

Code of Conduct



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Code of Conduct

Everyone conducting work on behalf of TrueCare, including employees, contractors, consultants, vendors, and Board of Directors (the Board) are expected to act with integrity.

Performing your work with integrity starts with knowing and understanding the laws and regulations that govern our organization and the work we do, the internal policies and procedures, and how it all ties together to provide the best possible care for our members.

The Code of Conduct outlines our commitments and the expectations when conducting business on behalf of TrueCare and should be considered a toolbox that can help you navigate challenges you may encounter, while performing your duties as well as a guide on how to conduct yourself ethically and contribute to the building of an ethical culture. Everyone who conducts business on behalf of TrueCare is responsible for living the values expressed in TrueCare's Code of Conduct.

The Code of Conduct cannot account for every situation you may encounter, but can equip you with the tools, in combination with your own good judgement, to make the best decision possible. Be sure to speak with your supervisor or the Ethics & Compliance Department about any questions or concerns that you have.

We must all:

- Follow the law.
- Refer to the Code of Conduct, our leadership, and TrueCare policies and procedures in all situations where we have questions, need guidance, or are seeking additional guidance.
- Know that a violation of the Code of Conduct can result in disciplinary action. Disciplinary action may include coachings, warnings, suspensions or termination of employment, contract or other relationship with the organization.
- Understand our obligation to ask questions and report issues of noncompliance, fraud, waste and abuse or violations of the Code of Conduct.
- Understand and comply with all policies and procedures that apply to us and our work.
- Attest to our commitment to the Code of Conduct.
- Speak up when we see something that isn't right.

A photograph of two men in business attire. The man on the left has a beard and glasses, wearing a dark blue suit. The man on the right has a beard and glasses, wearing a light-colored patterned blazer. They are both looking down at a laptop screen, which is partially visible at the bottom of the frame. The background is a blurred office setting.

Conflicts of Interest

A conflict of interest can arise in situations where the outside interests of a TrueCare workforce member may, or potentially, interfere or compete with (or could be perceived as interfering or competing with) TrueCare's interests.

You must ensure that your relationships and/or interests outside of TrueCare do not, directly, indirectly, or appear to interfere with your duties and responsibilities TrueCare. If you are assigned to a role or asked to perform work that you believe may be contrary to these rules and guidelines, you must notify both your leadership and the Ethics & Compliance Department immediately.

Failure to appropriately disclose and work with your leadership to manage a potential conflict of interest could result in disciplinary action up to and including termination.



Conflict of Interest Disclosures

Employees and the Board must avoid engaging in any activity, practice or act that creates an actual, apparent or potential conflict with the best interests of TrueCare. Employees and the Board must immediately disclose any potentially conflicting interests if and when they arise. TrueCare has policies related to reporting and management both for employees and the Board.

Prior to beginning employment with TrueCare and each year thereafter, employees are required to disclose information that may constitute a conflict of interest. It is important that you fill out the request for information honestly, accurately, and with as much detail as possible. This requirement is not intended to punish anyone for their activities outside of TrueCare but is intended to protect the employees and TrueCare from unintended consequences. The TrueCare Board of Directors utilizes a separate conflict of interest policy to manage their disclosures but is still required to disclose any information that may constitute a conflict.

Having information to disclose does not automatically mean that you have an impermissible conflict of interest. Common disclosures include having a job outside of your employment at TrueCare, having a seat on a board with a Company that TrueCare may do business with or having a relationship with a member. It is important that you discuss any disclosures such as these with your manager. Managers have the equally important task of discussing and overseeing mitigation of any real or perceived conflict of interest. If you are unsure if a disclosure constitutes a conflict of interest, contact the Ethics and Compliance Department to help you navigate the issue.

It is important that if you begin an activity or relationship during the year that could potentially be a conflict of interest or become aware of a situation that was previously unknown, that you update your conflict of interest form as well as have a discussion with your manager for their awareness. If you are unsure how to update your form, contact the Ethics and Compliance Department team for assistance.

Common Scenarios and How to Manage Them

The following are some common scenarios that, if not managed appropriately, could result in a conflict of interest.

Outside employment, board representation, or business interest:

If you, or an immediate family member, are employed with, serve on the board of, or have a financial, business or personal interest in a business or organization with which TrueCare does business, you must disclose that relationship and refrain from making any decision(s) on behalf of TrueCare that relate to that business or organization.

Employment or other relationships with providers:

If you or an immediate family member is employed by (or otherwise have/has a financial interest in) a health care provider that does business with TrueCare, you must not make any decisions on behalf of TrueCare related to that provider or provide any services for that provider on behalf of TrueCare, including, but not limited to: processing claims from that provider or fielding calls or questions from that provider.

