



# **Code of Conduct**

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## Why we have the Code

The Papa, Inc. (“Papa” or “Company”) **Code of Conduct** (“Code”) reflects Papa’s values and sets the ethical standards for business practices. While not an exhaustive rulebook, the *Code* outlines essential principles that safeguard Papa’s reputation, clients, shareholders, vendors, suppliers, business partners, and the communities we serve.

The Code applies to all individuals conducting business on behalf of Papa, including personnel, board members, directors, vendors, suppliers, subcontractors, downstream entities, agents, and consultants, independent contractors (collectively referred to as “Contractors”).

**For Papa employees**, the Code supplements—but does not replace—existing Company policies, including the Papa Employee Handbook. Employees must adhere to both the spirit and the letter of the Code.

**For Papa Pals**, the Code supplements—but does not replace—your Papa Pal Agreement. It sets forth ethical and compliance expectations for conducting business on behalf of Papa. However, this Code does not create an employment relationship, an employment contract, or convey any specific employment rights. Your engagement with Papa is governed solely by your Papa Pal Agreement, which remains the controlling document regarding the terms of your relationship with Papa.

**For Consultants**, the Code supplements—but does not replace your agreement with Papa. However, this Code does not create an employment relationship, an employment contract, or convey any specific employment rights or guarantee engagement for a specific period. Your engagement with Papa is governed solely by your consulting agreement, which remains the controlling document regarding the terms of your relationship with Papa.

Noncompliance with the Code, regardless of intent or ignorance, may result in disciplinary

actions, up to and including termination.

Papa strictly prohibits retaliation against anyone reporting in good faith a known or suspected ethical or compliance concern. Anyone found to have retaliated against someone for making such a report will be subject to corrective action(s), up to and including termination. By reporting misconduct, you are contributing to Papa’s ethical culture and upholding Papa’s values. If you believe you are being retaliated against, please contact a member of the Legal & Compliance Department or the People & Culture Department.

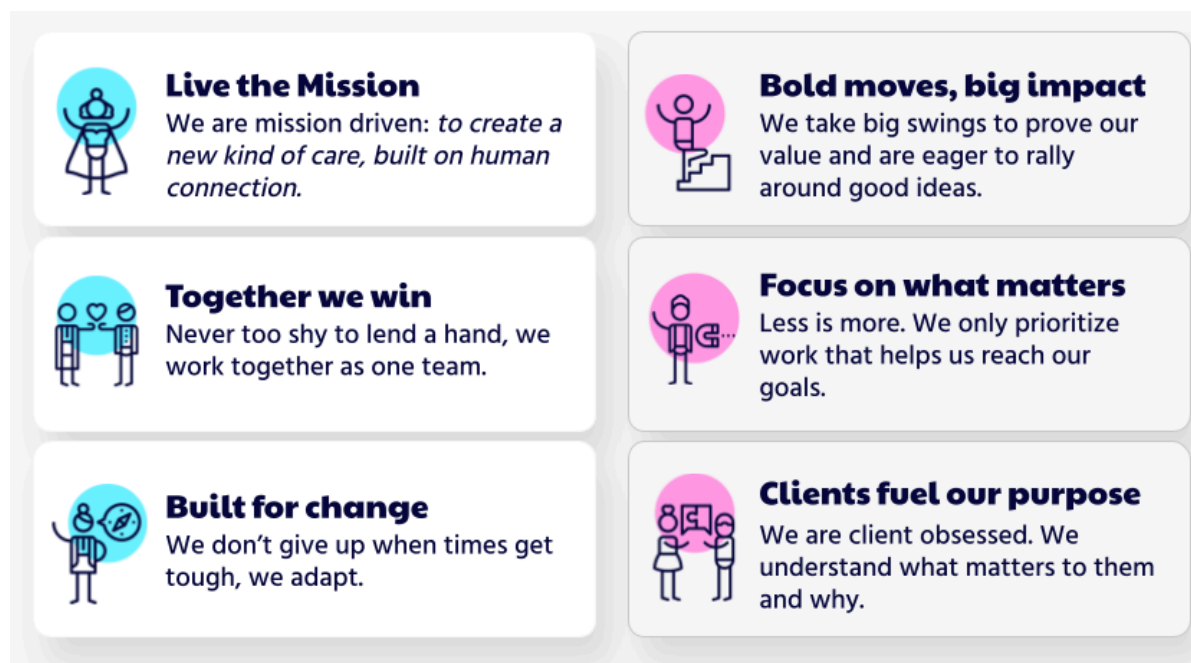
The Code does not create any contractual rights and may be modified at any time without notice. It should not be interpreted as a promise of employment or engagement.

