

Altai

Code of Conduct

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A Letter from Our CEO on Leading by Our Values

At Altas, *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.

Our 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 our most valuable asset – our reputation for integrity.

Thank you for making a statement with your actions.

Sincerely,



Dr. Nishant Anand

Chief Executive Officer

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 Altas, we are firmly committed to doing the right thing and conducting ourselves with the utmost integrity. The success of Altas 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 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

The Altas Code of Conduct details the fundamental principles, values, and ethical framework for all team members. Altas is committed to maintaining the highest level of integrity and ethical conduct, and to following all laws and regulations, with the expectation that all team members will hold themselves to the same standards. The Code of Conduct is the keystone to our values, principles, expectations, and our corporate philosophy, outlining how we accomplish our mission and in an ethical and legal manner.

As the foundation of our Compliance Program, the Code of Conduct articulates broad principles and is designed to promote a corporate culture of integrity, guide ethical decision-making, and set expectations for professional behaviors and business activities. The Code of Conduct:

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

Our Code of Conduct Applies to Everyone

Compliance with the Code of Conduct is everyone's responsibility. 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 discipline, up to and including termination. All team members are expected to:

- Adhere to the Code of Conduct
- Ask questions when we are uncertain about the compliant and ethical decisions and conduct.
- Communicate any concerns or issues that may violate policies and procedures.
- Report all suspected violations.
- Refuse to participate in illegal or unethical acts.
- Cooperate with investigations of potential violations and noncompliance.
- Protect Altais's reputation and assets.
- Complete new hire and annual compliance training.
- Be familiar with company policies and procedures and know where they can be found. Wherever Altais has an internal policy and/or procedure that is stricter than what is required by law, you are expected to follow the Altais policy.

The Code of Conduct is designed to create an environment that promotes and facilitates 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.

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. If ever in doubt, be sure to seek guidance from your manager or Compliance before proceeding.

For any questions about this Code of Conduct, please reach out to the Compliance Department.

Who are we referring to?

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.

"**Team members**" means employees of any Altais entity, officers, members of the Board of Directors or Clinical Advisory Groups of any Altais Medical Group, or 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 Altais on assignment. Altais team members may technically work for different legal entities, but the Code of Conduct applies to everyone.

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

Additional Expectations of Managers

Managers have heightened obligations as senior custodians of our values and culture and are expected to personify Altais values, set the proper tone-at-the-top and model integrity-based conduct. As with all Altais 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:

- Ensure the Code of Conduct is clearly communicated to all those who you lead
- Allow your direct reports time to complete required trainings
- Foster an open working environment in which people are encouraged and feel comfortable raising concerns or issues.
- When team members approach you, listen, act on the raised concerns, and promptly respond.
- Promptly report actual or potential Code of Conduct, policy or legal violations to Compliance or another appropriate resource listed in the Code of Conduct.
- Seek opportunities to routinely communicate and discuss ethical conduct, difficult decisions or other challenging situations.

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 Altais Chief Executive Officer. All waivers and exceptions will be properly documented and disclosed, as needed and if required by law.

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

Choosing the Right Course

Carefully consider your ethical and legal obligations in the course of your work, while exercising discretion and good judgment in your decision-making. 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 lose patients and business partners if they knew that the company engaged in this activity?
- Would I be comfortable explaining my actions to my team, my colleagues, my family, and my friends?
- Would I or Altais 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 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 the Compliance Department, People & Engagement, or other appropriate departments for further guidance.

Raising Concerns and How to Report Violations

If you see something, say something, whether it involves you or others. We all have a duty to report suspected or potential inappropriate behavior and noncompliance. Altais encourages a “speak up” culture which fosters an ethical and compliant organization. All Altais team members and business partners must report actual or potential violations of the Code of Conduct. Raising concerns helps to reduce risks, improve processes, and solve problems.

Please contact your manager if you have questions, concerns, or something to report. However, it may be more appropriate to contact someone else. You may seek guidance from, or make a report to, any of the following resources:

- Your direct supervisor or manager
- People & Engagement
- Compliance Department (Compliance@btmg.com)
- Compliance Hotline at (888) 201-7305 or <https://altais.ethicspoint.com/>

The Altais 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 of Conduct. When you call the 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. Altais strictly enforces a non-retaliation policy for raising concerns in good faith.

Refer to the Compliance Hotline Policy & Procedure (0300-21) and Reporting Compliance Concerns (0300-23) for additional information.

