

Altai Health Solutions

Code of Conduct

Leading with Integrity

Created and in effect as of

November 1, 2022

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A Letter From Our CEO on Leading By Our Values

At Altais Health Solutions, *how* we conduct our business is just as important as *what* we do to ignite an exceptional healthcare system that cultivates the health and well-being of physicians, patients, and the clinical community.

In fact, we've built our reputation based on our actions. We have built strong, lasting relationships with our patients, members, partners and communities by earning their trust, providing outstanding service, and acting with integrity in all that we do together.

Altais Health Solutions' continued success and the ongoing fulfillment of our mission is dependent on each of us individually dedicating ourselves to ethical business conduct and modeling a culture of integrity and compliance with the law and our policies. These principles are the foundation of our Code of Conduct as well as our compliance and ethics program.

Our Code of Conduct serves as our "playbook" by providing guiding principles for how we should conduct our business, giving examples to assist us in applying those principles, and providing contact information to help us seek additional guidance. You have my word that reports of actual or suspected violations will be treated confidentially to the extent possible, and no one who suspects a violation and reports it in good faith will be subject to retaliation for doing so. I encourage you to discuss any questions or concerns you may have about the Code of Conduct with your leader or our People and Engagement team.

Please join me in renewing our unwavering commitment to safeguarding Altais Health Solutions' most valuable asset – our reputation for integrity.

Thank you for making a statement with your actions.

Sincerely,



Dr. Nishant Anand

Chief Executive Officer, Altais Health Solutions

Living our Values

Our Mission

Our mission is “to ignite an exceptional healthcare system that cultivates the health & wellbeing of physicians, patients, and the clinical community.” To create better experiences for patients, by creating better experiences for physicians and clinicians. We transform patient care for improved health outcomes at an affordable cost and accelerate the improvement of the physician and patient experience and value-based care.

Our Values

We are **Bold**. Ready to challenge; we relentlessly pursue the fundamental changes that true progress requires.

We **Co-Create**. Together we go further; in partnership we solve bigger challenges and reach more ambitious goals.

We are **Compassionate**. Led by the heart; we serve others through the lens of understanding, care and support.

We are **Honest**. Governed by truth; we communicate with candor, transparency and respect

We are **Curious**. Driven to learn; we leverage knowledge and experience from the world around us.

We are **Accountable**. Honoring our commitments; we deliver on our promises and always ask “what more can we do?”

Introduction

Integrity Is Our Foundation

At Altai Health Solutions (“Altai Health Solutions”), we are firmly committed to doing the right thing and conducting ourselves with the utmost integrity. The success of Altai Health Solutions and the heritage of our brand depend on each of us to build trusting relationships with our fellow team members, plan members, patients, business partners, regulators and the communities we serve. To achieve our Mission, we conduct our business activities in an honest, fair and ethical manner. Beyond compliance with the letter of the law, we strive to “do the right thing.” Our values help us to understand what it means to do the right thing. By living our values, we will act with integrity.

We are operating in an environment where the rules that govern business conduct are more scrutinized and demanding than ever. Integrity is at the core of everything we do to advance our Mission and it is reflected throughout our values. It requires a foundational commitment from each of us; team members, officers, directors and business partners—to conduct our business honestly and ethically regardless of the situation, location or business unit. Our continued and future success will be determined by the commitment we make to living and leading by our values.

Our Code of Conduct

Altai Health Solutions' Code of Conduct details the fundamental principles, values, and ethical framework for all team members. The objective of the Code of Conduct is to articulate broad principles that guide all team members in conducting their business activities in a professional, ethical, and legal manner. The Code of Conduct provides guidelines for business decision-making and behavior, whereas Compliance Policies and Procedures are specific, and address identified areas of risk and operations.

Altai Health Solutions' Code of Conduct is the keystone to our values, principles, expectations, and our corporate philosophy. Our mission is to provide superior, coordinated, and comprehensive medical services, as well as providing excellent healthcare, product choice, and value to our patients through clinical integration, innovation, and technology.

Altai Health Solutions is committed to maintaining the highest level of integrity, ethical and compliant conduct standards, and following all federal and state laws and regulations and expects all team members to hold themselves to the same standards.

The Code of Conduct is vital to how we achieve our mission and vision and emphasizes that our work is accomplished in an ethical and legal manner. We operate with the highest principles and standards, and conduct our work with integrity, collaboration, and compassion.

The Code of Conduct at Altai Health Solutions:

- Represents our values and beliefs
- Guides our decision-making in our work
- Establishes and promotes the highest standards for ethics and integrity

Our Code Applies to Everyone

Yes. Compliance with the Code of Conduct is everyone's responsibility. It is every individual's responsibility to act ethically and report any potential violations.

Altai Health Solutions expects all team members to conduct themselves in a professionally responsible and ethical manner. In this regard there are certain rules that all Altai Health Solutions team members must know and follow. The Code of Conduct is designed for the protection of Altai Health Solutions team members, and for the good of the organization as a whole.

All Altai Health Solutions team members are expected to:

- Complete new hire and annual compliance training
- Be familiar with company policies and procedures and know where they can be found
- Communicate any concerns or issues that may violate policies and procedures
- Refuse to participate in illegal or unethical acts
- Cooperate with investigations of potential violations and noncompliance
- Protect Altai Health Solutions' reputation and assets

Failure to comply with the Code of Conduct is a serious violation. Individuals found in violation of the Code of Conduct may be subject to corrective action, up to and including termination.

Who are we referring to?

In this Code, when we talk about our “**business partners**,” this includes our providers, suppliers, vendors, producers, service providers, consultants, contractors, subcontractors, agents and anyone who may perform services or activities on our behalf.

“**Altai Health Solutions Affiliate**” means any organization that is an affiliate or subsidiary of Altai Health Solutions.

“**Team members**” means Altai Health Solutions team member, officers, members of the Board of Directors, and contingent workers (leased workers, independent contractors and consultants). “Leased workers” are team members of another company, such as a staffing company or a professional employment company, who provide services to Altai Health Solutions on assignment.

“**Managers**” means all individuals at Altai Health Solutions, regardless of title, who exercise supervisory responsibilities over another team member. In short, the term “managers” means people leaders.

Following the Code of Conduct

The Code of Conduct might not apply to every situation in your work, and it is not possible to list all unacceptable forms of behavior in the workplace, but the Code of Conduct provides general direction on a broad range of issues.

All team members have an affirmative duty to report all suspected violations of the Code of Conduct to People & Engagement and/or the Compliance department, depending on the type of issue being reported. In the event any person wishes to remain anonymous, they may use Altas Health Solutions' confidential reporting hotline. The purpose of the hotline is to ensure that there is a private line of communication for compliance issues throughout the organization.

Where to find more information about the Code of Conduct

- Contact your direct manager
- Contact the Compliance Department or People & Engagement
- [Altas Intranet Compliance Site](#)

Respect Confidentiality, Privacy, and Security

Much of the information we handle is confidential and sensitive and is protected by privacy and security laws. We must maintain the integrity of confidential and sensitive information and follow company policies and procedures when handling it.

When handling Protected Health Information (PHI), it is essential to:

- Preserve the integrity of the data
- Preserve the trust of our patients and provider community
- Comply with privacy and security laws and regulations, as well as company policies

Team member should always:

- Use “#secure” in the subject line when sending PHI to someone outside Altas Health Solutions
- Access only the minimum amount of information necessary to do your job
- Remember not to share passwords or allow non-Altas Health Solutions team member to access information unless authorized to do so
- Transmit confidential information appropriately, including only transmitting PHI on approved electronic devices
- Keep electronic devices password protected and secure
- Log off your computer when not in use
- Ensure paper PHI is properly disposed of

Additional Expectations of Managers

Our managers have heightened obligations as senior custodians of our Company values and culture. Managers are expected to personify our values, set the proper tone-at-the-top and model integrity-based conduct for the Company. As with all Altai Health Solutions team members, this includes acting promptly when becoming aware of something that may violate the Code of Conduct, our policies or the law. As a manager, you must also make sure that the Code of Conduct is clearly communicated to all those who you lead, including leased workers, contractors and other business partners, so they understand how to conduct themselves in a manner that reflects the highest ethical standards and complies with our Code of Conduct. You must also ensure that your team members complete all required training.

Most importantly, since most inquiries and reports are made to direct managers or other leaders, it is imperative that you create an environment in which people feel comfortable raising issues and that you properly and promptly act on such reports. You should foster an open working environment that encourages team members to come to you with any questions, concerns or reports. When team members approach you, you should listen, act on the raised concerns and promptly respond. This includes promptly reporting actual or potential Code of Conduct, policy or legal violations to Compliance or another appropriate resource listed in this Code of Conduct. When possible, you should also seek out opportunities to routinely communicate and discuss ethical conduct, difficult decisions or other challenging situations with your team members.

Compliance with the Law and Altais Health Solutions Policies

Altais Health Solutions is subject to a wide variety of federal, state, and local laws and regulations. We are all expected to comply with these laws, and with Company policies that apply to our work, and we are each responsible for asking questions when we are uncertain about the legality or propriety of particular conduct. If you are ever in doubt about any action, be sure to seek guidance from your manager or Compliance before proceeding. If you are concerned about the legality of an action or decision, you should consult an attorney in Altais Health Solutions' Law Department. No instruction, excuse or pressure justifies breaking the law or encouraging someone else to do so. Wherever Altais Health Solutions has an internal policy that is stricter than what is required by law, you are expected to follow Altais Health Solution's policy and standards.

Altais Health Solution's Code of Conduct is the foundation of our Compliance Program, which is designed to prevent, detect and remediate unlawful and unethical conduct by Altais Health Solutions team members, as well as to promote a corporate culture of integrity. In doing so, the Code of Conduct is designed to create an environment that facilitates the reporting of actual or suspected violations of the Code of Conduct and other misconduct without fear of retaliation. Reporting misconduct demonstrates transparency, responsibility and integrity to other team members, business partners, Board members and our patients. It also serves to protect our Company, brand and reputation. We all "own" compliance and integrity with our daily conduct and decisions.

