



Code of Conduct



Doing the Right Thing

Dear Colleagues,

At Mission, we are in the business of taking care of people, and we take great pride in what we do. We do this through our core values: Compassion, Accountability, Respect, and Excellence.

Mission Healthcare's Code of Conduct guides us in applying these core values to all we do, all the time. No code of conduct can anticipate every situation we might face as a healthcare organization; however, our Code of Conduct embraces our values and is a resource to help guide us in exercising good judgment.

We expect every employee to read and understand the Code of Conduct. Your manager, your Human Resource representative, our Chief Compliance Officer are available to you as resourceful points of contact.

Thank you for the work and care you each provide every day

Sincerely,

Phil Spencer

CEO



We are in the business of **taking care of people** and we take great pride in what we do.

Our Values Matter

Strive for the best in quality and care.

Our Core Values

We define ourselves by our values.

Mission Healthcare is committed to full compliance with all laws and regulations that apply to us in all of the work that we do. The standards described in our Code of Conduct, along with our values, mission statement, and policies serve as guidance to promote ethical, honest, and lawful actions. It is an important reference tool that can help you make the right decisions.

Our values speak to how we are, what we stand for and what we CARE about:

- **Compassion:** We currently take care of thousands of patients and continue to deliver exemplary care through the dedicated efforts of every Mission team member.
- **Accountability:** As a trusted community partner, physician groups and other providers turn to us to help provide the best possible outcomes, manage care and reduce costs.
- **Respect:** We adhere to the highest standard of professionalism and respect each individual we encounter treating every individual as part of the Mission family.
- **Excellence:** We are recognized as a community leader for the care we provide and serve as an expert in the industry. Our industry-leading analytics deliver clinical care excellence and better serve our patients, ensuring the appropriate level of care at the right time.

Our Values Matter

Follow Our Code

All your work must follow our Code, our policies and the law.

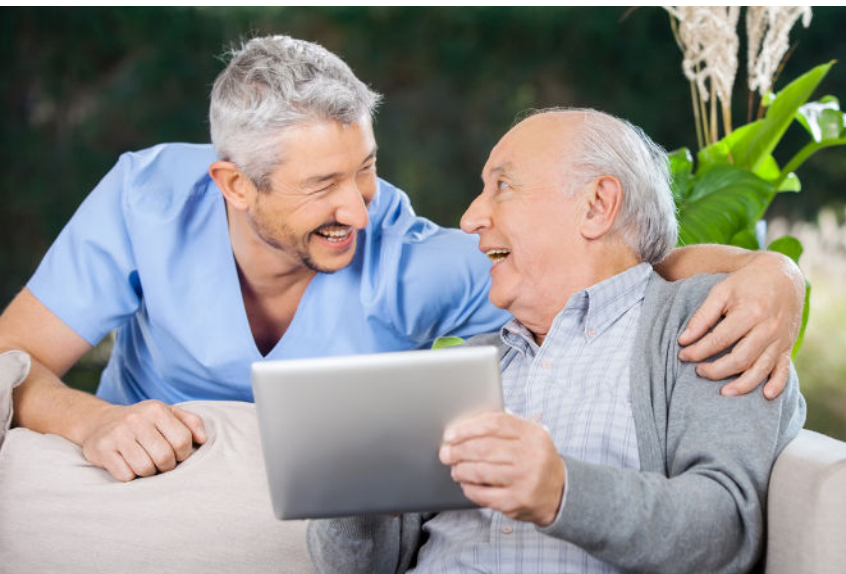
We are committed to acting ethically and responsibly every day and with every interaction. Our Code and our Company policies give you the information you need to perform your job ethically. It is your responsibility to know and follow the policies that apply to the work you do and the decisions you make. This code defines what it means to be a Mission employee and the high standards we commit to follow.

Lead by Example

Each of us must act with integrity and inspire trust.

We expect all employees to act ethically; however, each manager and leader has the increased responsibility of leading by example. We expect our leaders and managers to serve as a positive role model and inspire others to embrace our Code by:

- Rewarding integrity
- Encouraging ethical decision-making
- Creating a transparent work environment
- Preventing retaliation against those who speak up
- Seeking help in resolving and escalating issues



Speak Up

Be the voice of integrity.

Your Role

Speaking up is always the right thing to do.