Internal Investigations

Altas takes all reports seriously and welcomes the opportunity to resolve problems that may arise and take steps to prevent them from recurring. Investigations will be conducted and documented in accordance with investigation protocol. We are all expected to fully cooperate and assist in the process to safeguard the integrity of the investigation process. If an allegation is made against you, you must fully cooperate and maintain confidentiality with the investigation and refrain from interfering with the investigation or otherwise acting improperly.

When you make a report, your confidentiality and/or anonymity will be safeguarded to the extent possible, while Altas conducts the investigation discreetly. Altas enforces a strict non-retaliation and non-intimidation policy for raising or reporting concerns in good faith.

Altas team members who are aware of an active 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 corrective or disciplinary actions are required as the result of an investigation, Altas management will determine the proper corrective actions to take. Each situation or investigation will be defined by its unique facts and circumstances, which will be appropriately factored into any corrective or disciplinary decisions.

Corrective Action, Discipline and Enforcement

Altas prohibits any illegal or unethical conduct that impacts its operation, mission, or image, and shall accord no weight to a claim that any improper conduct was undertaken “for the benefit of Altas.” Individuals who violate the 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 appropriate, fair, and consistent disciplinary action such as termination, written reprimand, demotion, performance improvement, or remedial training. 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.

Refer to Reporting Compliance Concerns P&P (0300-23) for additional information.

Protection against Retaliation and Intimidation

Altais does not tolerate any form of retaliation or intimidation to team members who, in good faith, raise a concern, report an actual or potential violation of law, the Code of Conduct or company policy, or who participate in an investigation or audit, or when a team member refuses to participate in wrongdoing.

Any person who retaliates or threatens to retaliate (e.g., intimidation) 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.

Altais takes all reports of violations, suspected violations, questionable conduct, or practices seriously. Communications via the Compliance Hotline or to managers/supervisors or anyone designated to receive such reports shall be treated as confidential. The caller/reporter need not provide their name. Supervisors and managers who receive complaints of misconduct must immediately report such complaints to People & Engagement or the Compliance Department.

The “Open Door” policy encourages team members to discuss issues at any time 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 that we can allowed by law.

If you feel that you or someone else has been retaliated against, contact the Compliance Department or People & Engagement. Refer to Non-Retaliation and Non-Intimidation P&P (0300-024) for additional information.

Providing a Safe and Supportive Environment of our team members

Respect for Diversity & Equal Opportunity

Altais expects team members treat others 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. Likewise, Altais respects and values the diversity reflected in our various backgrounds, experiences and ideas.

Altais 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 does not tolerate discrimination based on any classification.

Altais further embraces our legal obligations associated with our Affirmative Action Program, which promotes hiring, advancement and contracting with certain protected categories of individuals.

Refer to your organization's Employee Handbook for additional information.

Preventing Harassment

Altais does not tolerate harassment, and harassment of any kind is prohibited and against company policy, whether the harassment was intended or not. 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 and regardless of intent. Examples of harassment include 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. Altais 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.

Harassment will not be tolerated regardless of whether you are on Altais premises or engaged in off-hours or off-site business-related functions, such as holiday parties or business travel. 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 Altais if your conduct were recorded and broadcast on the news?

Refer to your organization’s Employee Handbook for additional information.

Keeping Our Workplace Safe and Supportive

Altais 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, and as such, we all play a role in minimizing the likelihood of work-related injuries.

Refer to your organization’s Employee Handbook for additional information.

Health & Safety

Altais prioritizes and is 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 Altais will never retaliate against a team member for bringing any such incident or condition to its attention.

If you feel unsafe or see a potential hazard, please don’t hesitate to contact your direct manager or People & Engagement. We must work together to create a safe and secure work environment.

Additionally, it is not permissible for any team member to:

- Possess, distribute, sell, transfer, use or be under the influence of alcohol, illegal drugs, drug paraphernalia, misused prescription drugs or over-the-counter medications, and any other substance that may impair our ability to act safely and effectively in the workplace, on company premises or at company-sponsored events.
- Provoke a physical fight or engage in physical fighting during working hours or on premises owned or occupied by Altais.
- Carry firearms, weapons, or dangerous substances at any time, on premises occupied by Altais.
- Use abusive, violent, threatening, or vulgar language at any time during working hours or while on premises owned or occupied by Altais.
- Intentionally destroy or threaten to destroy company property or another’s individual property.
- Send inappropriate or threatening texts or social media posts to Altais team member, patients, providers, or business partners.
- Engage in stalking of Altais team members, patients, providers, or business partners.
- Make veiled threats of physical harm or similar intimidation against Altais team members, patients, providers, or business partners.

