or child labor

Always check your actions to ensure they do not violate or contradict any of the basic human rights principles noted above. If you suspect human rights abuse at Conifer, speak up and report it..

All team members should:

- Respect the diverse backgrounds of our fellow co-workers
- Give qualified individuals the chance to develop and succeed

Anti-Discrimination

We treat team members equally regardless of background.

Conifer follows all laws covering freedom of association, collective bargaining, immigration, wages and hours, as well as laws prohibiting forced or child labor. We believe in providing equal opportunities in employment for women, minorities, people with disabilities, and veterans.

Each of us should have the opportunity to reach our full potential. To accomplish this, we believe in fostering a work environment free of discrimination. Conifer prohibits treating anyone unfairly in matters that involve recruiting, hiring, training, promoting, compensation, or any other term or condition of employment. Employment decisions must always be in compliance with the law and based on merit, qualifications and job-related performance, and without regard to non-job-related characteristics such as:

- Race, color, or ethnicity
- Citizenship, ancestry, or national origin
- Disability
- Sex, gender, or gender identity
- Marital status or pregnancy
- Age
- Religion
- Sexual orientation
- Veteran status
- Any other legally protected status



Anti-Harassment

Team members should feel comfortable in the workplace.

Harassment includes unwelcome verbal, visual, physical, or other conduct of any kind that creates an intimidating, offensive, or hostile work environment. We seek to create a work environment that is free from harassment of any kind and offensive or disrespectful conduct. Conifer follows all state and local laws prohibiting harassment. While the legal definition of harassment may vary by local law, we consider the following examples to be unacceptable behavior:

- Sexual harassment
- Offensive language or jokes
- Racial, ethnic, gender, or religious slurs
- Degrading comments
- Intimidating or threatening behavior
- Unwanted physical activities (e.g., touching, hugging, or blocking someone's path)
- Showing hostility towards others

You should never act in a harassing manner or otherwise cause your co-workers to feel uncomfortable in their work environment.

What is Sexual Harassment?

Sexual harassment is bullying of a sexual nature, coercion of a sexual nature, or an inappropriate promise of rewards in exchange for sexual favors. Sexual harassment may consist of verbal, visual, or physical conduct of a sexual nature that is unwelcome or that makes someone feel uncomfortable. It can take many forms, such as:

- Unwanted touching, comments about appearances, or sexual advances
- Sexually oriented jokes, pictures, texts, or email messages
- Display of obscene pictures, posters, or pornography

It is important to remember that harassment, sexual or otherwise, is determined by how your actions impact others – **regardless of intentions.**

Substance Abuse

We are committed to a drug-free workplace.

Drugs may include illegal drugs, controlled substances, alcohol, or misused prescription medication. If you work under the influence of drugs or alcohol, you pose an unacceptable safety risk to yourself and others. We perform our job duties free from the influence of any substance that could affect job performance. We therefore prohibit:

- Working under the influence of alcohol, illegal drugs, or controlled substances
- Possessing, selling, using, or distributing illegal drugs or controlled substances while working on Conifer or Client property

If you have a drug or alcohol problem, **ask for help.**

Q: Over the past few months I've been dealing with personal issues that are causing emotional and financial stress. My doctor has prescribed medication to help me get through the day, but I'm beginning to think I may have a substance abuse problem. What should I do?

A: You should contact your healthcare professional or the Human Resources Department to discuss questions or concerns about substance dependency or abuse.

Our Employee Assistance Program can be contacted at 844-417-1158.

Workplace Violence

We are committed to a safe working environment.

Our safety programs include a zero-tolerance policy for violent behavior in our workplace both on- and off-site. Conifer also prohibits the possession of weapons in the workplace. You should not act in a way that could cause another individual to feel threatened or unsafe. This could include:

