

2026 Code of Conduct



Table of contents

Table of contents	2	Integrity	16
A message from our General Counsel	3	Fraud, waste, & abuse	16
Our Mission and Values	4	Financial integrity	16
Practice Success	4	Protecting company assets	17
The 5 matters	4	Legal adherence	18
About our code of conduct	4	Laws, rules, & regulations	18
Don't we already have a team member handbook? ..	5	Anti-kickback statute	18
Why do we need a code of conduct?	5	Gifts, gratuities, & entertainment	21
Our commitment	6	Business stewardship	22
Workplace conduct	7	Customer interaction	22
Ethical decision-making	7	Vendor relations	22
Whistleblower protection & anti-retaliation	8	Government entities & officials	23
Diversity & inclusion	8	Social media	23
Discrimination, bullying, & harassment	9	Respecting human rights	24
Conflicts of interest	10	Sustainability	25
Governance	12	Corporate social responsibility	25
Training & education	12	The environment	25
Data privacy & security	12	Resources	26
Responsible & ethical use of AI	14	Ensora Health Legal & Compliance Team	26
Quality assurance	15	Ensora Health Compliance Hotline	26

A message from our General Counsel

Dear Fellow Team Members,

At Ensora Health, we set out to be more than a technology company. We are here to help mental, behavioral, and rehabilitative health providers focus on what they do best, caring for their patients. That's what Practice Success is about. It's not a tagline; it's the reason we show up. When our customers succeed, their patients receive better care and better outcomes. That's the ripple effect of what we build together.

The recognition TheraNest and Fusion have earned – including placement among G2's Top 50 Healthcare Products – is a reflection of our culture, not just our products. Our extended care solutions continue to represent a significant portion of the Company's revenue, reflecting our teams' commitment to integrity, accountability, and responsible management of our customer relationships. That's what sets us apart.



But here's what is most meaningful, the culture behind the brand. The way our team operates, with accountability, with integrity, with genuine respect for one another, that camaraderie you can't manufacture. Every interaction, every decision, every effort allows us to recruit and retain the best talent, formulate premium business relationships, and attract customers that trust our service.

This Code of Conduct is a reflection of who we already are and a commitment to who we want to keep becoming. It's our shared agreement that we'll hold ourselves to a higher standard. I encourage you to read it, live it, promote it. Hold each other accountable, not from a place of judgement, but from a place of care. Keep exceeding the 5 Matters. Keep **Getting on Offense**. Keep showing up with energy, purpose, and pride.

Let's continue building something we're all proud of.

Sincerely,

Henry Pickens
General Counsel, Ensora Health

Our Mission and Values

Practice Success

“We exist to make behavioral, rehabilitative, and mental health providers successful. If our customers are successful, then we will be successful, and patients will receive better care with better outcomes.”

The 5 matters



- 1 Expectations Matter – set, manage, and exceed them.
- 2 Outcomes Matter – results are what count.
- 3 Speed Matters – move with urgency and purpose.
- 4 Respect Matters – debate the work, value the people.
- 5 Happiness Matters – energy and pride fuel our success.



About our code of conduct

The Ensora Health Code of Conduct outlines the behaviors and ethical standards we expect from everyone who works with and for our organization. It serves as a shared guide for how we act, make decisions, and treat one another in our professional roles. Grounded in our values, the Code helps us navigate complex or challenging situations by providing clear guidance and a common framework for making ethical, responsible choices.

Don't we already have a team member handbook?

The team member handbook is a broader resource that covers workplace policies, procedures, and day-to-day operational details for employees. Think of it as the **how things work around here** guide.

Our Code of Conduct, on the other hand, focuses specifically on ethical standards and expected behaviors for all members of our workforce – not just employees. It defines how we should interact with colleagues, customers, patients, and other stakeholders, and it reinforces our responsibility to comply with applicable laws and regulations. It's **the why behind how we behave**.

Both documents play an important role in shaping a positive workplace culture, but they serve different purposes and address different aspects of how our organization operates.

Why do we need a code of conduct?

Having a clear and well-defined Code of Conduct reinforces Ensora Health's commitment to a positive, ethical workplace and helps protect the trust we've built with those we serve. It sets clear expectations for accountability, respect, and excellence, and creates an environment where the importance of doing the right thing is understood.

A strong ethical culture benefits everyone. It helps attract and retain talented workforce members while building confidence and trust among customers, patients, partners, and the broader community.