The Code of Conduct is led and administered by Altais Health Solution's Chief Legal Officer, who makes regular reports to Altais Health Solution's Board of Directors regarding the operations and effectiveness of the Code of Conduct. The Chief Legal Officer works closely with Altais Health Solution's senior leaders, legal professionals and team members representing various areas across the enterprise.

Discipline

Individuals who violate Altais Health Solution's Code of Conduct, Company policies or the law, or any managers who fail to appropriately oversee compliance by those they supervise, are subject to investigation and disciplinary action up to and including termination of employment, assignment or contract, as applicable. Depending on the Code of Conduct violation, misconduct and circumstances, a criminal referral and reports to law enforcement or government agencies may also be warranted.

Performance Improvement may include, but is not limited to, verbal counseling, written warnings, final warnings, suspension, or termination. Altais Health Solutions policy does not require the performance improvement to be taken in any formal steps or order and recognizes that the determination of appropriate discipline will depend upon the facts and circumstances of the situation. Altais Health Solutions team member may be subject to

performance improvement action up to and including termination for failing to participate in Altais Health Solutions' Compliance efforts. Appropriate discipline will be determined based on the facts in the case. The following are some examples of conduct subject to enforcement and discipline:

- Failure to perform any required obligation relating to the Compliance Program or applicable law, including conduct that results in violation of any federal or state law relating to participation in federal and/or state health care programs.
- Failure to report violations or suspected violations of the Compliance Program or applicable law to an appropriate person or through the Compliance Hotline.
- Conduct that leads to the filing of a false or improper claim or that is otherwise responsible for the filing of a claim in violation of federal or state law.

Enforcement and Discipline

Altis Health Solutions prohibits any illegal conduct that impacts the operation, mission or image of Altis Health Solutions. Any team member or contractor engaging in a violation of laws or regulations (depending on the magnitude of the violation) may have their employment or contract terminated. Altis Health Solutions shall accord no weight to a claim that any improper conduct was undertaken "for the benefit of Altis Health Solutions." Illegal conduct is not for Altis Health Solution's benefit and is expressly prohibited.

The standards established in the Compliance Program must be fair and consistently enforced through disciplinary proceedings. These shall include the following:

- Prompt initiation of education to correct the identified problem.
- Disciplinary action, if any, as may be appropriate given the facts and circumstances of the investigation including oral or written reprimand, demotions, reductions in pay, and termination.

In determining the appropriate discipline or corrective action for any violation of the Compliance Program or applicable law, Altis Health Solutions does not take into consideration a particular person's or entity's economic benefit to Altis Health Solutions.

Using the Code of Conduct as Your Guide and Asking for Help

Choosing the Right Course

To choose the right course, you should understand our Company values, our Code of Conduct and our policies. You should carefully consider your options in each situation while exercising values-based discretion and good judgment. If there is a law, Company policy or Altais Health Solutions value to guide your decision making in a particular situation, you should follow it. If there isn't, you may find it helpful to ask yourself the following basic questions when thinking through a decision:

Is this action honest and ethical in all respects? Is it consistent with our Code of Conduct and values?

- Would Altais Health Solutions lose patients and business partners if they knew that the Company engaged in this activity?
- Would I be comfortable explaining my action to my team, my colleagues, my family and my friends?
- Would I or Altais Health Solutions be embarrassed if the situation became public? How would I feel if my action were reported on the front page of the local newspaper?
- Do I have all of the facts? Do I have enough information to make a good decision?

If your questions are not fully addressed by our Code of Conduct and policies, you should discuss the situation with your manager. You may also consult additional company resources, such as Altais Health Solutions Compliance, Law, Finance and People & Engagement, for further guidance. While you are always encouraged to speak with your manager to seek clarity and direction, our Compliance resources are available to you at any time to ask questions, obtain more information or report a concern.

Raising Concerns

Raising concerns can help our Company to reduce risks, improve processes and solve problems. We should never hesitate to report actual or potential violations or to ask questions about compliance issues at any time, whether the issues involve your own activities or the activities of others.

How to Report Violations

If you see something, say something. We all have a duty to report suspected or potential inappropriate behavior and noncompliance. Altais Health Solutions encourages a “speak up” culture which fosters an ethical and compliant organization. All Altais Health Solutions personnel must report actual or potential violations of the Code of Conduct. We encourage our business partners to likewise report actual or potential violations of the Code of Conduct to Altais Health Solutions. In many cases, your manager is likely to be the person who can assist you with questions and concerns. Sometimes, however, it may be more appropriate to direct your question or concern to someone else. You may seek guidance from, or make a report to, any of the following resources:

- Direct supervisor or manager
- People & Engagement
- Compliance & Legal Department
- [The Compliance Department's Altais Intranet Site](#)
- Corporate policies and procedures
- Compliance Hotline at (888) 201-7305 or www.altais.ethicspoint.com
- Team member Handbook

Altas Health Solution's compliance hotline is available 24 hours a day, seven days a week, 365 days a year. This hotline provides you with a confidential and anonymous way to raise concerns, and it is always available if you are uncomfortable or unsatisfied using one of the other resources identified in this Code. When you call Altas Health Solution's hotline, a trained specialist will speak with you and prepare a summary of your call. You may choose to remain anonymous, in which case the report will not identify you, although providing your name will assist us in more effectively investigating your concerns. Altas Health Solutions strictly enforces a non-retaliation policy for raising concerns in good faith.

Internal Investigations

Altas Health Solutions takes all reports seriously and welcomes the opportunity to resolve problems that may arise and take steps to prevent them from recurring. If Compliance undertakes an investigation, whether it is conducted by Compliance, another Altas Health Solutions resource or authorized outside parties (e.g., external investigators or outside counsel), we are all expected to fully cooperate and assist in the process. To safeguard the integrity of the investigation process, it is important that you maintain the confidentiality of investigation-related information, as instructed.

All Compliance investigations will be conducted and documented in accordance with Altas Health Solution's Compliance investigation protocol. Altas Health Solutions team members are not permitted to conduct their own investigations, and we each have an obligation to assist Company investigations and provide information in an open, honest and transparent manner. If an allegation is made against you, you must fully cooperate with the investigation and refrain from interfering with the investigation or otherwise acting improperly. Altas Health Solutions relies on us to trust the process and support investigations to determine the relevant facts.

When you make a report, your confidentiality and/or anonymity will be safeguarded to the extent possible. We endeavor to conduct all investigations in a discreet manner. Altas Health Solutions has and enforces a strict non-retaliation policy for raising or reporting concerns in good faith. Where practicable and permissible, Altas Health Solutions will endeavor to keep the person reporting the matter apprised of the progress and outcome of the investigation.

Corrective & Disciplinary Actions

If corrective or disciplinary actions are required as a result of an investigation, Altai Health Solutions management will determine the proper corrective actions to take, including legal action when appropriate. Each situation or investigation will be defined by its unique facts and circumstances, which will be appropriately factored into any corrective or disciplinary decisions.

Protection against Retaliation

Altai Health Solutions is committed to creating a work environment that protects all team member from making a good faith effort in reporting inappropriate or noncompliant activities, or when team member refuse to participate in wrongdoing. Altai Health Solutions prohibits any retaliation of any kind against anyone who makes a good faith effort to report suspected noncompliance or participate in an investigation or audit.

Altai Health Solutions takes all reports of violations, suspected violations, questionable conduct or practices seriously. Verbal communications via the Compliance Hotline and written or verbal reports to managers or supervisors or anyone designated to receive such reports shall be treated as confidential to the extent permitted by applicable law and circumstances. The caller/author need not provide his/her name. Supervisors and managers who receive complaints of misconduct must immediately report such complaints to People & Engagement or the Compliance Department.

Altai Health Solution's "Open Door" policy encourages team member to discuss issues directly with their managers, supervisors, the Compliance Department, People & Engagement, or members of the Leadership Team. These channels of discussion provide for confidentiality to the extent allowed by law.

If you seek advice, raise a concern or report misconduct, you are doing the right thing. The commitment to our Company values includes providing an environment for all Altai Health Solutions team members to express their concerns and report actual or suspected misconduct without fear of retaliation. Altai Health Solutions will not tolerate any form of retaliation for team members who, in good faith, raise a concern, report an actual or potential violation of law, the Code or Company policy, or participate in an investigation. Retaliation is any action that affects the terms or conditions of employment (e.g., termination, suspension, demotion, or reduction in compensation or responsibilities) due to raising a concern, making a report or participating in an investigation. "Good faith" does not mean that your report is true or that the allegation is ultimately substantiated, but rather that you are providing all of the information you have and that you believe it may give rise to an actual or potential violation or misconduct. Any person who retaliates or threatens to retaliate against an individual for raising a concern, reporting an actual or potential violation, or participating in an investigation will be subject to disciplinary action, up to and including termination of employment. Altai Health Solutions team members who are aware of an active compliance investigation must refrain from questioning anyone in an effort to determine who may have reported the possible violation or

otherwise interfering with the investigation, as such behavior could compromise the integrity of the investigation or appear to be a form of retaliation. If you feel that you or someone else has been retaliated against for raising any legal, Code of Conduct or Company policy issue, you should contact Compliance or People & Engagement.

Whistleblower Protection & Reporting

Altai Health Solutions require directors, officers, team member, contractors and agents to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As team member and representatives of the Company, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations. Team members are expected to report any reasonable non-compliance, suspicious, or illegal activity (or suspected) to the People & Engagement Organization or your supervisor/manager. This policy is also to promote open, honest, and accountable management of resources. Any activities in violation of state or federal law or regulations, including but not limited to, harassment or discrimination, corruption, malfeasance, bribery, theft of property, fraudulent claims, coercion, malicious prosecution, misuse of property or protected health information or willful omission to perform duty or is economically wasteful or involves gross misconduct, incompetency or inefficiency.

No team member, contractor or agent who in good faith reports a violation of the Policy shall suffer harassment, retaliation or adverse employment consequence.

