

Clarvida is committed to compliance with all applicable laws, rules and regulations. Our Compliance Program was created to ensure that we conduct our business with integrity and in accordance with applicable laws, regulations and our policies, as well as to provide a safe environment for raising compliance concerns and questions. The Compliance Department oversees Clarvida's Compliance Program and ensures compliance with our *Code of Conduct*. Our Compliance Program outlines what we do as an organization to comply with legal and ethical requirements, including the following:

- Maintaining a working environment that promotes ethical values, exemplary behavior and compliance with the letter and spirit of all applicable laws and regulations.
- Encouraging employees, contracted providers, vendors and their employees to demonstrate the highest ethical standards in performing their daily tasks.
- Providing oversight of a disclosure system (including but not limited to the telephone Compliance Hotline) that requires Clarvida to respond to reports by employees or others of a suspected violation of law or regulation or violation of the principles of the Compliance Program.
- Identifying situations in which the laws, rules, and standards of state and/or federal programs or other applicable laws and regulations may have not been followed and facilitating the correction and remediation of any such practices.
- Implementing procedures to ensure ongoing compliance with all laws and regulations.
- Training and communication that ensures employees and independently contracted providers understand and comply with all state and federal laws and regulations.
- Reducing the likelihood that compliance violations will occur through appropriate screening of potential and current employees and contractors of Clarvida.
- Assuring that documents are retained and kept secure, as required by state and federal law and regulation, for the appropriate length of time.
- Establishing disciplinary policies that are prompt, effective and consistent that discipline employees based on the severity of the violation fairly and consistently.
- Assuring that internal and external inspections and audits proceed in a smooth and professional manner and that all requests and concerns are addressed promptly and appropriately.

The standards set forth in Clarvida's *Code of Conduct* apply to all of Clarvida's employees, trainees, interns, independent contractors, vendors and Board of Directors. The *Code of Conduct* standards require us to follow all applicable laws, rules, regulations and company policies as related to the scope of our duties and responsibilities at Clarvida and to maintain a health care and business environment that is committed to integrity and ethical conduct.

Our *Code of Conduct* is the foundation of our Compliance Program and guides us in carrying out our daily activities with appropriate ethical and legal standards. Our *Code of Conduct* standards are mandatory and must be followed. Anyone who violates laws, company policies or our *Code of Conduct* may be disciplined, up to and including termination. Our *Code of Conduct* is an evolving document that will be reviewed and updated regularly to respond to changing conditions and to reflect changes in our regulatory environment.

Our *Code of Conduct* is not intended to cover every situation that may be encountered. We must comply with all applicable laws, regulations and our policies whether or not they are specifically addressed in our *Code of Conduct*. In some cases, a subject discussed in our *Code of Conduct* may involve such complexity that additional guidance may be needed. In these cases, you should consult with your supervisor or the

Compliance Department for additional guidance.

OUR DUTY TO REPORT AND COOPERATE WITH INVESTIGATIONS

Our *Code of Conduct* is to be used as a guide if you are confronted with a situation that raises questions about ethical business conduct. If you believe that a law, policy or our *Code of Conduct* is not being followed, you must report it to our Compliance Department. You should also report it to your supervisor. If you feel uneasy talking to your supervisor, you may voice your concern to the next supervisory level, up to and including the highest level of management. Clarvida encourages open and honest discussion of issues with all management personnel. We are committed to providing an environment that allows reporting in good faith without fear of retaliation.

It is very important, as well as required, that you immediately report any perceived violation of compliance law, policy or our *Code of Conduct* to the Compliance Department. Failure to report to the Compliance Department may result in disciplinary action, up to and including termination. Our Compliance Department will evaluate all reports promptly, completely and fairly.

You can report compliance concerns to the Compliance Department in one of the following ways:

- Call Clarvida's 24-hour Ethics Hotline at: (844) 629-2894 (you may make anonymous reports here)
- Report to Ethics Hotline via email: clarvida.ethicspoint.com
- Send an email to the Compliance Department at: compliance_support@clarvida.com
- Contact the Compliance Department directly at: (520) 747-6653

If you report a compliance concern, be sure to include as much information as possible so that our Compliance Department can appropriately investigate the concern, such as the location where your concern occurred or is occurring (for example, the program name and city), the date or dates of any incident, the names and job roles of individuals involved in the concern, a detailed description of your concern and your name if you are comfortable letting us know. If you are not comfortable leaving your name, you may make an anonymous report by calling the Ethics Hotline number above.