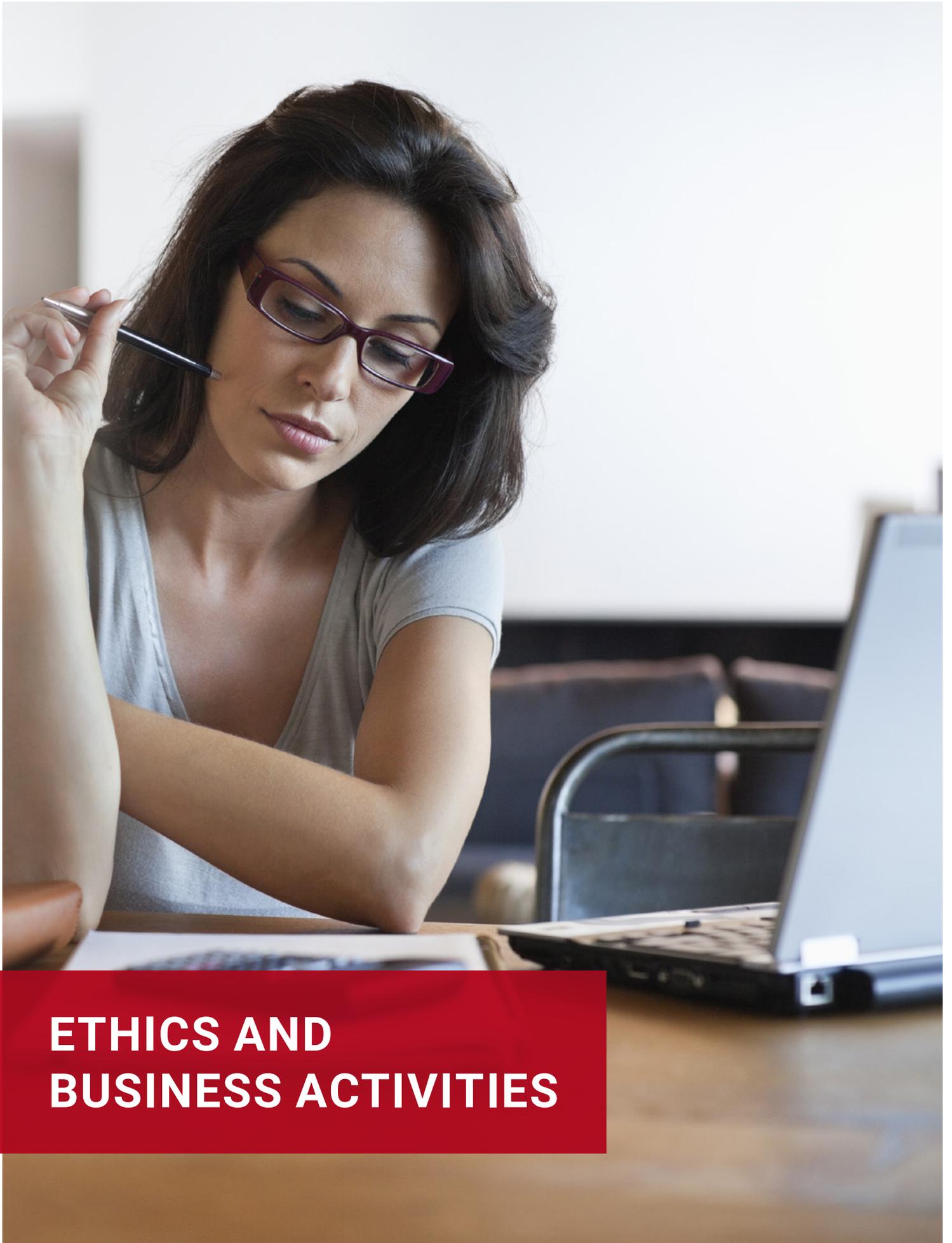
- Verbal assaults
- Threats or any expressions of hostility
- Intimidation
- Aggression or hazing

Team Member Employment Data

We respect team member privacy rights.

As part of our everyday work, some team members have access to personally identifiable information (PII). PII is any information that can be used to identify an individual (e.g., full name, birthdate, or social security number). We use, store, and transfer personal data per employment data protection standards, related procedures, and local law. We do not disclose team member PII unless required by law or when there is a legitimate business need and with the consent of the team member.

Speak up – Report threats or potential violence to your manager, Human Resources, or the Speak Up Line.



**ETHICS AND
BUSINESS ACTIVITIES**

BUILD GOODWILL AND RELATIONSHIPS THOUGHTFULLY

Gifts, Entertainment, and Other Favors

All gifts, entertainment, and other favors given or received must be reasonable.

Giving gifts, entertainment and other favors can potentially create a conflict of interest. "Gifts, entertainment, and other favors" includes anything of value. Examples include, but are not limited to, meals, lodging, discounts, prizes, travel, tickets, gift cards, money in any form, or stock. We never offer anything of value in exchange for referrals or other business.