Alcohol & Tobacco

While being under the influence of alcohol during work and while on premises at a company facility or company-sponsored event is generally prohibited, Altais 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, the Code of Conduct and other policies regarding workplace conduct remain in effect and will be enforced regardless of where the events are held. Additionally, all Altais 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.

Solicitation of Colleagues

Altais 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 Altais 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 and our Constituents

We each have an obligation to act in the best interests of Altais. Promoting the best interests of Altais and our constituents is critical to our Mission, and how we promote these interests is just as important as the interests themselves. Advancing and properly balancing the best interests of our company and our various constituents spans across many subject matter areas.

Protecting our Reputation

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

All types of external communications must be reviewed and approved. 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, such as materials provided to us by vendors, and give them to other parties with whom we may do business without permission from the owner.

Conflicts of Interest

A conflict of interest occurs when our personal or family interests, relationships, outside activities, or the exchange of items of value, financial or otherwise, influence, or appear to influence, our ability to do our jobs and make objective, sound business decisions in the best interests of Altais. Conflicts of interest generally arise from vendor, team member, or financial relationships, often in a decision-making capacity where the outcome can be influenced.

Conflicts of interest 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 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.
- Doing Business with or Supervising Family and Friends

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. Altais team members and business partners should be vigilant and sensitive to actual and perceived conflicts of interest. It is important to be

transparent and inquire when you are uncertain whether an actual or perceived conflict of interest exists.

Refer to the Conflicts of Interest P&P (0300-029) for additional information.

How to Handle Conflicts of Interest

You may disclose a potential conflict of interest at any time to your direct manager or to the Compliance Department. Actual or perceived conflict of interest must be promptly disclosed and must receive written approval. If prior approval from Compliance is not received, the activity, personal interest or conflict in question may be prohibited pending further inquiry.

Additionally, team members at a director level and above are required to fill out a conflict of interest disclosure form at least annually. The forms must be completed honestly, completely, and in a timely manner.

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.

Refer to the Conflicts of Interest P&P (0300-029) for additional information.

Outside Employment, Financial Interests & Other Activities

Although Altas encourages us to play active roles in our communities and in philanthropic, charitable, environmental, or other outside organizations, sometimes outside activities or financial interests may create a conflict of interest or otherwise reflect negatively on Altas. Altas 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 is permitted with the permission of your manager only if all the following conditions are additionally met:

- The assignment is not with, or in aid of, a Altas competitor, supplier, service provider, vendor, or other business partner.
- The assignment does not adversely conflict or interfere with your Altas job performance, responsibilities, hours, or duties.
- The activity or assignment does not require you to use Altas property, assets, equipment, facilities, or information.
- In any publicity relating to the activity, you do not associate the entity with Altas 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 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 the requirements above.

Refer to the Conflicts of Interest P&P (0300-029) for additional information.

Doing Business with or Supervising Family and Friends

A conflict of interest may arise if you, or your spouse, family member or close friend, have a personal stake or professional relationship to a company that is a Altais 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, and you must immediately notify your manager and remove yourself from the decision-making process.

Given that our managers are in a position of trust, it is improper and a conflict of interest to supervise someone in a subordinate position, with whom you have a romantic/sexual or close family relationship. Even acting impartially, other team members may perceive favoritism or preferential treatment.

Refer to the Conflicts of Interest P&P (0300-029) for additional information.

Private Use of Corporate Opportunities

Through your work at Altais 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 Altais may be interested. If you pursue such an opportunity in which Altais may have interest, you must promptly disclose it to your manager or a member of senior management so that Altais can properly evaluate it. You may act privately on an opportunity discovered through your position with Altais only after Altais has had the opportunity to formally evaluate it and has officially declined the opportunity in writing.

Written approval by your manager and Compliance is needed when using Altais resources or business partners to perform work for approved, non-conflicting outside business interests. Do not compete with Altais or its patients, either personally or by aiding a competitor, and 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.

Refer to the Conflicts of Interest P&P (0300-029) for additional information.

Exchanging Gifts and Entertainment

Altais allows reasonable expenditures for gifts and similar or related expenses with a bona fide and documented business purpose. However, exchanging excessive or inappropriate gifts may be a conflict of interest or, at worst, could be perceived or alleged to be bribes or kickbacks.