Our Code of Conduct also plays an important role in managing risk. It helps our workforce recognize potential issues and provides guidance on how to address them responsibly. By covering topics such as Conflicts of Interest, Data Privacy and Security, and Financial Integrity, the Code helps reduce the legal and reputational risks that can arise from unethical behavior.

Most importantly, the Code is a cornerstone of Ensora Health's corporate governance. It connects our values and everyday decision-making, supports a healthy, happy culture, and ensures long-term success and sustainability through consistent ethical conduct.

Our commitment

Our commitment to the Code of Conduct starts with our obligation to our customers. Compliance and integrity are essential to being truly customer-centric. Customers trust their healthcare technology partners to protect personal and sensitive information, comply with privacy and security requirements, and deliver products and services in an ethical and responsible fashion.

By living our values every day, we demonstrate that our customers' interests come first. This commitment reassures them that Ensora Health places the customer at the center of everything we do. When our actions align with these principles, we build strong and sustainable relationships – driving customer satisfaction, loyalty, and shared success.

Workplace conduct

Ethical decision-making

Ethical decision-making means taking the time to choose actions that reflect our values and uphold what is right, especially when situations are complex or unclear. In the workplace, this involves thinking carefully about how our decisions may affect others. At Ensora Health, ethical decisions are viewed through the lens of Practice Success—considering how our actions ultimately impact our customers’ ability to deliver high-quality patient care.

Making ethical choices requires objectivity, good judgment, and a willingness to pause and consider potential risks or dilemmas before acting. When we consistently lead with integrity, fairness, honesty, and respect, we create a culture that is supportive, innovative, and built on trust.

To support ethical behavior in our day-to-day work, all workforce members are expected to follow these key principles:

1. Be transparent and honest.

Communicate truthfully and share accurate information, even when conversations are difficult. Acting with integrity means taking

responsibility for our actions, acknowledging mistakes, and using them as opportunities to learn and improve.

2. Treat others with respect and fairness.

Respect the rights, dignity, and diversity of everyone we work with. Promote inclusivity, contribute to a positive work environment, and avoid any form of discriminatory or biased behavior.

3. Act responsibly and follow the rules.

Adhere to policies, standards, and legal requirements, and remain alert to potential conflicts of interest. Personal interests should never influence professional decisions. This includes avoiding bribes, kickbacks, or any activity that could compromise Ensora Health’s integrity or reputation.

4. Speak up about concerns.

Promptly report any known or suspected unethical behavior or misconduct, including discrimination, harassment, fraud, or other inappropriate actions. Raising concerns through the appropriate channels protects our culture of accountability and integrity.



When you’re faced with a difficult decision, a few simple questions can help guide you toward the right choice:

1. Is the action or decision legal?
2. Is it honest and transparent?
3. Does it align with our Code of Conduct, Mission, and Values?
4. Would you feel comfortable sharing or standing behind this decision publicly?

If you can confidently answer “**yes**” to all of these questions, you are likely making an ethical decision.

If you answer “**no**” to any of them, or you are unsure, it is important to pause and seek guidance from Leadership or the Legal and Compliance team.

Whistleblower protection & anti-retaliation

At Ensora Health, we are committed to creating an environment where people feel safe to speak up. We do not tolerate retaliation against any workforce members who raises a concern or reports a potential violation in good faith.

Whistleblower protection and anti-retaliation practices help reinforce accountability at every level of the organization. They recognize and respect individuals who act with integrity by reporting misconduct and ensure they are not penalized for doing the right thing.

These protections are important because they:

- Promote ethical conduct by encouraging individuals to report misconduct.
- Support transparency by allowing concerns to be raised openly and without fear of reprisal.
- Reduce risk by helping to identify and address potential legal or ethical issues.
- Build workforce confidence by assuring workforce members that speaking up is safe and supported.
- Strengthen customer trust by demonstrating that Ensora Health takes integrity and accountability seriously.
- Support legal compliance by aligning with requirements that may apply in certain jurisdictions.

For more information, please refer to the Whistleblower and Anti-Retaliation policy.

Diversity & inclusion

Ensora Health is committed to building a workplace where diversity, inclusion, and belonging are woven into both our culture and business. We strive to be recognized not only as a leader in healthcare technology, but also for our intentional efforts to create an equitable community.

One of our core values – **Respect** – guides how we treat one another. It calls on us to act with integrity, honor differences, and contribute to a workplace where everyone feels valued and included.