Being the voice of integrity is not always easy, but when we raise integrity concerns, we make our company stronger and protect our colleagues and patient from harm. You have an obligation to promptly raise a concern when you see a situation in which our integrity, principles or policies may not be followed. However, if you identify yourself, we can more easily follow up with you and provide feedback. We will only share your identity on a "need-to-know" basis.

Report Concerns

Raise potential violations.

If you believe something may be a violation of our values, our code, our policies, or the law, you should speak up and report it. Similarly, you should also report any instances where someone has asked you to violate the code.

We take your concerns seriously and handle them with care. Reports not made in good faith are also subject to disciplinary action.

Report Anonymously

Hotline: 1-844-719-1439

missionhealthcare.ethicspoint.com

Speak Up

Reporting Channels

You have several channels to seek guidance or make a report.

Your manager, others in your chain-of-command, or Human

Resources: Your managers and HR are excellent resources for guidance or concerns related to the company and job-specific policies and processes, work responsibilities, co-worker issues, discipline disputes, promotion opportunities, and issues related to the work environment.

Ethics and Compliance

Department: For issues involving actual or potential Code or legal violations, you should seek guidance or raise concerns to the Ethics and Compliance Department.

Ethics Hotline: The Ethics Hotline is an anonymous reporting mechanism. The Ethics Hotline is answered 24 hours a day, 7 days a week by a third party and can be reached at:

Hotline:

1-844-719-1439

Online:

missionhealthcare.ethicspoint.com

Remember, nothing in this code prevents you from reporting potential violations of law to relevant government authorities.



Examples of issues involving actual or potential Code or legal violations:

- Accounting or auditing errors or misrepresentations
- Fraud, theft, bribery, and other corrupt practices
- Antitrust or insider trading violations
- Discrimination or harassment
- Actual or potential conflicts of interest
- Payment to a physician based on the value or volume of referrals

Speak Up

Consequences of Non-Compliance

Non-compliance can have serious repercussions.

- **For our company:** Damage to our company's reputation, prosecution, fines, disclosure to government agencies, or loss of business
- **For our colleagues:** Prosecution, fines, or imprisonment; disciplinary actions; damage to personal reputation; or severe injury or illness
- **For our investors:** Loss of confidence and investment value, or damage to reputation for good corporate governance
- **For our patients:** Loss of patient trust or damage to our patient's overall health

Share Your Concerns Without Fear of Retaliation

We do not retaliate against those who raise concerns or cooperate with an investigation.

Our company is committed to non-retaliation and protecting the rights of individuals reporting issues in good faith or cooperating in an investigation.



Speak Up

How We Handle Concerns

We fairly examine every integrity concern.

Mission Healthcare is dedicated to conducting thorough investigations when issues are reported. Our company has a number of ways to report issues or concerns.

When you submit a case:

1. A written report is created (anonymously if you wish).
2. Your case is assigned a unique number and is investigated.
3. The case is resolved and documented.



Q:

How do I know when I should seek guidance?

A:

Ask yourself. If something does not seem right, then it might not be the right thing to do.

- How would it look on the front page of the newspaper?
- Am I sure this course of action is legal?
- Is it consistent with our values, Code, and policies?
- Could it appear unethical or dishonest?
- Could it hurt our Company's reputation?
- Will this hurt our employees, patients, physicians, or investors?

Treat One Another with Respect

Human Rights

We respect employee rights.

We have programs and policies (you may request a copy of these policies at any time) that:

- Provide fair wages, benefits, and other conditions of employment
- Recognize employees' rights to freedom of association
- Provide humane and safe working conditions
- Prohibit forced or child labor

Always check your actions to ensure they do not violate or contradict any of the basic human rights principles noted above.

All employees should:

- Respect the diverse backgrounds of our employees, coworkers, patients, clients & vendors
- Give qualified individuals the chance to develop and succeed

Anti-Discrimination

We treat employees equally regardless of background.

Mission follows all laws covering freedom of association, collective bargaining, immigration, wages and hours, as well as laws prohibiting forced or child labor.

Employment decisions must always be in compliance with the law and based on merit, qualifications, and job-related performance, and without regard to non-job related characteristics such as:

- Race, color, ethnicity
- Citizenship, ancestry or national origin
- Disability
- Sex, gender, or gender identity
- Marital status or pregnancy
- Age
- Religion
- Sexual Orientation
- Veteran Status
- Any other legally protected status

Treat One Another with Respect

Anti-Harassment

Employees should feel comfortable in the workplace.

