

# INTEGRITY IN ACTION



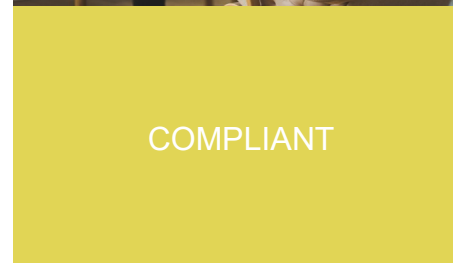
TRUSTED



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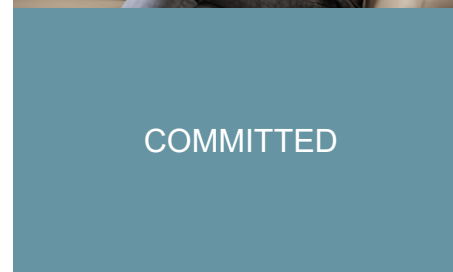
CUSTOMER-FOCUSED



COMPLIANT



SECURE



COMMITTED



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# ALL IN *Everyday*



We are building a world class software and services company supporting an incredible mission - to improve access to quality therapy and mental and behavioral healthcare. Our work has a profound and positive impact on the lives of countless people every day.

Building a strong ethical foundation is paramount for fostering a culture of trust and respect within Ensora Health.

Our Code of Values ensures that our actions align with our organizational core values, and that we consistently uphold the highest standards of integrity in everything we do. By adhering to this code, we solidify our commitment to transparency, accountability, and the well-being of our customers, team members, and the communities we serve.

Respectfully,

**Jeffrey Shoreman**

Chief Executive Officer



# VISION, MISSION, AND VALUES

## VISION

The **ENSORA HEALTH** vision is to expand access to quality therapy and mental healthcare.

## MISSION

At **ENSORA HEALTH** we are committed to transforming the mental and behavioral healthcare landscape.

As the trusted partner for therapists and mental health professionals, we empower care continuity, elevate decision-making, and enhance client engagement through cutting-edge technology and data driven solutions.

Our aim is to streamline operations, optimize financial outcomes, and enrich the therapeutic experience for both providers and patients.

## VALUES

Our values are a commitment to how we interact. Our commitment is woven into the fabric of our company; we are empowered and encouraged to prioritize customer satisfaction and to build our culture together. We stand to support and serve our customers and their needs, so in turn, they can provide best in class care to their patients. [WE CARE](#).







# VISION, MISSION, AND VALUES (cont.)

## C

We ask and listen with intention to our **CUSTOMERS** and each other to understand needs, expectations, and feedback.

We have a bias for action and deliver solutions and services that add value, enhance the customer/team member experience.

We seek to understand our customers and each other's unique needs by bringing adaptable solutions.

We are customer/team member advocates putting the customer and each other at the center of everything we do.

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## A

We hold ourselves **ACCOUNTABLE** for our actions and outcomes, and we honor our commitments.

We communicate and collaborate openly and honestly, and we respect the diverse perspectives and opinions of others.

We take ownership of our roles and responsibilities, and we trust and empower others to do the same.

We work together for our collective success and shared mission over individual achievement.

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## R

We have fun while treating everyone with **COURTESY**, kindness, empathy, and assuming positive intent.

We communicate openly, honestly, constructively, and probe for clarity.

We value the input and feedback of our team members, customers, and stakeholders.

We embrace diversity and inclusion as a source of strength and innovation.

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## E

We strive for **EXCELLENCE** in everything we do, from our products and services to our processes and interactions.

We set high standards and ambitious goals for ourselves and our teams, and we deliver on them with passion and integrity.

We learn from our successes and failures, and we seek feedback and opportunities for improvement continuously.

We leverage our strengths as a team, working together to get the best idea – keep it simple.



# ABOUT OUR CODE OF CONDUCT

The **ENSORA HEALTH** Code of Conduct & Values is a set of guidelines and principles that outline expected behaviors and ethical standards for our workforce. It serves as a framework for how we should act and make decisions in our professional roles and establishes a shared set of values and expectations within the organization to help guide behavior in complex and challenging situations. It provides a reference point for decision-making, helping our workforce navigate ethical dilemmas and make principled choices.

## Don't we already have an Employee Handbook?

An employee handbook is a broader document that covers a wide range of workplace policies, procedures, and operational details for employees. While a code of values is a more specific document focused on ethical standards and behavioral expectations for all workforce members, not just employees. Our Code of Values defines how workforce members should interact with colleagues, customers, patients, suppliers, and other stakeholders, while emphasizing the importance of compliance with laws and regulations. Both are important in establishing a positive workplace culture, but they serve different purposes and target different aspects of the organization.

## Why do we need a Code of Conduct & Values?

By formalizing our Code of Conduct & Values, we deepen our commitment to promoting a positive organizational culture and enhance the reputation of Therapy Brands. It fosters an environment of trust, respect, and accountability, where everyone understands the importance of ethical conduct and feels comfortable reporting any concerns or violations. A strong ethical culture not only attracts top talent but also builds trust among stakeholders, including customers, clients, and the community.

Secondly, a Code of Conduct & Values serves as a risk management tool. It helps our workforce identify potential areas of risk and provides guidance on how to mitigate those risks. By addressing topics such as compliance with laws, conflicts of interest, and protection of sensitive information, a Code of Values helps prevent legal and reputational issues that can arise from unethical behavior.

Lastly, our Code of Conduct & Values is a vital component of robust corporate governance. It provides a framework for our workforce to understand and uphold Therapy Brands' values, guides decision-making, promotes a positive corporate culture, and mitigates risks. By having a well-communicated and consistently enforced Code of Values, we can build trust, foster a sense of integrity, and contribute to long-term success and sustainability.



# INTEGRITY IN ACTION

## FOUNDATION

Our foundation is built upon a strong commitment to ethical behavior and legal compliance. Our Compliance and Risk Management Program serves as a cornerstone for ensuring that all employees are empowered to act with honesty, transparency, and accountability.

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# PROGRAM OVERVIEW

Healthcare companies, like Ensora Health, need a compliance and risk management program to ensure adherence to applicable laws, regulations, and industry standards, as well as to mitigate potential risks. The healthcare industry is highly regulated, and non-compliance can result in severe consequences, including financial penalties, legal liabilities, reputational damage, and loss of trust. A comprehensive program helps organizations proactively identify, assess, and address compliance and operational risks, ensuring the delivery of high-quality technology and services while safeguarding the organization's reputation and financial well-being. The Office of Inspector General (OIG) for the U.S. Department of Health & Human Services has outlined seven elements that contribute to an effective compliance program. These elements are:

## Written Policies and Procedures

A healthcare organization should have comprehensive written policies and procedures that outline the organization's commitment to compliance, provide guidance to workforce members, and address specific areas of risk and regulatory requirements.

Our program ensures legal and regulatory compliance by establishing policies and procedures that align with applicable laws, regulations, and industry best practices. This includes areas such as patient privacy and data protection (HIPAA), billing practices (CMS guidelines), anti-kickback and fraud regulations (OIG requirements), and quality standards (e.g., ONC certification requirements).

**1**

## Compliance Leadership and Oversight

Appointing a designated Compliance Officer and establishing a Compliance Committee demonstrates the organization's commitment to compliance. The Compliance Officer oversees the implementation and maintenance of the compliance program, while the Compliance Committee provides oversight, guidance, and support.

Our program is led by the Chief Compliance Officer with oversight from the Compliance Council to ensure Ensora Health's compliance and risk management efforts are comprehensive, effective, and aligned with regulatory requirements and industry best practices.

**2**

## Training and Education

An effective compliance program includes regular training and education initiatives to ensure that workforce members are aware of their compliance obligations, understand applicable laws and regulations, and are knowledgeable about the organization's policies and procedures.

Our program establishes a culture of compliance and ethical behavior throughout the organization by way of awareness and understanding of regulatory requirements, ethical standards, and the importance of compliance amongst the workforce. This helps foster a positive work environment, ensures consistent adherence to policies and procedures, and reduces the likelihood of non-compliant behavior.

**3**





# PROGRAM OVERVIEW (cont.)

## Effective Lines of Communication

Communication channels should be established to facilitate the flow of compliance-related information throughout the organization. This includes providing guidance, updates on regulations, and opportunities for workforce members to report concerns or seek clarification.