Papa reserves the right to modify or eliminate the Code at its sole discretion.

***This Code is not a contract of employment and it does not convey any specific employment rights or guarantee employment or engagement with Papa for any duration or specific time period. Papa reserves the right in its sole discretion to modify or eliminate any of the contents of this Code without prior notice.***

## Values

Our values are the guiding principles that shape our culture, drive ethical decision-making, and define how we collaborate and conduct business with integrity. They represent the qualities we strive for every day, fostering a culture of support, innovation, and inclusivity as we work toward creating a world where no one has to go it alone.



## Our shared responsibilities

### Knowing and complying with this code, our policies, and laws

We are responsible for understanding, adhering to, and upholding our policies and applicable laws. By fulfilling these responsibilities, we protect Papa's integrity and reputation.

We must never engage in or ask others to engage in unethical or illegal acts. Any request or direction to commit potentially illegal or unethical acts should be reported immediately to the Legal & Compliance Department.

## Mandatory compliance Requirements

Mandatory compliance requirements must always be completed within the time frame specified. As applicable to your role with Papa, these include:

- Required trainings
- Conflict of Interest Disclosure(s)
- Acknowledgement of the Code of Conduct within 30 days of hire/engagement, whenever updates occur, and annually; and/or
- Acceptance of the Employee Handbook upon hire and annually.

## Risk management

We are responsible for understanding and following company policies that address our identified and evolving internal and external risks to our strategies, objectives, financials, and operations. Managers must identify, assess, and mitigate risks. If you identify significant unmanaged risks, report them to your manager or the Compliance Department. c

## Noncompliance

Failure to comply with any part of Papa's policies, standards, guidelines, procedures, or the Code of Conduct, may result in disciplinary action(s) up to and including termination of employment, services, or relationship with Papa. In addition, noncompliance may result in individual or company financial penalties, regulatory sanctions, and/or criminal liability.

## Follow the law

Papa is committed to full compliance with all applicable federal and state laws. The Company's Workforce, Contractors, Vendors, and those who have a business or contractual relationship with Papa are responsible for following the law and Papa's policies and procedures. No instruction, excuse, or pressure justifies breaking the law or encouraging someone else to break the law. Any unlawful act

involving Papa's systems or business information may result in Papa turning over all evidence of unlawful activity to appropriate authorities.

## Commitment to fair competition and business practices

Papa is committed to lawful and ethical competition in compliance with all applicable antitrust and pro-competition laws. These laws generally prohibit anti-competitive agreements or conduct that may restrain trade or reduce competition. Papa values the competitive market and is committed to fair competition and business practices. Papa strictly prohibits unethical or illegal means of obtaining competitive information. The Company's workforce is expected to:

- Avoid all contracts, agreements, and/or actions that unlawfully limit or distort competition.
- Refuse agreements with competitors to fix prices, allocate markets or engage in other prohibited anti-competitive conduct.
- Contact the Legal & Compliance Department prior to engaging in communications with competitors or potential competitors.
- Avoid sharing competitively sensitive or confidential information with competitors or potential competitors, including material contract terms, non-public pricing information, strategic plans, cost and procurement information.
- Ensure all discussions and activities with representatives of other companies comply with antitrust and competition laws.
- Only obtain confidential information about a competitor properly, through publicly available sources or structured exchanges that follow antitrust guidelines, such as those managed by a third party, involving data over three months old, and sufficiently aggregated to prevent identifying individual participants.
- Contact the Legal & Compliance Department if you have questions about potential antitrust implications or antitrust practices.