Harassment includes unwelcome verbal, visual, physical or other conduct of any kind that creates an intimidating, offensive, or hostile work environment. We seek to create a work environment that is free from harassment of any kind and offensive or disrespectful conduct. Our company follows all state and local laws prohibiting harassment. We consider the following unacceptable behavior:

- Sexual harassment
- Offensive language or jokes
- Racial, ethnic, gender or religious slurs,
- Degrading comments
- Intimidating or threatening behavior
- Unwanted physical activities
- Showing hostility toward others

What is Sexual Harassment?

Sexual harassment is bullying of a sexual nature, coercion of a sexual nature, or an inappropriate promise of rewards in exchange for sexual favors. Sexual harassment may consist of verbal, visual, or physical conduct of a sexual nature that is unwelcome that makes someone feel uncomfortable. It can take many forms, such as:

- Unwanted touching, comments about appearances, or sexual advances
- Sexually oriented jokes, pictures, texts or email messages
- Display of obscene pictures, posters or pornography

Treat One Another with Respect

Substance Abuse

We are committed to a drug-free workplace.

Drugs may include illegal drugs, controlled substances, alcohol, or misused prescription medication. If you work under the influence of drugs or alcohol, you pose an unacceptable safety risk to yourself and others. We perform our job duties free from the influence of any substance that could affect job performance. We therefore prohibit:

- Working under the influence of alcohol, illegal drugs or controlled substance
- Possessing, selling, using or distributing illegal drugs or controlled substances while working or on company property, except in the legal and appropriate provision of controlled substances for patient care

Workplace Violence

We are committed to a safe working environment.

Our company prohibits the possession of weapons in the workplace both on and off-site. You should not act in a way that causes another individual to feel threatened or unsafe. This could include:

- Verbal assaults
- Threats or any expressions of hostility
- Intimidation
- Aggression or hazing

Employment Data

We respect employee privacy rights.

As part of our everyday work, some employees have access to personally identified information (PII). We do not disclose employee PII unless required by law or when there is a legitimate business need and with the consent of the employee.

Ethics & Business Activities

Gifts

We will not ask for nor accept gifts from patients, their families or vendors. One-time, small tokens of appreciation for the staff as a whole are allowed (i.e. a tray of cookies for an office or inpatient unit).



Ethics & Business Activities

Conflict of Interest

Don't let your personal interests interfere with the company's best interest.

In our work, we have a duty to put the interests of the company before our own. A conflict of interest occurs whenever someone might question whether we are acting for the company benefit or for our own personal gain. Conflicts of interest may arise with family, friends or anyone with whom you have a personal relationship.

If you think you may have a potential or actual conflict of interest, you may have an obligation to report it promptly to the company so that a determination can be made regarding next steps. Many times, conflicts can be resolved through disclosure and an open and honest discussion.

Failure to report and withdraw from conflicts of interest can result in disciplinary action up to and including termination.

Examples of potential conflicts of interest:

Personal Relationships:

- Conducting business with or entering into contracts with family or friends
- Reporting to, supervising, hiring or promoting a relative or someone with whom there is a close personal relationship

Personal Investments or Financial Decisions:

- Investments in stocks, bonds, options or other ownership interests with potential to impact decisions or company business

Company Property, Information or Resources:

Utilizing company assets for personal benefit or the benefit of others

Ethics & Business Activities

Political Activities

We encourage participation in civic and community activities.

