



Code of Conduct

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Letter from CEO and Compliance Officer

Hi WelbeHealth Team,

First, thank you for all you do, directly and indirectly, to provide the best clinical care to our participants. At WelbeHealth, we know it takes a special and diverse team, which includes team members, contractors, consultants, and partners, working together in the spirit of our shared values and driven by our purpose, to bring this important and transformative care to the vulnerable and frail seniors we serve. We could not do it without you!

In that light, a healthy and high-performing team is clear about expectations, ever-focused on being compliant with all laws and regulations and offers resources and clarity in the spirit of *shared intention*. That is the purpose of this Code of Conduct. We offer this not only as an expectation, but as a road map for you and your peers to use when navigating your jobs. We hope it is clear and helpful. If you have any questions regarding this or any other part of your role or team, you can follow-up with your direct supervisor, the WelbeAware Compliance Hotline 844-986-1440, or your HR Business Partner.

Again, thanks for being part of the WelbeHealth team, and we look forward to partnering with you on creating the best care and team experience we can at WelbeHealth!

Sincerely,

Clancy Si France, MD

Si France, MD
Founder and CEO
Officer

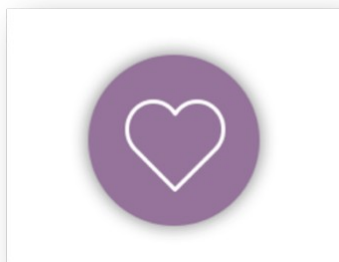
Blaire Bernard

Blaire Bernard, JD
General Counsel and Compliance

Our Guiding Force: WelbeHealth's Purpose and Values

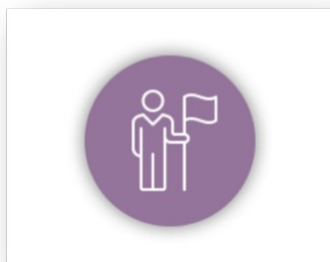
WelbeHealth was founded and built around one purpose: *To unlock the full potential of our most vulnerable seniors.* Every decision we make, as individuals and as teams, should be grounded in that purpose.

Our mission is to serve the most frail seniors with high quality and compassion in a value-based model of care. We envision a world where every person participates in our culture through their final days. To achieve this, our behaviors and work is guided by our three core values:



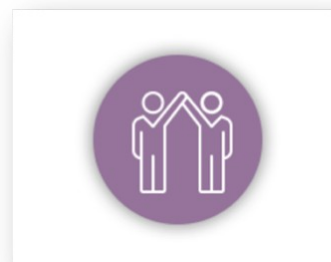
Courage to Love

We prioritize human connection and value every precious life we touch.



Pioneering Spirit

We relentlessly pursue resourceful solutions to support participant health and independence.



Shared Intention

We work as a team with a common purpose. We start by listening, promote and contribute diverse perspectives, and support team decisions.

In building our teams, we select individuals who share a commitment to our values, compassion for our participants, and belief in our purpose and mission. That is why you are here! Thank you for sharing in that commitment, and for being a part of this wonderful journey with us.

Our Code of Conduct

Welbe Health, LLC, its subsidiaries, and affiliated entities (together, “WelbeHealth” or “Company”) is committed to a culture of regulatory and best practice compliance. The purpose of this document is to set expectations and bring clarity to how we behave, ensure a culture of regulatory and best practice compliance, and provide resources and tools for team members to leverage if they have questions, need additional clarity, or want to raise concerns.

The Code applies to all directors, officers, full-time, part-time and temporary employees, contactors, consultants, interns and any other person involved in delivering care or a shared service to the WelbeHealth team and participants. **For WelbeHealth team members, this supplements the employee handbook and does not replace it.**

Ensuring a Culture of Compliance

We work in a very complicated and highly regulated area of healthcare. WelbeHealth works hard to ensure that our team is up to date on all regulations, laws, and best practices and that we are communicating and training appropriately to create a Culture of Compliance. Please note that attendance and participation in compliance and Fraud, Waste & Abuse training programs are a condition of continued employment.