Anyone making such a report is assured that it will be treated as confidential and will be shared with others only on a need-to-know basis. The findings of a compliance investigation are confidential to protect all involved in the investigation process. As a result, details and specific findings of a compliance investigation will be shared only on a need-to-know basis, meaning the individual making the report may not always be made aware of the investigation's outcome. The Vice President of Compliance ensures that all reports will be thoroughly and fairly investigated and that appropriate action will be taken.

No adverse actions will be taken against someone for making a report in good faith or for cooperating with a compliance investigation. Clarvida has policies that protect employees against retaliation or retribution for reporting a compliance concern in good faith or cooperating with a compliance investigation with good intentions. The non-retaliation policy ensures that no one is penalized for reporting what is honestly believed to be a compliance problem or for honestly participating in a compliance investigation. However, if someone purposely falsifies or misrepresents a report or makes false statements during an investigation, that person will not be protected under the non-retaliation policy.

False accusations or statements made in a report or during an investigation, including those made with the

intent of harming or retaliating against another person, may result in disciplinary action, up to and including termination. Although we have a policy that does not permit retaliation for reporting or cooperating in good faith, it is important to understand that no policy can protect you from applicable consequences if you have broken the law or violated our policies. Breaking the law or violating our policies may result in disciplinary action, up to and including termination, as well as possible state and federal actions and penalties.

Sometimes programs are required by law to report certain compliance issues to state or federal agencies. When this is the case, the Compliance Department, in conjunction with legal counsel, will conduct an evaluation of the issue in terms of state or federal reporting requirements and will notify the appropriate state or federal agencies on behalf of the programs when applicable.

Clarvida is committed to correcting wrongdoing, whether intentional or inadvertent, wherever it may occur in the organization, and to cooperating fully with government inquiries and investigations.

INTEGRITY IN CLIENT CARE

Quality Care

At Clarvida, we strive to provide client care that is:

- **Safe** – Behavioral healthcare services must be safe; avoid harm to consumers from the care that is intended to help them.
- **Timely** – Reducing waits and sometimes harmful delays for both those who receive and those who provide care.
- **Effective** – Providing services based on scientific knowledge to all who could benefit and refraining from providing services to those not likely to benefit (avoiding underuse and misuse, respectively).
- **Efficient** – Avoiding waste, including waste of equipment, time, supplies, ideas and energy.
- **Equitable** – Providing care that does not vary in quality because of personal characteristics such as gender, ethnicity, geographic location, and socioeconomic status.
- **Client-centered** – Providing care that is respectful of and responsive to individual consumer preferences, needs, and values, and ensuring that consumer values guide all clinical decisions and treatment.

Everything we do should advance our commitment to deliver the highest quality of care to our clients. We make every effort to provide each client with the best possible care in order for them to effectively reach their goals on their treatment plan. We treat all clients with dignity, respect and courtesy.

We are committed to providing clear, accurate, honest and transparent information about the quality of care we offer to all our clients so that they can make informed health care decisions. As health care providers, it is important for us to note errors or deficiencies, even those that seem small or insignificant, in order to improve future care. Promptly report such matters to your supervisor.

Privacy of Client Information

Clients and their families trust us with highly personal and sensitive information regarding their behavioral health conditions. If clients or families do not feel confident that we will keep such information private, they may hesitate to discuss some health concerns with us, which can affect our decision-making capabilities and hinder their behavioral health care.

We collect information about a client's mental and medical condition, history, medication(s) and family history in order to provide quality care. We realize the sensitive nature of this information and are committed to protecting client privacy. We do not access client information, internally use client information, or disclose client information outside the organization except as necessary to perform our jobs and as permissible under applicable laws and regulations. We are committed to complying with state and federal privacy laws, and to assisting clients with exercising their client privacy rights.

Strong federal and state laws govern the privacy of our clients and their health information. This includes client information that is spoken, written or in electronic systems. The laws apply to past, present or future health of a client, as well as deceased clients. These laws apply to the organization, as well as to you as an individual, even after you are no longer working here. Client privacy laws impose serious consequences for failing to protect client privacy, including potential fines, imprisonment, loss of your professional license and clients' right to sue both the organization and you personally. Additionally, violating our privacy policies can lead to disciplinary actions, up to and including termination.