To ensure a means of reporting potential issues and noncompliance, Altai Health Solutions has a Compliance Hotline to provide team members, subcontractors, physicians, and other individuals with a means to make anonymous telephone calls to report compliance concerns. The hotline provides an anonymous reporting mechanism for individuals to report compliance issues in a variety of methods, including a method for anonymous and confidential good faith reporting. This policy documents the process from when a call is made to the compliance hotline to when it is resolved.

To communicate compliance concerns to Altai Health Solutions anonymously, contact our third-party hotline service called **EthicsPoint**. Anonymous reports may be submitted to EthicsPoint by using one of the following methods:

Online: Go to www.altais.ethicspoint.com and submit a report. You can also call the toll-free hotline at 888.201.7305

The information you provide will be sent by EthicsPoint to Altai Health Solution on a confidential and anonymous basis if you so choose. The hotline is available 24 hours a day, 365 days a year.

Team Members may also communicate compliance concerns to the Chief Legal Officer (CLO) by email, by telephone or in person.

Providing a Safe and Supportive Environment of our team members

Altas Health Solution's people are what make this be a place where people love to work and provider's love to practice. Altas Health Solutions maintains a strict policy prohibiting harassment against team members, applicants for employment, people providing services in the workplace pursuant to a contract, vendors, unpaid interns or volunteers based on any legally-recognized basis, including, but not limited to, their actual or perceived race, religion or religious creed, color, national origin, ancestry, physical or mental disability, medical condition, genetic information, marital status (including registered domestic partnership status), sex and gender (including pregnancy, childbirth, lactation and related medical conditions), gender identity and gender expression (including transgender individuals who are transitioning, have transitioned, or are perceived to be transitioning to the gender with which they identify), age (40 or over), sexual orientation, Civil Air Patrol status, military and veteran status, immigration status, national origin or any other consideration protected by federal, state or local law.

Altas Health Solutions does not tolerate harassment, and harassment of any kind is prohibited and against company policy, whether the harassment was intended or not. If you are harassed, please immediately report it to your direct manager the People & Engagement Department, the Compliance Department or the Compliance Hotline

Respect for Diversity & Equal Opportunity

As an employer, Altas Health Solutions attracts the most talented people from all walks of life. We provide an environment in which everyone who chooses to join our team can compete and succeed according to their merit, skills and abilities. We encourage everyone who works for Altas Health Solutions to make meaningful contributions and be recognized and rewarded accordingly. All Altas Health Solutions team members should expect to be treated with dignity and respect regardless of their backgrounds or position within the firm, and all personnel share the responsibility of maintaining an environment based on mutual respect.

Altas Health Solutions respects and values the diversity reflected in our various backgrounds, experience and ideas. Altas Health Solutions is committed to providing equal opportunity in all employment practices, including hiring, work assignment, promotion and compensation decisions. We make employment decisions without regard to any personal characteristic or factor protected by applicable local, state or federal law, including race, color, national origin, ancestry, religion, creed, gender or gender identity, sexual orientation, age, marital status, pregnancy, physical or mental disability, medical condition and veteran status, among other protected groups. Altas Health Solutions does not tolerate discrimination on the basis of any classification protected by law.

Altas Health Solutions further embraces our legal obligations associated with our Affirmative Action Program, which promotes hiring, advancement and contracting with certain protected categories of individuals. We believe that doing so is the right thing to do and is good for our business. For further information, please contact People & Engagement.

Preventing Harassment

When someone is subjected to inappropriate conduct that interferes with his/her ability to perform their job, we all suffer. We all have a right to work in an environment free from harassment of any kind. Our policies strictly prohibit harassment based upon legally protected classifications and we are firmly committed to a workplace in which all individuals are free from inappropriate conduct that creates an intimidating, hostile or offensive work environment. Harassment may take many forms and includes both physical actions and verbal remarks, regardless of whether they are done by, or directed to, a team member or non-team member (such as patients, contingent workers, business partners and visitors, among others) and regardless of intent. Harassment can take the form of overt sexual advances, offhanded remarks or jokes, offensive gestures, visual displays, physical or intimidating conduct, and threats and demands, among other actions. Sexual harassment, in particular, involves unwelcome sexual advances, requests for sexual favors, and other physical or verbal conduct of a sexual nature. Altas Health Solutions strictly prohibits sexual harassment, particularly if used as a basis for employment decisions or when it interferes with a person's ability to do their job.

All of our team members patients, business partners and colleagues deserve to be treated with dignity and respect, and to be protected from offensive or degrading behavior. Harassment will not be tolerated regardless of whether you are on Altas Health Solutions premises or engaged in off-hours or off-site business-related functions, such as holiday parties or business travel. Regardless of where Company policy sets the bar with regard to prohibited inappropriate or harassing behavior, one may easily comply with our harassment related policies by asking oneself a few simple questions:

- Would you like a family member to be treated the same way?
- Would you behave the same way or say the same thing if a family member or our CEO were present?
- Would it embarrass you or Altas Health Solutions if your conduct was recorded and broadcast on the news?

If you observe, learn of or are subject to harassment, you should report it to your manager, People & Engagement, or Compliance. All managers should be familiar with our policies regarding harassment and their obligations for handling complaints and reporting policy violations.

Keeping Our Workplace Safe and Supportive

Altas Health Solutions is committed to providing a safe workplace and to enhancing the health and well-being of our team members. Our success in meeting this commitment depends on each of us doing his or her part. Altas Health Solutions provides the resources for an effective health and safety program, including a formal policy, relevant training, and specialists dedicated to ensuring a safe and healthy work environment. However, we all play a role in minimizing the likelihood of work-related injuries by acting in accordance with the law, Altas Health Solutions policy and sound judgment

Health & Safety

Altai Health Solution's greatest asset is its people, which means that health and safety are key priorities. For this reason, we are committed to pursuing all necessary health, safety, security and environmental standards. We comply with applicable health, safety and environmental rules and regulations, as well as all posted safety procedures within our areas of operation. We are all expected to report unsafe conditions, and Altai Health Solutions will never retaliate against a team member for bringing any such incident or condition to its attention. Altai Health Solutions prioritizes safety and follows the laws and regulations that govern health and workplace safety.

There are policies and procedures, tools, and equipment to help create a safe work environment. If you feel unsafe or see a potential hazard, please don't hesitate to contact your direct manager, People & Engagement, or the Compliance Department. Additionally, it is not permissible for any team member to:

- Possess, distribute, sell, transfer, use or be under the influence of alcohol or illegal drugs in the workplace
- Provoke a physical fight or engage in physical fighting during working hours or on premises owned or occupied by Altai Health Solutions
- Carry firearms, weapons or dangerous substances at any time, on premises occupied by Altai Health Solutions
- Use abusive, violent, threatening or vulgar language at any time during working hours or while on premises owned or occupied by Altai Health Solutions
- Intentionally destroy or threaten to destroy Company property or another's individual property
- Send inappropriate or threatening texts or social media posts to Altai Health Solutions team member, patients, providers, or business partners
- Engage in stalking of Altai Health Solutions team members, patients, providers, or business partners
- Make veiled threats of physical harm or similar intimidation against Altai Health Solutions team members, patients, providers, or business partners

We must work together to create a safe and secure work environment.

Drugs and Alcohol

Given that health and safety are top priorities, our workplace must remain free of the influence of alcohol, illegal drugs, misused prescription drugs or over-the-counter medications, and any other substance that may impair our ability to act safely and effectively while at work. This is true regardless of whether the use occurs during working hours, on Company premises or at Company-sponsored events. We must also not possess, sell, transfer or purchase any drugs, drug paraphernalia or alcohol during working hours or while on Altai Health Solutions premises or at Altai Health Solutions sponsored events. Altai Health Solutions recognizes an exception to this rule when alcohol is transferred in a sealed container as a permitted gift or is used in moderation at an authorized Company event. While it may be customary to have alcoholic beverages present at certain Company functions, this Code and our other rules and

policies regarding workplace conduct remain in effect and will be enforced regardless of where the events are held. We should be mindful that we represent Altai Health Solutions, our brand and our reputation at all times. Additionally, all Altai Health Solutions facilities and premises are smoke- and tobacco-free.

Workplace Laws

As part of our commitment to being a socially responsible company, we firmly support and uphold individual human rights in all of our operations, and we expect the same from all of our business partners. This means, in part, that we endeavor to provide reasonable working hours and fair wages for those who work on our behalf. Altai Health Solutions strictly prohibits the use of child or forced labor or human trafficking practices. We will not knowingly do business with business partners, vendors, suppliers or contractors who violate these practices. Given that Altai Health Solutions could be held accountable for the conduct of these parties, if you have reason to believe that any business partner or third party is engaging in any prohibited practices, you should promptly report the matter to your manager, People & Engagement or Compliance.

Solicitation of Colleagues

Altai Health Solutions is proud that many of our personnel give back to our communities through donations or volunteer work. While it may seem natural to ask those we know to participate, we should recognize that it may be uncomfortable, and even offensive, to be subjected to any pressure, however subtle, to participate in or support our colleagues' personal causes. Management may permit an occasional sale of products or solicitation for charitable purposes, provided that the activity does not interfere with business operations or pressure anyone to purchase a product or participate in a program. Requiring any Altai Health Solutions team members or other party to participate in non-work-related activities, whether inside or outside the office, is not permitted.

Promoting the Best Interests of Altais Health Solutions and our Constituents

We each have an obligation to act in the best interests of Altais Health Solutions. Promoting the best interests of Altais Health Solutions and our constituents is critical to our Mission, and how we promote these interests is just as important as the interests themselves. Our constituents include our team members, patients, business partners and communities, among others. Advancing and properly balancing the best interests of our Company and our various constituents spans across many subject matter areas, the most relevant of which we address in this Cornerstone.

Protecting our Reputation

Only authorized individuals may communicate to the public on behalf of Altais Health Solutions. Communication includes any form, including print advertising, publications, flyers, media, television, press releases, interviews, and social media channels maintained by Altais Health Solutions and/or its business partners.

All types of external communications must be reviewed and approved by the appropriate department(s). Some materials may need to be reviewed by Altais Health Solution's Compliance & Legal Department. If you receive a request for an interview, speaking engagement or social media interaction, please discuss it with your immediate supervisor / manager and/or the Compliance Department.

