



Code of Conduct

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Letter from the President

Dear employees, officers, and board members,

Leon Health, Inc.'s ("LH") members expect our help to access high-quality health care, to provide excellent service, and to keep personal information confidential and secure.

We are obligated to protect our members' privacy, to conduct ourselves with integrity, and to adhere to federal and state laws and regulations. This Code of Conduct ("Code") includes guidance to help you do your part. Inside this Code, you will find:

- The LH Mission, Vision, and Values
- Guiding principles
- Specific legal requirements
- Policy information
- Examples of acceptable and unacceptable behavior
- Ways to ask questions and report concerns

As an LH employee, officer, or board member, you are responsible for studying and knowing the content of the Code, completing the annual mandatory training and helping to ensure that we all adhere to the expectations described within this document.

If you see unethical or potentially harmful behavior to the company, we ask that you report it. Depending on how you are most comfortable communicating the issue, you may:

- Contact our Medicare Compliance Officer, Milagros Yzquierdo, at 305-496-3156 or milagros.yzquierdo@leonhealth.com with your questions or concerns.
- Talk to your manager about any issues
- Call the Compliance Hotline at

English speaking USA and Canada: 844-222-1593

Spanish speaking USA and Canada: 800-216-1288

Spanish speaking Mexico: 01-800-681-5340

French-speaking Canada: 855-725-0002

- E-mail the Compliance Hotline: reports@lighthouse-services.com
- Fax the compliance Hotline Fax: 215-689-3885 (must include company name with report)
- Submit a report via the Lighthouse website <https://www.lighthouse-services.com/leonhealth>

While the LH No Retaliation policy protects employees who report unethical behaviors, you may also choose to remain anonymous when you call the hotline.

This Code is integral to our daily work and our emerging reputation as a trustworthy organization. Thank you for helping LH maintain the highest ethical standards.

Inspiring Health with Compliance

It is our Vision to inspire health as a trusted leader in delivering affordable, innovative healthcare solutions. To achieve this vision, we collaboratively build honest relationships with our customers, suppliers, vendors, and providers.

By collectively engaging in building relationships, we uphold our Values. We are dedicated to doing our part in making the state of Florida a healthier place for all. We are caring by always putting customers first and are accountable to fulfill all of our commitments. We strive to be curious and embrace the opportunity to learn and innovate while collaboratively creating better health solutions together.

We conduct our business activities in a transparent, open, and truthful manner. We do not sacrifice our compliance and ethics concerns to accomplish personal or corporate goals.

By making compliance and ethics a part of our routine responsibilities, (both on and off the job), we can inspire health by providing the best value in health insurance and related health services to improve the quality of life for Floridians.

Introduction

As part of our commitment to compliance, LH has developed and implemented standards applicable to all employees, officers, and board members, that detail how to conduct business. These standards are described in the various sections of the Code. This Code is based on a strong commitment to compliance and ethical practices by LH's board of directors and senior management. It offers a clear and concise collection of company-wide principles and standards. The Code is the cornerstone of LH's Compliance & Ethics Program.

The Code details the fundamental principles, values, and framework for conducting business professionally and adequately at LH and in our interactions with customers, vendors, government regulators, local communities, and the environment. In addition, the Code affirms LH's commitment to comply with all federal and state laws and regulations. This document is reviewed annually and updated as needed. The Code and the Compliance & Ethics Program are available on LH's intranet site.

The Code is a set of general principles based on the laws, regulations, and corporate policies that affect us. These policies apply to all employees, officers, and board members of LH, and they describe the behavior required for initial and continued employment.

We are expected to perform our jobs consistent with the Code. However, nothing in the Code precludes lawful, concerted action by employees. Therefore, LH looks at how we apply the principles of the Code in our everyday activities as part of our annual performance evaluations and promotion decisions.

To have a company-wide culture of ethical behavior, we must understand what to do when we face an ethical or compliance concern. The Code provides the foundation for making ethical decisions and includes the many ways we can report known and suspected inappropriate behavior, actions, fraud, waste, and abuse.