Complying with our privacy policies includes the following:

- We access, use and disclose only the minimum amount of client information needed to perform our jobs;
- We do not discuss client information with others who do not have a job-related need to know, including co-workers, colleagues, family and friends;
- We do not share our user IDs or passwords to our electronic systems and we log-off when we step away from our computers; what is done under your ID/password is your responsibility;
- We assess our surroundings when speaking with or about clients and speak quietly, always asking the client for permission to speak to them about their care when family or friends are present;
- We do not mention or make reference to any clients whatsoever on personal social networking sites or blogs;
- We verify written client information to ensure that we do not mix one client's information with another's, that fax numbers are accurate and entered correctly before sending, and that client labels are correct;
- We dispose of written client information in confidential disposal bins and we contact IT for proper disposal of electronic client information;
- We type [encrypt] on the subject line of all emails that contain client information so that the email is encrypted and we do not put client information in the subject line;
- We do not send any client Protected Health Information to personal email addresses, including our own;
- We do not send *any type* of Excel spreadsheets to our personal email addresses
- We only use company-approved personal devices to store, download or capture client information, including photographs;

- We do not leave work bags, folders, papers, binders or equipment anywhere in our vehicles where they can be seen from outside the vehicle;
- We do not leave company property, including Protected Health Information, in our vehicles overnight or for extended periods of time;
- We report all privacy concerns or potential privacy violations immediately to our Compliance Department.

INTEGRITY IN BILLING AND FINANCIAL MATTERS

Coding and Billing for Client Care Services

Clarvida takes great care to ensure that billings to the government, third-party payors and clients are accurate and conform to all applicable federal and state laws and regulations. Coding is how we identify and classify health information, such as conditions and services, based on the care provided and documented in the client's medical record. Using these codes in the billing process is how we identify charges for services we have provided.

We are committed to timely, complete and accurate coding and billing, including the following principles:

- We bill only for services that we actually provide, document, and which are medically necessary, and, as applicable, ordered by a physician or other appropriately licensed individual;
- We assign billing codes that we believe in good faith accurately represent the services that we provide and that are supported by documentation in the medical record according to regulatory requirements and guidelines;
- We implement effective controls to prevent unbundling, upcoding, duplicate billing for the same service, or otherwise billing in an impermissible manner;
- We do not charge government payors in excess of our usual charges;
- We respond promptly to billing and coding inquiries and timely resolve inaccuracies in previously submitted claims that are discovered and confirmed;
- We ensure that employees and subcontractors who perform billing or coding services have the necessary skills, quality assurance processes and appropriate procedures to ensure that billings are accurate and complete; and
- We do not knowingly present, or cause to be presented, claims for payment that are false, fictitious or fraudulent.

False Claims Act and Deficit Reduction Act

The State and Federal False Claims Acts and the Federal Deficit Reduction Act protect government programs such as Medicare and Medicaid from fraud and abuse. It is a violation of the False Claims Act to knowingly submit, or cause another person or entity to submit, false claims for payment of government funds. Additionally, the State and Federal False Claims Acts contain provisions that allow individuals with actual knowledge of alleged false claims to sue on behalf of the government, as well as provide protections against retaliation for individuals taking a false claims action.

It is illegal to submit claims for payment to government programs that we know or should know are false or fraudulent. No specific intent to defraud the government is required for a claim to qualify as a false claim. The False Claims Act defines “knowing” to include not only actual knowledge, but also instances of deliberate ignorance or reckless disregard of the truth or falsity of a claim. Filing false claims may result in damages of up to three times the amount of the government program’s loss, fines, imprisonment, entering into a Corporate Integrity Agreement and exclusion from participation in federal and state health care programs.

We are committed to submitting claims that are accurate and truthful. If you know of a false claim, contact our Compliance Department immediately, or call the Compliance Hotline to notify the Compliance Department anonymously. As a Clarvida employee, vendor or contractor, you have an obligation to report known or potential compliance violations. Failure to notify the Compliance Department may lead to disciplinary action up to and including termination.