If proprietary information about a competitor is shared with you, deliberately or inadvertently, you should discuss the disclosure with the Legal & Compliance Department to determine proper use or next steps. You should not use the information without first obtaining approval to do so from the Legal & Compliance Department.

While Papa is not publicly traded, we may work with publicly traded companies. During your employment/engagement, you may come across confidential or “insider information.” It is against the law to use this information for personal or company gain, and utilizing or sharing this

information with others is strictly prohibited.

## Disclaimer

Papa complies with all applicable federal and state laws, regulations, and contractual obligations governing the provision of services to individuals and entities receiving federal or state funds. When multiple state laws apply to a specific issue or requirement, the most stringent requirement will be followed.

## Reporting violations, fraud, or other compliance concerns

Any suspected or observed fraud, misconduct including violations of the *Code*, company policies and procedures, suspected violation of law, or any other ethical concerns **must be reported** using one of the available reporting channels. Fraud is an intentional misrepresentation of fact through the use of words, conduct, or concealment of important information to induce someone to act in a way that causes them injury or harm. Suspected violations or misconduct may be reported directly to an employee’s manager, the Compliance Department, a member of the Company Compliance Committee or the Compliance Department. Managers who receive reports of suspected or actual violations or misconduct must report these matters to the Compliance Department immediately.

Reports can be anonymous and are not limited to compliance issues or inquiries, but may include reports of actual or suspected financial misconduct, HR concerns, or ethical violations. The failure to report known violations or misconduct may lead to corrective action(s) up to and including termination.

## Reporting finance, accounting, or internal accounting control concerns

Concerns related to finance, accounting, and/or internal accounting controls require special focus because they could affect Papa’s financial reporting obligations. Some examples include, but are not limited to:

- false statements or deliberate errors in the recording and maintaining of Papa’s financial records;
- false statements or deliberate errors in the preparation, evaluation, review, or audit of any of Papa’s financial statement; and
- deficiencies in or noncompliance with Papa’s internal accounting controls or policies.

## Ethics and Conduct Hotline Reporting

Suspected or actual violations may be reported directly to the Legal & Compliance Department or through the following methods:

**Hotline:** 1-844-850-2144  
**Online Web:** <https://joinpapa.ethicspoint.com/>



## Reporting fraud, waste, and abuse (FWA) concerns

Papa is committed to preventing, detecting, and investigating FWA to protect the integrity and availability of healthcare resources. Fraud can take many forms and may be reported directly to the Compliance department, via the Ethics hotline, or online.

## Non-retaliation and non-intimidation

Papa prohibits retaliation against individuals reporting compliance concerns, workplace violations, or ethical misconduct. Reporting suspected instances of noncompliance should be done without fear of intimidation or retaliation. Papa is equally committed to non-retaliation for any self-organizing efforts.

## Investigating reported violations, confidentiality, and duty to cooperate

All reported concerns will be investigated confidentially, and information is shared strictly on a “need-to-know” basis. **All individuals and entities conducting business on behalf of the Company, including personnel, board members, directors, vendors, suppliers, and Contractors are obligated to fully cooperate with investigations, providing all relevant information and ensuring that no records or evidence are withheld, destroyed, or tampered with.** Participation in or approval of actions that violate the Code, company policies/procedures, laws, or regulations, or failure to cooperate in an investigation, may result in corrective action(s). This may include termination of employment/engagement or of the business relationship with Papa.

## Cooperation and disclosure

Papa is committed to cooperating with and making appropriate disclosures to regulators, state, local, and federal government agencies, and law enforcement authorities.

Further, Papa strictly prohibits impeding any investigation or audit, including internal and federal audits. Denying access to a federal auditor can result in severe penalties. Compliance with all audit requests is mandatory to avoid severe consequences and should be coordinated with the Legal & Compliance Department.

## Our work environment

### Drug-free, alcohol-free, and tobacco-free workplace

Papa, Inc. enforces a strict no-drug, no-alcohol, and no-tobacco policy at work to safeguard workplace safety and operational efficiency. This policy applies to all personnel and other individuals who perform work for or on behalf of Papa, Inc. A violation of the company's policy on alcohol and drug-free workplace may result in corrective action, including termination of employment.