Ways to report:

- Speak to your supervisor, manager, director, or vice president.
- Ask to meet with the Medicare Compliance Officer, a member of the Compliance Committee, Legal, or Human Resources.
- Send a letter, email, or memo to the Medicare Compliance Officer
- Call the Compliance Hotline at

English speaking USA and Canada: 844-222-1593

Spanish speaking USA and Canada: 800-216-1288

Spanish speaking Mexico: 01-800-681-5340

French-speaking Canada: 855-725-0002

- Email: reports@lighthouse-services.com

Our Role:

- Know the laws and regulations that apply to our jobs.
- Ask questions when in doubt.
- Treat others with honesty and respect.
- Take responsibility for our actions.
- Report known or suspected inappropriate behavior, actions, fraud, waste, and abuse.

Reporting Violations of the Code

As LH team members, we all have a responsibility to report potential or actual violations of the Code. We have many ways to report suspected violations of the Code without fear of punishment or retaliation from LH or its management. We can discuss matters with our management or use another method to report, such as the Compliance Hotline. The hotline is staffed by an external vendor, 24 hours a day, seven days a week. When making a report, we need to give specific details so that a proper investigation can be conducted.

LH's Responsibility to Respond

The Compliance Officer will investigate all reported violations. The Compliance Officer will report the results to the board of directors.

The Compliance Officer, another officer of LH, or the Chief Executive Officer (CEO) will report actual violations of federal or state law to the appropriate authorities. LH and our board of directors will cooperate fully with all government investigations.

No Retaliation Policy

If you make a report in good faith of a suspected violation of the Code, you will be protected from retaliation. Know that you will not lose your job or be disciplined just because you make a report or ask a question. LH will do its best to protect the confidentiality and anonymity of anyone who makes a report. However, under certain circumstances, LH may have to supply the person's name making the report.

Reporting to the Government

The U.S False Claims Act contains reporting provisions protecting individuals who report concerns to the government. Ways to report to the government include:

- A member of Congress or congressional staff
- The Office of Personnel Management (OPM) Office of the Inspector General
- The Centers for Medicare & Medicaid Services (CMS)
- The Government Accountability Office
- A federal employee responsible for contract oversight or management at the OPM
- An authorized official of the Department of Justice or other law enforcement agency
- A court or grand jury
- A management official or other employee of the Plan or subcontractor who has the responsibility to investigate, discover, or address misconduct

Employees should report:

- Known or suspected instances of gross mismanagement of a federal contract or grant.
- Gross waste of federal funds.
- An abuse of authority relating to a federal contract; A substantial and specific danger to public health or safety.
- A violation of a law, rule, or regulation related to a federal contractor.

Employees who report misconduct to the government are protected from retaliation. While the False Claims Act was enacted as a way for people to report wrongdoing to the government, we have a Compliance & Ethics Program in place so employees can report potential misconduct internally.

SECTION 1

Ethical Professionalism Requires Legal Compliance

We obey the law at all times when conducting LH Business.

This Code is part of our Compliance & Ethics Program. This program was created to help us understand our duty under and beyond the law.

Some laws and regulations affect the way we do business.

We must all know about the laws and regulations that apply to our jobs.

We must follow LH's corporate policies and procedures. In addition, LH provides training on general policies and compliance issues through live and online training and departmental meetings.

Code Requirements

We are each responsible for:

- Following the laws and regulations that apply to LH.
- Following our corporate policies and procedures.
- Adhering to our corporate values.
- Asking questions when we are uncertain about something.
- Reporting known and suspected violations of laws, regulations, or LH policies and procedures.

SECTION 2

Report Data Truthfully and Accurately

Record and report all financial data and transactions accurately and honestly. Follow proper accounting rules at all times.

We each have a responsibility to ensure that we record truthful and accurate information in everything we do and especially in these critical areas:

- Timecard reporting
- Business expenses
- Production or performance data
- The production and performance data of LH
- Any other business-related activities we record and/or report on

We must report and record information in connection with LH contracts accurately and truthfully. **Do not:**

- Distribute or assign costs to contracts that violate the contract's provisions or fail to follow applicable accounting rules.
- Inaccurately report labor cost records or submit or instruct another employee to submit false time charges or assign costs to the wrong contract.
- Alter or falsify any information in any record or document that misrepresents the facts.
- Try to influence, pressure, or manipulate an auditor to make misleading financial statements.

Risks of Inaccurate Data

Inaccurate data can lead to fines for LH, restrictions on our ability to do business, and prosecution in the most egregious circumstances.