A Culture of Compliance starts *with you!* Thank you for your commitment to a Culture of Compliance. This section of the Code has very specific areas for you to understand to drive towards this Culture of Compliance.

Standards of Conduct

We expect all of the WelbeHealth team to adhere to the following *Standards of Conduct*:

1. Live and act by the WelbeHealth values of ***Courage to Love, Pioneering Spirit, and Shared Intention.***
2. Actively participate and create a workplace that honors our values, each other, and the dignity of every life that we touch.
3. Act in good faith and honest in all interactions and dealings.
4. Follow all laws, regulations, policies and procedures that govern the important work that we do.
5. Respect every person’s privacy and confidentiality, including participants and those on our team.
6. Avoid direct or the appearance of conflicts of interests.
7. Be a good steward of resources.
8. In the spirit of *shared intention*, speak up when you are concerned that someone is not acting in accordance with this Code.

Anti-kickback Statute

Individuals and entities are prohibited by the federal anti-kickback statute from knowingly offering, paying, soliciting, or receiving “kickbacks,” defined as a benefit or financial reward in exchange for referring items or services to be paid for by a federally funded program such as Medicare and Medicaid. In practical terms, this means that our motivation and incentive for making clinical and business decisions should be based on what is in the best interest of the participants we serve, not by what a financial or perk we might receive, either as individuals or as a company, in return.

A “kickback” can come in many forms. While it is impossible to come up with a complete list, the below sampling can give you an idea of what to watch out for in dealing with other parties:

- Gift certificates or gift cards
- Cash payments
- Tickets to local events
- Free space
- Excessive discounts
- Large meals or gifts

If any vendor or partner offers you what may be perceived as a kickback, politely decline and follow-up with your supervisor.

When in doubt, check it out! If you are ever unsure if you can accept something – either tangible or intangible – from another person, please follow-up with your direct supervisor or the Compliance Department.

WelbeHealth’s required training and development curriculum includes additional detail on compliance with all laws and regulations. Please ensure you have taken all required training, so you have a complete understanding of what is required and forbidden.

Physician Self- Referral Law (Also known as the Stark Law)

Under the Stark Law physicians are prohibited from referring Medicare and/or Medicaid patients to a healthcare provider if the physician or the physician’s immediate family member and provider have any type of financial relationship, with the exception of cases where the financial relationships have been structured to comply with certain exceptions noted under the Stark Law.

It is important to know that the Stark Law is a “strict liability” statute, which means that there are significant consequences even when the law is violated unintentionally.

When in doubt, check it out! If you are unsure if a physician referral is appropriate, please follow-up with your direct supervisor or the Compliance Department *before* taking any action.

WelbeHealth’s required training and development curriculum includes additional detail on compliance with all laws and regulations. Please ensure you have taken all

required training, so you have a complete understanding of what is required and forbidden.

Antitrust Compliance

WelbeHealth complies with all laws that regulate competition in health care and PACE centers. We avoid any activities or actions that may be perceived as anti-competitive. Examples of such activities may include (but are not limited to):

- Sharing sensitive pricing information with competitors.
- Participating in competition-limiting agreements with competitors, such as wage fixing, boycotting, payer contract negotiations, and price fixing.

When in doubt, check it out! If you are unsure if an action or agreement could be perceived as anti-competitive, please follow-up with your direct supervisor or the Compliance Department *before* taking any action.

WelbeHealth's required training and development curriculum includes additional detail on compliance with all laws and regulations. Please ensure you have taken all required training, so you have a complete understanding of what is required and forbidden.