Diversity and inclusion matter because they:

- **Bring different perspectives and insights.**

A diverse workforce brings a wide range of experiences, backgrounds, and viewpoints. When those perspectives are included in decision-making, teams are better equipped to identify risks, challenge assumptions, and consider ethical implications. This diversity of thought reduces group think and supports successful outcomes.

- **Enhance problem-solving and innovation.**

Inclusive environments encourage open dialogue and collaboration. When people feel psychologically safe to share ideas or raise concerns, organizations benefit from stronger problem-solving and more innovative solutions.

- **Promote fairness and equal treatment.**

Diversity and inclusion ensure workforce members are evaluated based on their skills, contributions, and performance, not personal characteristics. This fairness and equal

treatment build a sense of trust and ethical conduct across the organization.

- **Meet stakeholder expectations.**

Customers, patients, investors, and regulators increasingly expect organizations to demonstrate a genuine commitment to diversity, equity, and inclusion. By doing so, Ensora Health strengthens its reputation, credibility, and long-term success while aligning with the values of those we serve.



Microaggressions are everyday comments or actions, often unintentional, that can carry negative or dismissive messages toward others. They are frequently directed at people based on aspects of their identity, such as gender, ethnicity, sexual orientation, or other personal characteristics.

Because microaggressions are often unconscious, the impact may not match the intent. For example, asking someone “Where are you from?” can unintentionally suggest that they don’t belong.

Preventing microaggressions starts with awareness and learning. Workforce members are expected to review the Team Member Handbook and complete required Compliance training, which are designed to help identify unconscious biases and promote respectful, inclusive interactions.

For more information, please refer to the Equal Employment Opportunity section of the Ensora Health Team Member Handbook.

Discrimination, bullying, & harassment

Respect is fundamental to our everyday practice – we care for every person, regardless of race, color, religion, sex, national origin, age, disability, identity, orientation, or familial status.

Discrimination, bullying, or harassing behavior is strictly prohibited because it undermines our values and our culture. All workforce members are expected to conduct themselves in a way that supports a safe and respectful environment.

Maintaining a workplace free from discrimination, bullying, and harassment is essential because it:

- **Upholds respect and dignity.**

Every person, regardless of background, has equal worth and deserves to be treated with dignity. Discrimination, bullying, and harassment erode that by replacing trust with fear and fairness with intimidation. A respectful workplace isn’t just a nice idea; it’s a non-negotiable part of how we operate.

- **Ensure compliance with laws and regulations.**

Preventing discrimination, bullying, and harassment isn’t only an ethical responsibility, it’s a legal one. Organizations that fail to address these behaviors face real consequences: legal liability, regulatory action, and financial risk. By fostering a safe environment, we demonstrate our commitment to the laws and regulations that govern our work.

- **Protects our reputation and brand.**

In today's connected world, how an organization treats its workforce members is visible, and it matters. Tolerating harmful behavior put our reputation and the trust of our customers at risk. But when we prioritize the well-being of our workforce, we reinforce

- **Ensora Health as an organization that stands behind its values, not just on paper, but in practice.**



1. Is the conduct unwelcome?
2. Does the conduct make someone feel uncomfortable, intimidated, or disrespected?
3. Is the behavior related to a personal characteristic or protected status?
4. Is the behavior severe or pervasive enough to create a hostile work environment?

If you answer “**yes**” or even “**maybe**” to any of these questions, the behavior may be inappropriate and should be reported to People Operations or Legal and Compliance teams.

For more information, please refer to the Anti-Harassment and Bullying policy.

Conflicts of interest

A conflict of interest arises when a workforce member is in a position to influence a decision that could result in person benefit, for themselves or for a relative, through business dealings involving Ensora Health. For the purposes of this Code, a **relative** includes anyone related by blood or marriage, or someone whose relationship is similar to that of a close family member.

Personal gain is not limited to ownership or financial interest in companies that do business with Ensora Health. Conflicts can also arise if a workforce member or their relative receives a bribe, kickback, significant gift, or special treatment connected to Ensora Health business. In addition, workforce members are prohibited from initiating personal relationships with customers, supervisors, or subordinate employees, as these relationship may compromise professional judgement.

If you have any influence over purchasing decisions, contracts, leases, or similar transactions involving Ensora Health, you must promptly disclose any actual or potential conflict of interest to the People Operations team. Early disclosure allows Ensora Health to put appropriate safeguards in place and helps to protect everyone involved.

Managing conflicts of interest is critical because they can:

- **Impair objectivity.**

Personal interest may interfere with fair and impartial decision-making, leading to biased outcomes and a loss of trust among colleagues, customers, and other stakeholders.