Our program develops and implements communication plans that outline the objectives, strategies, and timelines for communicating compliance-related information to workforce members. This can include distributing newsletters, email updates, posting materials to the Intranet, or participating in town hall meetings to provide updates on compliance initiatives, regulatory changes, and best practices.

**4**

## Enforcing Standards

To deter noncompliant conduct, organizations should establish appropriate consequences that are clearly communicated, applied, and enforced. Consequences may be educational, remedial, or sanctioned, depending on the facts. This indicates a commitment to take disciplinary action or impose other remedial consequences on a fair and equitable basis.

Our program enforces standards equitably, with actions taken that are proportionate to the severity of the misconduct. Such measures include progressive steps, ranging from warnings to more serious consequences depending on the nature and frequency of the infraction. By ensuring consistent application, we reinforce a culture of integrity and accountability.

**5**

## Risk Assessment, Auditing, Monitoring

Regular internal audits and monitoring activities help identify areas of risk, assess compliance with policies and procedures, and detect potential violations. These activities enable the organization to address and correct issues promptly and prevent future non-compliance.

Our program aims to identify and mitigate potential risks that could impact patient safety, operational efficiency, financial stability, and reputation. It involves conducting risk assessments, implementing risk mitigation strategies, and monitoring ongoing compliance. By proactively working to identify potential risks, we can take preventive measures, implement corrective actions, and reduce the likelihood and impact of adverse events.

**6**



# PROGRAM OVERVIEW (cont.)

## Response and Corrective Action

A compliance program should include processes for investigating reported concerns, taking appropriate corrective actions, and implementing measures to prevent future violations. This includes promptly addressing identified issues, implementing necessary changes, and monitoring the effectiveness of corrective actions.

Our program establishes clear and accessible reporting channels for workforce members to raise compliance concerns or report potential violations. This includes the anonymous hotline, and incident reporting system, as well as designated individuals within the compliance department who can receive and respond to reports. All compliance concerns are promptly investigated, and recommendations are provided on risk mitigation and remediation. Additional reports are presented to Senior Management and the Board of Directors regarding compliance activities, identified risks, and mitigation efforts enabling the organization to make informed decisions and allocate necessary resources.



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I'm pleased to present Ensora Health's 2025 Code of Conduct & Values. While much of the Code of Conduct & Values remains the same, we have revised some sections to reflect the evolution of our Company and brand.

This Code of Conduct & Values is your guide. It outlines the legal and ethical responsibilities we all share and conduct we all must exhibit to succeed as a trusted partner to therapy professionals. Read it, live it, and hold each other accountable to it. Upholding these commitments ensures that we not only comply with the law, but also live up to the values that define Ensora Health: customer centricity, accountability, respect, and excellence. It guides each of us in making decisions that honor our commitment to transform the mental and behavioral healthcare landscape. The decisions we make, our behavior, and the values we uphold must always reflect that purpose.

Thank you for cultivating a workplace and a world where CARE thrives.

Respectfully,

**Amber Thomas**

Chief Compliance & Privacy Officer





# OUR COMMITMENT

Our commitment begins with an obligation to our customers. Compliance and integrity are vital components of customer centricity. Customers expect that their healthcare technology partner will comply with privacy regulations, protect their client's personal information, and deliver products and services in an ethical and responsible manner. By demonstrating a commitment to our values, we reassure customers that their interests are prioritized and that they can rely on Ensora Health to operate with the customer at the head of everything we do. We can create a positive and sustainable relationship with our customers, enhancing their satisfaction, loyalty, and overall business success by aligning these principles.

“

We are Ensora Health—we are dedicated to upholding our mission and values in all that we do, with Compliance at the center of our daily practices. By demonstrating our commitment to excellence, we are better able to serve our customers and their communities. Together, we can lead with purpose and create a workplace we can be proud of.

- Sr. Program Manager, Compliance

“

As we grow, innovate, and lead in our industry, we are reminded that with great power comes great responsibility. Each of us—regardless of our title or tenure—has the power to shape our culture in the workplace, commit to excellence, and positively influence those we serve.

- Director, Compliance & Risk Management





# INTEGRITY IN ACTION

## WORKPLACE CONDUCT

Our workplace is built on a foundation of respect and inclusivity and our success depends on the professionalism and collaboration of every team member. All employees are responsible for contributing to fostering a positive environment where every employee feels valued and protected.

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# ETHICAL DECISION-MAKING

Ethical decision-making at work refers to the process of evaluating and choosing actions and behaviors that align with honorable principles and our organizational values. It means considering the potential impact of decisions on various stakeholders, including the organization, customers, workforce members, and the wider society. Ethical decision-making requires workforce members to assess situations objectively, identify potential ethical dilemmas, and choose courses of action that uphold integrity, fairness, honesty, and respect. When we consistently make choices that reflect our values, we are better able to augment a thriving workforce and innovative culture within the organization.

## To uphold morality in the workplace, workforce member should follow key principles, including:

- ▶ Prioritize transparency and honesty in all interactions and communications. This means being truthful and providing accurate information, even when faced with challenging situations or difficult conversations. Integrity also entails taking responsibility for one's actions, admitting mistakes, and being willing to learn and grow from them.
- ▶ Demonstrate a strong sense of accountability and adhere to organizational policies, procedures, standards, and legal requirements. Workforce members should be mindful of potential conflicts of interest and avoid situations where personal interests may compromise professional judgment. This includes refraining from accepting bribes, kickbacks, or engaging in any activities that could undermine the organization's reputation and/or integrity.
- ▶ Act with integrity, respecting the rights, dignity, and diversity of others. This means treating colleagues, customers, and stakeholders with fairness, equality, and respect, irrespective of differences in background, beliefs, or characteristics. Workforce members should actively promote inclusivity, foster a positive work environment, and refrain from discriminatory or prejudiced behavior.
- ▶ Proactively report any known or suspected incidents of unethical decision-making or misconduct. This includes reporting instances of discrimination, harassment, fraud, or other behaviors deemed inappropriate. By speaking up and raising concerns through appropriate channels, workforce members contribute to maintaining a culture of integrity and accountability in the workplace.



Is the action and/or decision legal?

Is the action and/or decision transparent and honest?

Does the action and/or decision reflect our Code of Conduct, Mission Statement, and Values?

Would you proudly and publicly share the action and/or decision?

☒ If you can answer **YES** to every question, you are likely making an ethical decision.

☒ If you can answer **NO** to any question, seek guidance from Leadership or Compliance.



# WHISTLEBLOWER PROTECTION AND ANTI-RETALIATION

At Ensora Health, we will never retaliate against any workforce member who raises a concern or reports a violation in good faith. These protections ensure that workforce members can raise concerns about unethical or unsafe practices without fear of repercussions. This helps safeguard the interests and safety of customers and their patients.

As an Ensora Health workforce member, you are expected to report incidents of actual or suspected violations of law and company values, policies, procedures, or standards. Additionally, workforce members are prohibited from retaliating against any other workforce member for reporting or raising such concerns.

Whistleblower protections encourage workforce members to hold their colleagues and superiors accountable when they witness wrongdoing. Anti-retaliation policies ensure that those who report unethical behavior are not penalized and show respect for individuals who exhibit integrity by reporting misconduct. They protect the dignity of workforce members by preventing retaliation for speaking up. Additionally, whistleblower protections and anti-retaliation policies support excellence by creating an environment where ethical behavior is valued, and unethical actions are addressed promptly. This contributes to our culture of continuous improvement. This contributes to our culture of continuous improvement. Whistleblower Protections and Anti-Retaliation Policies are Important for the following reasons:



**ETHICAL CONDUCT** Avoiding such practices aligns with ethical standards and maintains the organization's integrity. It ensures that business decisions are made based on merit and ethical considerations rather than influenced by gifts or favors.



**TRANSPARENCY** Inappropriate gifts and entertainment can create real or perceived conflicts of interest, compromising the impartiality and fairness of business transactions. Avoiding them helps prevent such conflicts and ensures that decisions are made in the best interests of all stakeholders.



**RISK MITIGATION** Transparency is essential in business relationships. Avoiding inappropriate gifts and entertainment promotes transparency by eliminating potential hidden agendas or obligations associated with receiving or giving gifts.



**WORKFORCE CONFIDENCE** Avoiding such practices aligns with ethical standards and maintains the organization's integrity. It ensures that business decisions are made based on merit and ethical considerations rather than influenced by gifts or favors.