Relationships with members:

In the event you are related by blood or marriage to a TrueCare member, you must not make any decisions on behalf of TrueCare related to that member or provide any services to that member on behalf of TrueCare, including, but not limited to: processing claims related to the member, fielding calls or questions regarding that member, or providing any care management services for that member. Additionally, you must not access that member's protected health information.

If a friend or relative is employed by a competitor:

Relationships with people who work for a competitor are permissible, but you should be careful not to inadvertently disclose confidential information to them. It is important to let your supervisor and/or the Ethics and Compliance Department know of any activities or relationships that may raise the possibility of a conflict of interest. Please refer to the Conflict of Interest Disclosures section above.

Entertainment, Gifts, and Favors

TrueCare employees cannot solicit or accept any gifts, incentives, entertainment opportunities or favors that could result in:

- Inappropriate influence.
- Preferential treatment.
- Overutilization, underutilization or inappropriate utilization of health care services.
- Member safety or quality-of-care concerns.
- A violation of any federal or state laws including those related to referrals, tax exemption and public programs.

For more detailed information please refer to our Gifts and Entertainment policy.

If you have any questions regarding the above information, please contact the Ethics & Compliance Department.



Prohibited Affiliations, Political Activity, and Interactions with Government Entities

Prohibited Affiliations - State and Federal Exclusions, Sanctions & Debarment

We do not do business with individuals and organizations that have been excluded or debarred under federal health care programs or other federal contracts, or who have other restrictions on their eligibility to work with government contractors. TrueCare checks employees, the Board, vendors, providers and delegated entities for exclusions, sanctions, or debarments at least monthly.

If you become aware that we have a relationship with an individual or a company that is a prohibited affiliation, you should report it immediately to your supervisor or via the Compliance and Ethics reporting mechanisms. Employees who have been suspended, excluded, or debarred from participation in any of the above-named programs shall immediately inform the Human Resources Department and the Chief Compliance Officer.

Lobbying

TrueCare personnel will refrain from engaging in activities that may jeopardize the tax-exempt status of our organization, including improper lobbying and political activities. Any agreement to contribute any money, property, or services of any officer or employee on behalf of TrueCare at TrueCare's expense to any political candidate, party, organization, committee, or individual must comply with applicable law.

Political Activities

TrueCare encourages all employees to vote and engage in their civic duties. All employees are free to engage in political activities in an individual and private capacity. An employee's individual and private political activities will not influence an employee's compensation, job security, or opportunities for advancement at TrueCare.

Any participation in the political process should be conducted on an employee's personal time and must not involve TrueCare resources (e.g., funds or other assets). Employees must not explicitly or implicitly suggest in any way that their personal view is one that is supported by TrueCare.



Interactions with the Government

TrueCare interacts with governmental officials daily, and we have an obligation to deal fairly, appropriately and in accordance with the law with public officials and government agencies. We respond to government reviews and inquiries in a timely and appropriate manner. We also stay actively engaged in public policy advocacy on topics that impact the work we do and the people and communities we serve. TrueCare cooperates fully with any requests for information or assistance from local, state or federal agencies. This includes responding to government requests and inquiries in a timely and appropriate manner. On occasion, there might be an investigation. You are expected to cooperate with these investigations and should do so with guidance and assistance from the TrueCare Legal Department and TrueCare Ethics & Compliance Department.

Contact your supervisor, the TrueCare Compliance and Legal Department right away if, as a representative of TrueCare, you receive any summons, subpoena, inquiry or other communication from a court, law enforcement official, government agency or lawyer. In situations of requests or inquiries (outside of normal daily interactions) with governmental entities, you are required to contact the Legal Department. The Legal department will determine the best representative to respond to the request. All representatives that respond to governmental requests on behalf of TrueCare are expected to do so accurately and truthfully.

This applies to matters in which TrueCare is involved directly, like an investigation or lawsuit involving TrueCare. It also applies to matters in which TrueCare is involved indirectly such as investigations of suppliers, vendors, health care providers, etc.



Media Relations

TrueCare carefully manages the information it shares with the media, which is coordinated by the Communications and Media Relations team. There are designated company spokespeople who have received media training. All other employees should refrain from speaking to members of the media without prior approval from TrueCare Media Relations. Members of the media include, but are not limited to, reporters and producers for television or radio broadcasts, newspapers, magazines, online media outlets, bloggers or social media personalities. If you are approached by someone from the media and asked to comment on something pertaining to TrueCare, please either (a) do not comment and refer them to TrueCare Media Relations, or (b) make it expressly clear that any comments are your own, that you are not speaking on behalf of TrueCare, and that the views expressed do not necessarily reflect the views of TrueCare.

Policies, Procedures and Standards

To assist you in your work, TrueCare will provide you with policies, procedures and other standards for how you're expected to do your work. These are documents that are more specific to your duties than the Code of Conduct but are consistent with the Code of Conduct. Working on behalf of TrueCare you must understand and comply with the expectations for you and the work you do.