Coding and Billing and False Claims Act

WelbeHealth only submits complete and timely claims for accurate, appropriate and documented care and services. Failure to do so could result in fines, persecution, and/or additional consequences. All team members involved in delivering, documenting, coding and/or billing for services must ensure their work is:

- accurate
- timely
- complete
- for care actually delivered
- And appropriate

Any corrections to documentation and errors must be made in the accordance with WelbeHealth's policies and procedures.

By following these guidelines, we are also ensuring that we are complying with the federal False Claims Act, which helps the federal government combat fraud and recover losses resulting from fraud in federally funded programs such as Medicare and Medicaid. For more information on the False Claims Act visit [here](#).

When in doubt, check it out! If you are unsure if service documentation, coding, or billing or agreement could be perceived as fraud, please follow-up with your direct supervisor or the Compliance Department *before* taking any action.

WelbeHealth's required training and development curriculum includes additional detail on compliance with all laws and regulations. Please ensure you have taken all required training, so you have a complete understanding of what is required and forbidden.

Confidential Information

At WelbeHealth, we respect all people's – including participants, team members, contractors, consultant, and volunteers – confidential information. To that end, before sharing *any* personal information about a person, **pause and ask:** "is this information required for the other person to complete what s/he needs to do?" If not, *then think twice before sharing.*

We take special precautions when it comes to the health information of our participants. In compliance with the Company's Health Insurance Portability and Accountability Act (HIPAA) compliance program, each team member is responsible for safeguarding the confidential information (including participant protected health information) obtained during employment.

In the course of your work, you may have access to trade secrets or similarly protected proprietary or confidential information regarding the Company's business (such as financial data, written policies and procedures, research and development, marketing, business plans or strategies, suppliers, business partners, or customers), or regarding current or past PACE participants. You have a responsibility to prevent revealing or divulging any such information unless it is necessary for you to do so in the performance of your duties or as required by law.

Access to, or disclosure of, confidential information should be on a "need-to-know" basis and must be authorized by your supervisor. Any breach of this policy will not be tolerated, and legal action may be taken by the Company.

This policy does not prohibit team members from confidentially disclosing trade secret, proprietary, or confidential information to federal, state, and local government officials, or to an attorney, when done to report or investigate a suspected violation of the law. Team members may also disclose the information in certain court proceedings if specific procedures to protect the information are followed. Nothing in this policy is intended to conflict with Section 1833 of the United States Code Title 18 or create liability for disclosures of trade secrets that are expressly allowed under Section 1833 of the United States Code Title 18.

Any team member working on an assignment which requires HIPAA compliance must adhere to all privacy practices specific to the program. Any data classified as "Protected Health Information," must be guarded to the fullest extent feasible under the program.

Note for WelbeHealth team members: this information can also be found in the WelbeHealth Employee Handbook.

When in doubt, check it out! If you are unsure if you should share specific information, please follow-up with your direct supervisor or the Compliance Department before taking any action.

WelbeHealth's required training and development curriculum includes additional detail on compliance with all laws and regulations. Please ensure you have taken all required training, so you have a complete understanding of what is required and forbidden.

Conflicts of Interest

All WelbeHealth team members must avoid situations involving actual or perceived conflict of interest. Personal or romantic involvement and employment or other financial relationship with a competitor, supplier, or subordinate team member of the Company, which impairs a team member's ability to exercise good judgment on behalf of the Company, can create an actual conflict of interest. Team members are prohibited from accepting gifts from participants and/or their family members.

As we operate a federally funded program and in order to avoid even the appearance of improper conduct, WelbeHealth discourages providers and vendors from offering gifts to our staff and participants. WelbeHealth limits vendor gifts to staff to \$20 per team member per year and \$100 across all team members per year. Gifts include business meetings over meals or coffee, physical gifts, gift certificates, and tickets to sporting and other entertainment events. Financial support to attend conferences or seminars would be a legitimate business expense and would not be considered a gift. It is our hope that this policy will eliminate real or imagined bias by regarding selection of providers for participant services. Team members who may be in doubt of what is considered an acceptable or unacceptable item are instructed to ask their supervisor or a member of the HR team for clarification and assistance.