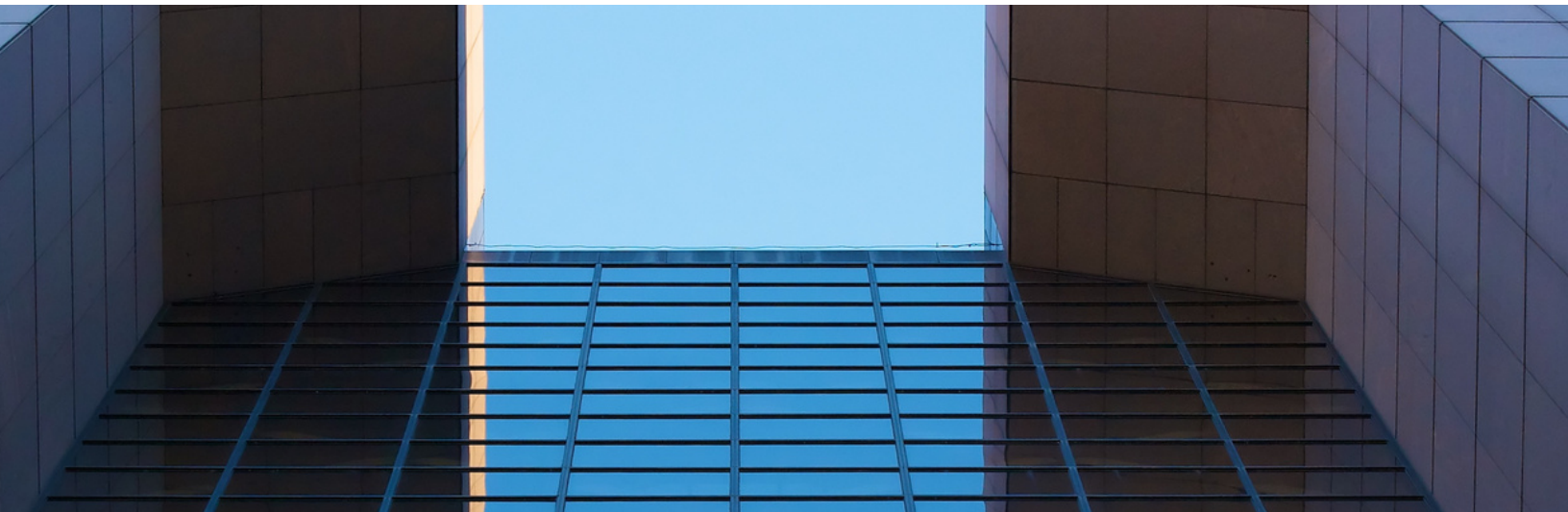
We respect our colleagues that make personal decisions to use their own time and money towards political or community activities. These activities should occur on personal time and not result in conflicts of interest. We must also make sure our political views do not interfere with our co-worker or patient relationships.

Hiring of Former & Current Government Employees

We do not use employment with our firm as a potential reward for prior actions.

The regulations of certain anti-bribery laws and conflict of interest policies cover the recruitment of former or current U.S. government employees.

Consult the Human Resources Department prior to recruiting government employees.



Corporate Responsibility

Do more than just the right thing.

Quality of Patient Care & Safety

We take care of people safely, effectively and efficiently.

Our goal is to provide high-quality, cost-effective healthcare to all of our patients. We treat all patients with dignity and compassion.

In any situation, if you have a question about our commitment to quality or patient safety, please raise concern to your manager or Chief Compliance Officer.

Patient Rights

Our patients come first.

We have the ethical responsibility to make our patients feel secure while in our care. We treat patients with respect and make no distinction in the availability of services based on age, gender, disability, race, color, religion, sex, sexual orientation, national origin, ability to pay, or any other legally protected status.

Patients and families trust us with highly sensitive medical information. It is our duty to protect this information, follow all state and federal privacy laws, and report any potential privacy concerns.



Corporate Responsibility

Company Resources

We use company resources for business use.

Company resources are intended for legitimate business purposes. You also have a responsibility to protect our equipment and resources from theft, loss, damage, waste, or abuse.

You must always:

- Ensure company funds are used properly for their established business-related purpose
- Obtain required approval before incurring an expense
- Accurately record all expenses in company records
- Verify compliance with our policies



Examples of Company Resources

Physical Property:

- Facilities
- Materials
- Supplies
- Equipment
- Company funds

Intangible Assets:

- Company time
- Confidential information
- Intellectual property
- Information Systems

Corporate Responsibility

Email, Internet, and Information Systems Use responsibly.

We provide information technology systems for authorized business purposes. Our use of these systems must follow our security policies and procedures. For example, never share passwords, leave laptops unattended or download unapproved software.

If there is a potential breach in data, including loss or theft of a laptop or a handheld device, report the situation to our Information Technology Department immediately.

You may engage in reasonable incidental personal use of phone, email and the internet if such usage does not:

- Consume a large amount of time
- Interfere with work performance
- Involve illegal, sexually explicit, discriminatory or other inappropriate material
- Relate to outside business interests
- Violate company policy

To the extent permitted by local law, our Company reserves the right to monitor activity on our resources.



