



CODE OF ETHICS AND BUSINESS CONDUCT

INTRODUCTION:

Integrity is a core value of TrueCare and acting with integrity helps uphold our reputation, as well as attract and retain quality staff who can meet the highest expectations of our patients, business partners, and our community. In short, integrity is the foundation on which everything else matters. This Code of Ethics and Business Conduct helps to promote a common understanding of what is right and wrong across our business.

Our Code of Ethics and Business Conduct Applies Equally to All

The Code of Ethics and Business Conduct applies to everyone at TrueCare, including our Board of Directors, corporate officers, employees, volunteers, student interns/externs and contracted workers.

The foundation of our reputation and credibility both individually, and as an organization, is upheld by adhering to our values, exhibiting honesty and integrity in all our actions, and reaching company goals solely through honorable and ethical conduct.

MISSION

To improve the health status of our diverse communities by providing quality health care that is comprehensive, affordable and culturally sensitive.

CORE VALUES

Excellence: TrueCare seeks excellence through the identification and implementation of superior ambulatory healthcare practices. TrueCare will enhance the capacity of employees to achieve excellence by offering responsive support systems and quality practices in hiring, training and employee recognition and coaching.

Integrity: Integrity, honesty and ethical behavior are the cornerstones of TrueCare. TrueCare will treat everyone with respect, and the values of honesty and ethical behavior will be demonstrated in everything we do.

Team Work: Working together and facilitating the achievement of shared goals is highly valued at TrueCare. The organization's success depends on an environment of mutual trust, high standards and the ability to make a difference in the access and quality of healthcare for the medically underserved.

Quality of Care and Services: Continuous quality improvement and a commitment to excellent customer service are at the heart of TrueCare. Leadership and staff are committed to working with community partners to bring about the elimination of health disparities and the attainment of healthy communities.

Innovation: Understanding the changing government, regulatory and marketplace environments and creating new initiatives and workable models to respond to community need is paramount to the mission. TrueCare will continue to encourage an environment of creativity, and will work to be innovative leaders within the health care community.

Stewardship: TrueCare is committed to a culture of stewardship, one in which leadership and staff are both resourceful and productive with the resources placed in their care. TrueCare is further committed to conducting business in a manner that reflects collaboration and accountability, encouraging everyone to recognize their role as stewards of the patients and communities we serve.

PERSONAL CONDUCT:

TrueCare values an atmosphere of open communication, ethical and honest behavior and adherence to all laws, regulations, policies, procedures, and protocols. All concerns raised regarding possible misconduct will be taken seriously and thoroughly investigated. Based on the outcome of the investigation, necessary actions will be taken.

TrueCare prohibits retaliation against anyone who in good faith reports a concern or raises questions about compliance with regulations, policies or practices. Retaliation of any kind must be reported to Corporate Compliance, Human Resources or the Ethico, [My Compliance Report](#) hotline. Regardless of position, any person found to have acted in a retaliatory manner is subject to disciplinary action, up to and including termination of employment.

TrueCare has a designated Corporate Compliance Officer who reports to the CEO and Board of Directors. The Corporate Compliance Officer functions as an independent and objective party that reviews and evaluates compliance issues/concerns, ensuring compliance with rules and regulations of regulatory agencies, related laws, corporate policies and protocols, and that behaviors in the workplace align with the Mission and Core Values. The Corporate Compliance Officer also serves as a point of contact to receive and direct compliance issues to appropriate resources for investigation and resolution.

ACCOUNTABILITY:

Although no company can have a policy, procedure or practice for every possible situation that might arise, TrueCare has a large number of corporate policies, procedures, and protocols to guide the performance of daily work and sound business practices. Most policies, procedures, and protocols are published in PolicyTech and/or the Learning Management System. It is the expectation that these resources are routinely utilized for awareness, education as well as for guidance on business practices, and performance expectations. It is further expected that:

- 1) All mandatory training is completed in a timely manner.
- 2) Without exception, all laws, regulations, policies, procedures and sound business practices are followed.
- 3) All available resources, including management, are utilized to ensure understanding of specific requirements of job performance.
- 4) Concerns about any ethical situation, are promptly discussed or reported.
- 5) Timely cooperation is provided with any issue that may need to be investigated or addressed.

The following principles outline key areas of ethical conduct that are further addressed in individual policies. It is everyone's responsibility to:

- 1) Safeguard the health and safety of employees, patients and our community.
- 2) Promote a culture that is inclusive, and values diversity.
- 3) Protect the privacy of all patients, team members and company (proprietary) information.
- 4) Act in the best interests of TrueCare, and those of our patients and community.
 - a. Special areas for awareness include policies on the False Claims Act; Conflict of Interest; Gifts, Gratuities and Business Courtesies; Purchasing; Research; as well as Political Contributions; Fundraising; and Patient Referrals.
- 5) Always communicate accurately and truthfully on behalf of TrueCare.

CONCLUSION:

Without exception, it is everyone's responsibility to report any misconduct or suspected violation of the Code. A potential violation is a serious matter and all are responsible for protecting our culture of integrity. The following are options to make a report:

- 1) Discuss the issue with your supervisor, manager or a leader you trust;
- 2) Contact Human Resources;
- 3) Contact the Compliance Officer; or
- 4) To make a report to our 3rd Party, Ethico, contact the 24-hour Compliance hotline by calling 1-855-387-4417 or report on-line at [My Compliance Report](#).

Each report is investigated and action is taken as warranted. Reporting a situation, even if uncertain, helps TrueCare gain information about areas where additional communication and training may be required. Reporting issues also help to quickly resolve and correct any issues that do exist.

CODE OF ETHICS AND BUSINESS CONDUCT ACKNOWLEDGMENT

I understand I have a personal obligation to ensure my professional conduct aligns with the TrueCare Code of Ethics and Business Conduct.

I understand this policy applies to me even if I am not directly employed by TrueCare, however may work with TrueCare as a Director of the Board, contractor, volunteer, or student intern/extern.

I understand that if I observe or suspect a situation that I believe may be unethical, illegal, unprofessional or wrong, or if I have any clinical, ethical or financial concern, I must make a report.

In fact, if I know of a violation and do not report it, I could face disciplinary action. I understand that TrueCare prohibits retaliation against anyone who in good faith reports a concern or raises a question about compliance with regulations, policies or practices.

I understand that I may make an anonymous report by calling 1-855-387-4417 or, report online at [My Compliance Report](#).

I understand that if I have questions or concerns about this, or any other TrueCare policy, I may ask for clarification from my supervisor, Human Resources or the Compliance Officer.

Signature: _____

Date: _____

Print Name: _____

Acknowledgment is required at time of hire, orientation as a student/volunteer; or appointment to the Board. Annual attestation by staff is to be documented during performance appraisals. Directors of the Board are to sign the acknowledgment annually.

[Revised: 03/2019; 09/2020; 03/2023]