Financial Reporting

We maintain a high standard of accuracy and completeness in the documentation and reporting of all financial records. These records serve as the basis for managing our business and are important in meeting our obligations to clients, staff, suppliers and others. These records are also necessary for compliance with tax and financial reporting requirements.

Our financial information fairly represents actual business transactions and conforms to industry practice standards. We maintain a system of internal controls to ensure accuracy and completeness in documenting, maintaining and reporting financial information. We cooperate fully with internal and external auditors and any regulatory agencies that examine our books and records.

State and federal laws require us to submit reports of our operating costs and statistics, known as cost reports. These laws define what costs are allowable and outline the appropriate methodologies to claim reimbursement for the cost of services provided to government program beneficiaries. We are committed to the preparation, submission and settlement of accurate, timely and complete cost reports where state laws require us to submit cost reports.

INTEGRITY IN BUSINESS CONDUCT

Use of Funds and Assets

Clarvida’s organizational assets and resources are to be used for business purposes only. Personal use of organizational assets is strictly prohibited. No company assets shall be used for any unlawful purpose. In addition:

- No employee shall obtain privileges or special benefits through payment of bribes, illegal political contributions or other illicit payments.
- Provision of Clarvida’s services as well as purchases of products and services or supplies shall be made solely on the basis of quality, price and service, and never on the basis of giving or receiving payments, gifts, entertainment or favors.
- No undisclosed or unrecorded fund or asset shall be established for any purpose.

Record Creation, Maintenance, Retention and Destruction

It is our duty to create and maintain accurate and complete records that are in compliance with federal and state laws and applicable policies. Clarvida's policies provide guidance on the proper creation, amendment, maintenance, retention and destruction of organizational records and documents. Additional guidelines are as follows:

- No false or artificial entry shall be made in the books and records of Clarvida for any reason, and no employee shall engage in any arrangement that results in such prohibited act, even if directed to do so by his or her supervisor.
- All requests for payment shall be supported by a document stating the purpose for the payment.
- No payment shall be approved or made with the agreement or understanding that any part of such payment shall be used for any purpose other than that described by documents supporting the payment.
- The Chief Financial Officer shall have the primary responsibility to devise, establish, and maintain an effective system of internal accounting controls and to demonstrate that such controls are documented and periodically appraised.
- Client records shall be maintained, secured, and protected in compliance with applicable state and federal confidentiality laws, and shall be retained for at least six years or such longer period as is required by applicable law.
- Client records shall be destroyed in a manner that protects confidentiality and renders the records indecipherable, as required by applicable laws and regulations.
- All non-client records will similarly be retained and destroyed in compliance with applicable laws and regulations.

Conflicts of Interest

A conflict of interest involves any situation where your personal activities or interests are advanced at the expense of Clarvida. Conflicts of interest can arise, for example, via an individual's outside employment, certain business opportunities that present an opportunity for personal gain, and/or via relationships with family or friends. These circumstances may be financial or involve some other type of personal interest that conflicts with your professional responsibilities. Since our clients and community expect us to make decisions that are not biased by personal interests, actual or perceived conflicts-of-interest may compromise our ability, and the ability of our organization, to provide client care, transact business or make purchasing decisions. They may also pose a risk to the operations and reputation of Clarvida's programs.

Conflicts-of-interest can often be avoided or mitigated when Clarvida is aware of potential conflicts. We are required to follow the *Conflict-of-Interest Policy* and disclose at the time of hire, promotion or transfer, and as they occur, all information about any actual or perceived conflict-of-interest. Potential conflicts of interest should be reported to one's supervisor or to compliance_support@pathways.com. Failure to disclose a conflict-of-interest may result in disciplinary action, up to and including termination.

The following information provides examples of several common, potential and actual conflicts-of-interest:

- Ownership of, or an interest in, a competitor or a business with which Clarvida has or is contemplating a relationship (such as a provider, member, landlord, distributor, licensee/licensor, etc.), either directly or indirectly such as through family members.
- Profiting or assisting others to profit from confidential information or business opportunities that are available because of employment by Clarvida.
- Providing services to a competitor or a current or proposed contractor or subcontractor as an employee, director, officer, partner, agent or consultant.
- Influencing or attempting to influence any business transaction between Clarvida and another entity in which an employee (or a member of the employee's family) has a direct or indirect financial interest or acts as a director, officer, employee, partner, agent or consultant.
- Buying or selling securities of any company using non-public information obtained in the performance of an employee's duties, or providing such information so obtained to others.