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.

Exchanging gifts, either directly or indirectly, is inappropriate if it creates an obligation to 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.

The following principles apply to the exchange of gifts and entertainment on behalf of Altais:

- 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.

Refer to the Conflicts of Interest P&P (0300-029) for additional information.

Items of Value for Government Officials

Stricter and more specific rules apply when we do business or interact with any government entity, agency, official or intermediary (i.e., third party). Due to the highly sensitive nature and complexity of the laws in this area, always review and follow internal policies and laws, and contact the Compliance Department.

Receiving Items of Value

No Altais team member is authorized to accept or solicit any gift that could be perceived to improperly influence Altais business or purchasing decisions, or any decisions on behalf of any customer or business partner. Items of value can be gifts, entertainment, and gratuities, among others. If offered an item of value that is inappropriate, politely decline.

Anti-Corruption: Bribes, Kickbacks and Other Improper Payments

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. 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. This prohibition extends to our dealings with all entities, whether government officials

or commercial (private) parties, and in all jurisdictions, whether domestic or foreign, and extends through intermediaries or third parties, either directly or indirectly.

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, and maintain accurate and complete books and records to uphold strong internal financial and accounting controls.

Refer to the Fraud, Waste, and Abuse P&P (0300-012) and the Conflict of Interest P&P (0300-029) for additional information.

Accurate Books and Records

Business records should be maintained in accordance with regulatory requirements and company policy. 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 must be accurate, complete, and reliable. 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 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 transparency throughout the organization.

Records Management, Retention & Disposal

Properly maintaining our business records is vital to our compliance with laws and regulations. All our medical and business records must be retained and, when appropriate, disposed of in accordance with the law and Altais policy. This applies to paper-based and electronic records regardless of medium, file format or storage location.

In some instances, we may be required to suspend usual document retention or disposal rules and preserve evidence. Never dispose, destroy, or sabotage business records that are involved in litigation, investigations, have legal holds, or audits. 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. Records that are under a retention hold must not be destroyed without the express written approval of the Legal Department.

Refer to the Records Retention P&P (0300-027) and Records Retention P&P (0600-004) concerning the types of documents required to maintain, retention schedules for each type of record and specifying circumstances, such as lawsuits or investigations, and when it is necessary to maintain or segregate certain records.

Respect and Protect Confidentiality, Privacy and Security

It is every team member's personal responsibility to protect and ensure proper handling of confidential or sensitive personal information. Only access, use or disclose information as authorized and to the extent necessary to perform your official job duties.

For additional information about confidentiality, privacy, and security, please contact Compliance or IT Security. Refer to the Confidentiality and Conflict of Interest Agreement and HIPAA Privacy P&Ps (0300-001 through 0300-010, and 0300-017).

Confidential, Sensitive, and Proprietary Information

Confidential information such as financial data and reports, strategies, initiatives, and similar material should not be shared with anyone outside the organization without explicit approval. This information should be adequately protected, both to safeguard intellectual property, individual and plan privacy as well as to comply with various privacy and data protection laws, including business partners whom such sensitive information may be disclosed for necessary business or administrative purposes

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

- Protected Health Information ("PHI") is individually identifiable medical information regarding a patient. This includes medical information pertaining to team members and their families as well as providers and their families.
- Information developed by or on behalf of Altais, 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 Altais, and financial and billing information.
- Information regarding terms of the relationships between Altais, its physicians, medical groups or hospitals, and health plans

Company proprietary information (i.e., information about Altais or our business partners that is generally not known to the public) must 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.

Upon joining the company, we each sign a confidentiality agreement that continues in effect even after our employment ends. As a team member, you are responsible for protecting Altais, confidential information as well as the privacy of patients and physicians.

Privacy and Security

All information, data, and communications on Altais information systems, regardless of format (electronic, paper, audio, or video), is the property of Altais, including personally identifiable

information (“PII”), which includes PHI and other types of personally identifiable and/or sensitive information, and are monitored and reviewed without consent or notice.