We are committed to winning business based on the superior quality features and benefits of our services. Offering gifts, entertainment, travel or favors in order to win or keep business is unethical and may be illegal. However, there are occasions where it is acceptable to give a modest gift to a business contact as part of a business relationship. Rules regarding giving gifts to clients, vendors, and other third parties are in the box to the right. In addition, and in general:

- Do not consistently give gifts, entertainment, or favors to the same person or company on a frequent basis
- Limit gifts, entertainment, and favors to what is reasonable and appropriate under the circumstances
- Do not give gifts, entertainment, or favors if you are doing it to make the other person feel obligated to give business to Conifer
- Do not provide gifts or entertainment that may appear to violate our values
- Make sure you are not violating the other company's gift and entertainment policy
- Ensure the gift giving or receiving is consistent with applicable client policies
- Never give cash, checks, money orders, loans, or other types of money
- Gift Cards are permitted if designated by store and/or location (e.g., Starbucks, Target, etc.) VISA, American Express, and Mastercard or similar are not permitted

Allowed (Patients):

- Gifts, entertainment, and other favors to patients not exceeding \$15 per item and \$75 in total per year per patient or potential patient
- Patient Vouchers (\$5) are permitted to provide service recovery and used at the facility cafeteria, gift shop, etc.

Allowed (Clients, Vendors, & Other Third Parties):

- In limited circumstances, gifts, entertainment, and other favors purchased by Conifer for a client or other 3rd party as long as the value of the item does not exceed \$50 per item per person and \$100 in total per year
- Occasional and reasonable, non-extravagant business meals and entertainment with or for clients and other 3rd parties (within the non-monetary compensation limit, if with physicians)

Not Allowed (Patients, Clients, Vendors, & Other Third Parties):

- Cash or other cash equivalents to clients, vendors, or patients
- Free health care items or services provided to patients or physicians
- Trips purchased for vendors, clients, patients, or physicians*
 - Conifer will pay for all business trips taken by its team members
- Gifts from patients; we may not accept or solicit gifts from patients in any form
- Business meals or entertainment for/from patients

* At times, it may be appropriate to reimburse/pay for travel expenses of a Client, Vendor or Other Third Party for business purposes that do not constitute a gift. Prior approval from the Ethics and Compliance and Legal Department is required.



Accepting Gifts, Entertainment, or Other Favors

We may not accept anything that impacts our judgment.

In the course of working for Conifer, you may be offered gifts, entertainment, or other favors from clients, suppliers, vendors, or other business contacts. Accepting these can potentially create a conflict of interest and usually makes us feel like we should do something in return. This could impact our ability to make objective business decisions in the best interest of Conifer. In general, the only kinds of gifts and entertainment you may accept from anyone who does or may do business with Conifer are:

- Infrequent gifts of low value (not exceeding \$25 per item and \$100 in total per year) such as pens, calendars, mugs, or small promotional items related to business

- Non-cash perishable gifts such as cookies, gift baskets, chocolates, or flowers that are shared with a department
- Occasional reasonably-priced meals or travel with a business contact to discuss business matters
- Occasional attendance at local sports, concerts, theater or other cultural or social events, where tickets are generally available to the public and not to exceed more than once per year per vendor, and as long as the vendor is present and Company business is discussed

Be sure your manager is aware of any gift or business courtesies you receive. Each of us must not:

- Accept anything, including meals and entertainment, from patients or solicit gifts from patients in any form
- Accept anything if it will make you feel you should do, or promise to do, anything in return
- Accept anything lacking a business purpose
- Accept anything in return for giving someone Company business
- Accept any cash or cash equivalent such as a gift card
- Ask for a gift or other business courtesies
- Accept anything involving travel or overnight lodging expenses such as vendor trips or conference registration fees. If asked to speak at a conference, please follow-up with your manager for more information.

If you receive anything outside of these guidelines, you should return it and explain that our policy does not allow you to keep it. If it potentially violates a social custom to return it, talk to your manager about donating the item to charity or another solution. If you are not sure whether the gift, entertainment or favor offered to you complies with this policy, talk to your manager or Ethics and Compliance.

If unsure, contact your manager or Conifer's Ethics and Compliance Department first.



Q: A vendor said he was unable to attend the game tonight and asked me if I wanted his two tickets. Can I accept them?

A: Attendance is allowed only if it is with the vendor, the ticket is available to the public, and not more than once a year.