**CUSTOMER TRUST** Inappropriate gifts and entertainment can create real or perceived conflicts of interest, compromising the impartiality and fairness of business transactions. Avoiding them helps prevent such conflicts and ensures that decisions are made in the best interests of all stakeholders.



**LEGAL COMPLIANCE** Transparency is essential in business relationships. Avoiding inappropriate gifts and entertainment promotes transparency by eliminating potential hidden agendas or obligations associated with receiving or giving gifts.

These policies help shape an organization's culture by reinforcing the importance of integrity and accountability at all levels.





# DIVERSITY AND INCLUSION

Ensora Health is committed to instilling diversity and inclusion and belonging into our culture and business, as we strive to be recognized not only as the leader in healthcare technology, but also for our intentional efforts to promote a diverse community. All Ensora Health workforce members are expected to behave in a way that upholds our commitment to diversity and inclusion.

One of our values, Respect, provides that we interact with the highest integrity and respect for others, and honor diversity and inclusivity for all. Diversity and inclusion are crucial for fostering a culture of ethics and integrity within an organization. Additionally, diversity and inclusion are important for the following reasons:

## DIFFERENT PERSPECTIVE AND INSIGHTS

A diverse workforce brings together individuals with a variety of backgrounds, experiences, and perspectives. When diverse voices are included in decision-making processes, ethical considerations are enriched. Diverse teams are more likely to identify potential risks, challenge biases, and offer a broader range of solutions. This diversity of thought helps prevent groupthink and encourages critical thinking, leading to more ethical decision-making.

## ENHANCED PROBLEM-SOLVING

Inclusive environments encourage open dialogue and collaboration, allowing workforce members to freely express their ideas and concerns. This inclusivity promotes psychological safety, where workforce members feel comfortable speaking up and discussing ethical dilemmas or potential misconduct. By creating an environment that values diverse perspectives, organizations can tap into the collective intelligence of their workforce and find innovative and ethical solutions to complex problems.

## FAIRNESS AND EQUAL TREATMENT

A culture of ethics and integrity requires treating all individuals with fairness, respect, and dignity. Diversity and inclusion promote equal opportunities for individuals from different backgrounds, ensuring that workforce members are judged based on their skills, merits, and contributions rather than personal characteristics. This fairness and equal treatment contribute to a sense of trust, fairness, and ethical conduct throughout the organization.

## MEETING STAKEHOLDER EXPECTATIONS

In our industry, stakeholders, including customers, clients, investors, and regulatory bodies, increasingly expect organizations to demonstrate a commitment to diversity, equity, and inclusion. A company that values diversity and inclusion is seen as socially responsible and aligned with the ethical values of its stakeholders. This alignment enhances the organization's reputation, credibility, and long-term success.



## MICROAGGRESSIONS

Microaggressions are everyday comments or actions with conscious or unconscious derogatory messages. They are generally against specific groups, such as women, immigrants, ethnic minorities, LGBTQIA+, etc.

Microaggressions have various characteristics and often happen unconsciously. For example, “where do you come from?” may send the message to the recipient, “you are different” or “you do not belong here.” People who have never experienced discrimination themselves often know little about the challenges that some groups face. To prevent microaggressions, workforce members should review the Team Member Handbook and be sure to complete all required Compliance training that provides workforce members with the knowledge to recognize their own stereotypes and prevent them from influencing the workplace environment.





# DISCRIMINATION, BULLYING, AND HARASSMENT

We champion non-discriminatory practices throughout the workforce and customer lifecycle, caring for every person regardless of race, color, religion, sex, national origin, age, disability, identity, orientation, or familial status.

All Ensora Health workforce members are prohibited from engaging in any behavior that is discriminatory, bullying, or harassing. This expectation is important for the following reasons:

**FAIRNESS AND EQUAL TREATMENT** culture of compliance and integrity requires treating all individuals with fairness, respect, and equal opportunities. Anti-discrimination, anti-bullying, and anti-harassment policies and practices ensure that individuals are evaluated and treated based on their merits, skills, and qualifications, rather than personal characteristics. This promotes a sense of fairness and justice, which are fundamental ethical principles.

**RESPECT** A culture of ethics requires treating all individuals with respect and upholding their dignity. Discrimination, bullying, and harassment undermine these values by creating an environment of unfairness, fear, and intimidation. A culture that values respect upholds the ethical belief that all individuals, regardless of their backgrounds, have equal worth and deserve equal opportunities and protection against discrimination, bullying, and harassment.

**INCLUSIVE AND ENGAGED WORKFORCE** Discrimination, bullying, and harassment can create divisions, alienation, and a hostile work environment that erodes psychological safety. In contrast, an inclusive culture promotes collaboration, trust, and workforce engagement. When workforce members feel included and valued, they are more likely to be committed to upholding organizational values, deliver outstanding quality, and drive excellence and optimal results. This fosters a positive work environment and enhances the overall ethical climate of the organization.



# DISCRIMINATION, BULLYING, AND HARASSMENT (cont.)

**COMPLIANCE WITH LEGAL AND REGULATORY REQUIREMENTS** Anti-discrimination, anti-bullying, and anti-harassment are not only ethical imperatives but also a legal and regulatory obligation in many jurisdictions. Organizations that fail to address and prevent discrimination, bullying, and harassment may face legal consequences, reputational damage, and financial liabilities. By actively promoting respectful and safe work environments, organizations demonstrate their commitment to compliance with laws and regulations, reinforcing their reputation as ethical and responsible entities.

**REPUTATION AND BRAND IMAGE** Organizations that tolerate or overlook discrimination, bullying and harassment risk significant damage to their reputation and brand image. In our interconnected world, news of unethical behavior can spread rapidly, negatively impacting public perception and customer trust. Conversely, an organization that prioritizes the safety and respect of their workforce creates a positive reputation as an ethical employer that values the well-being and dignity of its employees.

**ETHICAL DECISION-MAKING** Discrimination, bullying, and harassment weaken the ethical decision-making process. When individuals are subjected to discrimination, mistreatment, disrespect, or feel unsafe, their ability to engage in open dialogue, express diverse perspectives, and make ethical choices is hindered.

If you answered **YES** or **MAYBE** to any question, you should report the matter to Leadership or Compliance.

Is it unwelcome conduct?

Does the conduct make others uncomfortable?

Is it based on a protected class?

Is the behavior severe or pervasive enough to create a hostile work environment?

# CONFLICTS OF INTEREST

An actual or potential conflict of interest occurs when a workforce member is in a position to influence a decision that may result in a personal gain for that individual or for a relative as a result of business dealings with Ensora Health. For the purposes of this policy, we define a relative as any person who is related by blood or marriage, or whose relationship with the employee is similar to that of persons who are related by blood or marriage.

The potential for personal gain is not limited to situations where an employee or relative has significant ownership in a firm with which Ensora Health does business. Personal gains can also result from situations where a workforce member or relative receives a kickback, bribe, substantial gift, or special consideration as a result of a transaction or business dealings involving Ensora Health. Furthermore, it is prohibited for a workforce member to initiate or otherwise start a personal relationship with a customer, supervisor, or subordinate employee.

If you have any influence on transactions involving purchases, contracts, or leases, it is imperative that you disclose this fact to the Compliance and Risk Management or Legal teams of Ensora Health as soon as possible. By alerting us to the existence of any actual or potential conflict of interest, we can establish safeguards to protect all parties.

## IMPAIRED OBJECTIVITY

Conflicts of interest may compromise the objectivity and impartiality of individuals involved in decision-making processes. When individuals have personal interests that may influence their judgment or actions, they may prioritize their own interests over those of Ensora Health or its stakeholders, including customers and colleagues. This can lead to biased decision-making, compromised integrity, and a loss of trust in the organization.

## LEGAL/REGULATORY CONSEQUENCES

Conflicts of interest may result in legal and regulatory consequences. Many jurisdictions have laws and regulations in place to prevent and address conflicts of interest, particularly in areas such as corporate governance, finance, and procurement. Failure to identify, disclose, and manage conflicts of interest may lead to legal disputes, regulatory sanctions, financial penalties, and damage Ensora Health's standing within the industry.

## COMPROMISED DECISION-MAKING

Conflicts of interest may compromise the ethical decision-making process. Personal interests that deter one's ethical behavior can result in suboptimal outcomes, missed opportunities, and even legal or ethical violations. Conflicts of interest can undermine the fairness, transparency, and integrity of decision-making, eroding trust within the organization.