Further, the Drug-Free Workplace law requires anyone working on a government contract to notify their manager within five days of any drug-related criminal conviction. Failure to notify the Company may result in corrective action(s), including termination of employment.

### Weapons

Weapons are prohibited on company-owned or leased property (subject to individual state laws) and while conducting company business on Client premises on behalf or for Papa (subject to individual state laws).

## Eligibility and exclusion of participating in state and federal healthcare programs

Prior to the hire, engagement, or onboarding of personnel, contractors, or others conducting work on behalf of Papa, an exclusion check will be performed to ensure eligibility to participate in federal and state healthcare programs. The Company will not hire, engage, or onboard any individual or entity that has been excluded, debarred, or is otherwise ineligible to participate in federal or state healthcare programs such as Medicare and Medicaid, including those whose governing body, officers, managers, employees, or contractors are excluded. After hire, engagement, or onboarding, Papa conducts monthly exclusion checks and will take immediate action, including removal, termination, or other appropriate measures, if an individual or entity is found ineligible.

## Employment of government personnel

Federal government personnel hiring is governed by federal law. Contact the Compliance Department before discussing employment or consulting arrangements with current or former federal government employees.

When considering hiring former state government employees, the hiring manager is responsible for ensuring no conflicts of interest exist with their Papa duties and the individual's prior employment. Contact the Compliance Department with questions.

## Equal employment opportunity

Papa is committed to providing equal opportunity in employment to all individuals making

employment decisions based on merit and job-related qualifications without regard to any legally protected classification. Papa is committed to providing fair and equitable wages, benefits and other conditions of employment, and recognizes employees' rights to freedom of association and collective bargaining.

## Discrimination and harassment

Rooted in our core values of trust and respect, Papa is committed to fostering a workplace free from all forms of unlawful discrimination and harassment. Whether sexual or non-sexual, any unwelcome behavior that creates an intimidating, hostile, or offensive environment undermines our focus on providing high-quality companion care and support.

Additionally, retaliation against anyone for reporting a valid workplace concern, or for reporting a concern in good faith is strictly prohibited.

## Diversity and inclusion

We embrace inclusivity and foster a culture where differences are valued and celebrated, equity is prioritized, and inclusion is woven into everything we do. By building a team that reflects the diversity of the communities we serve, we can drive positive change within our organization and beyond.



# Protecting Information

Papa has many types of information vital to conducting its business. This includes material and nonpublic information, as well as other confidential, proprietary, and non-public information, which may include information about Papa's:

- Strategies, products, processes, and financials; or
- Clients, Members, workforce members, contractors, vendors, business partners.

We must protect this data from unauthorized disclosure both during and after employment or engagement.

If you suspect data misuse, theft, or unauthorized sharing, report it to Legal & Compliance immediately. In addition, we must never use or disclose a third-party's confidential information learned in the course of doing business without proper authorization and approvals.

## Confidential and proprietary information about our business

Papa's confidential and proprietary information includes any information not publicly available. This may include business strategies, financial data, client information, and internal processes that must be protected to maintain the company's competitive advantage and trust.

We are obligated to protect this information from improper use or disclosure even after employment, engagement, or a contract ends. Information and work product during employment or engagement with Papa, is Papa property.

Personnel, contractors, and others performing business for or on behalf of Papa may be periodically required to sign confidentiality attestations to attest and swear Papa's assets and confidential information is being kept secure and confidential.

Papa's confidential information and assets must be protected against misuse, fraud, waste, abuse, loss, and theft, and used for legitimate business purposes. This information and assets should never be shared with unauthorized parties such as competitors, suppliers, or outside contractors without proper authorization. In the event you have information regarding misuse, damage, or theft of Papa's property, immediately report the matter to the Compliance Department, who will take appropriate action.

All information and work product created during employment or engagement with Papa is the property of Papa, unless otherwise specified in a written agreement. This includes any materials, work product, ideas, or inventions developed while performing work for the company.