SECTION 3

Follow Record Retention Policies

Keep or destroy all business records based on the law and our record retention policies. This includes all record types:

- Paper records
- Computer files
- Email
- Information stored any other way (on CDs, tape, discs, etc.)

Do not tamper with, remove, or destroy business records contrary to LH's record retention policies.

A government investigation, lawsuit, or court order may impose additional record retention requirements. When this occurs, carefully follow the instructions from the LH's legal counsel. Inappropriate destruction of records could constitute a crime.

Know Where to Find Record Retention Information

A link to the Record Retention page is located on LH's intranet. In addition, the page has link(s) to the records retention policy(ies). Refer to the same for additional information.

SECTION 4

Protect Non-Public Information

We have a responsibility to protect non-public Information at all times. Non-public Information includes Protected Health Information (PHI), Company Proprietary Information, and other Non-Public Information.

Do not use or give out Non-Public Information to anyone without approval.

Protected Health Information (PHI)

PHI is individually identifiable health information and includes:

- Medical records
- Patient information
- Other personal Information:
 - Social Security numbers
 - Addresses
 - Phone numbers
 - Financial Information (e.g., bank check account routing Information)
 - Email addresses

Access and use of PHI are limited to when it is necessary to complete our job functions. Accessing PHI when not needed to complete our job tasks or accessing PHI out of curiosity is strictly prohibited.

If PHI is released accidentally or inappropriately, please notify your supervisor and the Privacy Office right away. LH can be required to report the inappropriate release of or access to PHI within short timeframes.

Company Proprietary Information

Company Proprietary Information is Information that relates to LH's business that LH wants to keep private and includes:

- LH's business plans and operations
- Pricing and financial data
- Marketing plans
- Computer software
- Inventions
- Planned business transactions
- Underwriting information
- Information from a third-party vendor that we agreed to keep confidential
- Vendor or hospital contract details and pricing
- Data and lists that show employees and brokers
- Information we do not want competitors to know
- Information marked "Confidential" or "Proprietary."

Other Non-Public Information

Some information we have about others is also Non-Public Information that must be safeguarded. Examples include personal information we have about board members, brokers, employees, providers, and vendors. This includes Social Security numbers, birth dates, addresses, tax IDs, and other Information made known through employment.

Data Security and Software License Obligations

To ensure maximum protection of our company data, LH strictly enforces data security provisions. As an example, we must protect the integrity of company data by allowing only authorized users to access appropriate Information. In addition, we must all take precautions to ensure that LH work papers and equipment are returned when a contract ends.

LH uses a wide variety of computer software that is protected by various licensing agreements and copyright laws. As employees, we cannot duplicate or use computer software outside the bounds set by the vendor. The penalties for violating these licensing agreements are severe and may include personal liability.

Social Engineering

Be aware of social engineering and phishing scams. People try to obtain access to non-public Information by pretending – in person, on the phone, or through email – to be legitimate. For example, they may pretend to be from Information Technology and ask for your password or try to enter a building under pretenses. If you suspect phishing, check with LH's IT manager and/or the Privacy Officer.

Privacy Audits

The Privacy Officer and Information Security Services perform after-hour walkthroughs to monitor compliance with LH's privacy and information technology policies. If you have a question related to information security, please call 305-496-3156.

Helpful Hints

When sending PHI outside of the company by email, type Encrypt in the subject line to encrypt the Information. This also encrypts any attachments.

Place PHI only in the body of the email or as an attachment as the Subject line is not encrypted.

When sending faxes, use a cover sheet that does not contain PHI. Double-check the fax number before sending.

To prevent unauthorized access, protect system passwords the same way we do our Social Security numbers.

SECTION 5

Avoid Conflicts of Interest

Act in the best interest of LH. We must not participate in activities that conflict with our responsibilities as employees, officers, and board members. We should not compete with or benefit personally from opportunities we discover while using company property. This includes Information we learn while on the job.

A conflict of interest is a situation that occurs when our interests or activities could influence our decisions. It could prevent us from acting in the best interests of LH. A conflict of interest includes activities that may only appear to influence our judgment or decisions. However, even the appearance of a potential conflict of interest can cause our vendors and customers to question our motives.

For this reason, even if it would otherwise be a part of our regular job duties, we are prohibited from processing claims, testing systems, or working on cases that involve Information about people we know, such as family or friends. In such instances, always notify your supervisor and hand off work to someone else.