## EROSION OF WORKFORCE MORALE AND TRUST

Conflicts of interest may create a perception of unfairness and favoritism within the organization. When workforce members witness instances where personal interests supersede merit-based decision-making, it can undermine morale, create resentment, and damage the overall culture of trust and collaboration.



You have an obligation to report any actual or potential conflicts of interest to the Compliance Team.

- Be careful accepting gifts from a supplier, service provider, or customer, especially when the gift is of high value.
- Ensure your relationship do no create bias or the perception of bias.
- Do not use or share confidential or proprietary information outside of Ensora Health, unless for business purposes pursuant to a confidentiality agreement.
- Do not engage in other jobs or business interests that impact your ability to do your job or create



# INTEGRITY IN ACTION

## GOVERNANCE

Strong governance is essential to maintaining operational excellence at Ensora Health. Every employee plays a role in supporting responsible governance by staying informed through required training, protecting sensitive information, and contributing to the delivery of high-quality services.

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# TRAINING AND EDUCATION

Compliance training and education fosters a culture of accountability by clarifying the responsibilities and expectations. It teaches workforce members the importance of adhering to policies and procedures and holding themselves and their colleagues liable for compliance-related tasks. Through training, workforce members learn that culpability extends beyond individual tasks to include the ethical and legal aspects of their work.

At Ensora Health, we expect all workforce members to complete all mandatory training and education in a timely manner to ensure they are equipped with the knowledge, skills, and ethical framework needed to uphold our organizational values in their day-to-day work. The educational development at Ensora Health is important for several reasons:

## LEGAL AND REGULATORY COMPLIANCE

Ensures that the workforce is aware of their legal obligations, understands the regulations relevant to their roles, and holds themselves accountable. This helps the organization avoid legal ramifications, penalties, and reputational damage that may arise from non-compliance.

## RISK MITIGATION

Helps the workforce identify and understand potential risks and unethical practices within their respective work environments. By providing the workforce with the necessary knowledge and skills, the organization can mitigate risks related to fraud, data breaches, conflicts of interest, discrimination, and other compliance-related issues.

## PROTECTION OF REPUTATION

Plays a crucial role in protecting the organization's reputation. When workforce members understand and adhere to compliance standards, they bestow a positive and trustworthy image of the organization.

## CONTINUOUS LEARNING AND IMPROVEMENT

Provides an opportunity for ongoing learning and improvement within the organization. It keeps workforce members updated on evolving regulations, industry standards, and best practices. This helps the organization adapt to changes in compliance requirements, reduce vulnerabilities, and enhance overall compliance effectiveness.

## ETHICAL BEHAVIOR

Promotes ethical behavior and integrity amongst employees. It provides guidance on core principles, values, and expected conduct in the workplace. By raising awareness about ethical dilemmas and ethical decision-making processes, employees are better equipped to make ethical choices and act in accordance with the organization's values.

## WORKPLACE ACCOUNTABILITY

Establishes a foundation of accountability within the organization. Workforce members understand their obligations and the associated consequences of non-compliance. This encourages a culture of personal culpability, where workforce members actively contribute to maintaining a compliant and ethical work environment.

# DATA PRIVACY AND SECURITY

Protecting customer and patient data privacy and security is a fundamental aspect of our organizational values. Operating with the customer at the head of what we do means respecting their trust and safeguarding their sensitive information. Ensuring that their data is kept private necessitates treating individuals with the highest integrity and respect by protecting their personal and sensitive information.

Protecting customer and patient data is a service to both communities and the organization itself. When patients trust that their data will be handled securely, they're more likely to seek needed therapy services without fear of stigma. Every Ensora Health workforce member is required to comply with all applicable privacy and security laws, as well as any company policies, procedures, or standards designed to ensure data privacy and security. Protecting privacy and securing data is important to our workforce for the following reasons:



**LEGAL AND ETHICAL RESPONSIBILITY** Failing to protect customer data can result in legal consequences, including fines and penalties, and can damage an employee's professional reputation.



**TRUST AND REPUTATION** Trust is a valuable asset, and maintaining it is crucial for the organization's reputation and their own professional relationships.

- ▶ Learn how to spot phishing attacks. Cybercriminals cast wide nets with generic phishing attempts, knowing that all it takes is one person to click on a link or download an attachment. You can spot phishing attacks by looking for common red flags like poor grammar and spelling, threatening or urgent language, and unrealistic promises of money or prizes. Never assume someone is who they say they are. Treat all requests for information or money with skepticism.
- ▶ Respect the access you've been granted. Every member of our organization has been granted certain levels of access to data, networks, and secured areas. Every member of our organization is required to respect that access by never allowing anyone to use their credentials and by ensuring secure doors remain locked.
- ▶ Use situational awareness. If you happen to work from a remote location, mind your surroundings. Keep an eye out for shoulder surfers who might try to peek at your screen. Use discretion when talking on the phone. If you access public Wi-Fi, use a virtual private network, or VPN, which gives you an encrypted connection and prevents criminal hackers from intercepting your internet traffic and stealing data.
- ▶ Never plug in random USB devices. A seemingly harmless USB flash drive you found in the hallway may be a targeted attack. Cybercriminals use USB drives and other devices to spread malware by planting them in public places. All it takes is one curious person to find it and plug it into their computer.
- ▶ Report all security incidents immediately. A phishing email, a suspicious package, a secured door left unlocked—anything that might seem off—must be reported. Failing to report security incidents, big or small, prevents us from mitigating any potential damages and ensuring the incident doesn't happen again. If you're unsure how to report incidents, please ask.
- ▶ Always follow policy. We have procedures in place for how data gets collected, stored, transferred, and destroyed. We have policies that regulate what devices may access our networks, which apps may be installed, and how passwords should be created. Circumventing policies for any reason, even if it seems minor, could undermine our efforts to maintain the security and privacy of our employees, clients, and business associates.



# RESPONSIBLE AND ETHICAL USE OF AI

As a forward-thinking organization, we embrace innovation while remaining steadfast in our commitment to using emerging technology responsibly, ethically, and in alignment with our values. Our use of Artificial Intelligence (AI) is grounded in quality, precision, and integrity. We continuously evaluate our AI systems for accuracy, reliability, and ethical alignment, seeking to improve them through innovation, collaboration, and responsible research and development. We believe that the power of AI must be guided by strong human values. All workforce members are expected to approach AI use with thoughtfulness, integrity, and a deep sense of responsibility to our community. By embedding our values into the core of our AI strategy, we ensure that technology remains a force for good in service of our mission.

- We are dedicated to protecting the dignity, rights, and privacy of all individuals affected by AI.
- We design, deploy, and use AI solutions that prioritize the needs, safety, and well-being of our customers and their clients.
- We commit to safeguarding personal and sensitive data and using AI in a manner that is lawful and fair. We strive for excellence in how we design, implement, and govern AI.
- We ensure that AI does not unintentionally discriminate, reinforce bias, or diminish trust.
- We are committed to using AI in ways that enhance the user experience, protect individual rights, and create meaningful value without compromising data privacy and security.
- We take full responsibility for the outcomes of AI-enabled systems, whether developed in-house or sourced from third parties. Our teams follow rigorous ethical and regulatory standards, and we are transparent about how AI is used in decision-making processes.
- We empower workforce members to raise concerns about emerging technology and are committed to continuous review and improvement of our AI practices.

## 1 USE AI TOOLS APPROPRIATELY

All workforce members should familiarize themselves with our Information Security and Responsible and Ethical AI policies, as well as how AI is used within the organization and in your role. You don't need to be a technical expert, but you should understand how AI affects decision-making, data use, privacy, security, and customer experiences.

## 2 PRIORITIZE HUMAN OVERSIGHT

Never rely solely on AI for high-impact decisions, especially those affecting patient's most sensitive health care data. Ensure there is appropriate human review and intervention where needed.

## 3 BE TRANSPARENT

When AI is involved in a decision or workflow that affects customers, be open about it. Transparency builds trust. Avoid giving the impression that AI decisions are infallible or beyond question.

## 4 ASK QUESTIONS

Emerging technology inherently presents new risks, including risks you may not have considered. Engage with the Compliance and Security teams on any initiatives that involve AI. Early engagement can prevent bigger issues later.