A team member involved in any of the types of relationships or situations described in this policy must immediately and fully disclose the relevant circumstances to his or her immediate supervisor and HR representative for a determination about whether an actual conflict exists. If an actual conflict is determined, the Company may take whatever corrective action appears appropriate according to the circumstances. Failure to disclose facts shall constitute grounds for disciplinary action, up to and including termination. Team members who may be in doubt of what is considered an acceptable or unacceptable item are instructed to ask their Supervisor or a member of the HR team for clarification and assistance.

Relatives of team members, contractors, consultants and volunteers may be eligible for employment with the Company only if individuals involved do not work in a direct supervisory relationship, or in job positions in which there is a conflict of interest. The Company defines "relatives" as spouses, registered domestic partners, children, siblings, parents, cousins, aunts, uncles, in-laws, and step-relatives. Present team members who marry or become registered domestic partners must report this to the HR team. These team members will be permitted to continue working in the job position held only if they do not work in a direct supervisory relationship with one another or in job positions involving conflict of interest.

This policy in no way prohibits team members affiliations or activities communications that are protected under applicable state and federal laws, including but not limited to, any activity that is protected under Section 7 of the National Labor Relations Act, which includes the right of team members to organize collectively and to speak with others about their terms and conditions of employment.

Note for WelbeHealth team members: this information can also be found in the WelbeHealth Employee Handbook.

When in doubt, check it out! If you are unsure of a relationship could be perceived as a conflict of interest, please follow-up with your direct supervisor or the Compliance Department before taking any action.

WelbeHealth's required training and development curriculum includes additional detail on compliance with all laws and regulations. Please ensure you have taken all required training, so you have a complete understanding of what is required and forbidden.

Elder and Dependent Abuse Reporting

All WelbeHealth team members are required to report suspected elder and dependent adult abuse and neglect. WelbeHealth ensures that when staff becomes aware of suspected elder abuse a report is made to the appropriate authorities.

Types of Abuse

There are many types of abuse. Some of the more common types, with examples, are listed below:

- **Physical Abuse:** Indicators of physical abuse: bruising, lacerations, burns, malnutrition, open wounds.
- **Sexual Abuse:** Nonconsensual sexual contact of any kind with an elder or dependent adult, if an elder is mentally impaired, consent can usually not be given. In many cases dependent adults are unable to provide legal consent.
- **Isolation:** e.g., Preventing the individual from receiving mail, telephone calls, or visitors.
- **Financial Abuse:** The theft or embezzlement of money or property of an elder or dependent adult by: (1) Caretaker or a person in a position of trust with the elder/dependent adult or (2) a person, who does not serve as a caretaker for the elder/dependent adult but knows or reasonably should know the victim is an elder/dependent adult.
- **Neglect:** (by others) occurs when any person having the care or custody of an elder/dependent adult fails to provide medical care for physical and mental health needs, fails to protect the elder/dependent adult from health and safety hazards and/or fails to prevent malnutrition or dehydration. Also referred to as abandonment.
- **Self-Neglect:** when an elder/dependent adult fails to provide medical care for physical and mental health needs, fails to protect themselves against health and safety hazards and/or fails to prevent malnutrition or dehydration.
- **Emotional Abuse:** The infliction of distress, anguish or pain through verbal and/or non-verbal actions on an elder/dependent adult. Any behavior that causes mental suffering, such as severe depression, fear, agitation, confusion, or other forms of serious emotional distress.