It is important not to copy any materials that have been produced outside of Altais Health Solutions and give them to patients without copyright permission from the owner.

Conflicts of Interest

Our actions, both inside and outside the workplace may directly or indirectly impact Altais Health Solution's integrity and reputation. The way in which we conduct our work should be performed fairly and objectively. Conflicts of interest arise when a person or organization is involved in multiple interests, financial or otherwise, and serving one interest could involve or complete against the other. Conflicts of interest can arise from vendor, team member, or financial relationships, often in a decision-making capacity where the outcome can be influenced. If conflicts of interest aren't handled correctly, Altais Health Solutions can be susceptible to fines, litigations, penalties, and loss of reputation with our patients, our regulators, and the public at large.

Conflicts of interest or unethical behavior may take many forms such as:

- Being employed (you or a close family member) by, or acting as a consultant to, a competitor or potential competitor, supplier or contractor, or other or persons.
- Serving as a board member for a competitor or potential competitor, supplier, or contractor
- Owning or having a substantial interest in a competitor, supplier, or contractor

- Having a financial interest or potential gain
- Accepting gifts, discounts, favors or services from a customer/potential customer, competitor or supplier

A conflict of interest occurs when our personal or family interests, relationships, outside activities, or the exchange of items of value influence, or appear to influence, our ability to do our jobs and make objective, sound business decisions in the best interests of Altais Health Solutions. In any organization, conflicts between personal and company interests inevitably arise. While we cannot always avoid actual or perceived conflicts of interest, we can minimize their harmful impact through the way we identify, disclose and address them.

“Items of value” are tangible and intangible benefits and favors, including cash, gifts, prizes, tickets, meals, entertainment, events, travel, transportation, lodging, goods, supplies and services of any kind, and special opportunities.

“Exchanging” items of value includes giving, offering, receiving and soliciting.

Our Company recognizes that we have a broad range of personal and community interests and involvement. We strive to strike the right balance between encouraging these pursuits and protecting our business, brand and reputation. However, if the interests of an individual and the Company collide, we must safeguard the interests of Altais Health Solutions and our patients. As you make decisions on behalf of Altais Health Solutions or participate in activities outside the workplace, you should be aware of our policies dealing with conflicts of interest. Most of the time, using common sense will result in the right answer. However, it is important to ask for help when you are uncertain of the right course of action.

Altais Health Solutions team members and business partners should be vigilant and sensitive to actual and perceived conflicts of interest. The mere appearance of a conflict of interest can be just as damaging as an actual conflict and can tarnish your reputation within Altais Health Solutions and the Company’s reputation for fair dealing. Therefore, any activity, personal interest, personal relationship or exchange of an item of value (that is not an “approved exchange”) that causes or could reasonably cause an actual or perceived conflict of interest must be promptly disclosed to Compliance through our established procedures and must receive prior written approval. If prior approval from Compliance is not received, the activity, personal interest or conflict in question may be prohibited pending further inquiry.

Some of the most common types of potential conflicts between one’s personal interests and those of the Company are described in the following sections.

How to handle conflicts of interest

You have the opportunity to disclose any conflicts of interest during the annual training period. However, this isn’t the only way to communicate a potential conflict of interest. If you believe you or others may have a conflict of interest, talk with your direct manager or the Compliance Department. Conflict of interest situations are often not obvious and should be reviewed on a

case-by-case basis. It's better to have the conversation with your manager or the Compliance Department as soon as a potential conflict of interest is realized. Contact the Compliance Department if you need to disclose a potential conflict. Upon hire and during annual compliance training, an attestation will be provided to you to complete. You must complete the attestation honestly, completely, and in a timely manner.

Outside Employment, Financial Interests & Other Activities

Altas Health Solutions encourages us to play active roles in our communities and in philanthropic, charitable, environmental or other outside organizations. Sometimes, however, outside activities or financial interests may create a conflict of interest or otherwise reflect negatively on Altas Health Solutions. Altas Health Solutions reserves the right to prohibit service for outside organizations after carefully considering the relevant facts and circumstances. Taking employment or a consulting engagement outside of Altas Health Solutions is permitted with the permission of your manager and Compliance only if all of the following conditions are additionally met:

- The assignment is not with, or in aid of, a Altas Health Solutions competitor, supplier, service provider, vendor or other business partner.
- The assignment does not adversely conflict or interfere with your Altas Health Solutions job performance, responsibilities, hours or duties.
- The activity or assignment does not require you to use Altas Health Solutions property, assets, equipment, facilities or information.
- In any publicity relating to the activity, you do not associate the entity with Altas Health Solutions without the Company's prior written approval.

Serving on the Board of Directors or a similar body of another organization is permitted only with prior written approval of your manager and Compliance and may also require specific actions to mitigate any real or perceived conflicts of interest. Such activities must not adversely interfere with your ability to do your job and must satisfy all of the requirements above.

Doing Business with or Supervising Family and Friends

Anytime we interact with family members, close friends or romantic partners in a business setting, there is the potential for a conflict of interest. To be the strongest possible organization, we must make our business decisions based on merit and in the best interests of Altas Health Solutions. Favoritism in contracting, hiring or other business and employment decisions that results from any factor other than performance diminishes our strength and deprives the most deserving parties of the opportunity to contribute.

A conflict of interest may arise if you, or your spouse, family member or close friend, have a personal stake in a company that is a Altas Health Solutions supplier or business partner, potential supplier or business partner, or competitor. In these situations, you must not use your position to influence the bidding process, negotiation or transaction in any way. If you are directly involved in supplier or business partner selection, you must immediately notify your manager and remove yourself from the decision-making process. If you have a family member, close friend or romantic partner who works for a competitor and the relationship may

give rise to an actual or perceived conflict of interest, you must also promptly notify your manager.

It is a conflict of interest to supervise someone with whom you have a romantic or close family relationship. Even if you are acting impartially, other team member may perceive favoritism or preferential treatment. Whether these relationships pre-existed or were recently formed, we should disclose the relationship so that we can take steps to appropriately manage the actual or perceived conflicts of interest and perceptions of favoritism.

Given that our managers are in a position of trust, it is improper for a manager to become romantically or sexually involved with someone he/she directly or indirectly supervises or who is in a subordinate position within their business unit or department. Similarly, an individual should not be placed in a position of direct or indirect decision-making authority over another if the two are family members, close friends or romantic partners. If these relationships exist or form, they must be promptly disclosed to the next-level manager, People & Engagement or Compliance so that the appropriate steps can be taken to protect the Company and our reputation.

Private Use of Corporate Opportunities

Through your work at Altai Health Solutions and contacts with our patients and business partners, you may learn of opportunities to provide a service, make a purchase or make an investment in which Altai Health Solutions may be interested. As team members, we owe Altai Health Solutions an undivided duty to advance its business interests when the opportunity to do so arises. Accordingly, if you become aware of an opportunity in which Altai Health Solutions may be interested, you must promptly disclose it to your manager or a member of senior management so that Altai Health Solutions can properly evaluate it. You may act privately on an opportunity discovered through your position with Altai Health Solutions only after Altai Health Solutions has had the opportunity to formally evaluate it and has officially declined the opportunity in writing. Additionally, using Altai Health Solutions resources or business partners to perform work for approved, non-conflicting outside business interests (either yours or a family member's) may occur only with prior written approval of your manager and Compliance. Similarly, we may never compete with Altai Health Solutions or its patients, either personally or by aiding a competitor. We should never use our contacts, resources or position within the Company, or the Company's assets, equipment or information, to advance our own business or financial interests or those of others for personal gain. For more information regarding Altai Health Solutions' conflict of interest guidelines, please refer to our Conflicts of Interest Policy.

Exchanging Gifts and Entertainment

Exchanging business gifts and entertainment is a customary practice throughout most of the world and promotes good working relationships and goodwill with patients, vendors and business partners. It may be customary and routine for certain business units to sponsor events, entertain patients, or provide business gifts or courtesies in certain circumstances. We also recognize that gift-giving is synonymous with the holiday season and even an expected

part of doing business during that time of year. In fact, we ourselves may receive gifts sent from patients, business partners and others during the holiday season. That said, this is another situation where actual or perceived conflicts of interest may arise.

Altas Health Solutions does not prohibit reasonable expenditures for gifts and similar or related expenses with a bona fide and documented business purpose. However, exchanging excessive or inappropriate gifts may give rise to actual or perceived conflicts of interest or, at worst, could be perceived or alleged to be bribes or kickbacks. There is a bright dividing line between exchanging customary or reasonable gifts on the one hand and exchanging unreasonable, excessive, lavish or inappropriate gifts on the other. It is illegal for health care providers to accept bribes or other kickbacks in return for generating federal health care business. Arrangements for recommending or orders products or services is strictly illegal and carry stiff penalties

Exchanging gifts, either directly or indirectly, is not appropriate if it creates an obligation on either party, puts the giver or receiver in a situation where either party appears to be biased, or is done with the intent to influence a business decision or transaction. For example, gifts that are excessive or accepted under certain questionable circumstances (e.g., when you are negotiating a contract with the giver) could create an actual or perceived conflict of interest.

Regarding the exchange of gifts or entertainment on behalf of Altas Health Solutions, either directly or indirectly, the following principles apply:

- We believe that we offer the best services in the industry. Any business, benefit or advantage that must be won by providing unusual or excessive gifts is business that we do not need.
- We must not do anything illegal, inappropriate or unethical.
- We must be aware of, and respect, our patients' and constituents' own rules, regulations and policies in these areas. Ask your customer or the intended recipient in advance about their policy on accepting gifts and entertainment.
- We must ensure that all expenditures are appropriately authorized and accurately recorded in our books and records.

What constitutes a gift?

Anything of value may be a gift. This includes tangible and intangible benefits and favors, including cash, prizes, tickets, meals or entertainment when the host does not attend, events, travel, transportation, lodging, goods, supplies and services of any kind, and special opportunities.

What constitutes entertainment?