# QUALITY ASSURANCE

Quality assurance ensures that products and services consistently meet or exceed customer expectations. By maintaining high standards of quality, organizations demonstrate their commitment to putting the customer's needs and satisfaction first. Quality assurance also involves taking responsibility for the quality of work and holding oneself and others accountable for meeting established organizational standards and ensures that workforce members are responsible for the quality of their output and are answerable for any deviations from established quality criteria.

Ensora Health workforce members are expected to have and follow quality assurance procedures in their day-to-day work. Quality assurance demonstrates respect for customers and colleagues. It involves delivering products and services that are free from defects, errors, or deficiencies, which shows respect for the recipient of those products or services. It also respects the work of colleagues by ensuring that it meets quality standards. It also means executing tasks with outstanding quality, rigor, and attention to detail. It is about continuously striving for optimal results and driving excellence in all aspects of work.



Quality assurance is a form of service to both customers and each other. It ensures that customers receive high-quality, reliable products and services that promote their growth and development. Internally, it supports colleagues by providing them with quality input and output that enables them to excel in their roles.

- **Customer Satisfaction:** Quality assurance ensures that products and services consistently meet or exceed customer expectations. Satisfied customers are more likely to remain loyal, make repeat purchases, and recommend the organization to others.
- **Risk Mitigation:** Quality assurance helps identify and address potential issues and risks early in the process, reducing the likelihood of costly defects, recalls, or customer complaints. It also minimizes the risk of legal and regulatory compliance breaches.
- **Operational Efficiency:** By setting and adhering to quality standards, organizations can optimize their processes and workflows. This leads to increased operational efficiency, reduced waste, and cost savings.
- **Reputation:** Maintaining a reputation for high-quality products and services enhances the organization's standing in the market and can give it a competitive edge.
- **Employee Morale:** Employees take pride in delivering high-quality work. A focus on quality assurance can boost workforce morale and job satisfaction, as it aligns with the value of excellence.
- **Continuous Improvement:** Quality assurance is a continuous process of monitoring and improvement. It encourages organizations to constantly evaluate and enhance their processes and products to stay competitive and relevant.





# INTEGRITY IN ACTION

## INTEGRITY

Conducting business with integrity is the essence of establishing trust. Ensora Health and its team members are dedicated to upholding the highest level of integrity in all actions and decisions, especially in areas that impact the financial practices and resources of our Company and customers.

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# FRAUD, WASTE, AND ABUSE

Service-oriented organizations recognize the importance of preventing fraud, waste, and abuse as a means of standing in service to both customers and society. It promotes growth and development by ensuring that healthcare resources are available to those who truly need them, instead of being misappropriated through fraudulent activities. We hold ourselves accountable by accepting responsibility for ensuring that healthcare resources are used appropriately and holding individuals and systems accountable for detecting and preventing fraudulent and/or wasteful activities.

All Ensora Health workforce members are expected to combat fraud, waste, and abuse in the healthcare system. Preventing healthcare fraud, waste, and abuse is important for the following reasons:





# FINANCIAL INTEGRITY

Financial integrity is essential for maintaining trust with customers, investors, employees, and vendors. When we operate with financial integrity, we ensure that customer transactions and financial interactions are conducted honestly and transparently. This aligns with our principle of customer centricity, as customers can trust that their financial interests are protected and that we are acting in their best interest.

Accordingly, all Ensora Health workforce members are expected to accurately record financial transactions in accordance with generally accepted accounting principles and company policies; safeguard company assets and resources from misuse, theft, or unauthorized access; avoid conflicts of interest that may compromise financial integrity; and report any suspected financial misconduct promptly through established channels.

Financial integrity is critically important for several reasons:

## LEGAL COMPLIANCE

Maintaining financial integrity ensures that a company complies with applicable laws and regulations. Failure to do so can lead to legal consequences, including fines, penalties, and legal actions. Employees who engage in financial misconduct can also face legal repercussions.

## ETHICAL CULTURE

Financial integrity is a key component of an ethical corporate culture. Companies that prioritize financial integrity are more likely to have strong ethical values and practices throughout the organization. This, in turn, fosters a positive work environment where employees feel proud of their company's values and are more likely to act ethically in their roles.

## PERSONAL ETHICS & RESPONSIBILITY

For employees, personal financial integrity is essential. Engaging in financial misconduct not only puts the company at risk but also jeopardizes the employee's own career and reputation. Employees who maintain personal financial integrity demonstrate responsibility and trustworthiness, qualities that can contribute to career advancement.

**REPUTATION** Financial integrity is closely tied to a company's reputation. A reputation for ethical and transparent financial practices can build trust with customers, investors, and stakeholders. Conversely, financial impropriety can damage a company's reputation, making it harder to attract customers and investors, and potentially leading to a loss of business.

**COMPETITIVE ADVANTAGE** Companies with a reputation for financial integrity often have a competitive advantage. They can attract customers who value ethical business practices, as well as investors who see the company as a safe and trustworthy investment. This advantage can contribute to long-term growth and success.

**FINANCIAL STABILITY** A company's financial integrity is crucial for its long-term stability and sustainability. Financial misconduct, such as embezzlement or fraud, can lead to financial instability, even bankruptcy. This instability can have devastating consequences for employees, including job loss and financial hardship.

**EMPLOYEE TRUST** Employees want to work for companies that demonstrate financial integrity. When employees believe that their company is financially stable and ethical, they are more likely to have trust in their employer. This trust can contribute to higher employee morale, job satisfaction, and retention.

**INVESTOR CONFIDENCE** Investors want to have confidence in a company's financial management. Financial integrity, including accurate financial reporting, transparency, and honesty, is essential for maintaining this confidence.

# PROTECTING COMPANY ASSETS

When assets are safeguarded, it ensures the continuity and reliability of products and services, which is vital for customer satisfaction and organizational excellence. Operating without disruptions due to asset losses or damage allows the organization to consistently meet customer needs. Workforce members are responsible for the assets under their care, and they hold themselves and others accountable for maintaining the security and integrity of these resources. Protecting company assets and property is important for the following reasons:

Assets and property often represent a significant portion of a company's value. Protecting them is essential for maintaining financial stability. Losses due to theft, damage, or misuse of assets can have severe financial consequences, including reduced profitability and investor value.

## LEGAL COMPLIANCE

In many cases, organizations are legally obligated to protect certain assets, such as customer data or intellectual property. Failure to do so can result in legal and regulatory consequences, including fines and penalties.

## REPUTATION

Losses or damage to company assets can negatively impact the organization's reputation. Customers, investors, and other stakeholders may lose trust in an organization that cannot protect its resources.

## RESOURCE EFFICIENCY

Protecting assets and property is an efficient use of resources. It minimizes the need for costly replacements or repairs, allowing the organization to allocate resources more effectively.

## WORKFORCE WELFARE

Protecting company assets can also be seen as a way of safeguarding the jobs and livelihoods of workforce members and asset protection contributes to the stability of the organization.

ASSETS AND PROPERTY ARE CRITICAL TO THE DAY-TO-DAY OPERATIONS OF AN ORGANIZATION. ENSURING THEIR PROTECTION HELPS MAINTAIN OPERATIONAL CONTINUITY, PREVENTING DISRUPTIONS THAT CAN AFFECT CUSTOMERS AND THE ABILITY TO DELIVER PRODUCTS AND SERVICES.





# INTEGRITY IN ACTION

## LEGAL ADHERENCE

Compliance with legal and regulatory requirements is a shared responsibility, and our obligations under key legal frameworks is critical to ensuring the trust of our customers and stakeholders. Employees are expected to follow these guidelines, exercise sound judgment, and seek guidance when faced with uncertainty.

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# LAWS, RULES, AND REGULATIONS

Compliance ensures that products and services are provided to customers in accordance with relevant laws, rules, and regulations. This not only protects customers' rights and interests but also contributes to their trust and confidence in the organization's offerings.

Adherence to laws, rules, and regulation signifies a commitment to upholding the rule of law and the rights of individuals. It exemplifies the importance of engaging with integrity while showing regard for the rights and interests of customers, colleagues, and stakeholders. Complying with laws, rules, and regulations guarantees that both individuals and organizations respect societal norms and adhere to legal frameworks. The significance of compliance with laws, rules, regulations, and organizational policies/procedures is underscored by the following reasons:



Compliance with applicable requirements helps organizations avoid costly legal and regulatory consequences associated with non-compliance; such consequences include fines, penalties, and legal actions

Compliance with applicable requirements reduces the risk of legal and financial issues that can negatively impact an organization's stability and reputation. It mitigates the potential for regulatory fines, lawsuits, and reputational damage.