- **Compromise ethical decision-making.**

When personal interests influence professional judgement, decisions may no longer reflect Ensora Health's values, potentially resulting in ethical lapses, missed opportunities, or violations of law or policy.

- **Create legal and regulatory risk.**

Many laws and regulations require organizations to identify, disclose, and manage conflicts of interest. Failing to do so may lead to legal disputes, regulatory penalties, financial loss, or reputational harm.

- **Erode trust and workforce morale.**

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.



1. Be careful when accepting gifts from suppliers, service providers, or customers, especially when the gift is of high value.
2. Ensure your relationships do not create bias or a perception of bias.
3. Do not use or share confidential or proprietary information outside of Ensora Health, unless for business purposes pursuant to a confidentiality agreement.
4. Do not engage in other jobs or business interests that impact your ability to do your job or create competition for Ensora Health.

You have the obligation to report any actual or potential conflict of interest to the People Operations team.

For more information, please refer to the Conflicts of Interest policy.

Governance

Training & education

Training and education play an important role in building a culture of accountability at Ensora Health. Training helps clarify expectations, responsibilities, and standards, while reinforcing that ethical and legal considerations are part of every role, not just individual tasks.

All workforce members are expected to complete required training and education on time. These programs are designed to ensure everyone has the knowledge, skills, and ethical foundation needed to uphold our values and make responsible decisions.

Ongoing training and education are important because they:

- **Support legal and regulatory compliance.**

Training helps workforce members understand the laws, regulations, and requirements that apply to their roles. This awareness reduces the risk of noncompliance, legal penalties, and reputational harm.

- **Help identify and manage risk.**

Education equips workforce members to recognize potential risks and unethical practices, such as fraud, data breaches, conflicts of interest, or discrimination. Early awareness prevents issues before they escalate.

- **Strengthen workforce accountability.**

Clear expectations and training reinforce personal responsibility. Workforce members

understand their obligations and consequences of non-compliance, contributing to a culture where accountability is prioritized.

- **Encourage continuous learning and improvement.**

Regular training keeps the workforce informed about evolving regulations, industry standards, and best practices to support adaptability, reduce vulnerabilities, and strengthen overall compliance effectiveness.

For more information, please refer to the Training and Education policy.

Data privacy & security

Protecting data benefits both the individuals we support and Ensora Health as an organization—and is fundamental to Practice Success. When customers trust that their patient data is secure, they can focus on delivering care with confidence, leading to better outcomes. Subsequently, when patients trust that their information is handled securely, they are more likely to seek care and services without fear of misuse or stigma.

Every workforce member is required to comply with all privacy and security laws, as well as Ensora Health policies, procedures, and standards designed to protect data.

Data privacy and security help:

- **Fulfill our legal and ethical responsibilities.**

Failing to protect customer or patient data can result in legal consequences, including fines and penalties, and may harm our professional credibility. Acting responsibly with data is both a legal obligation and ethical expectation.

▪ **Preserve trust.**

Trust is one of our most valuable assets. Safeguarding sensitive information helps Ensora health maintain strong, sustainable relationships.



1. **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.
2. **Respect the access you've been granted:** Every workforce member has been granted certain levels of access to data, applications, and secured networks. Every workforce member is required to respect that access by never allowing anyone to use their credentials and by never utilizing someone else's credentials.
3. **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. When accessing Wi-Fi in public spaces, you are required to use a company-approved virtual private network (VPN) to encrypt connections and reduce the risk of unauthorized access.
4. **Report all security incidents immediately:** A phishing email, a suspicious phone call, a unanticipated device interruption—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.
5. **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 workforce, customers, and business associates.
6. **Take data protection personally:** Personal data represents the digital DNA of people. When that information is compromised or mishandled, the damage could lead to a long, painful recovery. This isn't only about our organization; in our personal lives, we all trust multiple organizations with our confidential information, and we expect them to take reasonable steps to protect it. Use that mindset in the workplace.

For more information, please refer to the Information Security policy.

Responsible & ethical use of AI

As a forward-thinking organization, we embrace innovation while remaining steadfast in our commitment to using technology ethically, and in alignment with our values. Our use of Artificial Intelligence (AI) is grounded in quality, precision, and integrity. We will regularly evaluate our AI systems and how AI is used to support accuracy and reliability, and pursue improvements through responsible research and development. Our goal is to ensure that AI meaningfully supports Practice Success—helping providers operate more efficiently, make better decisions, and ultimately improve patient outcomes.