Papa owns all intellectual property that you, as an employee, consultant, or a contractor, create, develop, or write, either individually or in collaboration with others, during your employment/engagement if it:

- Relates to or competes with Papa's current or anticipated business, research, development, strategy, or customers.
- Results from work assigned to or performed by you on behalf of Papa.
- Is created using Papa's licensed software, equipment, materials, facilities, computer programs, or other resources, or involves Papa's ideas, trade secrets, or confidential information.

## Confidentiality

Papa must protect the confidential information of Members, clients, and the Company's workforce. Sensitive information may only be shared with authorized individuals and the sharing process must follow all federal and state laws, corporate policies, and procedures for handling protected health information (PHI) and personally identifiable information (PII). These protections apply both within and outside of Papa. Improper use or disclosures can lead to privacy violations, legal penalties, and contract breaches.

Papa often needs to retain sensitive personal information and other information about individuals and clients securely for an extended period. It is important to protect the confidentiality and integrity of information used to access our systems, including but not limited to logins, passwords, security codes, and the locations of sensitive data.

Follow all of Papa's policies, including the Acceptable Use Policy, to ensure the security of information and compliance with both company standards and best practices.

## Confidential information about others

Never access or share any confidential information about a member, personnel, contractors, vendors, suppliers, or business partners unless it is authorized by policy, for a valid business purpose, and required by your assigned job duties.

Nothing in this section or the company's policies intends to or will be applied in a manner to limit personnel rights to discuss and share wage/salary data, claims and medical information, employment agreement, Social Security number, financial and banking information, and other personal information with each other and with outside entities as protected by the National Labor Relations Act and other relevant laws.

## Requests for confidential information related to government contracts

Much of the information created under government contracts belongs to the government entity for which the work is being performed. We must comply with all applicable laws, including the Freedom of Information Act, HIPAA, the Privacy Act of 1974, and state law equivalents, regarding the use and disclosure of this information.

## Third-party confidential and proprietary information

Papa prohibits the use or disclosure of confidential or proprietary information of a prior employer or other third-party, whether or not a competitor, in connection with your work for Papa. Sharing such information can violate laws or contract requirements, damage our integrity, and expose the company and us to liability. Improper use of this type of information may result in corrective action(s), including termination of employment and legal action.

If any unauthorized nonpublic, confidential, or proprietary information about any third party is received **immediately** contact the Legal and Compliance Departments for next steps. Information may not be used, forwarded, copied, deleted, or destroyed unless instructed to do so by the Legal or Compliance Department.

## Documenting and reporting information

Accurate, complete, and truthful financial, operational, and other business records are essential to informed decision-making and ensure compliance with financial, legal, and regulatory reporting requirements. Providing false information is strictly prohibited.

In addition, undisclosed or undocumented (unrecorded) accounts, funds, or assets are not allowed. Company funds should never be placed in any personal or non-corporate account.

Another important responsibility is the proper maintenance of records for retention periods required by Papa, **which is ten (10) years**. However, if Papa's Records Retention Policy conflicts with any applicable law, the law shall take precedence over the policy.

# Use of company assets

## Electronic communication and information exchange

The Company uses a variety of equipment and communication tools, including company issued devices and equipment, email, messaging, and telephones to conduct business. These systems and tools are provided by Papa and are company property, unless explicitly otherwise indicated. Their use is intended to facilitate company business, and are to be used in a professional, productive, ethical, and lawful manner. In some situations, equipment and communication tools may be used for personal use, in a limited manner, as long as your manager approves this use, and your personal use:

- Does not affect productivity.
- Does not result in a direct material cost to the company.
- Follows applicable company Information Security policies and the law.

Papa reserves the right to monitor all communications, data, and materials on its systems and devices. Employees should have no expectation of privacy regarding their use of company-provided systems, which may be monitored or disclosed in accordance with business needs or legal obligations.

The contents of electronic communications storage (including, but not limited to email) may be monitored, reviewed, and disclosed to those who have a need to know, as well as with individuals or entities outside the company (including law enforcement or government agencies) without your knowledge or permission.