Compliance with applicable requirements reflects ethical conduct by adhering to societal norms and legal requirements. It demonstrates a commitment to acting with integrity, transparency, and responsibility.

Organizations that comply with laws and regulations are more likely to maintain a positive reputation in the eyes of customers, investors, and stakeholders. A good reputation can enhance trust and loyalty.

Compliance with applicable requirements helps to streamline operations by providing clear guidelines for conducting business activities. It supports efficiency and consistency in processes.

Compliance with applicable requirements assures customers that the organization operates with their best interests in mind, reinforcing trust and confidence in its products and services.

Organizations that comply with laws and regulations are more likely to maintain a positive reputation in the eyes of customers, investors, and stakeholders. A good reputation can enhance trust and loyalty.

Compliance with applicable requirements helps to streamline operations by providing clear guidelines for conducting business activities. It supports efficiency and consistency in processes.

**“Our commitment to integrity and excellence.”**





# ANTI-KICKBACK STATUTE

The Anti-Kickback Statute prohibits entities involved in federal health care program business from engaging in some practices that are common in other business sectors, such as offering or receiving gifts to reward past or future referrals. As a general matter, the Anti-Kickback Statute is an intent-based, criminal statute that prohibits remuneration, whether monetary, in-kind, or in other forms, in exchange for referrals of federal health care program business.

More specifically, under the Anti-Kickback Statute, it is a criminal offense to knowingly and willfully offer, pay, solicit, or receive any remuneration to induce, or in return for, the referral of an individual to a person for the furnishing of, or arranging for the furnishing of, any item or service reimbursable under a federal health care program. The statute's prohibition also extends to remuneration to induce, or in return for, the purchasing, leasing, or ordering of, or arranging for or recommending the purchasing, leasing, or ordering of, any good, facility, service, or item reimbursable by a federal health care program.

The statute covers activity occurring directly or indirectly as well as overtly or covertly in all instances. For purposes of the Anti-Kickback Statute, "remuneration" includes anything of value, whether in cash, in kind, or other form. By way of example only, remuneration may take the form of cash, cash equivalents, cost-sharing waivers or subsidies, an opportunity to earn a fee,

items, space, equipment, and services—regardless of the amount of remuneration—and in some circumstances, where the remuneration has been determined to be fair market value in an arm's-length transaction.

The statute has been interpreted to cover any arrangement where one purpose of the remuneration is to induce referrals for items or services reimbursable by a federal health care program. Violation of the Anti-Kickback Statute constitutes a felony punishable by a maximum fine of \$100,000, imprisonment up to 10 years, or both. Conviction also will lead to mandatory exclusion from Federal health care programs, including Medicare and Medicaid. Liability under the Anti-Kickback Statute is determined separately for each party involved. In addition, a person who commits an act described in section 1128B(b) of the Social Security Act (the "Act") may be subject to False Claims Act liability<sup>4</sup> and civil monetary penalties (CMPs). <sup>5</sup> OIG also may initiate administrative proceedings to exclude such person from Federal health care programs.

Compliance with the Anti-Kickback Statute helps ensure that decisions made within a healthcare organization are driven by the best interests of our customers, their patients, and any other healthcare consumer. The statute prevents improper acquisition or relinquishing of financial incentives that could influence medical decisions to the detriment of the healthcare system.

**LEGAL CONSEQUENCES** Non-compliance with the Anti-kickback Statute can result in legal consequences, including fines, penalties, and criminal and/or civil charges. Participating organizations and individuals can encounter severe legal repercussions for engaging in kickback schemes.

**ETHICAL STANDARDS** Compliance with the Anti-Kickback Statute reflects adherence to ethical standards in healthcare. It emphasizes the importance of ethical behavior and responsible financial conduct within the industry.

**REPUTATION** Compliance with the Anti-Kickback Statute maintains a positive reputation, both with patients and within the healthcare community. A reputation for ethical conduct and integrity is crucial for building trust and confidence.

**QUALITY OF CARE** Compliance with the Anti-Kickback Statute helps preserve the quality of healthcare services by ensuring that medical decisions are not negatively influenced or impacted by financial incentives or kickback arrangements. This, in turn, supports optimal patient outcomes.

**TRUST AND CONFIDENCE** Compliance with the Anti-Kickback Statute ensures patient, provider, and stakeholder trust and confidence in healthcare organizations that demonstrate a commitment to legal and ethical adherence.

**LONG-TERM SUSTAINABILITY** Compliance with the Anti-Kickback Statute contributes to the long-term sustainability of healthcare organizations by minimizing legal risks, preserving their reputation, and ensuring the delivery of quality patient care.



# ANTI-KICKBACK STATUTE (cont.)

**WHEN ATTEMPTING TO IDENTIFY PROBLEMATIC ARRANGEMENTS UNDER THE FEDERAL ANTI-KICKBACK STATUTE, SOME RELEVANT INQUIRIES TO EXPLORE AND CONSIDER CAN INCLUDE THE FOLLOWING:**

**Relationship**

What degree of influence do the parties have, directly or indirectly, on the generation of Federal health care program business for each other?

**Federal Program Impact**

Could the remuneration potentially affect costs to Federal health care programs or their beneficiaries, or lead to overutilization or inappropriate utilization?

**Selection**

Were parties selected to participate in an arrangement in whole or in part because of their past or anticipated referrals?

**Clinical Decision-Making**

Could the arrangement interfere with clinical decision making, raise patient safety or quality of care concerns, or lead to selective treatment of patients based on cost considerations?

**Determination of Remuneration**

Is the remuneration or arrangement influenced by the volume or value of business generated, referrals, or Federal health care program business, and are there any services provided other than referrals?

**Steering**

Does the arrangement or practice raise concerns related to steering patients or health care entities to a particular item or service, or steering to a particular health care entity to provide, supply, or furnish items or services?

**Value of the Remuneration**

Is the remuneration fair market value for legitimate services, free from inflated rates or below-market deals, and based on a reasonable, uniformly applied methodology, without being tied to Federal health care program reimbursement?

**Potential Conflicts of Interest**

Would acceptance of the remuneration diminish the objectivity of professional judgment, and if it involves disseminating information, is that information complete, accurate, and not misleading?

**Items or Services Provided**

Are the items and services actually needed and rendered, commercially reasonable, and necessary to achieve a legitimate business purpose?

**Documentation**

Is the arrangement properly documented in writing, with parties monitoring and documenting the items and services provided, and conducted according to the terms of the written agreements?

# GIFTS, GRATUITIES, AND ENTERTAINMENT

Inappropriate or excessive gifts, gratuities, or entertainment can lead to ethical dilemmas, conflicts of interest, and legal issues. Therefore, organizations must establish clear policies and guidelines to ensure that such practices align with their values and ethical standards. Transparent record-keeping and oversight mechanisms are also crucial to maintain accountability and prevent abuse.

When done appropriately, gifts and entertainment can enhance customer and workforce member experiences. They can be used to express gratitude to valued customers and associates, strengthen relationships, and demonstrate appreciation for their loyalty. However, it's essential to ensure that such practices do not compromise the organization's integrity. Workforce members who handle such interactions must be accountable for ensuring they remain within reasonable and appropriate boundaries, adhere to company policies, and avoid situations that could give rise to conflicts of interest or ethical concerns.

Gift-giving should be non-discriminatory and should not create a perception of favoritism. Avoiding inappropriate gifts, gratuities, and entertainment is important for the following reasons:



**ETHICAL CONDUCT** Avoiding such practices aligns with ethical standards and maintains the organization's integrity. It ensures that business decisions are made based on merit and ethical considerations rather than influenced by gifts or favors.



**PREVENTION OF CONFLICTS OF INTEREST** Inappropriate gifts and entertainment can create real or perceived conflicts of interest, compromising the impartiality and fairness of business transactions. Avoiding them helps prevent such conflicts and ensures that decisions are made in the best interests of all stakeholders.



**TRANSPARENCY** Transparency is essential in business relationships. Avoiding inappropriate gifts and entertainment promotes transparency by eliminating potential hidden agendas or obligations associated with receiving or giving gifts.



**FAIRNESS AND INCLUSIVITY** Avoiding inappropriate gifts and entertainment promotes fairness by treating all stakeholders equally and without bias. It ensures that no one is disadvantaged or excluded based on their ability to provide or accept gifts.



