

# Code of Conduct

Principles that guide our decisions, are authentic to who we are,  
and who we strive to be, every single day.



**Morality**

**Choice**

**Responsibility**

**Behavior**

**Trust**

**Reliability**

**everside**  
HEALTH™

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# Welcome

## Dear Everside Health Teammates,

**Our mission at Everside Health is to enable patients in our care to live their healthiest lives.**

We do this by providing and coordinating innovative, high quality, community-based care for individuals and their families. Everside Health empowers everyone we serve to improve the quality of their lives and health. Since our beginning, Everside Health's teammates have worked tirelessly to meet the ever-evolving needs of our patients and clients so they can achieve their best life. This work happens because of the community of people who make up Everside Health, and we are so pleased to have you on the team. Our teammates are our greatest strength.

At Everside Health, we believe that we can play a much broader role in empowering those we care for to achieve not just good, but great outcomes. To do that, every member of our team needs the tools and information to perform at the highest standards to be successful.

We ask that you exercise good judgment as you go about your daily activities and assignments on behalf of Everside Health and our patients. If you have a concern about a particular business practice, or are unsure if a standard is being compromised, please speak up. Notify your supervisor, other leaders, General Counsel, or Human Resources. Please follow the recommendations and guidelines set forth in this Code of Conduct so that you can help Everside Health maintain our excellent reputation in the communities we serve.

Thank you for your commitment to service at Everside Health.

Sincerely,

**Chris Miller**

Chief Executive Officer



# Mission, Vision, & Values

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## Our mission

Enable patients in our care to live their healthiest lives.

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## Our vision

Build the most trusted, accessible and personalized healthcare experience alongside our patients and clients.

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## Our core values

Patients first, courage, ingenuity, community, and fun.

### Patients First

We think of our patients as more than patients – members of our family who come first in every decision. Patients are why we exist, and our commitment to them is unwavering.

### Courage

Fortune favors the bold. We have the mental and moral fortitude to challenge the status quo and make hard decisions. We have conviction in our beliefs and live them every single day.

### Ingenuity

We are known for innovation that improves our patients' lives. We seek every opportunity to bring our unique expertise and creativity to create meaningful impact for patients, clients and teammates.

### Community

We strive to create a welcoming and inclusive community with our patients, clients and teammates. We are stronger together than as individuals. We are a unifying force in the world.

### Fun

We enjoy what we do. We take pride in working hard, but even hard work can be fun. We know that a fun environment motivates and inspires us to do our best work while allowing our teammates' unique personalities to shine.



# Code of conduct

## Purpose

To be a road map for Everside Health, guiding teammates to make the right choices in their daily activities.

Everside Health is committed to improving the wellness and health of our communities. We strive to ensure top quality services, and to protect our patients and clients from harm, while being fiscally responsible and focusing on the customer. We operate with integrity and comply with federal, state and local laws and regulations while carrying out our mission. The Everside Health Code of Conduct (the “Code”), is a key element of our Compliance Program, designed to help us with this commitment by serving as a guide and framework for how we do business at Everside Health. The Code and its underlying principles apply to all Everside Health-related parties including, but not limited to, all teammates, employed physicians, executive leadership, members of the Board of Directors, members of the Medical Staff, consultants, vendors and other business partners.

While the Code is designed to provide overall guidance, it does not address every situation. Medical and business decisions can be complex. As you read this Code, it is the expectation that all teammates will use the guidelines and principles to drive behavior and incorporate the principles into everyday tasks. You are accountable for knowing enough about compliance to recognize an issue when it arises and have the ethical responsibility to stop something that is wrong by reporting it. You are required to comply with the Code, which is intended to supplement, not replace, Everside Health’s policies and procedures. If you encounter a situation not addressed specifically, you should apply the overall philosophy and concepts of this Code to your situation.

Leaders are expected to set the example and must ensure that ethical and compliant behavior is never sacrificed during the pursuit of business objectives. They must help promote a “culture of compliance” within Everside Health to achieve high standards of ethics and compliance. This kind of culture encourages anyone in the organization to ask questions or express concerns without fear of retaliation or intimidation of any sort.

## Who this code applies to

Everyone! The Code of Conduct is a guide for all teammates, including members of our Board of Directors, executives, joint venture partners and employees (teammates), affiliated physicians, vendors and all third parties conducting business on behalf of Everside Health.

## Procedures & the code of conduct

Compliance policies and procedures provide guidance on specific topics and business activities, whereas the Code is a guide to overall conduct of our global operations. We are expected to read, understand and follow all of Everside Health’s policies and procedures and this Code of Conduct. If you are unclear about how certain policies and procedures apply to your activities, consult your supervisor or General Counsel.