Gifts to Government Officials

Offering even a simple gift or meal to a government official can be illegal.

Generally, Conifer may not accept or request gifts from foreign or federal government officials or their agents. Before interacting with any government officials, you should

familiarize yourself with our Anti-Bribery and Anti-Corruption policy and contact the Legal or Ethics and Compliance departments for specific guidance.

As a federally-registered lobbying entity, entities of the Tenet enterprise, including Conifer, must never provide any gift, meal, entertainment, or other item of value to any member of Congress or their staff, unless that item qualifies for one of several exceptions to the congressional gift rules.

As we continue to expand our global footprint through services within the Global Business Center, engagement of offshore suppliers and vendors, and business development activities, we must limit giving or offering gifts to foreign officials except as expressly authorized by our Anti-Bribery and Anti-Corruption policy.

Insider Trading

Trading securities based on non-public information is a crime.

Inside information is anything that is important enough to potentially affect a company's stock price, but is not yet public. Some examples of inside information may include:

- Financial results
- Earnings projections
- Changes in senior management
- Information about acquisitions

If we have access to inside information about Conifer or one of our business partners, we may not trade in that company's stock until the information is public, nor may we "tip" others to do so. Trading on such information, or "tipping" others, is known as insider trading and is a violation of federal law. Please contact the Legal Department for more information.

Conflict of Interest

Don't let your personal interests interfere with Conifer's best interest.

A conflict of interest occurs when someone might question whether we are acting for Conifer's benefit or for our own personal gain. Conflicts of interest may arise with family, friends, or anyone with whom you have a personal relationship.

If you think you may have a potential or actual conflict of interest, you have an obligation to report it promptly to Conifer so that a determination can be made regarding next steps. Many times, conflicts can be resolved through disclosure and an open and honest discussion. Other conflicts may require reassignment of roles or withdrawal from certain business decisions.

Failure to disclose conflicts of interest can result in disciplinary action up to and including termination.

Examples of Potential Conflicts of Interest*

Personal Relationships

- Contracting with or conducting business with family or friends
- Reporting to, supervising, hiring, or promoting a relative or someone with whom there is a close personal relationship

Personal Investments or Financial Decisions

- Investment in stocks, bonds, options, or other ownership interests with potential to impact decisions or business

Company Property, Information, Position, or Resources

- Utilizing Conifer assets for personal benefit or the benefit of others

**These are only a few examples; we must report any other actions or circumstances that could be perceived as potential conflicts.*

Remember — Having a conflict of interest is not a Code violation. **Not** disclosing it is.

To decide if you have a conflict of interest that should be disclosed, ask yourself these questions?

- Do my outside interests influence my objectivity?
- Do I personally benefit from my involvement in this situation?
- Does a friend or relative of mine benefit from my decision?
- If the situation were public, would I be proud of my decisions?

 **To disclose a Conifer conflict of interest, email ethics@coniferhealth.com**

Political Activities

We encourage participation in civic and community activities.

Our culture fully supports service and the needs of others. We respect our team members who make personal decisions to use their own time or money towards political or community activities. These activities should occur on personal time and not result in conflicts of interest. We must also make sure our political views do not interfere with our co-worker or client relationships.

From time to time, Conifer may communicate information related to public topics. This information is not meant to pressure you to adopt certain ideas or support certain causes. Instead, we believe it is part of transparency into the Conifer's position and opinions.

There are complex federal and state restrictions regulating the forms of political contributions companies can offer. We follow all laws in promoting Conifer's position and the Tenet Government Relations Department must approve any corporate political contributions.

Hiring of Former and Current Government Employees

We do not use employment with Conifer as a potential reward for prior actions.

The regulations of certain anti-bribery laws and conflict of interest policies cover the recruitment of former or current U.S. government employees. For example, hiring an employee directly from a fiscal intermediary or Medicare Administrative Contractor requires certain regulatory notifications.

Consult the Human Resources Department, the Ethics and Compliance Department, or the Legal Department prior to recruiting government employees.





**CORPORATE
RESPONSIBILITY**

DO MORE THAN JUST THE RIGHT THING

Quality of Healthcare Services and Patient Care

We support the delivery of accurate, effective, and efficient healthcare services.

Our goal is to support our clients as they provide high quality, cost effective healthcare services to their patients. We treat all of our clients and their patients with dignity and compassion and only provide necessary and appropriate care.