It is not unusual or necessarily wrong to have a conflict of interest. Sometimes just the act of disclosing and formally recording the potential conflict is sufficient to resolve it.

In addition, to avoid these conflicts, board members, officers, and employees must disclose any financial interest they have in competitors or companies doing business or seeking to do business with LH.

Laws prohibit loans or extensions of credit of any kind to officers and board members.

Examples:

- If your spouse has a financial interest (5% or more ownership) in a company seeking to do business with LH, your loyalty to LH could conflict with your financial interests.
- The same conflict could exist if you or your parent have a financial interest in an LH vendor.
- Suppose a company seeking to do business with LH offers you a gift or loan. In that case, the acceptance of a gift or loan from a potential business partner could compromise your ability to act in the best interests of LH and would have to be refused.

We also must ensure that any second jobs we take do not create any conflicts of interest.

Second Jobs We Cannot Accept

We cannot accept jobs as a consultant, director, officer, or part-time employee of any of the following:

- Competitors
- Subcontractors
- Providers
- Vendors
- Others seeking to do business with LH

For example, an employee cannot work part-time for a hospital, physician, or care facility. However, the Compliance Officer may approve exceptions if allowed under state or federal law.

SECTION 6

Dealing with Suppliers, Contractors, and Customers

Conducting business with suppliers, customers, and contractors can pose ethical or even legal problems. The following guidelines can help us make the right decisions in potentially inappropriate situations.

Kickbacks and Rebates

Do not accept any kickbacks or rebates connected to a purchase or sale of goods or services. These can take many forms are not limited to direct cash payments or credits. In general, it is prohibited if you or someone with whom you have a personal relationship could gain personally through the transaction.

A kickback could be disguised as:

- An offer for a significant discount on a new air conditioner for your home or your parent's home, in exchange for contracting with an air conditioning company for LH
- Use of ABC company's condo in San Diego for a vacation after you renew ABC's group plan
- A free night's stay at a hotel for you after you book a convention on behalf of LH

Reciprocity

LH may purchase goods or services from a supplier who also buys services from us. This practice is normal and acceptable, but any form of pressure for "reciprocity" from either part is not acceptable. Suppliers must not be asked to buy our products or services to become or continue to be an LH suppliers. Likewise, the sale of our products and services will not depend on an agreement that we purchase goods or services from the potential vendor.

Charitable Contributions

LH follows applicable anti-kickback rules when making charitable contributions. Anti-kickback rules prohibit money or gifts from going into personal accounts of the plan group benefits administrator in exchange for consideration for becoming or remaining a customer. Therefore, we as a company, and you as an individual, are not allowed to make or imply that charitable contributions will be made in exchange for an individual or a group becoming or remaining an LH customer.

Business Courtesies

A business courtesy is a gift or favor for which we pay nothing or less than fair market value. It may include such items as:

- Gifts
- Transportation
- Tickets
- Passes
- Promotional items

If you or your management is uncertain about accepting or giving a business courtesy, you should decline to do so. The Compliance Officer is available to assist you should you need additional guidance.

Acceptance of Business Courtesies

We can never accept money or solicit gifts or favors for personal use from suppliers, customers, contractors, or providers. We or someone with whom we have a personal relationship is permitted to accept business courtesies from a business or individual doing or seeking to do business with LH only if the courtesy is:

- Unsolicited
- Non-monetary
- Infrequent
- Inexpensive (not more than \$100 retail value)
- Acceptance is approved in advance, when possible, by management or the Compliance Officer.

Holiday Gifts

Gift-giving increases during the winter holidays. Members, vendors, and others express their appreciation for exemplary service and good working relationships. If you are ever unsure about a gift, contact the Compliance Officer for guidance.

Exceptions

- We may distribute items, such as pens or coffee mugs, to local health plan customers or potential customers, as long as the value of the items is \$10 or less.
- We may not give gifts to union members or union officers.

SECTION 7

The Government is a Unique Customer

We conduct our government business with the highest degree of integrity and honesty.

An essential part of our business is the work we do for the government. This includes Medicare Part C and D and Florida State Medicaid. When we act as a government contractor, we have a duty to the government (along with the public at large) to perform with the highest degree of integrity. In addition, we must comply with the letter and the spirit of the laws and regulations that apply to our government contract business.