# Compliance

No one is expected to know it all, which is why General Counsel created Compliance policies. Ensure that you are familiar with:

- The Teammate Handbook: Section 7: Compliance policies
- Teammate Central > Myself Tab > Company Info > Security Awareness Policies

## Compliance training

Training our teammates is an important part of the Compliance Program. All teammates (regardless of status, including, temporary, contract or part-time) complete compliance training as new hires and on an annual basis. This training is the foundation of our Compliance Program and provides guidance on our daily activities.

## Compliance hotline: make the right call

**Phone: 1-844-280-0005**

**Email: [reports@lighthouse-services.com](mailto:reports@lighthouse-services.com)**

We have a dedicated Compliance Hotline for teammates and other individuals to confidentially, and if permitted by local law, anonymously report a suspected or actual violation of Everside Health's Compliance policies and procedures, or applicable laws and regulations. The Compliance Hotline can be accessed 24 hours a day, 365 days a year via a toll-free telephone number or via email.

A specialized third-party company manages our Compliance Hotline. Compliance Hotline reports should be made in good faith.

## Obligation to report

It is your duty to maintain the highest level of integrity and accountability by alerting a supervisor, senior management, General Counsel or the Compliance Hotline of suspected or actual violation of Everside Health's policies and procedures, applicable laws and regulations, or this Code. We cannot exempt ourselves from the consequences of our own misconduct by reporting an issue, but self-reporting may be taken into account when determining appropriate corrective action.

If you fail to report a violation of Everside Health policies and procedures, applicable laws or regulations, or this Code, you may be subject to corrective action, up to and including termination of employment, to the extent permitted by law. Remaining silent about a violation of Everside Health policies and procedures, applicable laws or regulations, or this Code puts you and Everside Health in jeopardy.



# Compliance

## Non-retaliation

We are all encouraged to raise issues or concerns in good faith and may do so without fear of retaliation. Everside Health makes every effort to maintain the confidentiality and anonymity of any individual who reports concerns or possible misconduct. Teammates who retaliate or encourage others to do so will be subject to corrective action, up to and including termination of employment to the extent permitted by law. Everside Health does not tolerate any form of retaliation against anyone who makes a report in good faith.

If you feel that you have experienced retaliation, immediately report your concern to a supervisor who is not involved in the issue, senior management, Human Resources, General Counsel or contact the Compliance Hotline. All allegations of retaliation will be investigated and appropriate steps will be taken to protect those who report retaliation.

## Internal investigations

We investigate reported concerns promptly and confidentially to the fullest extent possible. All internal investigations and audits are conducted impartially and without predetermined conclusions. We are all expected to cooperate with audits, investigations and any corrective action plans, which may include areas for continued monitoring and assessment.

For additional information on investigations please reference the Teammate Handbook Section 5.9.

## Responding to external investigations

We are committed to appropriately responding to, and not interfering with, any lawful government inquiry, audit or investigation. We will be forthright in our dealings with government officials or employees who are responsible for administering and enforcing the law.

If you receive a request for information from a government investigative agency, external surveyor or enforcement agency, you should take the following steps:

- Immediately notify your supervisor.
- Immediately contact the Chief Compliance Officer / General Counsel (call the Compliance Hot Line during “off hours” at 1-844-280-0005)

For further information please see Teammate Handbook: section 7.3 Government Investigations.



# Patient commitments

## Quality patient care

We make a difference in each patient's life by providing quality care. We treat all patients with warmth, respect and dignity, providing care that is both medically necessary and appropriate. We involve patients in treatment planning and decisions affecting their care whenever appropriate. We make no unlawful distinction in the admission, transfer, discharge or care of patients based on race, ethnicity, religion, gender, sexual orientation, national origin, age, disability, veteran status or other protected-class status. Each of us is required to adhere to Everside Health policies and procedures, laws and regulations regarding patient care, and this Code.

## Patient confidentiality

We respect and protect confidential information obtained from our patients. We take proactive measures to safeguard our documents, computers and other data devices that contain patient information. We commit to the following privacy and security principles:

- We provide patients with notice of our privacy and security practices in accordance with applicable laws and regulations.
- Patient information, including personal health information, is protected through reasonable and appropriate technical and organizational security measures, including, where appropriate and if allowed under local laws, encryption of patient information.
- We only use and disclose patient information as required or permitted by applicable laws and regulations.
- Vendors who process patient information on our behalf may only process patient information at our direction and as permitted by our privacy and security policies, and all applicable laws and regulations.
- Teammates and vendors are not authorized to access, use or disclose patient information which is not necessary to perform their individual job function or more than the minimum necessary amount of information needed to fulfill their Everside Health duties.
- Teammates and vendors who use Everside Health patient information to perform services on Everside Health's behalf are expected to promptly notify the Compliance Line or General Counsel of any unauthorized use or disclosure of patient information.
- Everside Health will obtain patient and teammate consent in accordance with applicable laws and regulations, prior to using patients' or teammates' pictures, testimonials or other information for marketing or other purposes.