Entertainment includes events where both the person offering and the person accepting attend. Examples include meals, sporting events and golf outings, among others. The legitimate purpose of exchanging gifts or entertainment must be to appropriately maintain or enhance the general business relationship as opposed to improperly influence any particular business decision or transaction. In general, exchanging items of value, whether gifts, entertainment or otherwise, is permitted if it is:

- Of a nominal value (e.g. pens, note pads, etc.)
- Irregular or infrequent.
- In good taste.
- Unsolicited.
- Not cash or cash equivalents (such as checks, gift cards, vouchers, etc.).
- Exchanged in a setting that is appropriate for a business discussion.
- Intended to reasonably and appropriately maintain or enhance the business relationship and is not directly or indirectly related to any particular business decision, transaction, or the exchange of any business advantage or benefit.
- Not in violation of any applicable law, regulation, policy or professional business decorum; and
- Something you and the other party would openly discuss with co-workers and others. If Altai Health Solutions is giving the item of value, gift or entertainment, the cost must be properly approved, expensed and documented.

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Items of Value for Government Officials

Stricter and more specific rules apply when we do business or interact with any local, state, federal or international government entity, agency, official or intermediary (i.e., third party). Various laws prohibit the exchange of any item of value to/from a government official, team member or intermediary. We must never offer, give, receive or solicit any item of value to obtain or retain any business, advantage or benefit. Due to the highly sensitive nature of these relationships and the complexity of the laws in this area, we should always review the applicable policy and seek advice from Altai Health Solutions Law or Compliance before exchanging any gift, hospitality or item of value, regardless of the cost or value, to government officials, team member or intermediaries. If you regularly interact with government officials or team member, or their intermediaries, you should familiarize yourself with and follow the relevant laws and regulations. Even if an applicable law, rule or custom appears to be vague, we must remain extremely vigilant and always conduct ourselves with the highest level of transparency and integrity. We must ensure that all of our business partners do the same, as their actions can be attributed to, or associated with, Altai Health Solutions and subject us to serious potential legal and reputational risks.

Receiving Items of Value

Regarding the receipt or solicitation of gifts, entertainment and other items of value, no Altai Health Solutions team member is authorized to accept or solicit any gift that could be perceived to improperly influence Altai Health Solutions' business or purchasing decisions, or any decisions on behalf of any customer or business partner. If you are offered an item of value that is inappropriate, you should politely decline. If you are unsure about whether you can accept a particular gift, invitation or item of value, you should ask your manager or consult Compliance for guidance. If you are not able to inquire in a timely manner, you should politely decline the offer.

For more information regarding approved and prohibited exchanges of items of value, please refer to our Gifts & Entertainment Policy.

Accurate Books and Records

Whether we realize it or not, each of us contributes in some way to creating Altai Health Solutions' financial statements, books and records. Whether you have prepared a timesheet, a statement of benefits or an expense report, or you have purchased goods or services, your actions contribute to the ultimate documentation of our books and records.

Business records should be maintained in accordance with regulatory requirements and company policy. Never dispose, destroy, or sabotage business records that are involved in litigation, investigations or audits. Refer to company or departmental policies and procedures for specific requirements on various business record retention requirements.

We are required to maintain and provide full, accurate, timely and transparent reporting of information about our Company and operations. To fulfill this obligation, every business record we create and approve must be accurate, complete and reliable. We have adopted specific policies and procedures to ensure that we make full, accurate and timely disclosures in our periodic filings with regulators, and to comply with our obligations under the law. Making or approving false or misleading records or documentation, or failing to properly disclose relevant items, undermines our ability to make good decisions and is strictly prohibited.

We must never do any of the following:

- Intentionally create a false or misleading record
- Knowingly make improper changes or false entries, or willfully fail to make correct entries, on any Company record or document
- Guess at an answer on a document
- Intentionally omit or conceal relevant information
- Create secret or unrecorded ("slush") funds or assets for any purpose

The integrity of our internal controls and procedures is only as strong as our environment of open communication and honesty throughout the organization. If you have concerns about any aspect of our financial reporting or any accounting, audit or internal control issues, you should report them to your manager, Compliance or People & Engagement.

Records Management, Retention & Disposal

Properly maintaining our business records is vital to our compliance with laws and regulations. However, knowing what documents and information to keep, and for how long, can be confusing. In fact, in the event of a lawsuit or investigation, we may be required to suspend usual document retention or disposal rules and preserve evidence. The consequences of a wrong decision, whether to retain too long or discard too soon, can be costly and subject the Company to serious risks.

All of our medical and business records must be retained and, when appropriate, disposed of in accordance with the law and Altai Health Solutions policy. This applies to paper-based and

electronic records regardless of medium, file format or storage location. In order to comply with all laws and regulations regarding records management, we have adopted records retention policies and procedures concerning the types of documents we are required to maintain, establishing retention schedules for each type of record and specifying circumstances, such as lawsuits or investigations, when it is necessary to maintain or segregate certain records.

Records that are under a retention hold must not be destroyed without the express written approval of Altais Health Solutions' Law Department

Money Laundering

In order to maintain our reputation for integrity and trustworthiness, we must ensure that our Company is never involved in money laundering activities, which are attempts by an individual or organization to conceal the origin of illegal funds. We must ensure that no funds transferred to, or through, our Company have an illicit origin by performing careful due diligence on all third parties and potential business partners who wish to do business with Altais Health Solutions. Some potential business partner or third-party warning signs that may warrant further inquiry are:

- The lack of an identifiable physical presence or address
- A convoluted or obscure business history
- A reticence to share financial or other material information

If you need more information about how to identify possible money laundering or have a specific concern that you wish to address, you should consult Altais Health Solutions Law or Compliance.

Protecting Altais Health Solutions' Assets

Altais Health Solutions' assets are essential to our competitiveness and success. Altais Health Solutions' facilities, equipment, materials, property, technology, information and brand have been acquired through the hard work of thousands of people over a long period of time. Company assets also include our intellectual property such as trademarks, patents, copyrights, trade secrets (e.g., patient roster, terms and conditions; rates and fees; and business and marketing plans), salary information, unpublished financial data and reports, and other forms of valuable confidential and proprietary information. All publications, materials, databases and other programs developed by or for Altais Health Solutions are intellectual property belonging to the Company. Altais Health Solutions property should only be used for legitimate business purposes, and we must take proactive measures to prevent its theft, loss, waste, damage, unauthorized access, use or disclosure, or misuse. These obligations continue even after our employment with Altais Health Solutions ends.

Loss or misuse of these assets jeopardizes our Company and ability to compete in the market, as well as the trust that our customer and business partners place in our care of their confidential information. If you access or disclose confidential information, be sure you have the right to do so as part of your official job responsibilities, and only access or disclose such information in accordance with the law and our policies. We must never use Altais Health

Solutions' confidential or proprietary information for our own personal benefit or for any unlawful or unethical purpose. Altais Health Solutions assets are to be used for official business purposes only. We must protect our resources against misuse, waste, damage, and loss. Do not use Altais Health Solutions assets for personal gain or benefit.

Confidentiality, Privacy & Security

Information is one of Altais Health Solutions' most valuable and essential assets. Handling it properly is critical to our success and protecting it is every workforce member's personal responsibility. All information maintained by the Company, regardless of format (electronic, paper, audio or video), is the property of Altais Health Solutions. Upon joining the Company, we each sign a confidentiality agreement that continues in effect even after our employment ends. Whether you are dealing with Company confidential information or sensitive personal information, you may only access, use or disclose information as authorized by the appropriate Altais Health Solutions manager and to the extent necessary to perform your official job duties on behalf of the Company.

Individually identifiable personal information ("IIPI") includes protected health information ("PHI") and other types of personally identifiable and/or sensitive information. In the course of our work, we obtain and access a great deal of information that is confidential and highly sensitive to our patients, personnel and business partners. Confidential information such as Altais Health Solutions' financial data and reports, strategies, initiatives and similar material should not be shared with anyone outside the organization without explicit approval from an appropriate decision-maker.

Properly serving our constituents requires that this information be adequately protected, both to safeguard individual and plan privacy as well as to comply with various local, state, federal and even international privacy and data protection laws. This includes contracting with and overseeing qualified business partners to whom such sensitive information may be disclosed for necessary business or administrative purposes. Examples of IIPI include, but are not limited to:

- Names, addresses, phone numbers, birth dates, driver's license and Social Security numbers.
- Credit card, banking and other financial information.
- Medical information, including treatment, health status and medical history.
- Claims payment and benefit information.
- Team member salary and earnings data; and
- Team member identification numbers.

Failure to properly access, use, manage, protect, disclose and dispose of IIPI can result in significant damage to the Company as well as a great deal of customer, workforce member or business partner inconvenience and distress. This includes the possibility of identity theft.

- Altais Health Solutions systems should never be used to engage in illegal or illicit activities and that violate Altais Health Solutions policies or damage Altais Health

Solutions' reputation. The following activities are not allowed on Altais Health Solutions electronic devices:

- Sending mass emails
- Gambling
- Bidding or purchasing items other than for Altais Health Solutions use
- Viewing pornography and other offensive, discriminatory, derogatory, or exploitive content
- Downloading or using software not approved by Altais Health Solutions IT
- Accessing social media for personal purposes

All information, data, and communications on Altais Health Solutions information systems are the property of Altais Health Solutions and are monitored and reviewed without consent or notice. Company proprietary information (i.e., sensitive or proprietary information about Altais Health Solutions or our business partners that is generally not known to the public) must likewise be protected from public disclosure and unauthorized internal disclosure. Examples include operational information, marketing data and sales information, group or provider records and contracts, pricing policies, information system and technical designs, business forecasts and strategies, and new business plans, among others. Public disclosure of this type of data could negatively impact the Company's competitiveness in the marketplace.

Strict privacy and data security laws, as well as Company policies, require us to properly secure our patients', team member', Company and other constituents' sensitive information and to collect, manage, safeguard, disclose and dispose of it in the appropriate manner. While Company policies can guide our actions, each of us must play our part and take common-sense steps to prevent the loss, manipulation or unauthorized access, use or disclosure of all forms of sensitive information. We must all be knowledgeable about our responsibilities to keep Altais Health Solutions' information systems and assets secure, and what to do if they are ever compromised. For additional information about confidentiality, privacy and security, please contact Altais Health Solutions' Privacy Office or IT Security Department.