Conifer has a comprehensive program to promote the work quality goals of the organization. We focus on:

- Delivering services to clients and their patients that focus on their specific needs
- Utilizing innovative technology and solutions to improve the services we provide
- Establishing a culture that prioritizes accuracy and integrity

In any situation, if you have any question about our commitment to service quality or patient care, you must raise this concern to your manager, Ethics and Compliance or the Speak Up Line at **1-833-7COMPLY (726-6759)** or Ethics@ConiferHealth.com.

Speak Up Line

1-833-7COMPLY (726-6759)
(you can choose to remain anonymous via phone)

ethics@coniferhealth.com

Report a concern at:

- [General Compliance Allegation Reporting Form](#)
- [Privacy & Security Allegation Reporting Form](#)



Patient Rights

Patients come first.

We have an ethical responsibility to make our clients' patients feel secure while in our care. We treat patients with respect and make no distinction in the availability of services based on age, gender, disability, race, color, religion, sex, sexual orientation, gender or gender identity, national origin, ability to pay, or any other legally protected status. We respect the various backgrounds and cultures of patients and work diligently to respect and support each patient's unique needs.

Our clients encourage patient and family involvement in all aspects of care. Patients, family, and other caregivers are participants in the care and discharge process; therefore, we give priority to their choices whenever possible. Patients and families are provided with a written statement of rights to patients and families upon admission. At the same

time, we must follow our clients' policies on informed consent, advance directives, discharge planning, and patient participation in the care plan. Conifer, when contracted by our clients to do so, provides health education, health promotion, and illness prevention programs as part of our overall effort to improve the quality of life for patients.

Patients and families trust us with highly sensitive medical information. It is our duty to protect this information, follow all state and federal privacy laws, and report any potential privacy concerns immediately upon discovery.

Company Resources

We use Conifer's resources for Company business.

We rely on you to manage our resources honestly and efficiently. Conifer resources are intended for legitimate business purposes. You also have a responsibility to protect our equipment and other resources from theft, loss, damage, waste, or abuse. Protecting Conifer funds is particularly important if you have spending authority, approve travel and entertainment expenses, or manage budgets and accounts.

You must always:

- Ensure Conifer funds are properly used for their established business-related purpose
- Obtain required approval before incurring an expense
- Accurately record all expenses

Examples of Company Resources

PHYSICAL PROPERTY:

- Facilities
- Materials
- Supplies
- Equipment
- Company funds

INTANGIBLE ASSETS:

- Company time
- Confidential information
- Intellectual property
- Information systems



Email, Internet, and Information Systems

Use Conifer email, internet, and information systems responsibly.

We provide our information technology systems for authorized business purposes. Our use of these systems must follow our privacy and information security policies and procedures. For example, we should never share passwords, leave laptops unattended, or download unapproved software to our computers.

All employees complete mandatory privacy and cybersecurity training during onboarding and receive an annual refresher training thereafter. In addition, we conduct simulated phishing campaigns and periodic privacy and cybersecurity awareness activities.

If there is a potential incident involving the compromise of company systems or data, including the loss or theft of a laptop or other device, it must be immediately reported to the Incident Response Team.

To the extent permitted by local law, Conifer reserves the right to monitor activity on our resources.

You may engage in reasonable incidental personal use of phone, email, and the internet if such usage does not:

- Consume a large amount of time
- Interfere with your work performance or that of others
- Involve illegal, sexually explicit, discriminatory, or other inappropriate material
- Relate to outside business interests
- Violate our Code or any of our policies



Environmental and Workplace Welfare

We protect the earth's natural resources.

We seek out responsible business actions and sustainable solutions that support our efforts to be efficient and effective corporate citizens. Our team prioritizes innovation and is continually looking for ways to conduct business in more environmentally responsible ways.

We are committed to:

- Ensuring compliance with all applicable environmental, health, and safety (EHS) laws
- Educating and training team members to work in a safe, environmentally-friendly manner

We are all responsible for:

- Understanding or following applicable EHS requirements
- Reporting any injuries and illnesses at work
- Disclosing any issues that could impact the environment or community health or safety
- Reporting concerns about potential non-compliance

Protecting the environment and the health and safety of our colleagues, visitors, and the communities in which we work is a corporate priority and makes good business sense.



Media Inquiries

We cannot speak on behalf of Conifer.

Please refer inquiries from the investing community and members of the press to the appropriate Corporate Communications department as specified below.