## Company assets

Company assets include any physical location, physical property and equipment (e.g. telephones, office supplies, computers, computer hardware, etc.), email, confidential and

proprietary information, and other technology systems. We all share a responsibility for protecting the company's assets and ensuring all assets are used properly and appropriately. Company assets should never be used for illegal purposes, or in any way that threatens the integrity of Company systems or Clients' systems. Additional unacceptable uses of company assets include:

- Illegal activities
- Actions causing reputational harm to the company
- Defamatory or discriminatory content
- Privacy invasions
- Workplace disruption or hostility
- Political activities (unless authorized by management)
- Installing or distributing unlicensed software
- Introducing viruses or destructive programs

## Social networking

The Company recognizes that social media and social networking can be a highly effective tool for sharing ideas, exchanging information, and heightening Papa's visibility. The Company promotes responsible social media usage allowing the Company to maintain its brand identity and integrity while minimizing actual or potential legal risks. When participating in an electronic communication such as social network sites, blogs, chat rooms, Facebook, Twitter, Instagram, and similar forms of communication, Papa's confidential information and proprietary client or company information must never be disclosed. With any communication, including social media communications, we are expected to follow all company policies and procedures. Individuals must not give the appearance of speaking or acting on behalf of the company unless explicitly authorized to do so. The content of communications must never be obscene, threatening, or discriminatory or harassing towards any person or entity, including other personnel, managers, members, vendors, competitors, or any business partners of the company.

## Record retention and destruction

We are responsible for complying with the Company's Records Retention Policy, as well as recordkeeping requirements of applicable laws and contract requirements. In addition, records relevant to actual or anticipated litigation or government investigations, may not be altered or destroyed.

Destruction or alteration of records to avoid disclosure in a legal proceeding, government investigation, or audit is strictly prohibited and may constitute a criminal offense.

## On our own time

The Company is committed to making decisions in the best interests of the Company, the Company's clients and the populations it serves. To protect the company's reputation, we avoid situations that create an actual or potential conflict of interest, or even the appearance of one. A conflict arises when personal interests interfere, or seem to interfere, with our ability to act objectively and in the company's best interest.

## Avoid Conflicts of Interest

A conflict of interest occurs when your personal or family interests, relationships, outside activities, or the exchange of items of value influence or appear to influence your ability to do your job and make objective, sound business decisions in the best interest of Papa. Some examples of conflicts of interest include, but are not limited to:

- Having a personal interest, financial interest, or potential gain in any Papa transaction.
- Giving Papa business to a personally owned business or a business controlled by you or one of your family members.
- You or a member of your immediate family being employed by, owning, or acting as a consultant to a competitor, potential competitor, vendor, or contractor while you are working with Papa.
- Hiring or supervising family members.
- Accepting gifts, gratuities, discounts, favors, or services from a customer, potential customer, competitor, or vendor.

While conflicts of interest, whether actual or perceived, cannot always be avoided, their impact can be minimized by identifying, disclosing, and addressing them promptly. If a potential or actual conflict arises, it must be disclosed immediately to the Legal & Compliance department, and approval from the Department is required before proceeding. Conflicts must be reported as soon as they are discovered. Papa requires preemptive disclosure, acceptance, and confirmed compliance with its Conflict of Interest Policy within 30 days of hire/engagement and annually thereafter.

## Family and personal relationships

Employment of relatives and individuals involved in personal relationships with personnel is allowed as long as those individuals are the best-qualified candidates for the job, and it is not a prohibited reporting structure relationship.

## Outside employment and other activities

Our primary employment obligation is to Papa. Any activities such as working a second job, serving as a member of an external board, or operating a personal business must not conflict with our obligations to Papa. In most cases, a mitigation plan can be developed to help prevent any actual or perceived conflicts. In addition, we may not use the company's name, time, assets, or the services of other personnel for any outside activities unless authorized by the company.

## Personal political activity and contributions

We support individual involvement in political life, and individual support of candidates or organizations of an individual's choosing through both personal contributions or volunteering, provided that these activities are kept separate from work and Papa's business.

Soliciting contributions or asking other Papa personnel to support personal political activities during company time is prohibited.