As employees, we owe a duty to Clarvida to advance Clarvida's interest when the opportunity to do so arises. Employees are prohibited from:

- Taking for themselves personally opportunities (or opportunities for family, friends or another employer) that are discovered through the use of company property, information or position
- Using company property, information or position for personal gain
- Competing with Clarvida
- Offering, promising or paying money or anything of value to any government employee or official, political party official, or any candidate for political office for any of the following purposes:
 - Obtaining or retaining business for Clarvida;
 - Directing business to any person or entity;
 - Influencing any act or decision of such official in his or her official capacity;
 - Inducing such official to do or refrain from doing any act in violation of his or her lawful duty; or
 - Inducing such official to use his or her influence improperly to affect or influence any act or decision.
- Causing, either directly or indirectly, an offer, promise, or payment as described above to be made through a third party or intermediary.

Gifts

We maintain high ethical standards regarding the offering and acceptance of gifts. Offering or accepting personal gifts may influence our decisions or the decisions of others and may constitute a conflict-of-interest. The appropriateness of offering or accepting gifts depends on the specific circumstances of the gift and who is offering and receiving it. The following information provides general guidance on this topic.

Receiving Gifts and Hospitality

In general, it is acceptable to receive small gifts of modest value (e.g., pens, calendars, small holiday baskets), particularly if they bear a company's name or insignia and can thus be regarded as being in the nature of advertising or promotional items. We may accept items of modest value from non-"industry" vendors, such as food or flowers, provided that the gift is shared with our entire department or program.

It is not always possible or even desirable to reject modest offers of hospitality and the decision to accept or not depends on the circumstances in each case. Invitations to receptions, luncheons, sports outings, and the like may be accepted if such events are useful to Clarvida to make contacts, discuss business, or otherwise promote the interests of the business. When in doubt as to whether a gift or hospitality is "modest" or whether attending a hospitality event will be useful to Clarvida, consult with the Compliance Department.

The guidelines above apply equally to gifts or hospitality given by Pathways employees to others and modest expenditures should be approved in advance by Clarvida's General Counsel.

If you have questions about whether a particular situation amounts to a conflict of interest or the appearance of one you are required disclose the situation to your supervisor. Each supervisor is responsible for discussing the situation with the employee and arriving at a decision after consultation with the General Counsel and/or the Compliance Department.

Excluded Parties or Unlicensed Providers

Clarvida does not hire employees, contract with independent providers or allow anyone to take a position on a Clarvida Board who has been publicly sanctioned or excluded from participating in federal or state healthcare programs. Furthermore, Clarvida does not bill for services rendered by individuals or organizations that are excluded from participating in federal or state healthcare programs.

Clarvida has implemented screening procedures to identify individuals that governments have sanctioned or excluded from participation in government programs, including checks of publicly available databases such as the U.S. Office of Inspector General list of excluded individuals and entities and GSA's System for Award Management (SAM). Clarvida conducts initial exclusions checks on potential employees and contractors, and monthly exclusions checks on existing employees and contractors to ensure continued eligibility to participate in federal and state healthcare programs. As an employee, you have a duty to immediately report any change in your eligibility status to the Compliance Department or to HR, and to report any information that another employee or contractor may be excluded to the Compliance Department.

Clarvida and its individual providers must also maintain all credentials, licenses and certifications that are necessary to perform our respective jobs. Employees and contractors in positions that require professional licenses, certifications or other credentials are responsible for keeping their licenses, certifications or other credentials current and active. Any lapses in licensure or certification must be reported to a supervisor as soon as possible. Clarvida will comply with local law requirements applicable to our respective disciplines. If you are found to have falsified credentials, licensure or certification for yourself or others, you will be subject to corrective action, up to and including termination, to the extent permitted by law.