All workforce members are expected to approach the use of AI with thoughtfulness and a deep sense of obligation to our community. By embedding our values into the core of our AI strategy, we ensure that technology empowers us in service of our mission.

Our commitment to responsible AI means that we:

- Safeguard personal and sensitive data and ensure AI is used in ways that respect privacy, dignity, and human rights.
- Design our solutions to enhance user experience and deliver meaningful value without compromising safety or trust.
- Actively work to ensure our AI systems do not unintentionally discriminate, reinforce bias, or produce inequitable outcomes.
- We will (i) regularly review and improve our AI practices to keep pace with evolving expectations and risks and (ii) empower workforce members to raise concerns.

For more information, please refer to the AI Governance and Responsible and Ethical AI policies.

Quality assurance

Quality assurance is how we operationalize Practice Success—ensuring that the outcomes we deliver to customers enable them to succeed and provide better care.

Quality assurance is essential to delivering products and services that consistently meet or exceed customer expectations. At Ensora Health, we believe that outcomes matter, and quality is how we ensure that our work delivers real, measurable value.

All Ensora Health workforce members are expected to follow established quality assurance procedures as part of their daily work. Prioritizing quality ensures our work meets shared standards and supports collective success – because the results we deliver are what count.

Quality is how we turn effort into impact.

It induces:

- **Customer satisfaction.**

Satisfied customers are more likely to remain loyal, renew their services and subscribe for additional services, and recommend Ensora Health to others.

- **Operational efficiency.**

By setting and adhering to quality standards, we better optimize our processes and workflows. This leads to increased operational efficiency, reduced waste, and cost savings.

- **Continuous improvement.**

Quality assurance allows us to constantly evaluate and enhance our processes and products to stay competitive and relevant.

- **Employee morale.**

Workforce members take pride in delivering high-quality work. A focus on quality assurance continues to boost workforce morale and job satisfaction.

Integrity

Fraud, waste, & abuse

Preventing fraud, waste, and abuse is a critical part of serving our customers and supporting the healthcare system. By protecting healthcare resources from misuse, Ensora Health helps ensure they are available to those who truly need them and will use them in ways that support positive outcomes for patients and communities. We take this responsibility seriously and hold ourselves, and our systems, accountable for detecting, preventing, and addressing fraudulent, wasteful, or abusive activity.

All Ensora Health workforce members are expected to play an active role in combatting fraud, waste, and abuse. Doing so is essential because it:

- **Reduces healthcare costs.**
Fraud, waste, and abuse can drive up costs for healthcare organizations, insurers, and patients. Preventing these activities helps ensure resources are used efficiently and responsibly.
- **Protect patients.**
Fraudulent or wasteful practices can lead to unnecessary, inappropriate, or unsafe treatments. Preventing these behaviors helps safeguard patient health and well-being.
- **Promotes fairness and equity.**
Preventing fraud, waste, and abuse ensures that healthcare resources are allocated

based on medical necessity and legitimate need, not improper claims or unnecessary services.

- **Improves resource allocation.**
When fraud, waste, and abuse are reduced, resources can be redirected toward patient care, innovation, research, and improved healthcare outcomes.
- **Support long-term sustainability.**
Responsible use of healthcare resources helps ensure the stability and sustainability of healthcare systems for future generations.

For more information, please refer to the Fraud, Waste, and Abuse policy.

Financial integrity

Financial integrity earns and maintains the trust of our customers, investors, and vendors. When we operate with integrity, we ensure that all financial transactions are accurate, honest, and transparent.

All Ensora Health workforce members are expected to execute financial transactions in accordance with generally accepted accounting principles (GAAP), avoid conflicts of interest that may compromise financial integrity, and promptly report any actual or suspected financial misconduct through established channels.

Financial integrity:

- **Builds investor confidence.**

Investors rely on accurate reporting, transparency, and honest financial management.

- **Promotes financial stability.**

Sound financial practices help protect the organization from instability caused by fraud, embezzlement, or misuse of funds, reducing risks that could impact operations, jobs, and long-term viability.

- **Creates a competitive advantage.**

Organizations known for ethical financial practices are more attractive to customers and investors alike, supporting long-term success and growth.

Protecting company assets

Long-term success for Ensora Health directly correlates with reliable service for our customers. When our assets are secure and well cared for, we can operate without disruption and continue delivering the products and services our customers depend on. Safeguarding these resources reflects our commitment to operational excellence.