Corporate Responsibility

Follow best Marketing practices.

Media Inquiries

Please refer inquiries from members of the press to Communications & Marketing.

Please email Marketing Manager tmiller@missionhh.com for media requests.

Social Media

Separate personal and business social media activity.

Social media is used to promote our services. When used inappropriately, it can violate patient privacy leading to significant damage.

Do not use personal devices to take photos of patients or patient information. We never post patient information or photographs to a website, social media page even if the patient is not identifiable unless the patient gives written permission.

Consider the following when posting on social media:

- State the materials and opinions you are posting are yours and not the company's
- Take every precaution to ensure that you are not disclosing any confidential information about the company
- Refrain from using any logos or trademarks without permission

For questions about **social media and logo use**, contact Marketing & Communications Manager at tmiller@missionhh.com

Corporate Responsibility

Email etiquette and virtual meetings.

Email Etiquette

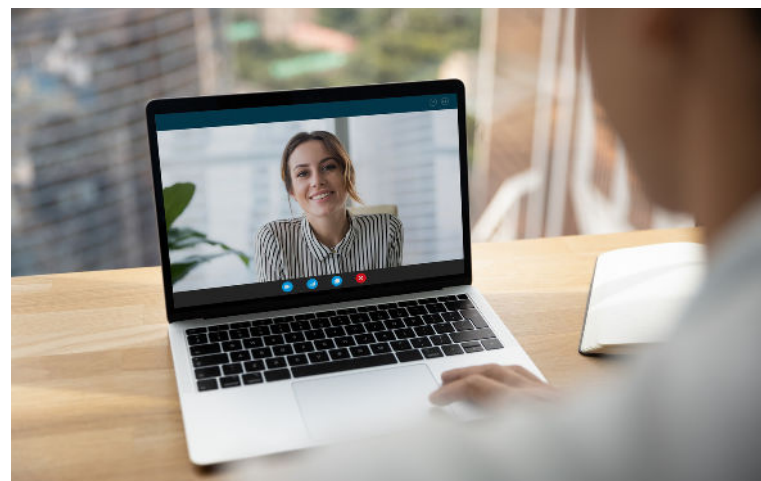
Please follow these essential rules when using your business email.

- Include a clear, direct subject line
- Think twice before hitting 'reply all'
- Use the standard signature block provided by Mission
- Use professional salutations (example: Hi John or Hello John)
- Use proper grammar and punctuation
- When sending an email, use black font color only between 10-12 point type and easy-to-read fonts such as Arial, Calibri, or Times New Roman
- Be suspicious of unknown links or requests sent through email or text messages
- Do not open email attachments from unknown sources, only open attachments from known sources after confirming with the sender

Virtual Meetings

Virtual meeting etiquette across all possible platforms, including but not limited to Skype, Microsoft Teams, or Google Meet.

- Be mindful of background noise
- Turn off or silence loud notifications
- Do not use inappropriate backgrounds
- Position your camera properly
- Avoid distractions
- Dress appropriately



Corporate Responsibility

Privacy and Confidentiality

Protect the privacy of our patients.

As part of your job, you may have access to proprietary corporate information or private patient data. This information must be protected to prevent an unauthorized disclosure that could put our company at risk and potentially violate certain laws. Always take necessary precautions to protect the confidential information you learn or have access to as part of performing your job.

You should not share any confidential information outside the company, even with members of your own family unless the disclosure is:

- Properly authorized
- Relating to a clearly defined, legitimate business need
- Subject to a written confidentiality agreement

Confidential business information includes:

- Non-public information that could be useful to competitors or harmful to our company, patients, physicians, vendors or another third party
- Material information to guide investor decisions in buying or selling securities

Examples of confidential information:

- Earnings/forecasts
- Business plans and strategies
- Restructurings or acquisitions
- Undisclosed marketing and promotional activity
- Management changes

Regulatory Excellence

Ineligible Persons

We conduct business with high ethical standards.

Our company does not contract with, employ or seek payment for services from an individual entity that is excluded, suspended debarred or ineligible to participate in Federal healthcare programs. Additionally, all employees and the employees of our third-party suppliers are required to report to us if they become excluded, debarred, or ineligible to participate in Federal healthcare programs.

License & Renewals

We stay up to date on license and renewals.

It is each colleague's personal responsibility to be able to provide evidence of compliance with federal, state, or local licensing requirements.