Warning Signs

These are some possible warning signs that abuse might be occurring to an older or disabled adult or that the individual is at increased risk for abuse. WelbeHealth staff are expected to monitor whether these may be occurring with a PACE participant:

- Explanation for an injury is inconsistent with its possible cause

- Recent changes in the elder or dependent adult's thinking; seems confused or disoriented
- The caregiver is angry, indifferent, or aggressive toward the elder or dependent adult
- Personal belongings, papers, or credit cards are missing
- The elder appears hesitant to talk openly
- Lack of necessities, such as food, water, utilities, medications, and medical care
- The caregiver has a history of substance abuse, mental illness, criminal behavior, or family violence
- Another person's name added to the client's bank account or important documents, or frequent checks made out to cash.

All WelbeHealth team members are required to complete training on elder abuse and mandating reporting obligations, recognizing abuse and neglect, and the reporting process during their orientation, annually, and as needed.

All WelbeHealth team members should refer to the Identifying and Reporting Elder and Dependent Adult Abuse and Neglect Policy and Procedure for specific requirements and reporting phone numbers for specific service areas.

Note for WelbeHealth team members: this information can also be found in the WelbeHealth Employee Handbook.

When in doubt, check it out! If you are unsure if a situation requires reporting of elder abuse, please *immediately* follow-up with your direct supervisor or the Compliance Department.

WelbeHealth's required training and development curriculum includes additional detail on compliance with all laws and regulations. Please ensure you have taken all required training, so you have a complete understanding of what is required and forbidden.

Interacting with Government and Regulatory Agencies

A key part of WelbeHealth's success for our participant relies on effective and collaborative partnerships with local, state and federal government and regulatory agencies. Our Chief Mission Officer and compliance team is committed to building those partnerships and supporting WelbeHealth team members in any interactions they may have with these different agencies.

As part of our work, we may be approached by local, state or federal requests for information, to which we must respond in a timely fashion while preserving WelbeHealth's legal rights. If a government agent approaches you or you receive a subpoena, either at work or at home, you should:

- Ask for identification, verify the authority of the agent, and write down that agent's identification information.
- Immediately call your direct supervisor.
- Immediately call the Compliance Hotline.

- Inform the agent that you are not allowed to answer any questions or provide any information without first getting the authorization of the Chief Regulatory Affairs Officer or appropriate designee.
- Ask for the agent's contact information and inform him/her that someone from WelbeHealth will respond in a timely matter.

To ensure that we are compliant and prepared for any potential investigation, it is critical that all WelbeHealth team members abide by WelbeHealth's communication, documentation and documentation retention policies.

When in doubt, check it out! If you are unsure if a situation requires action or information sharing, please *immediately* follow-up with your direct supervisor or the Compliance Department.

WelbeHealth's required training and development curriculum includes additional detail on compliance with all laws and regulations. Please ensure you have taken all required training, so you have a complete understanding of what is required and forbidden.

Political Activity

Many WelbeHealth team members participate in political activities on their own time. Company time, facilities, property or equipment (including all computers, photocopiers, networks, and electronic equipment) must not be used for an individual's outside political activities. WelbeHealth will not reimburse any team member for political contributions, and team members should not attempt to receive or facilitate such reimbursements.

Absent a formal statement by WelbeHealth announcing any political endorsements, team members must not, through their own actions, speech, contributions, or written communication, mislead others to believe that WelbeHealth officially endorses or opposes any candidates for political office that WelbeHealth itself has not publicly announced. Company team members are entitled to their own personal position.

WelbeHealth will not discriminate against team members based on their lawful political activity engaged in outside of work.

Note for WelbeHealth team members: this information can also be found in the WelbeHealth Employee Handbook.

When in doubt, check it out! If you are unsure if a situation constitutes inappropriate political activity, please follow-up with your direct supervisor or the Compliance Department.

WelbeHealth's required training and development curriculum includes additional detail on compliance with all laws and regulations. Please ensure you have taken all required training, so you have a complete understanding of what is required and forbidden.