Doing business with the government involves unique laws and regulations that may not apply to our commercial business.

The False Claims Act is a federal statute that establishes “liability for certain acts” by any person who “knowingly presents or causes to be presented” a false or fraudulent claim. A false claim is not just the act of submitting a false claim for services to the government. Under this law, a false claim can include any action tied to seeking payment from the government. Violators of the False Claims Act may be required to pay up to three times the amount of damages sustained by the government. In addition, they may be prohibited from participating in federal healthcare programs.

It is a crime to knowingly:

- Make a false claim for payment from the government
- Make a false statement to the government

Not following laws or regulations may result in criminal prosecution.

If you falsify data submitted to the government, even if you are not attempting to obtain payment, you and LH may have committed a crime.

You, as an individual, and LH, as a company, could be subject to:

- Criminal prosecution for the violation
- Large penalties and fines
- Inability to work on government projects in the future.

The federal government has special laws and regulations regarding cost accounting and cost charging. Consider the following:

1. Cost Records, Price Estimates, and Time Charging

We are required to keep accounting and other records and provide the government access upon request. This allows the government to verify its payments to us for work done on existing contracts. This also helps verify our cost and pricing estimates on future contracts. Therefore, we must:

- Maintain accurate and truthful records
- Keep records for a minimum of 10 years, or longer depending upon contract provisions
- Charge all costs and labor accurately to the appropriate account, regardless of the status of the budget for that account

All submissions to the government must be accurate and timely and must meet any applicable government healthcare program requirements. All employees who prepare, sign, or in any way support certifications and representations share the responsibility for careful and accurate document preparation.

SECTION 8

Treat Government Investigations/Audits as Serious Matters

Occasionally, LH may be asked to participate in a government investigation, audit, or respond to a request for information about how we conduct our business. The request may come through official channels from the government to LH management. It could also come from a member of an enforcement agency, such as the Federal Bureau of Investigation, the Office of Inspector General, the Department of Justice, or the Florida Attorney General, to an employee individually.

How should we respond?

- When LH receives official requests for information or cooperation, we notify the appropriate employees of their responsibilities and duties to cooperate and provide such information.
- If you are contacted individually by government investigators and are asked to meet with them individually to discuss activities in connection with your employment, you may do so. The decision of whether to cooperate with them inure is up to you alone, and you will not be disciplined, punished, or otherwise retaliated against if you decide to do so.
- As LH may have certain rights and privileges concerning the Information you may be asked to provide, you should contact the Compliance Officer or LH legal counsel to let them know you have been contacted by the government.
- If you decide to speak with government investigators, you must be accurate and truthful in your answers to their questions. If you are not, you and LH could be subject to criminal prosecution.

SECTION 9

Fraud, Waste, and Abuse (FWA) Prevention, Detection, and Correction

LH is committed to delivering affordable healthcare solutions to our customers. This is reflected by detecting, correcting, and preventing FWA. The efforts undertaken in these processes are collaborative and involve training and education, monitoring, auditing, the Special Investigations Unit (SIU), and more. All activities are consistent with applicable laws, regulations, and government healthcare program requirements. It is everyone's responsibility to report suspected FWA immediately.

The SIU investigates allegations of FWA concerning:

- Provider and member claims
- Over- and under-utilization
- Misrepresentation of member application information
- Suspected FWA for the above circumstances can be reported by sending an email to SIU. You can attach any supporting documentation or evidence. The SIU maintains a dedicated hotline for reporting suspected FWA. The FWA hotline number is:

English speaking USA and Canada: 844-222-1593

Spanish speaking USA and Canada: 800-216-1288

Spanish speaking Mexico: 01-800-681-5340

French-speaking Canada: 855-725-0002

While we encourage callers to leave as much information as possible, they can choose to remain anonymous.

Other types of FWA, such as internal FWA or employee wrongdoing, can be reported by calling the Compliance Hotline. You can remain anonymous. The Compliance Office may work with other company departments, such as Human Resources, when investigating these different types of fraud and abuse. Examples include:

- Misuse of corporate assets
- Financial reporting misrepresentations
- Financial fraud
- Other types of fraud or abuse involving employees' actions.

SECTION 10

Safeguard LH Assets

Do not use company assets or LH's electronic communication systems for personal reasons.