You may need to complete training about a policy or other standard and how to follow it. You can find policies and procedures on MySource.

Accurate Reporting

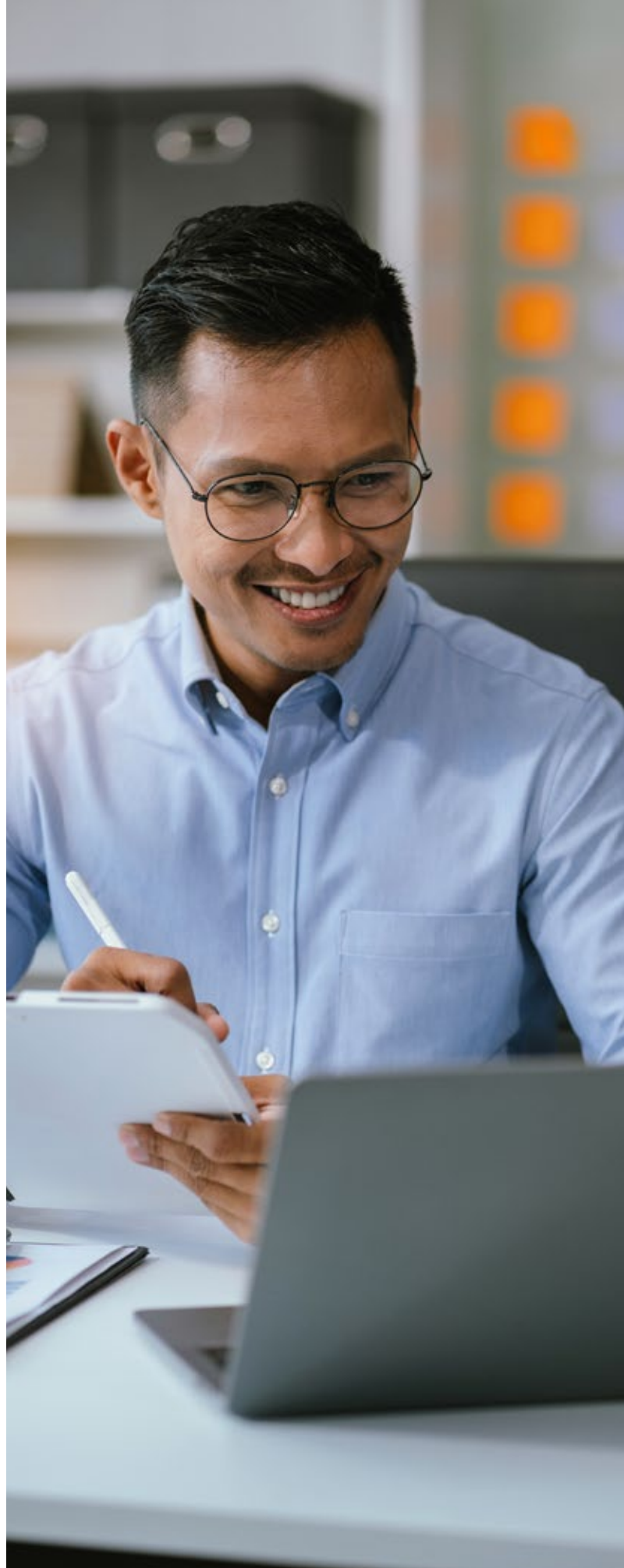
TrueCare employees are accountable to ensure the accuracy of all business-related books, records, accounting, and reporting. It is vitally important that transactions such as these are recorded and retained in accordance with company policy. Employees and others acting on TrueCare's behalf are accountable for fair, accurate complete information. Accurate reporting of data to regulators and representations of facts, reports and other governmental filings when dealing with regulators, auditors (Internal and external), and others. You should never falsify information and if you find an error or inaccuracy in any of our information, bring it to your leader's attention immediately.

Responsible Use of Artificial Intelligence

TrueCare is dedicated to the responsible and ethical implementation of artificial intelligence (AI) and emerging technologies to enhance our services, elevate customer experiences, and improve health outcomes. Our AI systems are built upon the principles of transparency, fairness, compliance, ethics, and accountability to ensure that we meet the highest standards in our operations. TrueCare proactively monitors and refines our AI risk management practices to stay aligned with evolving legal requirements and industry best practices, including guidance from the National Association of Insurance Commissioners (NAIC). By cultivating a culture of ethical usage, we strive to build trust with our members, ensuring that our AI-driven solutions make a positive impact on health outcomes.

TrueCare expects all workforce members to utilize AI responsibly. This includes using only approved AI platforms, adhering to the guidelines provided by the organization for appropriate use, and safeguarding the confidentiality and integrity of all data.