This includes formal and informal requests for information, whether made in person, over the phone, in writing, or using any form of social media.

Do not share information with external parties. Instead contact the appropriate group:

Inquiries from	Contact	
The Media or Public	Corporate Communications	(469) 803-3000
Financial Analysts or Investors	Investor Relations	(469) 893-6992
Regulatory bodies, law firms, or regarding legal concerns	Legal Department	1 (833) 7COMPLY
The government or related to inspections	Ethics & Compliance Department	1 (833) 7COMPLY

Social Media

Separate personal and business social media activity.

Social media is a powerful tool. When used appropriately, social media can promote individual and public health, as well as our services.

When used inappropriately, it can violate client and patient privacy leading to significant damage to Conifer through:

- Reputational harm
- Loss of client trust and/or business
- Substantial fines and penalties

We have a responsibility to use our mobile devices and applications in accordance with Conifer's social media policy. This means we do not use our personal devices to take pictures of patients or patient information. We never post patient information or photographs to a website, social media page, or public forum—even if the patient is not identifiable.

We also never speak on behalf of Conifer via social media unless specifically authorized as a Conifer contributor within the Corporate Communications team.

Consider the following when posting on social media:

- State the materials and opinions you are posting are yours and not Conifer's
- Take every precaution to ensure that you are not disclosing any confidential information about Conifer
- Refrain from using any Conifer logos or trademarks without written permission

For social media questions contact Conifer Corporate Communications at Conifer.Communication@coniferhealth.com

Q: My LinkedIn profile describes me as a Conifer team member, should I be mindful of things I “like”, comment on, or share?

A: Yes. We respect the rights of our team members to have personal lives and personal interests. However, as Conifer representatives, we have a responsibility to use social media respectfully and in accordance with our values and our Social Media Policy.

Intellectual Property

Always use our trademarks and other assets properly.

Our intellectual property is a valuable asset that we must always protect.

You should never allow a third party to use our trademarks or other intellectual property without proper authorization and a license agreement approved by the Legal Department.

Furthermore, our trademarks should never be used in a degrading, defamatory, or otherwise offensive manner. As a team member, any work you create, in whole or in part, relating to your duties, and/or using Conifer time, resources, or information, belongs to Conifer.

Intellectual property includes our:

- Trademarks
- Brands
- Package designs
- Logos
- Copyrights
- Inventions
- Patents
- Team Member products

Confidential Information

Keeping information secure and confidential is essential to our success.

As part of your job, you may have access to proprietary corporate information, PHI, or PII. This information must be protected to prevent an unauthorized disclosure that could put Conifer at risk and potentially violate certain laws. Always take necessary precautions to protect the confidential information you learn or have access to as part of performing your job.

You should not share any confidential information with anyone outside Conifer, even to members of your own family, unless the disclosure is:

- Properly authorized
- Relating to a clearly defined, legitimate business need
- Subject to a written confidentiality agreement approved by the Legal Department

Even within Conifer and among your co-workers, you must only share confidential information on a need-to-know basis. Confidentiality does not impact your responsibility to report legal violations internally.

Confidential business information includes:

- Non-public information that could be useful to competitors or harmful to Conifer, our clients and their patients, our vendors, or other third parties, if disclosed
- Potentially material information to guide investor financial decisions

Examples of confidential information:

- Earnings/forecasts
- Business plans and strategies
- Significant restructurings or potential acquisitions
- Undisclosed marketing or promotional activity
- Management change



Remember – We must never use or disclose confidential information that violates the privacy rights of our patients

Q: We have just hired a team member from a competitor. How much information is he allowed to volunteer about his former employer?

A: We must not allow the team member to volunteer, nor should we ask for, any proprietary or confidential information about his former employer. Ask yourself if you would be comfortable if a former colleague shared such information with a competitor of ours. Additionally, there are legal implications relating to the disclosure of other companies' confidential information.



**REGULATORY
EXCELLENCE**

PROTECT CLIENTS THROUGH TRANSPARENCY AND HONESTY

Ineligible Persons

We conduct business with high ethical standards.

Conifer does not contract with, employ, or seek payment for services from an individual or entity that is excluded, suspended, debarred, or ineligible to participate in Federal healthcare programs. We routinely search applicable debarment and exclusion lists to ensure this does not happen. Additionally, all team members and the employees of our third-party suppliers are required to report to us if they become excluded, debarred, or ineligible to participate in Federal healthcare programs.