All workforce members are required to protect the company assets entrusted to them because it:

- **Promotes efficient use of resources.**

Protecting assets reduces unnecessary costs related to repair, replacement, or recovery, allowing resources to be directed toward innovation, improvement, and successful outcomes.

- **Ensures operational continuity.**

Our assets are critical to daily operations. Protecting them helps avoid disruptions that could impact service delivery.

- **Supports financial stability.**

Company assets represent significant value. Preventing theft, damage, or misuse helps protect profitability and the organization's financial health.

- **Meets legal and regulatory obligations.**

Certain assets, such as customer data, intellectual property, and proprietary systems, must be protected by law.

Legal adherence

Laws, rules, & regulations

Compliance isn't just a requirement; it's how we demonstrate that we mean what we say. When we follow the laws, rules, and regulations that govern our work, we're doing more than checking a box. We're protecting the people we serve, honoring the trust our customers place in us, and holding ourselves to the standard of integrity we've committed to.

Compliance matters across every part of the organization, and here's why:

- **Protecting against legal and financial risk.**
Non-compliance carries real consequences – fines, penalties, regulatory action, and legal liability. Following applicable laws and regulations helps us avoid those risks and protects the stability of our organization.
- **Upholding ethical standards.**
Compliance is integrity in action. When we operate within legal and regulatory frameworks, we show that we're committed to doing business honestly and responsibly; not just when it's convenient, but as a matter of principle.
- **Earning and keeping trust.**
Our customers, investors, and stakeholders need to know that we operate with their best interests in mind. Consistent compliance builds confidence.
- **Operating with consistency and efficiency.**
Clear compliance guidelines give us a shared foundation for how we conduct

business. That structure helps us work more efficiently, make better decisions, and maintain consistency across teams and processes.

- **Sustaining long-term success.**

Compliance isn't just about today; it's about building an organization that lasts. By reducing legal exposure, maintaining operational stability, and protecting our standing in the communities we serve, we set ourselves up for sustainable growth.

For more information, please refer to the Sanction policy.

Anti-kickback statute

The Anti-Kickback Statute (AKS) is a federal law that prohibits offering, paying, soliciting, or receiving remuneration in exchange for referrals of items or services covered by federal healthcare programs like Medicare and Medicaid. It's an intent-based statute, meaning even if only one purpose of the arrangement is to influence a referral, it can trigger a violation.

- **What does "remuneration" mean?**

Under the AKS, remuneration includes anything of value, not just cash. Examples include:

- Cash or cash equivalents
- Cost-sharing waivers or subsidies
- Opportunities to earn a fee
- Items, equipment, space, or services

▪ What does the statute prohibit?

The AKS makes it a criminal offense to knowingly and willfully:

- Offer or pay remuneration to reward referrals for items or services reimbursable by a federal healthcare program;
- Solicit or receive remuneration in return for such referrals; or
- Provide or accept remuneration to reward the purchasing, leasing, ordering, or recommending of any good, facility, service, or item reimbursable by a federal healthcare program.

▪ What are the consequences?

Violations of the AKS are serious, both legally and professionally:

- **Criminal Penalties:** A felony conviction carrying up to \$100,000 in fines, up to 10 years imprisonment, or both.
- **Program Exclusion:** Mandatory exclusion from participating in federal healthcare programs, including Medicare and Medicaid.
- **Additional Liability:** A person who violates the AKS may also face False Claims Act liability and Civil Monetary Penalties.

Complying with the AKS helps ensure that the decisions made within our organization are driven by what's best for healthcare consumers, not by improper financial incentives. This law exists to protect the integrity of the healthcare system.



When attempting to identify problematic arrangements under the Anti-Kickback Statute, some relevant inquiries to explore and consider include the following:

Issue	Key questions
Relationship	What degree of influence do the parties have, directly or indirectly, on the generation of federal health care program business for each other?
Selection	Were parties selected to participate in an arrangement in whole or in part because of their past or anticipated referrals?
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?
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?
Items or services provided	Are the items and services actually needed and rendered commercially reasonable, and necessary to achieve a legitimate business purpose?
Federal Program Impact	Could the remuneration potentially affect costs to federal health care programs or their beneficiaries, or lead to overutilization or inappropriate utilization?
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?
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?
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?
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?

For more information, please refer to the Anti-Kickback Statute policy.