Confidential Business Information

Confidential information about our organization's strategy and operations is a valuable asset. Although you may use confidential business information as necessary to perform your job, it must not be shared with others outside the organization or internally with those who do not need to know about the information in order to perform their jobs. Confidential and proprietary business information covers anything related to our business or operations that is not publicly known, such as personnel files, wage and salary information, financial information, billing and pricing information, cost data, strategic plans, work plans, marketing strategies, projected earnings, information related to investigations, disciplinary actions, information related to acquisitions or joint ventures, policies and procedures, clinical and client information, computer and system login IDs, passwords and emails. Protecting all of these assets against loss, theft and misuse is vitally important.

Each employee is responsible for protecting Clarvida's property entrusted to him or her and for helping to protect Clarvida's assets in general. Should you observe any situation that could lead to the loss, misuse, or theft of Company assets, you should report the situation to your supervisor as soon as possible.

Proprietary Information

Proprietary information is almost always confidential. It includes, among other things, business, financial, marketing plans associated with Clarvida's services, processes, business plans, personnel and salary information, client information, and copyright material associated with our services.

You must not use or disclose Clarvida's proprietary information except as authorized by Clarvida. Similarly, Clarvida's employees are prohibited from misappropriating the confidential or proprietary information of Clarvida's competitors.

Inadvertent disclosure by employees can also harm Clarvida's interests. You should not discuss confidential information even with authorized persons within Clarvida if you are in the general presence of others, i.e. at a conference, reception, restaurant, or on an airplane. Further, you should not discuss such information with individuals within Clarvida who are not authorized to receive such information.

If questioned by someone from outside Clarvida about Clarvida's confidential information, do not answer unless you are certain you are authorized to do so. If you are not authorized, refer the person to the appropriate Company officer.

Even once you have left Clarvida, you are still required to maintain the confidentiality of any Company information that you viewed, received or used during the course of your employment with Clarvida. Copies or electronic files of any confidential or proprietary information in your possession once you leave Clarvida must be returned at the end of your employment with Clarvida. Taking any company information with you as you prepare to leave Clarvida is strictly prohibited. Furthermore, Clarvida owns any and all intellectual property that you created during the time that you were employed with Clarvida. Taking any company documents with you when you leave Clarvida, whether you created them or not during your employment, is strictly prohibited and may result in legal action being taken against you.

INTEGRITY WITH REFERRAL SOURCES

Anti-Kickback Laws

The federal Anti-Kickback Law prohibits entities such as Clarvida from knowingly or willfully offering or paying, directly or indirectly, any form or remuneration in return for, or to promote, the referral of any client or business that is covered by Medicare, Medicaid or any other federal or state health care financing program. Similarly, most states have anti-kickback laws too. Remuneration includes bribes, kickbacks or rebates. Where gifts are intended to induce or reward referrals, gifts (discussed above) can also implicate these Anti-Kickback Laws.

Clarvida may not engage in any financial transactions or arrangements that include incentives for referring clients or business to Clarvida or recommending the services of Clarvida. All arrangements, whether formal contracts or informal dealings, that involve client referral sources (including but not limited to prescribers, other healthcare providers and managed care organizations) must be reviewed and approved by Legal prior to entry/execution.

Physician Self-Referral Law

The Stark Law is a set of federal laws that prohibit physician self-referral. Specifically, The Stark Law prohibits a referral by a physician of a Medicare or Medicaid client to an entity providing certain health services if the physician, or an immediate family member of the physician, has a financial relationship with that entity. Clarvida conducts all business arrangements and practices with physicians in compliance with The Stark Law. Clarvida employees are required to immediately report all known or suspected violations of The Stark Law to the Compliance Department.

SAFE AND RESPECTFUL WORK ENVIRONMENT

Clarvida is committed to providing a supportive work environment where employees have the opportunity to reach their full potential. Clarvida employees are expected to do their best to create a respectful workplace.

Equal Opportunity Employment

Clarvida is committed to providing a workplace that is diverse and free from improper discrimination and harassment. Clarvida hires and promotes employees based on their ability to demonstrate excellence in their work and dedication to meeting client needs. Clarvida employees' interactions with one another should always be fair, objective and professional. Every Clarvida employee is responsible for supporting fair employment values by complying with applicable labor and employment laws, including anti-discrimination and privacy laws. Clarvida will make reasonable accommodations for individuals with physical or mental disabilities, in accordance with applicable laws. If you have questions or concerns about unlawful discrimination or harassment in the workplace, bring these issues to your supervisor or to HR. Anyone found to be engaging in unlawful discrimination or harassment will be subject to corrective action, up to and including termination of employment, to the extent permitted by law.