If you have any concerns regarding AI usage, please report them promptly through the Ethics & Compliance Reporting Hotline. Information for the hotline can be found in this Code of Conduct, The Corporate Compliance Plan, or the TrueCare Employee Handbook. Timely reporting is essential in helping us to swiftly remediate issues and maintain the security and trustworthiness of our AI systems.





Leader Accountabilities

Leaders have a special responsibility when it comes to the Code of Conduct.

Leaders are expected to:

- Ensure that employees within your department understand all portions of this Code and relevant policies and procedures.
- Create an environment where your employees are comfortable asking questions, seeking guidance, and speaking up when they see something that doesn't feel right.
- Ensure your staff completes the mandatory training in a timely manner and support them should they ask appropriate questions.
- Consider an employee's adherence to the Code of Conduct when assessing their performance.
- Understand that TrueCare does not permit retaliation against any employee for reporting a compliance, fraud, waste or abuse concern in good faith.
- Do not encourage, direct, or tolerate violations of the Code of Conduct, or other requirements and policies and procedures.
- Ensure that issues of suspected or known compliance issues are reported to the Ethics and Compliance department in a timely manner.

Remember, employees who choose to report suspected health care fraud to the government are also entitled to protections against retaliation.



Reporting a Concern

Violations

We expect that individuals who represent TrueCare conduct themselves in a way that reflects TrueCare's mission and values as well as ethical behavior. Please use this Code of Conduct and other resources made available to you to help you make the right decisions. A violation of the standards described in this Code of Conduct or Corporate Compliance Plan can result in disciplinary action, up to and including discharge from employment or contract termination. Disciplinary action taken by the organization to uphold this Code of Conduct will be imposed fairly and consistently, appropriate to the violations in question, and in accordance with our published disciplinary guidelines.

Non-Retaliation Policy

Any employee who, in good faith, reports a violation or suspected violation of the Code of Conduct or other misconduct will not suffer any penalty, harassment or adverse employment consequence. A violation or suspected violation might include:

- A violation of our state or federal contract.
- Actual or suspected fraud, waste or abuse.
- A violation of state, federal or local law.
- A violation or suspected violation of any other company policy.

This policy is designed to protect employees who are being honest and forthright. Anyone who retaliates against an employee for making a report in good faith, or participating in a related investigation, will be subject to appropriate disciplinary action.

If you feel someone has violated this policy, report it via the Compliance and Ethics reporting mechanisms listed in the Code of Conduct. Your report may be submitted confidentially or anonymously. It will be kept confidential to the extent permitted by law.

Where to Report a Suspected Code of Conduct or Compliance Violation

Employees, contractors, vendors, Board of Directors, and other persons supporting TrueCare business are obligated to report any known noncompliance or suspected noncompliance. To ensure anonymity and availability, TrueCare has partnered with a vendor to provide Ethics & Compliance reporting services. These services are available 24 hours a day, seven days a week.



- Employees should first go to their managers or leadership to report a concern.
- Leaders who have an ethics or a suspected or known compliance issue reported to them are obligated to timely report the issue using one of the methods listed below.
- For any employee, contractor, vendor, or other person supporting TrueCare programs not comfortable reporting a concern to their manager, does not have a manager, wants to report an issue anonymously, or feels their manager is not addressing an issue appropriately, an individual can report a compliance issue to the Ethics & Compliance Reporting Hotline. Issues and concerns should be submitted by all workforce members, including all vendors, temporary employees, contractors, consultants, interns, volunteers, and the Board using one of the options listed below:
 - Your manager or leadership
 - Your appropriate compliance representative or the Chief Compliance Officer
 - Anonymous Hotline: 844-784-9583
 - Anonymous Website:
<http://TrueCare.ethicspoint.com>
 - TrueCare Ethics & Compliance
P.O. Box 273
Dayton, OH 45401
Fraud, Waste, and Abuse Reporting
Mechanisms

TrueCare works to prevent, detect and correct issues of fraud, waste and abuse in our healthcare system. Anyone acting on behalf of TrueCare is expected to report any suspected instances of fraud, waste, and abuse. All reports can be made anonymously and will be kept confidential to the extent permitted by law.

- Anonymous Hotline: 877-725-4583
- Internal: x12300
- Email: fraud@TrueCare.com
- Fax: 800-418-0248

To Provide a Written Report: Write a letter or use the Fraud, Waste and Abuse Reporting Form at TrueCare.com or use the Fraud, Waste, and Abuse Reporting form available on MySource under Employee Reporting Options and send to:

TrueCare
Attn: Program Integrity
P.O. Box 1940
Dayton, OH 45401-1940

You do not have to use your name when you write or call. Non-anonymous options for reporting include:

- Email: fraud@TrueCare.com
- Fax: 800-418-0248