Gifts, gratuities, & entertainment

Gifts and entertainment are a normal part of building business relationships; a thank-you lunch, a small token of appreciation, or a team outing are all part of cultivating productive business relationships. When done thoughtfully and appropriately, they can strengthen connections with customers, partners, and colleagues, and show genuine gratitude for the relationships we value.

But, in healthcare, the line between a well-intentioned gesture and a compliance risk can be thin. As covered in the Anti-Kickback Statute section, offering or receiving anything of value that could influence or appear to influence business decisions is a serious legal violation. Gifts, gratuities, and entertainment are among the most common ways that line gets crossed, often unintentionally.

It's important to approach these situations with both good judgement and clear boundaries. Here's what we expect:

- **Keep it reasonable and appropriate.**

Any gift or entertainment should be modest, proportionate, and clearly tied to a legitimate business purpose; never excessive or lavish.

- **Avoid even the appearance of impropriety.**

If a gift or gesture could be perceived as favoritism, an incentive to influence a decision, or a reward for a referral, it's not appropriate regardless of intent.

- **Be fair and non-discriminatory.**

Gift-giving should never create the impression that certain people or relationships receive preferential treatment.

- **Maintain transparency.**

Accurate record-keeping and proper oversight helps us stay accountable and ensure that our practices hold up to scrutiny.

Generally acceptable	Generally unacceptable
▪ Gifts that fall within limits laid out by Company standards; ▪ Gifts of nominal value bearing the organization's logo (e.g., swag); ▪ Perishable gifts; ▪ Modest business meals; and ▪ Gifts approved by Legal and Compliance.	▪ Gifts exceeding the value stipulated by Company standards; ▪ Gifts to government officials; ▪ Gifts intended to influence business decisions; ▪ Gifts that may be considered bribes; and ▪ Gifts that you have requested.

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 the Legal and Compliance team for an official determination.

Business stewardship

Customer interaction

Customer interaction is where Practice Success comes to life—every engagement either helps our customers succeed in caring for their patients or detracts from that goal. At Ensora Health, the customer is at the center of everything we do, and that means more than delivering a great product.

How we engage with our customers reflects who we are as an organization. Every touchpoint is an opportunity to build trust, demonstrate respect, and reinforce the values we've committed to throughout this Code. That includes helping our customers operate in a compliant manner, because protecting them is part of caring for them.

Lead with respect and empathy. Customers who consistently experience superior service develop a deeper connections with our brand; they stay longer, engage more, and become advocates for Ensora Health.

- **Engage with purpose.**

Workforce members who engage meaningfully with customers report higher job satisfaction and a stronger sense of purpose. When you know your work is making a real difference in someone's experience, it changes how you show up every day.

- **Be honest, transparent, and inclusive.**

We have an ethical obligation to treat customers fairly, honestly, and with compassion.

- **Make every interaction count.**

Every positive interaction reinforces who we are in the market. Every careless one undermines it. In a world where word travels fast, how we treat our customer is our brand. The impact of customer centricity goes well beyond a single interaction.

Vendor relations

The vendors we choose to work with reflect directly on Ensora Health, on the quality we deliver and the integrity of our operations. That's why vendor selection must always be based on what's best for the organization, never on personal relationships, biases, or self-interest.

Conflicts of interest in vendor selection don't just create ethical problems; they create real business risks. When decisions are influenced by personal interests rather than organizational needs, we open ourselves up to unfair processes, lower quality outcomes, and legal exposure.

When we keep vendor relationships clean, objective, and well-governed, we make better decisions.

- **Select vendors on merit.**

Vendors should be evaluated and chosen based on their qualifications, capabilities, track record, and ability to deliver quality and value.

- **Disclose conflicts of interest.**

If you have a personal or financial relationship with a vendor, or anything that

can be perceived as one, you're expected to disclose it and step away from the selection process.

- **Follow the approval process.**

All vendors must be properly reviewed and receive the necessary approvals before any work begins.

- **Keep it transparent.**

Vendor selections should be well-documented and able to withstand scrutiny.

For more information, please refer to the Vendor Lifecycle Management policy.

Government entities & officials

When interacting with government entities and officials, the rules are stricter and the stakes are higher. Practices that might be perfectly acceptable in a standard business relationship can be unacceptable or even illegal when a government official is involved.

This is an area where the principles we outlined in the Anti-Kickback Statute and Gifts, Gratuities, and Entertainment sections carry even greater weight. Government interactions are subject to additional laws, including rules governing political contributions and lobbying, that impose specific limits on what can be offered, by whom, and under what circumstances.