Patient Care and Rights

Because we believe that it is critical that each of our participants understand his or her care and rights, we include review of these during each participant's enrollment, and have them posted in each of our Centers. *Please read a copy of the [WelbeHealth Participant Rights](#). It is expected that all WelbeHealth team member honors and protects these rights.*

Marketing Practices

WelbeHealth is committed to promoting honest, reliable and responsible information in all marketing activities. Marketing is a highly regulated area in the PACE program and compliance with State and Federal regulations is vital to guard against misinformation to the community and prospective and current participants. Ethical marketing cultivates valuable relationships, trust and a positive organizational image. As such, all WelbeHealth team members must avoid participating in the prohibited marketing practices described below.

Prohibited Marketing Practices:

- Unsolicited door-to-door or cold call marketing;
- Calling or e-mailing a potential or current participant without the individual initiating contact;
- Presentations at primary care sites;
- Misrepresentation of PACE program, Medicare or Medicaid programs through false advertising, false statements or activities that involve gifts or payments;
- Misleading claims, inferences or representations that:
 1. WelbeHealth employees are representatives of the State, County, Centers for Medicare & Medicaid Services or other governmental agencies
 2. The State agency or county agency endorses WelbeHealth's marketing activities
 3. The State or county recommends Medi-Cal members' enrollment into the PACE program
- 4. The Medi-Cal member will lose benefits under the Medi-Cal program or any other benefit to which he/she is legally entitled if the member does not enroll into the PACE program
- Gifts or payments or other compensation, reward or loan to induce or procure enrollment (except Welbe leadership-approved nominal gifts offered to all potential enrollees without regard to enrollment and not in the form of cash or other monetary rebate).
- Activities that could mislead or confuse potential participants, or misrepresent the PACE organization, CMS, or the State administering agency.
- Conducting marketing activities on State and County premises;
- Discrimination against prospective members based on marital status, religion, age, sex, national origin, language, sexual orientation, ancestry, pre-existing psychiatric problems or medical conditions (such as pregnancy, disability, acquired immune deficiency syndrome)
- Utilizing a list of Medi-Cal recipients for marketing purposes
- Direct one-on-one soliciting of participants for referrals

- Pressuring, coercing, or in any way inconveniencing PACE participants in an effort to gain referrals.

Finally, please note, Federal and State regulators must approve all marketing information before distribution by the PACE organization, including any revised or updated material.

Reporting

WelbeHealth is committed to promoting compliance with the laws, rules, and regulations that govern its business operations and to establishing and maintaining best practices in healthcare. As part of our effort to promote and achieve compliance, we encourage all team members to report good-faith concerns about any business-related conduct they believe to be fraudulent, illegal, or unethical, whether that conduct is occurring within WelbeHealth or otherwise involves one of the WelbeHealth's team members, including team members, consultants, vendors, contractors, subcontractors, bankers, or any other party having a business relationship with WelbeHealth.

Examples of fraudulent activity that should be immediately reported to WelbeHealth, include, but are not limited to:

- Intentional manipulation of company purchase procedures for personal gain;
- Bribery;
- Theft or embezzlement of company resources;
- False statements made on financial reports and other official communications;
- Creation of false contracts;
- Misuse of Company resources for personal benefit;
- Expense claim fraud;
- Association with outside companies in a manner that creates a conflict of interest in the performance of job functions;
- Disclosure, destruction, or theft of confidential and proprietary Company information;
- Presentation or creation of false claims for government payment;
- Creation of a false record or statement in support of a fraudulent claim for government payment; and
- Health Insurance and Portability and Accountability Act (HIPAA) violations
- Participant care issues
- Other violations of the Company's policies.

Team members may submit complaints, concerns, and information regarding potential unethical, fraudulent, or illegal business conduct to:

Your immediate supervisor

The Compliance Officer

The WelbeAware Compliance Hotline at [WelbeHealth.EthicsPoint.com](https://www.welbehealth.com/ethics)

The WelbeAware Compliance Hotline by calling 844-986-1440

Complaints may be made anonymously and confidentially. Team members who choose to identify themselves when submitting a report may be contacted by a WelbeHealth representative in order to gain additional information. WelbeHealth will maintain confidentiality to the fullest extent possible, consistent with applicable legal requirements and the need to conduct an adequate investigation or review.