Strict privacy and security laws, as well as company policies, require us to properly access, use, manage, protect, disclose, and dispose of PII. Without these safeguards can result in significant damage, inconvenience, noncompliance, and distress to the company, our patients, workforce members, and/or business partners. Each of us must take common-sense steps to prevent the loss, manipulation, or unauthorized access, use or disclosure of all forms of PII. 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 PII/PHI or confidential and proprietary information, you must notify your supervisor so that appropriate steps may be taken to remedy the situation.
- Secure and protect all PII/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. This includes protecting information from family members or roommates in the vicinity of your workstation while working from home.
- 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.

Refer to Altais Commitment to PHI Privacy and Security P&P (0300-001) for additional information.

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. These systems are intended for authorized company business. Incidental or occasional personal use of computer systems should not disrupt business activity, conflict with company values and policies, and be minimal.

As the property of Altais, Altais 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. As 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.

When handling 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 Altais.
- Access only the minimum amount of information necessary to do your job.
- Remember not to share passwords or allow non-Altais team members 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.
- Confer with IT before downloading or using software not approved.

Refer to Altais Commitment to PHI Privacy and Security P&P (0300-001) for additional information.

Social Media

Altais 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. We encourage you to always think before you send or post. One offensive statement, off-color joke, or reference to confidential/personal information or proprietary information, whether ill-intended or not, can be viewed by anyone for years to come, potentially exposes significant legal, financial, brand and reputational ramifications. 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.

Review our guidelines in this ever-evolving area. You should also note that all Altais 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.

Conducting Business in a Fair and Honest Manner

Protecting Altais' Assets

Altais 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, and Altais expects all team members to help to protect assets against misuse, waste, damage, and ensure property is only be used for legitimate business purposes. Company assets include intellectual property such as:

- All publications, materials, databases, and other programs developed by or for Altais.
- 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
- Other forms of valuable confidential and proprietary information.

Only access or disclose confidential information that is part of your job responsibilities and in accordance with the law and our policies. Never use Altais's confidential or proprietary information for our own personal benefit or for any unlawful or unethical purpose.

Integrity and Fair Dealing

Altais strives to do the right thing and to deal fairly and honestly with our patients, personnel, business partners and even our competitors. Do not partake in 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.

Intellectual Property

We will not misappropriate or misuse the intellectual property of any other entity, including copyrighted, trademarked or patented materials, and trade secrets. Many publications and data sources carry restrictions on their use or limited to designated individual team members. Sharing these materials with others, either within or outside Altais, may be a violation of intellectual property laws. If you are in doubt as to whether any material legally belongs to someone else or can be used for Altais' benefit, you should seek advice from Compliance.

Proper Handling of Inside Information

Team members may have access to information of which the general public is unaware, about Altais, our patients, business partners and competitors. Although Altais is not a publicly traded company,

many of our 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. It is also illegal to 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 Altais. 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 Altais, including spouses, relatives, friends, and advisors.
- Do not disclose any material, non-public information about a public company to anyone inside Altais 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 Altais, contact the Legal Department.

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. 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 Altais 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 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 publicly available information. We never attempt to acquire a competitor's trade secrets or other confidential or proprietary information.

Fair Competition

Altais 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. This 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. Our values dictate we compete in a legal, fair, and ethical manner. Secondly, antitrust laws are complex, and violations can carry severe penalties.

Avoid engaging in anticompetitive activities or unfair trade practices. 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 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 that we will not contract with particular providers or business partners.
- Agreeing to divide the market, territories and/or patients.

Here are a few helpful tips for compliance in this area:

- Do not enter into any agreements with a competitor except as approved.
- 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 possible. If you are unsure of the right decision to make or need to report any such incidents, promptly contact the Compliance Department.

External Affairs: Interactions with the Government, Health Plan Partners, and the Public

Doing Business with the Government and Health Plan Partners

Altais conducts business with local, state, and federal governments. There are 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. The following basic rules always apply when we are dealing with government officials 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. 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.
- Ensure proper signing authority. 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 Altais 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 or former government team members. You must seek Legal Department approval before mentioning possible employment to a current government team member and before hiring a former government team member.

Combating Fraud, Waste & Abuse

Combating fraud, waste, and abuse (“FWA”) in all forms is our legal and ethical obligation. There are numerous anti-fraud laws in place within the healthcare industry, including Anti-Kickback, Stark Law, and the False Claims Act. 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.

You must immediately report any actual or suspected fraud, whether on the part of a health care provider, patients, Altais team members, business partner or any other party. You must constantly be vigilant in preventing and detecting the various types of FWA.

Report to your manager, Compliance, and/or the hotline if you prefer to remain anonymous if you suspect fraud or something just doesn’t seem right. For additional information, refer to the Fraud, Waste, and Abuse P&P (0300-028).