Protection of Patient Health Information and Other Confidential Information

As a team member, you are responsible to protect Altas Health Solutions, confidential information as well as the privacy of patients and physicians. You are expected to comply with the Company's "Confidential and Proprietary Information, Non-solicitation & Conflict of Interest Agreement for Altas Health Solutions Team Members." Unauthorized access use or disclosure of protected patient health information (PHI) and other confidential or proprietary information are grounds for performance improvement up to and including immediate termination and/or legal proceedings.

"Confidential and Proprietary Information" includes, but is not limited to:

- Protected Personal Health Information (PHI) is individually identifiable medical information regarding a patient. This includes medical information pertaining to team member and their families as well as providers and their families.
- Information developed by or on behalf of Altas Health Solutions, such as financial information, billing information, marketing strategies, technological data and prototypes, team member information, research, pending products and proposals, and proprietary materials.
- Information of or concerning "third parties," including patients and physicians, medical groups and hospitals served by Altas Health Solutions, and financial and billing information.
- Information regarding terms of the relationships between Altas Health Solutions, its physicians, medical groups or hospitals, and health plans

Protection of PHI is a critical individual and company responsibility. Precautions must be taken to ensure that confidential information is protected and secured at all times. You are required, for example, to use the following practices when working with PHI and other confidential information:

- Access, use and disclose patient information only as authorized and as necessary to perform your job.
- Do not access, use, disclose or discuss patient information with anyone for non-business purposes.
- Do not access or perform work on your own records or records of family members unless it is in the authorized course of your job functions and complies with all department procedures.
- If at any time you improperly access, use or disclose Confidential & Proprietary information, you must notify your supervisor so that appropriate steps may be taken to remedy the situation.
- Secure and protect all PHI and other confidential information (e.g., claims and authorization forms) in a locked drawer or cabinet. Never leave PHI or other confidential information unattended or exposed at your workstation.
- Follow encryption protocols when emailing patient information to external parties.

- When transporting patient information for business purposes outside the office, you are responsible for keeping the information protected and secure until you return to the office. At no time should computers or documents be unattended.

Company Information Systems

Our Company information and communication systems, such as Internet access, e-mail, voicemail, instant messaging, our internal intranet sites, video/web conferencing and telephone services, are essential tools that support our business. We must use our systems consistent with our Company values and policies. We are each responsible for using Altais Health Solutions' network and computer systems ethically, professionally and legally.

These systems are intended for authorized Company business and are the property of Altais Health Solutions. Altais Health Solutions retains the right to monitor your use of its systems and to block, intercept or review any content or communications that occur on, or are stored in, Company systems. Workforce member privacy and confidentiality are not guaranteed when using these systems and you should not expect them to be. Since the contents of e-mail and voicemail can be accessed by management without prior notice, and since management can monitor our use of computer network systems, we should not use any of the systems to engage in conduct or transmit messages that we would not want to be viewed by management.

While you may use the Company's systems for incidental or occasional personal use, you must recognize that you are not permitted to do so in any manner that may disrupt your or anyone else's job performance or is otherwise offensive or contrary to our Company values and policies. Incidental personal use of these systems is permissible as long as the usage does not consume more than a minimal amount of system resources, does not interfere with your responsibilities or productivity, and does not disrupt any business activity.

During the last several years, the use of e-mail and other messaging technologies has fundamentally transformed communications. However, the ease and speed with which these technologies can be used increase the risks of poor communications or misuse. We should compose our e-mails and other electronic messages with the same thoughtfulness and care taken when composing any other written document. These messages can be permanent and recoverable, and they can be easily copied and forwarded worldwide without your knowledge or permission. At worst, messages that advance personal or political views, or that contain derogatory, profane, explicit or offensive content, may be attributed to Altais Health Solutions and degrade our brand or cause liability.

Social Media

Altais Health Solutions recognizes that the Internet provides unique opportunities to communicate and engage with our patients, partners and the public using a wide variety of social media. Altais Health Solutions and many of our team members use social media to advance our business and careers. Some examples include Facebook, LinkedIn, Twitter,

instant messaging, intranet sites, various internal and external blogs, and myriad other online media. As Altai Health Solutions embraces the age of social media, it is critical that we harness the tremendous power of technology for our benefit and avoid the common pitfalls. We encourage you to become a knowledgeable and responsible user of social media to engage our various constituents in dynamic ways, grow our customer base and innovate with new services. Before you venture into uncharted territory, you should review our guidelines in this ever-evolving area. You should also note that all Altai Health Solutions policies (e.g., harassment and discrimination policies, privacy and confidentiality policies, etc.) are applicable when using any form of social media, whether internally or externally.

As Altai Health Solutions personnel living in a wired and social media-friendly world, we always represent the Company in both words and actions, whether such activities occur during working hours using Company resources or they occur during off-hours using personal resources. Everything we say and do reflects on Altai Health Solutions, our brand and our reputation. When we use social media, we represent our Company and brand, whether officially or unofficially. Inappropriate conduct, unauthorized disclosure of confidential information, harassment, excessive use of Company systems for personal matters and fraud are treated the same whether they are committed online or offline. Regardless of the platform, medium, hour or location, these activities will not be tolerated. We encourage you to always think before you send or post. One offensive statement, off-color joke, or reference to confidential or personal information, whether ill-intended or not, can be viewed by anyone for years to come, potentially exposing Altai Health Solutions (and you) to significant legal, financial, brand and reputation risks.

When using social media, you should adhere to the following basic principles:

- **Identify yourself.** If you are discussing Altai Health Solutions or our services, be clear about who you are, your relationship to Altai Health Solutions and that you are expressing your personal opinion.
- **Protect all sensitive and proprietary information from unauthorized access, use or disclosure.** Our commitment to protecting sensitive and proprietary information regarding our Company, our patients, our team members, our business partners and others applies online.
- **Your accountability is real.** The Company's values and policies continue to apply online. Failure to properly adhere to Company values, policies and legal requirements may adversely affect your employment, assignment or contract, as applicable. You should use your best judgment before posting or sending something online.

Remember that the digital footprints of your post or message will last forever. Everything you post or write will permanently exist in search engine archives and chat logs. Therefore, if you make a mistake or publish something hastily, inaccurately or inappropriately, you should immediately correct it.

External Affairs

Audits, Investigations & Inquiries

From time to time, Altai Health Solutions may be asked to cooperate with external (government or regulatory) audits, investigations and inquiries regarding how the Company conducts its business. It is Altai Health Solutions' policy to fully cooperate with all governmental agencies regarding audits, investigations, inquiries and requests for information. If you receive a notice of a government audit, investigation, inquiry or request for information, you should immediately communicate it to the relevant business units and the Law or Compliance Department so that Altai Health Solutions can properly ascertain the needs of the regulators and take appropriate action.

When Altai Health Solutions receives official requests for information or cooperation, our Company will notify you of your responsibilities in connection with the request. If you are directly contacted by government investigators and are asked to meet with them individually to discuss Altai Health Solutions activities, you are free to do so or not, and in either case you will not be subject to discipline or retaliation as a result of your decision. If you are contacted directly, however, Altai Health Solutions requires that you immediately notify the Law or Compliance Department to inform them that you have been contacted.

Any time you speak with government regulators or investigators, you must be accurate and truthful in all of your answers to their questions. You may not provide Altai Health Solutions documents, data or confidential information in response to a government request without first obtaining authorization from the relevant business units and the Law Department.

Public Relations and the Media

The media is one of the most important and effective avenues for communicating news of our Company's business, services and positions on critical matters. We endeavor to cooperate with the media, but it is important that Altai Health Solutions speaks to the media and others with one unified voice. Therefore, only designated individuals are authorized to speak on behalf of Altai Health Solutions.

Dealing with the media, community organizations, public officials and other members of the public requires a special understanding of their needs and our obligations as a company. The following guidelines will safely guide us through such situations:

- Refer any media calls or requests for interviews directly to Corporate Communications.
- If a reporter or other external party contacts you directly or comes to a Altai Health Solutions location, you should immediately obtain the individual's name and affiliation and notify Corporate Communications. We should not provide reporters or others with comments about the Company or our business if they approach us outside a Company building or other location.

- Before publishing articles or opinion pieces, making speeches, giving interviews or making public appearances that are connected to our business, you should obtain the approval of your manager and Corporate Communications before proceeding.
- Before agreeing to publicly endorse a product or service through any media channel, you should obtain the approval of your manager and Corporate Communications before proceeding.

Corporate Social Responsibility

Altai Health Solutions' industry leadership carries an ethical responsibility to all of our constituents, including our local communities. Strong corporate citizenship and living up to our core values are fundamental tenets of Altai Health Solutions and the way we conduct our business. To live up to these principles, Altai Health Solutions has launched initiatives and programs in a variety of areas that include ethics and compliance, social and economic sustainability, environmental stewardship, strong corporate governance, health and safety, team member wellness and corporate philanthropy.

Partnering With Our Communities

As a health insurance provider in a highly regulated and scrutinized industry, Altai Health Solutions needs to be proactive in partnering with our communities. We should be aware of community needs and concerns as they relate to our business and patients, and work constructively with the right parties to resolve issues. Through Altai Health Solutions' social responsibility initiatives we strive to serve our various constituents by targeting issues such as health care accessibility, affordability and quality, domestic violence prevention, environmental responsibility, and health and wellness. Our Company is an active member of leading socially responsible organizations, and we strive to be a leader on initiatives that will benefit our communities.

Respecting the Environment

Consistent with our social responsibility objectives, Altai Health Solutions is committed to becoming an industry leader in environmental sustainability. As good corporate citizens, we must comply with environmental laws, rules and regulations, and look to exceed them when possible as a true environmental steward. To reduce our environmental impact, we strive to maximize the efficient use of natural resources, such as by measuring our carbon footprint, reducing the use of printed materials, encouraging carpooling, and encouraging corporate recycling and composting efforts.

