

CODE OF ETHICS & BUSINESS CONDUCT

Statement of Our Mission and Core Values

Mission: To make the healing experience enjoyable, both for those receiving care and for those delivering care.

Values:

- **Compliance:** 100% compliance. No excuses.
- **Humility:** We are comfortable admitting mistakes and acknowledging that we don't know everything. We sincerely seek feedback as it is key to our improvement; most ask for criticism but truly only want praise.
- **Trust:** Satisfying our customers require unifying the care efforts of many. To truly succeed, all involved must be comfortable collaborating and contributing.
- **Relentless:** We continuously strive to improve the experience of receiving and delivering care.
- **Honor:** Delivering care is a privilege; therefore, we must exude integrity to earn the right to participate in the patient's healing process.

Build Trust and Credibility

The success of our business is dependent on the trust and confidence we earn from our employees, customers, partners, and stakeholders. We gain credibility by adhering to our values and commitments, displaying honesty and humility, and achieving company goals without sacrificing any of our values. It is easy to say what we must do, but the proof is in our actions. Ultimately, we will be judged on what we do.

Respect for the Individual

We all deserve to work in an environment where we are treated with dignity and respect. Contessa Health is committed to creating such an environment not only because it is the fair and right thing to do, but because it brings out the full potential in each of us, which, in turn, contributes directly to our business success. We are proud that our employees are our greatest asset and we cannot afford to let anyone's talents go to waste.

Contessa Health is an equal employment/affirmative action employer and is committed to providing a workplace that is free of discrimination of all types and from abusive, offensive or harassing behavior. Any employee who feels harassed or discriminated against should report the incident to his or her manager or to human resources.

Create a Culture of Open and Honest Communication

At Contessa Health, everyone should feel comfortable to speak his or her mind, particularly with respect to ethics concerns. Managers have a responsibility to create an open and supportive environment where employees feel comfortable raising such questions. We all benefit tremendously when employees exercise their power to prevent mistakes or wrongdoing by asking the right questions at the right times.

Contessa Health will investigate all reported instances of questionable or unethical behavior. In every instance where improper behavior is found to have occurred, the company will take appropriate action. We will not tolerate retaliation against employees who raise genuine ethics concerns in good faith.

Set Tone at the Top

Management has the added responsibility for demonstrating, through their actions, the importance of this Code. In any business, ethical behavior does not simply happen; it is the product of clear and direct communication of behavioral expectations, modeled from the top and demonstrated by example. Again, ultimately, our actions are what matters.

To make our Code work, managers must be responsible for promptly addressing ethical questions or concerns raised by employees and for taking the appropriate steps to deal with such issues. At Contessa Health, we want the ethics dialogue to become a natural part of daily work.

Confidential and Proprietary Information

Integral to Contessa Health business, success is our protection of confidential company information, as well as, nonpublic information entrusted to us by employees, customers and other business partners. Confidential and proprietary information includes such things as: pricing and financial data, customer names/addresses or nonpublic information about other companies, including: current or potential suppliers and vendors. We will not disclose confidential and nonpublic information without a valid business purpose and proper authorization.

Avoid Conflicts of Interest

We must avoid any relationship or activity that might impair, or even appear to influence, our ability to make objective and fair decisions when performing our jobs. We must never use Contessa Health property or information for personal gain or personally take any opportunity for ourselves that is discovered through our position with Contessa Health. We should avoid any actions that create a perception that favorable treatment of outside entities by Contessa Health was sought, received or given in exchange for personal business courtesies such as: gifts, gratuities, meals or entertainment. Although we may not use our position at Contessa Health to obtain business courtesies, we must never ask for them, nor accept unsolicited business courtesies that promote successful working relationships and good will with the firms that Contessa Health maintains or may establish a business relationship with, provided such acceptances do not create the appearance of conflicts nor influence our decision in vendor or business partner.

Determining whether a conflict of interest exists is not always easy to do. Employees with a conflict of interest question should seek advice from management. Before engaging in any activity, transaction or relationship that could give rise to a conflict of interest, all employees must seek review from their managers or the HR department.

Accountability

Each of us is responsible for knowing and adhering to the values and standards set forth in this Code, as well as the legal and ethical parameters of our work and for raising questions if we are uncertain about company policy. If we are concerned whether the standards are being met or are aware of violations of the Code, we must contact our supervisor, or the HR department or compliance hotline.

Contessa Health takes seriously the standards set forth in the Code, as well as, all legal and ethical obligations and expectations. Violations are cause for disciplinary action up to and including termination of employment.

Do the Right Thing

Several key questions can help identify situations that may be unethical, inappropriate or illegal. Ask yourself:



- Does what I am doing comply with the Contessa Health's Mission & Values, Code of Ethics and Business Conduct, and company policies?
- Have I been asked to misrepresent information or deviate from normal procedure?
- Would I feel comfortable describing my decision at a staff meeting or if this decision was published online or in the media?
- Is this the right thing to do?

Reporting

You have the responsibility to report violations of this Code of Ethics & Business Conduct, as well as any suspected non-compliance with federal or state law, this Code or Contessa Health's policies and procedures. Should you encounter potential violations, you have an obligation to report. Options include 1) talking to your supervisor, the Contessa Health compliance officer or a member of the executive leadership team or 2) filing a complaint through our compliance hotline at contessahealth.ethicspoint.com or via phone at 844-882-3812. Reporting through the compliance hotline can be made anonymously. Any reporting of good faith concerns will be handled with confidentiality and without retaliation.