This could include:

- Licensing
- Certification
- Registration
- Accreditation

Remember, we do not do business with individuals or entities that are not in good standing with the government.

Regulatory Excellence

Billing and Documentation

We keep accurate and timely medical & billing records.

We have policies and systems in place to bill correctly. These procedures meet all federal and state laws and regulations to cover all payers, including government, commercial plans, and patients.

To support billing, we must accurately document medical records for the services provided. It is important that all individuals who contribute to medical records provide factual information.

If you see a billing error, we involve a manager and Compliance Officer to investigate and correct the error.

Fraud

Conduct business with honesty.

We believe in conducting business transparently in the best interest and in accordance with the highest ethical standards.

It is considered fraud when you intentionally conceal, alter, falsify or omit information for your own benefit or the benefit of others.

Examples of fraud include:

- Presenting false medical information to obtain benefits
- Falsely reporting hours to earn more pay
- Requesting expense reimbursement from the company for personal items

Regulatory Excellence

Government Investigations and Requests for Information **Never obstruct a government investigation.**

Our company will cooperate with reasonable government requests for information or visits. If a government authority contacts you with a non-routine request, you must notify the Compliance Officer.

When speaking with a government official, always tell the truth.

False Claims Act and Deficit Reduction Act Requests for Information

We speak up if we see an error or potential false claim.

The Federal False Claims Act and Deficit Reduction Act protect government programs including Medicare, Medicaid, and TRICARE from fraud and abuse. The company follows these laws and has policies to detect, report, and prevent fraud and abuse.

If you see an inaccurate medical record, fix it before it is submitted as a claim. If it already has been submitted, contact management.



Regulatory Excellence

Financial Incentives, Bribes and Kickbacks

We do not tolerate bribery as a business practice.

We follow all industry anti-bribery laws, such as that regulate the relationship between hospitals and physicians or other referral sources who may refer patients to our services. The two primary federal laws are the Anti-Kickback Statute and the Stark Law but there are also international, state, and local laws.

Potential interactions with physicians or other referral sources covered by the Anti-Kickback Statute or Stark Law include:

- Making payments to physicians or other referral sources for services rendered
- Providing services to physicians or referral sources
- Recruiting physicians in the community

- Arranging for physicians or other referral sources to serve in leadership positions
- Referring patients to practice owned by a family member

We must structure all arrangements with physicians or other referral sources to ensure compliance with legal requirements and our policies and procedures. Additionally, we need to make sure we are meeting our contractual requirements.

If you believe that someone has offered or received a bribe, or kickback, or provided something of value in exchange for referrals please notify our Chief Compliance Officer.



Regulatory Excellence

Our Company's overarching principles that govern our interactions with physicians and other referral sources:

Principles

Standards

We do not pay for referrals

- Patient referrals are based on medical need and our ability to provide the service
- Never offer to pay anyone for patient referrals

We do not make referrals based on financial relationships

- Never offer to pay or give something of value to anyone for patient referrals

We do not accept payments for referrals we make

- When making referrals, we don't take into account the volume or value of referrals the other provide makes to us
- No quid-pro-quo (or this for that) arrangements

Regulatory Excellence

Wage and Hour Standards **We compete fairly.**

We do not seek to gain an edge through unfair compensation. We comply with all antitrust laws and never make agreements with competitors that create monopolies or stifle competition. We do not illegally obtain or use proprietary information from competitors nor do we use deceptive means to gain such information.



Know How to Get Help

Integrity

The Code of Conduct cannot cover every scenario.

The Code does not address every difficult situation you may encounter in the workplace. It is up to each of us to ask for help if we find ourselves questioning whether a certain situation or issue is consistent with our values, codes, and policies. This means consulting with management, Human Resources, the Compliance Officer or emailing ethics@missionhh.com.

If you are unclear about something, reach out and let us help. We will thoroughly review your concerns and take steps to correct any problem. We will never approve or condone unethical or illegal behavior.

Integrity Check:



- Is it legal or ethical?
- Is it consistent with our values?
- Is it in the best interest of our patients?
- Would you feel comfortable or be proud if everyone knew about it?

When you are faced with a gray area of integrity, consider the following:

- How does this decision impact our Company both internally and externally?
- Am I confident this decision is something for which I am willing to be held accountable?
- Is this decision consistent with our Code of Conduct?



**Thank
You**