The standard here is straightforward: workforce members should not provide gifts, entertainment, or anything of monetary value to government employees or agencies unless you have received prior approval from the Legal and Compliance team. If you're unsure whether an interaction

involves a government entity or official, ask before you act.

It keeps the playing field fair. Compliance prevents any organization, including ours, from gaining an unfair advantage through improper influence. Fair competition benefits everyone.

Social media

What we say online matters, and in today's connected world, there's no clear line between personal social media activity and how it reflects on the organizations we're part of.

Whether on personal or professional platforms, workforce members are expected to engage on social media in ways that reflect our values:

- **Don't share confidential or proprietary information.**

This includes any customer data, patient information, internal business details, or anything that isn't publicly available.

- **Don't speak on behalf of Ensora Health.**

Workforce members should never respond to public inquiries, complaints, or comments as a representative of the Company. This responsibility belongs to the Marketing team.

- **Be respectful and professional.**

Whether you're posting, commenting, or engaging in discussions, treat colleagues and the public with courtesy.

- **Be accurate.**

If you're discussing topics related to your work or industry, stick to what you know to be true. Avoid speculation, misinformation, or statements that could be misleading.

If a current or prospective Ensora Health customer reaches out to you directly through social media, do not engage beyond the following response:

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

Then notify the Social Media and Reputation Manager immediately so they can follow up through the appropriate channels.

Social media can be a powerful tool for connection and engagement, but it also carries real risk when it's not handled thoughtfully:

- **Reputation:** A single post or comment can shape how customers, partners, and the public perceive Ensora Health. Consistent, professional behavior online protects the brand we've all worked to build.
- **Legal exposure:** Sharing confidential information, making defamatory statements, or misrepresenting the company can create legal liability.
- **Personal protection:** These guidelines aren't just about protecting Ensora Health; they're about protecting you. Thoughtful social media habits safeguard your own professional reputation and reduce the risk of personal liability.

- **Crisis readiness:** When everyone follows the same guidelines, we're better prepared to respond to negative publicity or social media incidents in a coordinated, responsible way.

For more information, please refer to the Social Media section of the Ensora Health Team Member Handbook.

Respecting human rights

At Ensora Health, we believe mental health is a universal human right. That belief isn't just a statement; it's the foundation of our mission and the lens through which everything at Ensora Health should be measured.

Respecting human rights means ensuring that our operations, our products, and our conduct never harm, exclude, or discriminate against the people we serve or the people we work alongside. It means holding ourselves accountable, not just for what we build, but for how we build it and who it impacts.

Respecting human rights isn't a separate initiative; it's woven into every other commitment in this Code. It connects directly to how we approach workplace conduct, how we engage in business stewardship, and how we govern our operations.

There's something meaningful about being part of an organization that treats human rights as a core part of who we are and why we exist.



Sustainability

Corporate social responsibility

Our responsibility doesn't end with the products we build or the customers we serve. We believe that how we operate, the choices we make, the practices we follow, the impact we leave behind, matters beyond the walls of our organization.

Corporate Social Responsibility (CSR) is how we put that belief into action. It's our commitment to considering the broader social, environmental, and ethical consequences of the work we do.

At Ensora Health, we strive to:

- **Go beyond what's required.**

Compliance is the floor, not the ceiling. CSR challenges us to ask not just "Is this legal?" but "Is it right? Could we do better?" and then to act on the answer.

- **Build with impact in mind.**

We consider the highest ethical and environmental standards when building our products and services, because the people who use them deserve that level of care.

- **Use our expertise to drive meaningful change.**

Whether it's supporting mental health awareness, sharing knowledge, or expanding access to tools that will improve care, we look for ways to put our expertise to work where it's needed most.

The environment

Environmental responsibility means being honest about the footprint our operations leave behind and being intentional about reducing it. It means adhering to the regulations and standards that govern environmental stewardship, and then asking ourselves whether we can do more. It means recognizing that the health of our planet and the health of the people we serve are not separate concerns.

There's also a practical reality: organizations that take environmental responsibility seriously are better positioned for the future. Sustainable practices reduce cost and risk, attract partners and customers who share our values, and help us adapt to the regulatory and market changes that are already underway.

If you spot an opportunity to reduce waste, energy use, or unnecessary resource consumption, raise it. Good sustainability ideas can come from any role, not just leadership.



Resources

Ensora Health Legal & Compliance Team

To report a possible legal violation, contact legal.services@ensorahealth.com.

For general inquiries, or to report a possible violation of our Code of Conduct, contact compliance@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.

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