In general, company assets and electronic communication systems should be used for LH business purposes only. The corporate policy allows use for incidental personal use on a break or lunch hour in some instances. Using company assets and electronic communications systems for personal financial gain is prohibited and goes against our values.

Electronic Communications

Electronic communication systems include, but are not limited to:

- Email from the desktop and on mobile devices
- Internet use, including social media such as Facebook, Twitter, Instagram, YouTube, and Pinterest
- Faxes
- Instant Messaging (IM)
- Simple Messaging System (SMS)
- Media Messaging System (MMS)
- Secure File Transfer Protocol (SFTP)
- Any other electronic communication methods employed by LH

Do not use company electronic systems for personal use, except as permitted by the company. In addition, do not use company electronic systems to conduct any business other than LH business under any circumstances.

Did you know LH assets include:

- Our time
- Office supplies
- Computers
- Telephones
- Copy machines
- Computer software

Please use these assets according to corporate policies, which, in some instances, may permit incidental personal use on a break or lunch hour or when you receive prior management approval.

SECTION 11

Our Greatest and Most Valuable Asset is Our Workforce

LH is committed to maintaining a safe and professional working environment for all our employees and ensuring that all employees are treated with fairness, dignity, and respect. We believe in and adhere to treating others the way we want to be treated.

To comply with this section, observe all government regulations and rules that protect workplace health and safety. To protect our employees, we take the following steps:

- Security badges must be worn and visible at all times.
 - Employee badges serve as a simple way of instant identification for everyone in the building. Our safety increases when employees can tell at a glance who does and does not belong in the building.
 - In addition, wearing a badge helps to ensure we do not accidentally get locked out of our work area when visiting the common areas. This is particularly important when working after standard business hours.
 - When we forget to bring our badge, we must obtain a temporary badge from Security to work anywhere in the building. This badge will be programmed with our access hours for just one day and must be returned to Security at the end of the day.
- Visitors must sign in and be escorted while walking around our building.
 - If a consultant has a business agent agreement (BAA) with us, an access ID card is provided that allows them access to specific areas of the building. An escort is not needed when there is a BAA with the visitor. We can tell when a visitor has a BAA with us when they have an access ID card visible on them.
- Provide a drug-free work environment. All employees shall comply with LH procedures on drug usage and testing.
- Provide a workplace that is free of discrimination and harassment based on race, color, national origin, sexual orientation, gender identity or expression, genetic information, religion, age, sex, physical or mental disability, marital status, pregnancy, protected veteran status, or any other classification protected by law.

Inappropriate conduct also includes workplace violence, such as threats of violence or violence directed toward co-workers, or LH, or “stalking” behavior committed by or directed toward employees.

While on LH work premises (buildings, parking lots, company vehicles), we are prohibited from possessing weapons (including lawfully authorized concealed weapons), explosive devices, or other items that could reasonably be used to harm others.

All officers, directors, board members, and employees of LH are also prohibited by federal law from continuing employment or service with the company if they have been indicted or convicted on certain types of criminal or misdemeanor charges, on either the state or federal level, without approval from Legal and Human Resources. For this reason, all officers, directors, board members, and employees are required to report any criminal felony charge, indictments, plea agreements, convictions, or violations of insurance law to Human Resources or the Compliance Officer within 10 days.

All officers, directors, and employees who hold medical credentials, such as MD, RN, PT, and R.Ph, and have a change in status for that license must report the change immediately to Human Resources.

Board members and Officers must report bankruptcy, receivership, or license revocation proceedings for any business in which they serve as an officer or board member to the CEO within 10 days.

Obligation to Report and No Retaliation

We all contribute to an ethical culture for LH when we report misconduct. Therefore, when making a report, you will not be required to reveal your name, and if you make the report in good faith, you are protected from retaliation. However, if you know or should have known of an actual violation of this Code, law, or regulation and you fail to report it, you will be subject to appropriate discipline, up to and including termination.

This Code is not a complete list of potential legal or ethical situations you may encounter. Therefore, it should be liberally interpreted in favor of the highest standard of behavior.

REVISION HISTORY

| Date | Revision # | Description of Change |
|----------|------------|------------------------------------|
| 10.01.21 | 0.0 | Creation |
| 06.10.22 | 1.0 | Annual Policy and Procedure Review |
| 10.04.23 | 2.0 | Annual Policy and Procedure Review |