License and Renewals

We stay up to date on our licenses and renewals.

Some of us are in positions which require professional licenses, certifications, or other credentials. We maintain the current status of our credentials. It is each team member's personal responsibility to be able to provide evidence of compliance with federal, state, or local licensing requirements. This could include:

- Licensing
- Certification
- Registration
- Accreditation

Conifer has procedures to ensure documentation of compliance with the requirements for each position description.



Remember, we do not do business with individuals or entities that are not in good standing with the government.

Billing and Documentation

We keep accurate and timely medical and billing records.

We have implemented policies, procedures, and systems to bill correctly. These controls meet all federal and state laws and regulations and cover all payers, including government, commercial plans, and patients.

In support of correct billing, we must work with our clients to ensure that medical records accurately reflect the services provided. It is important that all individuals who contribute to medical records provide factual information and do not destroy any information considered part of the legal medical record.

Any subcontractors engaged to perform billing or coding services must have the necessary skills, training, and infrastructure in place to ensure all billings for government and commercial insurance programs are accurate and complete. Conifer expects such entities to have their own ethics and compliance programs, Code of Conduct, and quality control procedures. In addition, any third party billing supplier must be approved, consistent with Conifer's due diligence process.

Q: What do I do if I see a billing error?

A: If you see a billing error, we involve a manager, Compliance Officer, or the Speak Up Line. Conifer investigates and corrects the error prior to seeking payment. If we have already billed, we correct the underlying problem and make the proper disclosures and refunds.

Fraud

Conduct business with integrity and openness.

We believe in conducting business transparently. Integrity is one of our core values and we embrace a culture where we feel confident sharing results and outcomes. It is also our responsibility to conduct business in Conifer's best interest and in accordance with the highest ethical standards.

In addition to violating our values and this Code, it is considered fraud when you intentionally conceal, alter, falsify, or omit information for your own benefit or the benefit of others. You should avoid even the appearance of fraud in your business transactions. For example, never spend Conifer funds without proper approval or enter into an agreement on behalf of Conifer unless authorized.

Examples of fraud include:

- Presenting false medical information to obtain benefits
- Falsely reporting hours to earn more pay or to avoid discipline
- Requesting expense reimbursement from Conifer for personal items
- Misrepresenting or misstating financial information

Q: What is the harm in using a slightly different billing code to ensure the treatment is covered or reimbursed by the payer?

A: Accurate records are crucial to our business. Falsely coding medical records puts yourself, our client and Conifer at risk of violating federal laws.

Government Investigations and Requests for Information

Never obstruct a government investigation.

Conifer will cooperate with reasonable government requests for information. If a government authority contacts you with a non-routine request, you must notify Ethics and Compliance and the Legal Department at once. Ultimately the Ethics and Compliance and Legal Departments will decide what information to provide the government agency or investigators. Depending upon the nature of the request, the Legal Department may need to balance other concerns such as the privacy rights of patients and team members or the right of Conifer to defend itself from alleged wrongdoing.

Remember, when speaking with a government official, always tell the truth. Lying to a local, state or federal official can be a crime. Never obstruct or interfere with a government investigation and consult with the Ethics and Compliance and Legal Departments, if unclear of what steps to take.

False Claims Act and Deficit Reduction Act

We speak up if we see an error or potential false claim.

The Federal False Claims Act and Deficit Reduction Act protect government programs including Medicare, Medicaid, and TRICARE from fraud and abuse. Conifer follows these laws and has policies to detect, report, and prevent fraud, waste and abuse. We also respect and provide protection for whistleblowers, including anonymous reporting options and non-retaliation policies.

If you see an inaccurate medical record, fix it before you submit as a claim. If it has already been submitted, contact management, Ethics and Compliance, or the Conifer Speak Up Line.

Federal False Claims Act:

The False Claims Act and other statutes prohibit knowingly or recklessly submitting false claims to the Government, or causing others to submit false claims.

Deficit Reduction Act:

Contains a number of provisions intended to bolster Medicaid fraud and abuse enforcement, including the requirement to notify whistleblowers of their rights.

Financial Incentives, Bribes, and Kickbacks

We do not tolerate bribery.