Additionally, any political activities conducted on behalf of the company must strictly comply with applicable laws regarding political contributions and lobbying, and employees must seek approval from the Legal & Compliance department before engaging in any company-related political or lobbying activities.

# Conducting Papa's business

## Fairness

We deal fairly and honestly in all business dealings. We accurately represent our service offerings and we do not take unfair advantage of anyone through illegal conduct, misrepresentation of material facts, or manipulation.

## Environmental, social, and governance principles

We are committed to integrating Environmental, Social, and Governance (ESG) principles into our operations, even as a remote-first organization. We encourage the minimization, reuse, and recycling of waste whenever possible and promote sustainable practices that reduce our

environmental footprint, even in a distributed workforce.

We actively engage with our personnel, vendors, suppliers, and the communities we serve to foster health, wellness, and inclusivity. As a remote-first company, we recognize the importance of digital sustainability, responsible resource consumption, and maintaining ethical business practices across all locations.

Additionally, we encourage our team members to give back to their communities through volunteerism and socially responsible initiatives.

## Gifts and special courtesies

Papa expects individuals to maintain the highest integrity and objectivity standards when dealing with vendors, service providers, and customers. Individuals are prohibited from accepting or



giving gifts or gratuities beyond common business courtesies of nominal value.

Papa understands that gifts and entertainment are a part of doing business designed to build goodwill among business partners. However, a problem may arise if a gift or special courtesy compromises or appears to compromise our ability to make fair and objective business decisions.

Papa expects all personnel to recognize when a gift or gratuity is inappropriate. Acceptable gifts and entertainment must meet the following guidelines:

- **Nominally valued:** Gifts should not exceed \$50 from any one source, and the total value of gifts from all sources must not exceed \$150 per year. Any exceptions must be approved by the Legal & Compliance Department.
- **Government officials:** Never offer or accept gifts or items of value to or from government, public, or regulatory officials without prior approval from the Legal & Compliance Department. Special rules apply to entertainment and dealings with these officials
- **Kickbacks:** Do not accept or give kickbacks in connection with contracts, services, referrals, or business transactions. A kickback involves offering, requesting, or receiving anything of value in exchange for business referrals.
- **Cash equivalents:** Cash or cash-equivalent gifts (e.g., checks, money orders, honoraria, stocks) are prohibited. Gift certificates and gift cards are acceptable within the \$50 limit but must follow Papa's policy.
- **Entertainment and meals:** Business-related entertainment and meals are not subject to the \$50 limit but should be reasonable and moderate.

Contact the Legal & Compliance Department if you have any questions on whether a gift or course of conduct is appropriate.

## Business entertainment

Our interactions with vendors, customers, and

prospective customers may involve business entertainment, where business matters are often discussed even if the event isn't solely a business meeting. Examples of business entertainment include:

- Meals
- Charitable and sporting events
- Golf, spas, and parties
- Plays and concerts
- Industry conferences or seminars
- Other events where business matters are discussed

It is essential to demonstrate appropriate behavior during these events and ensure that all business entertainment remains reasonable and complies with Papa's policies and this Code.

## Procurement

Our clients, vendors, suppliers, and the communities we serve rely on us to provide high quality service, and to meet this expectation we demonstrate sound business practices, including an honest, objective, and efficient procurement process. All purchases of services, materials and goods must be reviewed and completed in accordance with our procurement process and policies.

Purchasing decisions must be based solely on predetermined selection criteria, including, but not limited to, quality, performance, and price. Relations with suppliers must be maintained on an objective basis, free from the influence of gifts and favors.

## Commitment to quality

Our clients and the communities we serve are the foundation of our business. We are deeply committed to delivering excellence in all of our services and products. In every service we provide, it is essential to:

- Deliver and provide prompt and accurate services consistent with contractual obligations, Company policies, and regulatory standards.
- Uphold professionalism, integrity, honesty, and respect in every interaction.



- Adhere to all applicable federal and state laws.
- Continuously seek innovative ways to enhance service quality, ensuring both efficiency and cost-effectiveness.

Our commitment to these principles defines and drives the success of our business.