**LEGAL COMPLIANCE** In some healthcare environments, giving and accepting inappropriate gifts and entertainment can have legal implications, especially if they violate the federal or state Anti-Kickback laws or regulations. Avoidance helps organizations remain compliant with legal requirements.



**REPUTATION** Maintaining a reputation for ethical conduct and fair business practices is crucial for building trust with customers, employees, investors, and partners. Avoiding inappropriate gifts and entertainment supports this positive reputation.



# GIFTS, GRATUITIES, AND ENTERTAINMENT (cont.)

## GENERALLY ACCEPTABLE

- ▶ Gifts that fall within the limits laid out by company policy
- ▶ Gifts of nominal value bearing the organization's logo (e.g., swag)
- ▶ Perishable gifts
- ▶ Gifts approved by Compliance
- ▶ Modest business meals

## GENERALLY UNACCEPTABLE

- ▶ Gifts exceeding the value stipulated in your policy without prior approval
- ▶ Gifts to government officials
- ▶ Gifts intended to influence business decisions
- ▶ Gifts that may be considered bribes
- ▶ Gifts that you have requested
- ▶ Gift cards or other cash equivalents that must be treated as income in accordance with the Internal Revenue Service

When a gift or entertainment is given or received, it should be done without any expectations of something in return. If there is an intention that you will give or get something in return, it's no longer a gift and becomes a bribe. Even if there is no expectation of something in return, there could be a perception of something underhanded or unethical. If you're unsure, you should disclose the gift, entertainment, or gratuity to Compliance and Risk Management team for an official determination.



# INTEGRITY IN ACTION

## BUSINESS

Our commitment to excellence and professional business practices is reflected in how we communicate, collaborate, and represent our brand—both online and offline. It is expected that all employees maintain compliance across all aspects of our operations and partnerships.

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# CUSTOMER INTERACTION

Ethical and compassionate interactions with customers are at the core of customer centricity. Operating with the customer at the head of what we do means prioritizing their well-being, which includes protecting customers by ensuring they are operating in a compliant matter. Ethical and compassionate interactions demonstrate a genuine commitment to understanding and addressing customer issues, building trust, and delivering an exceptional customer experience.

At Ensora Health, we expect our workforce members to engage in ethical and compassionate interactions with customers. Ethical and compassionate interactions reflect the value of respect for others. They involve treating customers with the highest integrity and respect, acknowledging their diverse backgrounds and perspectives, and ensuring inclusivity for all. Respecting customers' rights, opinions, and concerns is fundamental to building positive relationships and fostering trust. Ethical and compassionate interactions contribute to excellence by creating positive customer experiences and are important for the following reasons:



## CUSTOMER SATISFACTION

When customers feel valued, heard, and respected, they are more likely to be satisfied with their interactions and overall experience. Satisfied customers are more likely to become repeat customers and brand advocates. .

## REPUTATION

Ethical and compassionate interactions contribute to a positive reputation for the organization. Word-of-mouth recommendations and positive reviews from satisfied customers can enhance the company's standing in the market.

## BUSINESS GROWTH

Satisfied, loyal customers are more likely to contribute to the growth of the business through repeat purchases and referrals. Ethical and compassionate interactions directly support business growth and sustainability.

## CUSTOMER LOYALTY

Consistently ethical and compassionate interactions foster customer loyalty. Customers who feel a strong connection with a brand or company based on positive interactions are more likely to remain loyal and continue doing business with that organization.

## WORKFORCE MORALE

Workforce members who engage in ethical and compassionate interactions with customers often have higher job satisfaction and morale. They feel a sense of purpose and pride in their work, knowing that they are positively impacting customers' lives.

## ETHICAL RESPONSIBILITY

Organizations have an ethical responsibility to treat customers fairly, honestly, and with compassion. Ethical interactions ensure that the organization upholds its moral obligations and ethical standards.



# VENDOR RELATIONS

Avoiding conflicts of interest ensures that vendor selection is based on what's best for the organization and our customers rather than personal or biased considerations. Making vendor selections free from conflicts of interest promotes excellence by ensuring that vendors are chosen based on their qualifications, capabilities, and ability to deliver outstanding quality.

**It is expected that all Ensora Health workforce members avoid conflicts of interests when recommending or selecting a particular vendor. Additionally, all vendors should be reviewed and receive necessary approvals before beginning work.**

## FAIRNESS

Avoiding conflicts of interest promotes fairness in vendor selection processes. It ensures that all vendors have an equal and unbiased opportunity to compete for business.

## OBJECTIVITY

Conflicts of interest can lead to subjective decision-making, which may not always align with the best interests of the organization or its customers. Avoidance of such conflicts ensures objectivity in vendor selection.

## TRUST

Vendors chosen without conflicts of interest inspire trust among customers and stakeholders. Trust is crucial for building strong and lasting business relationships.



Selecting vendors based on their qualifications and merits rather than personal relationships or interests typically results in better quality products or services and better value for the organization.

## RISK MITIGATION

Conflicts of interest can create legal and reputational risks for organizations. Avoiding them helps mitigate these risks and ensures compliance with ethical and legal standards.

## TRANSPARENCY

Avoiding conflicts of interest ensures that vendor selection processes are transparent and can withstand scrutiny from internal and external stakeholders.

## ETHICAL CONDUCT

Avoidance of conflicts of interest aligns with ethical standards and principles of integrity. It demonstrates a commitment to ethical conduct in all business dealings.

## LONG-TERM SUSTAINABILITY

Making vendor selections free from conflicts of interest contributes to the long-term sustainability of the organization by minimizing risks and ensuring that vendors are chosen based on their ability to deliver long-term value.



# GOVERNMENT ENTITIES AND OFFICIALS

Compliance in this area ensures that business interactions with government entities and officials are transparent and ethical, safeguarding the interests of the public and the organization. Respecting laws and regulations governing government interactions reflects a commitment to the highest integrity. When interacting with government employees, certain sales and marketing practices that may be acceptable in a purely commercial setting may be unacceptable or even against the law.

As a general matter, workforce members should not provide gifts, entertainment, or anything of monetary value to government employees or agencies unless an exception has been approved by the Compliance and Risk Management and/or Legal teams. Compliance with laws and regulations regarding doing business with government entities and officials, including political contributions, is important for the following reasons:

**COMPLIANCE UPHOLDS ETHICAL STANDARDS AND DEMONSTRATES A COMMITMENT TO INTEGRITY IN BUSINESS DEALINGS. IT ENSURES THAT DECISIONS AND ACTIONS ARE NOT UNDULY INFLUENCED BY POLITICAL CONTRIBUTIONS OR UNETHICAL LOBBYING.**

**TRANSPARENCY** Compliance ensures that interactions with government entities and officials are transparent and that all stakeholders can understand and trust the processes and decisions involved.

**PUBLIC TRUST** Complying with laws and regulations in this area is essential for building and maintaining public trust. Customers and stakeholders expect organizations to engage with government entities and officials ethically and responsibly.

**LEGAL CONSEQUENCES** Non-compliance with these laws can result in severe legal consequences, including fines, penalties, legal actions, and damage to an organization's reputation.

**FAIR COMPETITION** Compliance fosters fair competition by preventing situations where organizations gain advantages through improper lobbying or contributions. It helps maintain a level playing field for all businesses.

**RISK MITIGATION** Compliance helps mitigate legal and reputational risks associated with improper lobbying, political contributions, or unethical government interactions.

**LONG-TERM SUSTAINABILITY** Ensuring compliance contributes to the long-term sustainability of an organization by avoiding legal troubles, maintaining a positive reputation, and securing public trust.



# SOCIAL MEDIA

Workforce members are expected to represent Ensora Health in a responsible and positive manner. Responsible use of social media, such as avoiding sharing confidential information, making defamatory statements, or engaging in activities that could harm Ensora Health's reputation, is an expectation of all workforce members. Responsible use of social media also includes treating colleagues, customers, and the public with courtesy and respect, refraining from offensive language or behavior, and avoiding discriminatory or harassing content.

Upholding these expectations reflects the values of respect and accountability. Current workforce members should not respond on behalf of Ensora Health at any time. In an event that a current customer of Ensora Health contacts a workforce member via social media, the workforce member is expected to contact the Communications team and avoid responding directly to the customer other than to say,

**"Thank you for reaching out. Someone from Ensora Health will contact you soon regarding this matter."**

Workforce members should strive for excellence in their social media interactions by providing accurate information, avoiding misinformation, and maintaining a high standard of professionalism, and never disclosing any customer or patient data. It's important to follow these social media guidelines for the following reasons:

## CUSTOMER ENGAGEMENT

Guidelines can guide employees on how to effectively engage with customers and respond to inquiries or complaints, enhancing customer satisfaction and loyalty.