Conducting Business in a Fair and Honest Manner

Integrity and Fair Dealing

Altai Health Solutions exists and succeeds due to the trust we have earned for integrity and fair dealing. We always strive to do the right thing and to deal fairly and honestly with our patients, personnel, business partners and even our competitors. No one at Altai Health Solutions will take unfair advantage of others through manipulation, fraudulent inducements or concealment, abuse of confidential or privileged information, interference with a known contractual relationship, or any other form of unfair dealing. No financial benefit is worth conducting business in a manner that could damage others' trust in us. Any ill-gotten profit or gain based on disregarding our values is short-lived and causes greater harm in the long run.

Doing Business with the Government

Altai Health Solutions holds a number of governments contracts and conducts substantial business with local, state and federal governments. There are many specific rules and prohibitions that must be observed when doing business with the government, so it is critical that we perform all obligations under each government contract carefully, completely, and with the highest degree of honesty and integrity.

Failure to abide by the unique laws, rules and regulatory provisions of government contracts can subject both Altai Health Solutions and our personnel to severe civil or criminal penalties and may also result in disciplinary action against our team members, including termination of employment, contract or assignment, and Altai Health Solutions' loss of its government contracts. The following basic rules always apply when we are dealing with government officials, team member or intermediaries:

- Never request, seek or obtain any confidential information regarding the selection criteria used in awarding government contracts or business.
- Never falsify records or knowingly submit false, misleading or incomplete information to the government. All government contract claims must be charged to the correct accounts and no unallowable costs may be included in claims presented to the government.
- Immediately report any actual or potential deviation from the government contract requirements, however slight, to the appropriate department manager before proceeding.
- When signing a government certification or attestation, you must ensure that it is accurate and complete.
- Never accept classified, confidential or proprietary government information unless you are certain that the release has been properly authorized. If you are offered or inadvertently receive any such information without proper authorization, you must immediately notify the appropriate Altai Health Solutions department. Until instructed by such department, you must ensure that the information is properly secured from being inappropriately accessed, used or disclosed.

- Strict restrictions apply to recruiting and hiring current and former government team member. You must seek Altais Health Solutions Law Department approval before mentioning possible employment to a current government team member and before hiring a former government team member. For additional guidance regarding these rules or your responsibilities relating to Altais Health Solutions' government contracts, please consult with your manager, Compliance or the Law Department.

Meting Government and Health Plan Partner Expectations and Cooperate with Government and Health Plan Inquiries

The government and our contracted health plan partners may audit Altais Health Solutions records from time to time. All team members are required to appropriately and timely respond to any audit or Compliance Department request. All responses must be truthful, accurate, complete, and timely.

If you suspect there is a misstatement or misunderstanding either by saying something incorrect or through omission, or through identifying a mistake in a document or process, you must disclose the mistake immediately to the Compliance Department so that actions can be taken to immediately correct the situation.

Interacting appropriate with government and health plan officials

The government forbids Altais Health Solutions from doing business with individuals or organizations that have been excluded from government contracting. Everyone we do business with, including Altais Health Solutions staff is checked for exclusion from healthcare programs upon hiring/contracting and monthly thereafter.

Follow licensing and certification requirements

You are responsible for maintaining your appropriate professional licensing and certifications.

If you are convicted of a felony or misdemeanor crime in the courts, you are required to provide written disclosure to your direct leader as soon as possible.

Anti-Corruption: Bribes, Kickbacks and Other Improper Payments

We always win and conduct business with integrity and through the quality of our products and services, never through bribery, improper payments, or any other type of illegal or inappropriate activities. Although the exchange of gifts or items of value might be acceptable business practice in certain situations, it is never permissible to do so to obtain or retain any business, benefit or advantage and it is strictly prohibited with government officials, team member or intermediaries.

We must never offer, authorize, give, promise, solicit or accept any improper payments or items of value, or agree to do any of these activities, to or from any party for the purpose of obtaining or retaining any business, benefit or advantage. Improper payments can be, but are not limited to, bribes, kickbacks, rebates and facilitating payments. Items of value can be gifts, entertainment and gratuities, among others. This prohibition extends to our dealings with all

entities, whether government officials or commercial (private) parties, and in all jurisdictions, whether domestic or foreign. Lastly, this prohibition extends to engaging in such activities either directly or indirectly through intermediaries or third parties, as Altais Health Solutions may be held liable for others' actions on our behalf. In short, no Altais Health Solutions personnel, business partner or any other party may engage in such prohibited activities on Altais Health Solutions' behalf.

A “**bribe**” can be any item of value (as previously defined) that is provided to an individual, the individual's family or a group with which the individual is affiliated with the intention of authorizing or influencing business decisions. A bribe or other improper payment may take many forms, such as cash or monetary gifts, meals, drinks, entertainment, hospitality, passes, promotional items or use of a giver's name, materials or equipment, among others.

A “**kickback**” is the return or granting of a sum of money, or any item of value, in exchange for making business arrangements.

“**Facilitating payments**” are small payments, usually paid in cash, that public or commercial (private) officials may sometimes request or expect in order to expedite or guarantee routine governmental or administrative functions and services, such as granting permits, delivering mail and providing utility services. Altais Health Solutions strictly prohibits all of these improper payments and activities, regardless of the parties, intermediaries and jurisdictions involved, by any personnel, business partner or other party.

To ensure that third parties and other representatives working on our behalf are not making corrupt payments or engaging in other inappropriate activities without our knowledge, we must carefully assess, select and oversee our business partners who interact with government officials. We must additionally maintain accurate and complete books and records so that no questionable expense or transaction can possibly be obscured, and we must maintain strong internal financial and accounting controls to comply with our various legal and ethical obligations. Each individual at all levels of the Company has the personal responsibility to resist participation in any form of corruption and to report actual or suspected misconduct. If you become aware of, or receive a request for, any actual or potential improper payment or arrangement related to Altais Health Solutions' business, you must immediately contact your manager, Compliance and the Law Department.

For more information regarding Altais Health Solutions' anti-corruption guidelines, please refer to our Anti-Corruption Policy.

Combating Fraud, Waste & Abuse

Combating fraud, waste and abuse in all forms is our legal and ethical obligation. We must constantly be vigilant in preventing, detecting and remediating the various types of fraud, waste and abuse that can occur in our industry. There are numerous anti-fraud laws in place

within the healthcare industry. These include Anti-Kickback, Stark Law, and the False Claims Act.

Our failure to properly and timely identify and address fraud, waste and abuse makes it less likely to achieve our Mission and may subject Altais Health Solutions to substantial legal, financial, brand and reputation risks. You must immediately report any actual or suspected fraud, whether on the part of a health care provider, patients, Altais Health Solutions team members, business partner or any other party.

Altais Health Solutions' fraud control program protects the organization, our patients, and our resources. The fraud control program helps us to achieve our organizational mission and vision, and departmental objectives. We must never participate in fraudulent activity and must always act in a way most likely to preserve the integrity and reputation of the organization.

If you suspect fraud or something just doesn't seem right, immediately inform your manager or the Compliance department. If you prefer to remain anonymous, you can also use the Compliance Hotline.

Dealing Fairly with Patients

We respect the contracts and commitments that we make to our patients and prospective patients. We strive to exceed minimum compliance with the rules governing our business and to operate with the utmost reliability and transparency, especially when the interests of our patients are at stake.

Altais Health Solutions personnel involved in selling, advertising, promoting and marketing our products and services are each responsible for ensuring that our sales, marketing and promotional materials contain accurate descriptions of our products and services, and do not facilitate false or deceptive advertising or any other misrepresentations. This means that we are always transparent, accurate and truthful when representing the quality, features and availability of our products and services. It also means that we never make unfair or inaccurate comparisons between our competitors' products and services and our own. Furthermore, federal law strictly limits and regulates rewards, incentives and promotional activities for Medicare and Medicaid/Medi-Cal patients. Any false, misleading or inappropriate conduct related to our sales and marketing initiatives, and our general representations to and interactions with our patients, is strictly prohibited.

Fair Competition

Altais Health Solutions competes in an extremely dynamic market and a highly competitive industry. Altais Health Solutions is committed to conducting business in a manner that helps maintain a free and competitive market for our goods and services. Treating everyone, including our competitors, fairly and honestly helps to ensure that consumers have access to the best health care options at a fair price.

We compete solely on the merits of our services, the prices we charge and the customer loyalty we earn from a job well done. Our values require that we compete in a legal, fair and ethical manner. The laws regarding competition (e.g., antitrust) are complex and violations can carry severe penalties, including fines and imprisonment for individual personnel. Thus, all of us must ensure that our conduct is consistent with our values and the laws.

We must always take special care to avoid engaging in anticompetitive activities or unfair trade practices. Certain types of agreements with competitors are always illegal and must be avoided regardless of the circumstances. If a conversation with a competitor touch on one of these or any other inappropriate areas, you must immediately end the conversation and report it to Altais Health Solutions Law or Compliance. Examples of inappropriate and anti-competitive activity include:

- Agreeing with competitors to fix prices we or they will charge
 - Agreeing to stand down or collude on a competitive bid
 - Agreeing to contractor does not contract with particular providers or business partners
 - Agreeing to divide the market, territories and/or patients
- A few helpful tips for compliance in this area follow:
- Do not enter into any agreements with a competitor except as approved by Altais Health Solutions Law.
 - Avoid any discussions with competitors regarding pricing or supplier relationships unless the discussions have an appropriate business purpose and, even then, keep such discussions to a minimum, need-to-know basis.
 - Always be truthful about our competitors' products and services.
 - Avoid any action that could be an illegal interference with a competitor's contractual relationship with a third party (e.g., its customer).
 - Avoid soliciting or obtaining confidential information about a competitor in a manner that would be illegal or unethical (e.g., asking someone to violate a contractual agreement, such as a confidentiality agreement, with a current or prior employer).

You must be particularly vigilant when attending industry conferences or trade association meetings, ensuring that you are not drawn into discussions of inappropriate topics such as pricing, labor costs or marketing plans. If you find yourself in such a situation, you should immediately end the conversation and, if necessary, ask that your refusal to participate be documented in meeting minutes. If you are unsure of the right decision to make or need to report any such incidents, you should promptly contact Altais Health Solutions' Law and Compliance Departments.