External Audits, Investigations & Inquiries

From time to time, Altais may be asked to cooperate with government agencies or health plan partners in audits or investigations regarding how the company conducts its business. We must fully cooperate with all governmental agencies and our health plan partners with audits, investigations, inquiries, and requests for information. If you receive a notice of an audit, investigation, inquiry, or request for information, immediately communicate it to the relevant business units or Compliance so that Altais can take appropriate action.

When Altais receives official requests for information or cooperation, we will notify you of your responsibilities in connection with the request. All team members are required to appropriately and timely respond to any audit. And 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.

Prohibited Persons & Entities

Federal and state laws provide for the exclusion of the employment of, contracting with or payment to individuals and entities from participating in federally funded programs, such as Medicare and Medicaid. Altais regularly reviews applicable exclusion lists upon hiring/contracting and monthly thereafter to ensure compliance. Any Altais personnel, business partner or other party who becomes subject to such exclusion or debarment must immediately report this fact to their manager and the Compliance Department.

Contingent workers must immediately report this fact to their employer, who must immediately report it to Altais. Business partners must likewise immediately report this fact to their Altais supervising manager, who must immediately report it to the Compliance Department. Additionally, 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.

For additional information, refer to the following P&Ps: Altais Pre-Hire Screenings (0100-001), Business Associates and other Arrangements (0300-010), Excluded Individuals and Entities P&P (0300-012), and Delegation Oversight (0300-026).

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.

Dealing with the Public

Public Relations and the Media

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 media is one of the most important and effective avenues for communicating news of our company's business, services, and positions on critical matters, and as such, it is important that Altais speaks to the media and others with one unified voice. Therefore, only designated individuals are authorized to speak on behalf of Altais. If you aren't authorized to speak on behalf of Altais, do not provide any information and refer media inquiries directly to Marketing, Communications and Outreach.

Public, Political & Charitable Activities

Altais encourages us to participate in policy, educational and political matters that affect our lives, communities, and business. When engaging in these activities, do not:

- Give the impression of representing, being affiliated with, or endorsed by Altais (without prior consent)
- Use the Altais name or logo
- Perform these activities during company time or resources
- Use poor judgement and common sense when participating in any activity outside the office
- Make a political contribution to any person holding or running for a public office in an agency with which Altais is bidding on a contract without notifying the Compliance Department

Refer to the Conflicts of Interest P&P (0300-029) for additional information.

Lobbying

Corporate political contributions and lobbying of government entities or officials are strictly regulated activities, so all Altais political activity must be approved in writing. If you require guidance regarding these matters, you should contact the Compliance Department.

Dealing Fairly with Patients

Altais personnel involved in selling, advertising, promoting, and marketing our products and services are each responsible for ensuring that our 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, and 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.

Managing Business Partners and Third Parties

Altais expects its providers, suppliers, vendors, producers, service providers, consultants, contractors, subcontractors, agents, and anyone who may perform services or activities on its behalf to be guided by the same values and standards set forth in this Code of Conduct. We must conduct appropriate due diligence when initiating new business relationships to ensure the relationship is mutually beneficial and appropriate. We should ensure that any new business partner:

- Meets our required competencies
- Has a proven track record of compliance and ethics
- Engages in responsible conduct and contracting

Those that manage these relationships should follow any applicable policies for vendor oversight and procurement, and exercise proper due diligence and oversight for vendor conduct prior to contracting and regularly thereafter. Report any actual or suspected business partner misconduct to your manager or Compliance.

Refer to Business Associates and other Agreements (0300-010) and Delegation Oversight P&P (0300-026) for additional information.

Conclusion

We each have an ongoing obligation to treat our colleagues and others with respect, to represent Altais 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, 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 of Conduct cannot anticipate every situation that may arise in our business lives at Altais, 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 of Conduct 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 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 of Conduct.

Compliance & Ethics Resources

At Altais, 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 Hotline is a vendor-managed hotline, available 24x7x365 for reporting actual or suspected legal, policy or Code of Conduct violations and/or other misconduct. Although Altais 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 <https://altais.ethicspoint.com>. To report things to Compliance without needing to remain anonymous, please email Compliance@btmg.com.

Code of Conduct Approval

Approval By: Altais Board of Directors
Approval Date: November 7, 2023
Annual/Next Review Date: Q4 2024