Harassment

Clarvida employees should all feel safe while at Clarvida facilities. Therefore, Clarvida will not tolerate violence, threats of violence or any form of unlawful discrimination or harassment including sexual harassment in the workplace.

Anyone who experiences or observes unlawful harassment should immediately report the incident to a supervisor or HR. Similarly, supervisors who learn of any such alleged incident or concern should immediately report it to HR. HR will promptly and thoroughly investigate any complaints and take appropriate action. Anyone found to be engaging in unlawful harassment will be subject to corrective action, up to and including termination of employment, to the extent permitted by law.

Drugs and Alcohol

To protect Clarvida clients, employees, vendors, business partners, and third parties, Clarvida maintains an alcohol- and drug-free work environment. During work hours, while operating a Clarvida vehicle (or personal vehicle on work-related business) or equipment, or delivery of client care, Clarvida employees are prohibited from:

- Using, possessing, buying, selling, manufacturing, distributing, dispensing or transferring illegal drugs
- Possessing or consuming alcohol or marijuana
- Being under the influence of illegal drugs, alcohol or marijuana
- Using drugs intended for clients

In special instances, alcohol may be served at Clarvida-sponsored events, where permitted by law and culturally appropriate. Each Clarvida employee should use good judgment when deciding to consume alcohol in social situations. All employees will be held personally accountable for their actions, if they abuse alcohol or drive impaired after such an event.

Anyone with problems involving drugs or alcohol is strongly encouraged to seek help from appropriate internal and external resources. Any employee found to be in violation of Clarvida's alcohol-and drug-free work environment policies will be subject to corrective action, up to and including termination of employment, to the extent permitted by law.

Weapon-Free Workplace

Clarvida prohibits all persons who enter a Clarvida facility from carrying a prohibited weapon, regardless of whether the person is licensed to carry the prohibited weapon. A prohibited weapon includes, but is not limited to, any gun, rifle, firearm, explosive device, knives, stun guns, or any other weapon restricted or outlawed by law or that could cause serious bodily injury. Police officers, security guards or other persons who have been authorized by Clarvida may carry a prohibited weapon.

Clarvida employees are never permitted to have prohibited weapons in their possession while conducting Clarvida business, whether the business is conducted on Clarvida's premises or off-site.

Health and Safety

Each Clarvida employee needs to do their part to keep facilities clean and well-functioning. Clarvida

follows the health and safety policies and procedures that are designed to ensure that Clarvida is meeting all applicable laws and regulations as they apply to its workplaces. If you witness an injury, accident or dangerous situation, you must immediately report it to your supervisor or HR. It is important that employees immediately advise their supervisors of any serious workplace injury or dangerous situation so immediate action may be taken to resolve the issue.

INTEGRITY IN DECISION-MAKING

Clarvida's Code of Conduct assists us to make ethical decisions in the workplace. However, it is not designed to address every issue that you may encounter. You may face a situation where the right course of action is unclear. If you are unsure of what to do in a given situation, ask yourself the following questions:

- Is it illegal?
- Is it inconsistent with our mission, vision and values?
- Is it unethical?
- Could it harm our clients?
- Could it harm our coworkers, colleagues or contractors?
- Could it harm or be perceived as abusive to government programs?
- Could it harm Clarvida?
- Would our organizations be compromised or embarrassed if it became public knowledge?
- Would we be uncomfortable reading about it in the newspaper?
- It is unfair or inappropriate?
- Could it adversely impact our organization if everyone did it?
- Is it inconsistent with our policies or our Code of Conduct?

If, after you ask these questions, you are still unclear as to the appropriate course of action, have a conversation with your supervisor or consult with the Compliance Department.

It is imperative that Clarvida's Code of Conduct is effectively communicated throughout all levels of the organization. We all have a responsibility for compliance in the workplace. The Compliance Department welcomes constructive input regarding its Compliance Plan and Code of Conduct. If you have comments, suggestions or questions, please submit them to the Compliance Department.

Clarvida's Compliance Department: (520) 747-6653

Compliance_Support@clarvida.com

HIPAAPrivacyPC@clarvida.com

24-Hour Ethics Hotline: (844) 629-2894