# Patient commitments

## Patient relationships

We understand that close relationships form between patients and their healthcare providers. However, we must avoid conducting business transactions with patients that may result in an actual or potential conflict of interest. We do not want our patients to think they will receive better or worse care if they have outside personal relationships or business arrangements with their healthcare providers. We strive to have open, objective relationships with our patients.

## Proper coding, billing, & patient accounting

Everside Health documents patient care completely and in a timely manner. The medical record is written evidence of the quality care we deliver to our patients. We educate our teammates and work diligently to prevent knowingly creating records that contain any false or misleading information. We submit claims for payment or approval that are accurate, truthful, and contain properly documented codes. We only bill for goods or services that we provide.

# Business commitments

## Business relationships

We always treat our business partners, vendors, and third parties with integrity. Our reputation is one of our most valuable assets. It is up to all of us to protect Everside Health's reputation. We will comply with all laws and regulations relevant to our business and engage in fair and honest business practices.

We select business partners, vendors and third parties based on objective criteria including quality, price and service. We make partnering decisions based on the supplier's ability to meet our needs.

## Avoid conflicts of interest

To avoid a question about our integrity, we must be able to identify and disclose potential conflicts of interest and excuse ourselves from making decisions where it may appear our independence is compromised.

For further information please see Teammate Handbook: section 7.5 Conflicts of Interest.

## Business courtesies

We understand that people who work together often exchange business courtesies—such as meals, gifts, or entertainment—as an expression of goodwill and kindness. Because of regulatory concerns, we only



exchange business courtesies with our business partners in limited circumstances. We never use gifts or other incentives to improperly influence relationships or business outcomes. All business courtesies, whether offered, provided or received, must be reasonable, occasional and modest in nature.

We never offer, give, solicit or receive any form of bribe, kickback or improper inducement.

We never offer, give, or accept cash, gift cards or other cash equivalents.

When we are offered a business courtesy that is inconsistent with Everside Health policies and procedures, the business courtesy should be declined with a gracious thank you. If declining the business courtesy would create an awkward situation, contact General Counsel for guidance.

## **Business opportunities**

Business opportunities discovered through your work at Everside Health belong first to Everside Health. We owe a duty to Everside Health to advance its legitimate business interests. All teammates are prohibited from using Everside Health's confidential or proprietary information for personal gain.

## **Friends & relatives**

Relationships may affect our judgment which can easily lead to a conflict of interest. We should not participate in an existing or potential Everside Health decision involving any personal relationship. Just because we have a close relationship with a Everside Health teammate, business partner, vendor, contractor, patient, competitor, referral source, government official or employee, or other third party does not automatically mean there is a conflict of interest. However, the right thing to do is to discuss the potential conflict of interest with your supervisor or General Counsel.

## **Respect each other**

We are committed to providing a supportive work environment where teammates have the opportunity to reach their full potential. We are all expected to do our utmost to create a respectful workplace.

Please refer to the Teammate Handbook for the following:

- Equal Opportunity Employment: Section 2.1
- Legal Employment: Section 2.4
- Drugs & Alcohol: Section 5.13
- Harassment: Section 2.2
- Health and Safety: Sections 5.1 and 5.2

## **Obey the law**

Everside Health is serious about its responsibilities to comply with laws and regulations. While it's impossible for us to know all laws, we should understand how the following laws and regulations apply to our work.



**Anti-kickback laws:** We conduct business dealings with referral sources (e.g., physicians and other healthcare providers) in accordance with local laws and regulations. In the U.S., this means business dealings with referral sources are at fair market value and negotiated at arm's length. Everside Health's policy prohibits improperly accepting, soliciting or providing kickbacks of any kind. A kickback is an improper payment, gift, service, or item of value offered or received in return for increased business or patient referrals.

**Anti-corruption and anti-bribery laws:** We will not directly nor indirectly give, offer, or promise anything of value to any government official or employee, with the corrupt intent to obtain or retain business, or secure an unfair business advantage.

**Marketing and advertising practices:** We practice honest, straightforward and non-deceptive marketing techniques. Consistent with laws and regulations, we may use marketing and advertising activities to educate the public, increase awareness of our services and recruit teammates.

**Antitrust laws:** Antitrust laws and other laws governing competition are designed to promote and protect free, lawful and fair competition in the marketplace. These laws apply to conduct at all levels of an organization. In general terms, antitrust and other laws governing competition require Everside Health to compete on an individual basis rather than join with other companies or competitors in agreements to restrict competition or create monopolies.

## Conclusion

This Code of Conduct is a guide for our daily work. This Code is just the beginning of the many resources available to teammates. Ultimately, we rely on each teammate to use good judgment and to uphold our Core Values. If you have any questions, please ask your supervisor, senior management, General Counsel or contact the Compliance Hotline.