Export Controls, Anti-Boycott Requirements & Exclusion Lists

Although Altais Health Solutions is a California-centric health care company, we compete in a highly regulated and dynamic industry, and we interact with parties throughout the U.S. and even the world (such as offshore service providers). In situations where we interact with citizens or entities of other countries, we should have an understanding of the laws relating to

exports. Although we are not in an industry that commonly ships products overseas, export laws can also apply to information, technology or software that is provided in any way (including verbally in the case of information) to a non-U.S. citizen or entity. Before engaging in exporting activity, you must verify the eligibility of both the location of delivery and the recipient. You must also obtain all required licenses and permits and pay all proper duties.

Certain countries, individuals and entities are subject to different levels of restrictions, requirements and compliance risk under U.S. foreign policy, international trade regulations and regulatory exclusion lists. We cannot do business with certain individuals, entities or countries that the U.S. has identified as being involved in terrorism, money-laundering, fraud or other criminal activities. We likewise cannot cooperate with any requests concerning boycotts not initiated by the U.S. government. Penalties for violating trade control laws or regulatory exclusion lists can be severe. If you have any questions regarding these regulations, please contact Altai Health Solutions Law or Compliance.

Prohibited Persons & Entities

Federal laws provide for the exclusion of individuals and entities from participating in federally funded programs if they are identified on exclusion lists maintained by the federal government. Additional federal and state laws prohibit the employment of, contracting with or payment of monies to certain individuals and entities. Altai Health Solutions regularly reviews applicable exclusion lists to ensure that we comply with these requirements for team members, Board members, business partners and patients. Any Altai Health Solutions personnel, business partner or other party who becomes subject to such exclusion or debarment must immediately report this fact to their manager and Compliance.

Contingent workers must immediately report this fact to their employer, who must immediately report it to Altai Health Solutions. Business partners must likewise immediately report this fact to their Altai Health Solutions supervising manager, who must immediately report it to Compliance.

Competitive Intelligence

Market or competitive information can be valuable to understand and manage our business and services so we can better meet our patients' needs. However, we will gather and use information only in accordance with the law and our ethical standards, and we will respect the confidentiality of our competitors' and business partners' information. For example, we must never obtain information through illegal means such as theft, blackmail, wiretapping, electronic eavesdropping, hacking, pretexting (i.e., "phishing"), bribery, improper inducement, receiving stolen property, threats or other improper methods.

- Here are some guidelines to ensure that we acquire competitive information in legal and ethical ways: We will not misrepresent who we are or for whom we work. We clearly represent ourselves as Altai Health Solutions personnel to avoid any confusion or accidental disclosure on others' parts.

- We will not use a competitor's current or former team member or business partners as improper sources of confidential or proprietary information, even if they are current Altais Health Solutions personnel or recruits.
- We will not accept or use confidential information obtained from another company or third party, especially if it is marked as "proprietary" or "confidential" (or should be marked this way), unless we have authorized permission to do so from the party to whom it belongs.

Remember that we always respect the rights and property of our competitors, so we gather competitive information through the news media, the Internet, publicly available databases, industry journals and other non-confidential, non-proprietary sources. We never attempt to acquire a competitor's trade secrets or other confidential or proprietary information. If you have any questions or believe that any materials you possess may violate these standards, you should immediately contact Altais Health Solutions Law or Compliance.

Intellectual Property

We will not misappropriate or misuse the intellectual property of any other entity, including others copyrighted, trademarked or patented materials, and trade secrets. Many publications and data sources carry restrictions on their use or are licensed to an individual within Altais Health Solutions rather than the full Company. Sharing these materials with others, either within or outside Altais Health Solutions, may be a violation of intellectual property laws and could subject us to legal and financial risks. If you are in doubt as to whether any material legally belongs to someone else or can be used for Altais Health Solutions' benefit, you should seek advice from Altais Health Solutions Law.

Proper Handling of Inside Information

In performing our responsibilities for Altais Health Solutions, many of us may have access to information of which the general public is unaware, about Altais Health Solutions, our patients, business partners and competitors. Although Altais Health Solutions is not a publicly traded company, many of our patients, business partners and competitors are. Such information is often considered "material," meaning it would influence an individual's decision to buy, sell or hold the stock of that company. Federal and state securities laws make it illegal for anyone to use material, non-public information to trade in securities (such as stock and stock options) regardless of how the information is obtained. Given that "tipping" is also illegal, you must not disclose any such information to anyone who does not need to know it, including close family members and friends.

Violations of these laws can have serious legal and financial consequences for you, and they may subject Altais Health Solutions and our stakeholders to unreasonable legal, financial and brand risks. Be sure to keep the following guidelines in mind:

- Do not trade in the securities of any public company about which you possess material, non-public information. Examples of material information include corporate earnings, line of business performance, potential mergers or acquisitions, significant

- contract wins or losses, lawsuits and regulatory actions. Non-public information means that it has not yet been released publicly, such as in a press release.
- Do not disclose any material, non-public information about a public company to anyone outside Altas Health Solutions, including spouses, relatives, friends and advisors.
 - Do not disclose any material, non-public information about a public company to anyone inside Altas Health Solutions except those who have a business need to know such information.

If you have any questions or uncertainty about trading in a public company's securities because of information you received or learned in the course of your duties at Altas Health Solutions, you should contact Altas Health Solutions Law for guidance.

Public, Political & Charitable Activities

Altas Health Solutions encourages us to participate in policy, educational and political matters that affect our lives, communities and business, as long as we do so on our own time and at our own expense. If we do so, we must make clear that we are speaking or acting on our own behalf, never giving others the impression that we are speaking on behalf of, or otherwise representing, Altas Health Solutions.

When engaging in these activities, we may not use Altas Health Solutions' name or logo, or identify ourselves as being affiliated with Altas Health Solutions without obtaining prior written consent from External Affairs. We ask that our personnel and leaders use good judgment and common sense when participating in any activity outside the office, including civic affairs. Even when not using Altas Health Solutions' name, your unique position and profile within the community means that almost anything you say or do could be attributed to the Company.

Any personal political contributions that we make are also done in an individual capacity and are in no way authorized or endorsed by Altas Health Solutions. We should never expect to be reimbursed by Altas Health Solutions for any political contributions. Before making a political contribution to any person holding or running for a public office in an agency with which Altas Health Solutions is bidding on a contract, you should promptly notify Altas Health Solutions Law.

Lobbying

Altas Health Solutions' ability to participate in political activities is highly regulated by federal, state and local laws, so all Altas Health Solutions political activity must be approved in writing by External Affairs and the Law Department. The term "lobbying" covers many types of activities, including but not limited to the following:

- Contact with legislators, regulators, executive branch officials or their staffs
- Communicating with government officials, team member or intermediaries
- Efforts to influence legislative or administrative action

- Exchanging gifts, entertainment or other items of value with government officials, team member or intermediaries

Corporate political contributions and lobbying of government entities or officials are strictly regulated activities. If you require guidance regarding these matters, you should contact External Affairs or Altai Health Solutions Law.

Managing Business Partners and Third Parties

Altai Health Solutions believes in working with business partners that demonstrate high standards of ethical business conduct and legal compliance. We expect our providers, suppliers, vendors, producers, service providers, consultants, contractors, subcontractors, agents, and anyone who may perform services or activities on our behalf to be guided by the same values and standards set forth in this Code.

When we initiate a relationship with a new business partner, we must conduct appropriate due diligence to ensure that any business relationship will be mutually beneficial and appropriate. In particular, we should ensure that any new business partners meet our required competencies, have a proven track record of compliance and ethics, and engage in responsible conduct and contracting. In short, proper due diligence will help to ensure that the new relationship does not harm Altai Health Solutions or our constituents. Those of us who manage our business partner relationships should know and follow Company policies for suppliers and procurement and should exercise proper due diligence and oversight for vendor conduct prior to entering into the business partner relationship and on an ongoing basis thereafter. We each have a responsibility to report any actual or suspected business partner misconduct to our manager, Compliance or People & Engagement

Waivers of the Code of Conduct

In extremely limited circumstances, it may be appropriate to waive a provision of our Code of Conduct. All waiver requests must be made in writing to the Chief Legal Officer, who will present the request to the appropriate Altai Health Solutions Chief Executive Officer. All waivers and exceptions will be properly documented and disclosed, as needed and if required by law.

Conclusion

We each have an ongoing obligation to treat our colleagues and others with respect, to represent Altais Health Solutions with unwavering integrity and to lead by our values as we fulfill our Mission. These values form the core of the standards by which we conduct our business. This is a personal responsibility for each of us representing Altais Health Solutions, as we are each accountable for our individual actions. No illegal or unethical act can be justified by claiming that it was ordered or encouraged by someone else. While the Code cannot anticipate every situation that may arise in our business lives at Altais Health Solutions, applying its guiding principles and using good judgment can help us to make the right decisions in most cases. When we need additional guidance or support, the Code informs us where we can seek information and assistance.

Questions to Ask Before Acting

- Is it legal?
- Does it follow Company policy?
- Is it the right thing to do?
- How would it be perceived by our patients, the media, our communities and people I respect?

Remember These Rules

- Know the legal requirements and Altais Health Solutions policies that apply to your responsibilities.
- Follow these rules, requirements and standards.
- If you are unsure, ask your manager or one of the other resources listed in this Code

Compliance & Ethics Resources

At Altais Health Solutions, you have many resources available to assist you with your questions and concerns. You should raise concerns with your manager, who can help you navigate through the issues and identify the best courses of action. You may also report actual or suspected violations or misconduct, or find out information, by contacting the Compliance team through various means. The Compliance telephone and Web reporting Hotlines are vendor-managed hotlines that are available 24x7x365 for reporting actual or suspected legal, policy or Code violations and/or other misconduct. Although Altais Health Solutions strictly prohibits any form of retaliation for making good faith reports, you can make anonymous reports through our various reporting options at any time.

The anonymous compliance hotline number is 1-888-201-7305, or an anonymous report can be submitted at altais.ethicspoint.com. To report things to Compliance without needing to remain anonymous, please email Compliance@btmg.com