We follow all industry anti-bribery laws, such as those that regulate the relationship between hospitals and physicians or other referral sources who may refer patients to the facilities. The two primary federal laws are the Anti-Kickback Statute and the Stark Law but there are also international, state, and local laws. Potential interactions with physicians or other referral sources covered by the Anti-Kickback Statute or Stark Law include:

- Making payments to physicians or other referral sources for services rendered
- Providing space or services to physicians or other referral sources
- Recruiting physicians to the community
- Arranging for physicians or other referral sources to serve in leadership positions in facilities
- Referring patients to a practice owned by a family member

We must structure all arrangements with physicians or other referral sources to ensure compliance with legal requirements and our policies and procedures. Additionally, we need to make sure we are meeting our contractual requirements as even properly structured arrangements can be problematic if not administered correctly.

When doing business internationally, we must follow the Foreign Corrupt Practices Act as well as other applicable anti-bribery and anti-corruption national and local laws in the countries where we are operating. Specifically, we should never bribe foreign government officials, their agents, or their relatives to obtain or retain business.

If you believe that someone has offered or received a bribe or kickback, or provided something of value in exchange for business, contact the Conifer Speak Up Line. See Conifer’s Anti-Bribery and Anti-Corruption policy for additional requirements.

Conifer’s overarching principles that govern our interactions with referral sources, including but not limited to physicians:

Principles	Standards
We do not pay for referrals	<ul style="list-style-type: none"> • Patient referrals are based on medical need and our ability to provide the service • Never offer to pay anyone for patient referrals
We do not make referrals based on financial relationships	<ul style="list-style-type: none"> • Never offer to pay or give something of value to anyone for patient referrals
When doing business internationally, we never bribe government officials, their agents, or their relatives to obtain or retain business	<ul style="list-style-type: none"> • We may not pay or offer to pay a foreign government official, an agent, or relative of the official to influence that official to assist in obtaining or retaining business. • Accurate record and accounts of all transitions of assets must be maintained • We may not knowingly falsify books and record
We do not accept payments for referrals we make	<ul style="list-style-type: none"> • When making referrals, we do not take into account the volume or value of referrals the other provider makes to us • No quid-pro-quo (or this for that) arrangements

Anti-Kickback Statute:

Prohibits offering or paying (or asking for or receiving) anything of value to induce the purchase, order, or recommendation of products eligible for payment by a Federal healthcare program.

Stark Law:

Prohibits a physician from referring business to an entity in which the physician or an immediate family member has a “financial relationship.” It also prohibits the entity from billing Medicare, other payers, or the individual for “designated health services” performed based on a prohibited referral.

Foreign Corrupt Practices Act:

Prohibits individuals and businesses from bribing foreign government officials in order to obtain or retain business, imposes record keeping and internal control requirements, and prohibits individuals and companies from knowingly falsifying books and records.

Fair Competition

We compete fairly.

Being innovative means that we do not need to compete against others unfairly. We do not seek to gain an edge through unfair competition. We comply with all antitrust laws and never make agreements with competitors that create monopolies or stifle competition. We do not illegally obtain or use proprietary information from competitors, nor do we use deceptive means to gain such information.

Some activities that have the potential to violate antitrust laws:

- Mergers and acquisitions that could significantly affect consumer choices
- Agreements with competitors to exclusive dealing or splitting sales market territories or customer groups
- Agreements with competitors or other third parties to fix pricing and rig bidding
- Forced bundling of products and services
- Non-poach employment agreements with competitors

ETHICS AND COMPLIANCE SUPPORT

The Code of Conduct cannot cover every scenario.

Of course, no Code can anticipate every situation you might encounter at work. It is up to each of us to ask for help if we find ourselves questioning whether a certain situation or issue is consistent with our values, Code, and policies. Too often, it is easy to assume someone else has the same questions as we do, but it is a personal responsibility each of us has to speak up. This means consulting with management, Human Resources, the Ethics and Compliance Department, or the Conifer Speak Up Line.

If you are unclear about something, reach out and let us help. We will review your concerns and take decisive steps to correct any problems. We will never approve or condone unethical or illegal behavior.

When you are faced with a gray area of integrity, consider the following:

- How does this decision impact Conifer both internally and externally?
- Am I comfortable taking responsibility for this action?
- Is this decision consistent with our Code of Conduct?



Speak Up Line – 24 hours a day, 7 days a week

1-833-7COMPLY or 1-833-726-6759
(you can choose to remain anonymous via phone)
ethics@coniferhealth.com