## DATA PRIVACY AND SECURITY

Guidelines may cover the handling of sensitive information, promoting data privacy and security best practices to protect both the company and customers.

**REPUTATION MANAGEMENT** Following guidelines helps protect and enhance the company's reputation. Inconsistent or inappropriate social media behavior can damage the company's image and brand.

**LEGAL COMPLIANCE** Guidelines often include legal and regulatory considerations. Non-compliance can lead to legal issues, such as defamation or breaches of privacy.

**CONSISTENCY** Consistent adherence to guidelines ensures that the company's messaging and image remain uniform and aligned with its values and objectives.

**EMPLOYEE WELL-BEING** Guidelines can protect employees from inadvertently engaging in social media activities that could harm their own professional reputation or create personal liabilities.

## ETHICAL CONDUCT

Guidelines reinforce ethical standards in social media interactions, preventing situations where employees may engage in unethical or harmful behavior.

## CRISIS MANAGEMENT

In the event of a social media crisis or negative publicity, adherence to guidelines can provide a framework for how employees should respond and handle the situation.



# RESPECTING HUMAN RIGHTS

At Ensora Health, we believe mental health is a universal human right. This belief is at the core of our mission and values. As such, respecting human rights is fundamental to our organization. Practicing these values ensures that our operations and products do not harm or discriminate against customers or patients. By acknowledging our responsibility to uphold human rights, we demonstrate accountability for our actions and decisions. Respecting human rights is a testament to excellence in ethical conduct, ensuring that our actions align with the highest standards of human rights. By promoting and protecting human rights within our sphere of influence, we contribute to the growth and development of individuals, communities, and society as a whole.



**ETHICAL CONDUCT** Failing to protect customer data can result in legal consequences, including fines and penalties, and can damage an employee's professional reputation.



**LEGAL COMPLIANCE** Violating human rights can have legal consequences and lead to legal actions and penalties. Companies must adhere to local and international laws and regulations related to human rights.

## STAKEHOLDER TRUST

Stakeholders, including customers, investors, and communities, increasingly expect companies to respect human rights. Demonstrating such respect builds trust and credibility.

## GLOBAL BUSINESS

In an interconnected world, companies often operate in diverse cultural and social contexts. Respecting human rights helps companies navigate these complexities and engage in global business responsibly.

## WORKFORCE ENGAGEMENT

Companies that prioritize human rights often have a more engaged and motivated workforce who are proud to work for an organization that upholds ethical values.

## SUSTAINABLE DEVELOPMENT

Respecting human rights is intricately linked to sustainable development. It contributes to the well-being and advancement of individuals and communities, fostering long-term economic, social, and environmental sustainability.



**RISK MITIGATION** Respecting human rights helps mitigate various risks, including legal, operational, and reputational risks. It reduces the likelihood of adverse incidents that could harm the company's operations.



**REPUTATION** A company that respects human rights is likely to have a positive reputation, which can attract customers, partners, and workforce members who share these values.





# INTEGRITY IN ACTION

## SUSTAINABILITY

At Ensora Health, we recognize our responsibility to positively impact society while delivering long-term value. We strive for environmental stewardship. Every employee plays a role in supporting initiatives that protect our planet, uplift communities, and align our operations with sustainable principles.

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# CORPORATE SOCIAL RESPONSIBILITY

CSR demonstrates a commitment to our values by considering the impact of business operations on customers, their clients, and society. It ensures that products and services meet ethical and environmental standards, reflecting our dedication to the well-being and values of its customers. CSR is an expression of accountability, as it involves taking responsibility for the broader social and environmental consequences of business activities. When we practice CSR, we acknowledge our role in addressing societal challenges and holding ourselves accountable for our actions.

CSR initiatives often promote diversity and inclusivity, demonstrating respect for people from diverse backgrounds. CSR aligns with the pursuit of excellence by encouraging us to go beyond legal requirements and strive for outstanding quality not only in our products and services but also in our contributions to society. CSR is a form of service to society. By engaging in activities that benefit communities and the environment, we actively contribute to the betterment of society.

Essential for the long-term sustainability of both businesses and society. It addresses critical issues such as environmental conservation, social inequality, and economic development, contributing to a more sustainable world.

Enhances a company's reputation as a responsible and ethical organization. A positive reputation can attract customers, investors, and partners who share these values.

Companies that engage in CSR are better equipped to identify and mitigate social and environmental risks. This proactive approach can prevent costly incidents and legal liabilities.

Embodies ethical conduct by encouraging companies to act responsibly, ethically, and with integrity in all aspects of their operations. It helps prevent harm to people,

Initiatives foster positive relationships with stakeholders, including customers, employees, investors, and communities. Engaged stakeholders can support a company's growth and success.

Encourages innovation by prompting companies to find more sustainable and socially responsible ways of doing business. This innovation can lead to cost savings and new business opportunities.

Can provide a competitive advantage by differentiating a company from its competitors. Consumers often prefer products and services from socially responsible companies.

Companies that prioritize CSR often have more engaged and motivated employees. Employees feel proud to work for organizations that are making a positive impact.

Helps companies stay in compliance with evolving regulations and standards related to social and environmental responsibility.



# THE ENVIRONMENT

When we prioritize eco-friendly practices and products, it aligns us with the values of customers who care about sustainability and the environment. When we protect the environment, we demonstrate accountability for the impact of our operations on the natural world. We accept responsibility for reducing their environmental footprint and adhere to regulations and standards governing environmental stewardship.

Environmental protection reflects respect for the planet and its ecosystems. It acknowledges the importance of preserving the Earth's resources and biodiversity. When we are committed to environmental protection, we strive for excellence in sustainability practices.

**RESOURCE CONSERVATION** It helps conserve finite resources such as fresh water, minerals, and arable land, ensuring their availability for future generations.

**CLIMATE CHANGE MITIGATION** Environmental protection plays a vital role in mitigating climate change by reducing greenhouse gas emissions, conserving energy, and promoting renewable energy sources.

**BIODIVERSITY** Protecting the environment is crucial for preserving biodiversity. Ecosystems rich in biodiversity provide essential services, including pollination, water purification, and disease control.

**GLOBAL WELL-BEING** Environmental protection contributes to the well-being of people and ecosystems worldwide. It helps ensure clean air, safe drinking water, and a stable climate, which are essential for human health and prosperity.

## ECONOMIC SUSTAINABILITY

Sustainability practices can lead to cost savings and efficiency improvements for businesses. They also create opportunities for innovation and market differentiation.



**LEGAL COMPLIANCE** Companies must adhere to environmental regulations to avoid legal liabilities. Compliance demonstrates a commitment to accountability and responsible business conduct.

**REPUTATION** Companies that prioritize environmental protection often enjoy a positive reputation, attracting environmentally conscious customers and partners.

**LONG-TERM VIABILITY** Protecting the environment is essential for the long-term viability of businesses and industries. Sustainable practices can help companies adapt to changing environmental and market conditions.

**EMPLOYEE ENGAGEMENT** Employees are often more engaged and motivated when working for organizations that have a strong commitment to environmental responsibility. They take pride in contributing to a positive environmental impact.



# RESOURCES

## ENSORA HEALTH COMPLIANCE AND RISK MANGEMENT TEAM

For general inquiries, or to report a possible violation of our Code of Conduct & Values, contact [compliance@ensorahealth.com](mailto:compliance@ensorahealth.com).

## ENSORA HEALTH LEGAL TEAM

To report a possible legal violation, contact [legal.services@ensorahealth.com](mailto:legal.services@ensorahealth.com).

## ENSORA HEALTH COMPLIANCE HOTLINE

To anonymously, if you should so choose, report known or suspected incidents of perceived non-compliance, or to obtain clarity on an event that may be cause for concern, contact:

- By phone using a toll-free telephone number based on the country from which you are calling. In the United States, call 1-844-942-3298.
- By web, available at [www.ensorahealth.ethicspoint.com](http://www.ensorahealth.ethicspoint.com).

To access the Ensora Health policies, visit [www.ensorahealth.com](http://www.ensorahealth.com).



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