## Kickbacks

We are strictly prohibited from offering, soliciting, providing, or receiving kickbacks of any kind. Anti-kickback laws impose severe criminal and civil penalties on individuals and companies involved in such activities. Even attempting to offer or receive a kickback is illegal.

This prohibition is broad in scope, and the Legal & Compliance Department must be consulted before offering, giving, soliciting, or receiving anything of value that is not a bona fide, fair market payment for legitimate services or goods. purpose of wrongfully obtaining, retaining, or directing our business. This includes giving favors, preferential hiring, or anything of value to any government official.

## Business agreements

All business agreements must be in writing clearly outlining the services to be performed, the justification for earning commissions or fees, and the applicable rate(s) or fee(s).

# Doing business with government or government funded entities

## Monitoring for excluded persons

As a first-tier entity working with Medicare Advantage Organizations (MAOs) and other federally funded programs, Papa is prohibited from employing or contracting with individuals or

entities excluded from participating in government programs or receiving federal or state funds. To ensure compliance, we screen all workforce members and downstream entities against exclusion lists maintained by the Office of Inspector General (OIG), the General Services Administration (GSA), and against state exclusion lists prior to hiring or engagement.

We also re-screen workforce members and downstream entities on a monthly basis.

## False Claims Act and False Statements Act

As a first-tier entity working with Medicare Advantage Organizations (MAOs) and other federally funded programs, Papa is subject to federal and state fraud, waste, and abuse (FWA) laws, including the False Claims Act (FCA) and the False Statements Accountability Act.

The FCA imposes civil and criminal penalties for knowingly submitting false claims, making false statements, or failing to return overpayments related to federal or state funds. Many states have also enacted their own versions of the FCA.

The False Statements Accountability Act imposes criminal penalties on individuals or entities that knowingly falsify, conceal, or misrepresent material facts in connection with federal programs, including Medicare Advantage.

The Company's workforce, contractors, and vendors must ensure that all records, reports, and communications related to MAO contracts and government-funded programs are accurate, truthful, and compliant with applicable regulations.

Failure to comply may result in civil and criminal penalties, termination of contracts, and legal action. If you become aware of any potential false claims or misrepresentations, report them immediately to the Legal & Compliance Department or Ethics Hotline.

## Stark Law

The Stark Law is a health care fraud and abuse

law that prohibits physicians from referring individuals for specified “designated health services” for which Medicare pays any entity in which the physician has a “financial relationship.” A financial relationship includes direct or indirect ownership or investment interests in the referred entity; and compensation arrangements between the referring physician and the entity. The government can bring a civil action against Stark

Law violators which can result in penalties of up to \$15,000 for each billed service based on a prohibited referral, as well as three times the amount of the government overpayment.

## Doing business across the globe

Whether based in the United States or another country, we are responsible for conducting business in accordance with the laws of all impacted countries. We are subject to local laws, regulations, and jurisdictions. Contact your manager, the Legal & Compliance Department with questions.

### Bribery and corruption

Papa strictly prohibits bribes, kickbacks, or anything of value intended to improperly influence business decisions. We are committed to complying with the U.S. Foreign Corrupt Practices Act (FCPA), the U.S. Travel Act, the U.K. Anti-bribery Act, and all other applicable anti-bribery laws.

We must follow due diligence requirements before Papa engages a third party to act on its behalf in conducting international business.

wages, benefits, and employment conditions as well as recognizing and respecting employees’ rights in the workplace, including rights to freedom of association and collective bargaining. We also protect the privacy of our employees and partners and comply with all relevant data protection laws. By prioritizing ethical practices, we contribute to the well-being of our workforce and the communities we serve.

### Barred countries/ Office of Foreign Asset Control Screening

The Office of Foreign Asset Control (OFAC) is part of the U.S. Treasury Department that administers and enforces economic and trade sanctions against certain countries and individuals, such as terrorists and narcotics traffickers. Papa screens all business partners against sanctions lists to ensure compliance with U.S. trade laws.

### Human rights

We are committed to promoting and supporting basic human rights. This includes providing fair

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Papa, Inc.  
800-348-7951  
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