When submitting a complaint, team members should provide as much detailed information as possible, including the background and history of the concern; names, dates and places where possible; and why the situation is a reason for concern. Providing comprehensive information is particularly important when a team member submits a complaint anonymously because WelbeHealth will be unable to contact the reporting team member for additional information or clarification.

WelbeHealth will respond to team members' concerns by investigating them, if appropriate. An investigation does not imply that the concerns have been confirmed or rejected. To protect individuals and WelbeHealth, initial inquiries will be made to decide whether an investigation is appropriate and, if so, the form and scope of the investigation. The action taken by WelbeHealth will depend on the nature and severity of the concern, as determined during any investigation. While WelbeHealth will endeavor to maintain confidentiality, the primary focus will be on taking all reasonable steps to investigate the allegations thoroughly.

All conversations, calls, and reports made under this policy in good faith will be taken seriously. Team members who file reports that are dishonest or misleading or provide evidence that they know to be false will not be protected by this policy and may be subject to corrective action, up to and including immediate termination of employment.

This policy is not intended to address every concern that may arise in the workplace. Team members should be aware that WelbeHealth has other policies and procedures and available channels of communication for reporting certain concerns that may not be covered by this policy and/or that may be more appropriate mechanisms for addressing such concerns, including WelbeHealth's antidiscrimination and harassment policies. When appropriate or legally required, some issues initially received through the policy reporting mechanisms may be investigated and remedied consistent with the specific procedure applicable to that policy.

Anti-Retaliation Policy

WelbeHealth recognizes that the decision to report a concern can be a difficult one to make and that team members may fear reprisal for doing so. However, WelbeHealth encourages team members to come forward with concerns and will not tolerate harassment, retaliation, or reprisals of any kind against any team member who has, or whose family member has or is perceived to have, in good faith, protested, or raised a concern regarding a WelbeHealth policy or practice or reported a reasonable suspicion that someone connected with WelbeHealth is

engaged in fraudulent or other unethical or illegal conduct in the course of their work.

It is WelbeHealth's policy to adhere to all applicable laws protecting its team members against unlawful discrimination or retaliation as a result of their lawfully reporting complaints or participating in investigations regarding alleged unethical, illegal, or fraudulent business matters. Specifically, Welbe Health prohibits any form of unlawful discrimination or retaliation or taking any adverse action against team members because they have engaged in, or because they have a family member who has or is perceived to have engaged in, the following conduct:

- Providing information or otherwise assisting in an investigation regarding any conduct that the team member reasonably believes violates federal or state laws or regulations; or
- Filing, testifying, participating, or otherwise assisting in any proceeding relating to an alleged violation of federal or state laws or regulations.

Team members who believe that they have been subjected to any conduct that violates this policy may file a complaint using the procedures outlined above. Any team member who unlawfully harasses, discriminates against, or retaliates against another team member as a result of his or her protected actions as described in this policy may be subject to corrective action, up to and including termination of employment.

Nothing in this Code prohibits you from reporting concerns, making lawful disclosures, or communicating with any governmental authority about conduct that you believe violates any laws or regulations.

Consequences of failing to comply

WelbeHealth expects that all team members-- which includes all categories of hired employees, contractors, volunteers, interns, consultants, and any other person involved in delivering care or a shared service to the WelbeHealth team and participants abide by this Code. Failure to comply could result in corrective action up to and including termination, termination of a contract or agreement, and reporting to appropriate agencies as appropriate and deemed by law and regulations.

Acknowledgement of Receipt:

I have received and read this Code and understand that I am expected to abide by it. Please provide a copy to your HR representative for filing to your team member file.

Team member name and title (printed):

Team member signature and date: