

The cover image features a blurred background of people in a meeting. A large, light green circle is centered on the page, containing the text "Code of Conduct". The bottom half of the page is overlaid with a teal-to-blue gradient. The text "Code of Conduct" is written in a clean, black, sans-serif font.

Code of  
Conduct

CuraCor Solutions (CuraCor) is a people-first, not-for-profit health care solutions company dedicated to improving health outcomes through accessible, affordable, and innovative care. We partner to deliver exceptional service, transform the health care experience, and drive lasting impact for individuals and communities.

We are committed to conducting our business with honesty, integrity, and in full compliance with all applicable laws, regulations, and internal policies. This Code of Conduct reflects our shared responsibility to uphold the highest ethical standards in everything we do.

Unlawful or unethical behavior – no matter the intent or outcome – will not be tolerated. Each of us is accountable for understanding and following the rules that apply to our work and for speaking up if we see or suspect misconduct. By doing so, we protect each other, the customers we serve, and the company as a whole.

We strictly prohibit retaliation against anyone who, in good faith, raises a concern, reports a violation, or participates in an investigation. Creating a safe environment where individuals feel empowered to speak up is essential to maintaining our culture of integrity and trust.



# Message from Tunde

The year 2025 marked the beginning of a new era for the company with the formation of CuraCor Solutions, bringing together a family of companies, all oriented around a shared vision: To improve health outcomes by making care more accessible, more affordable, and more innovative.

At CuraCor Solutions, people are at the heart of everything we do. That's why this Code of Conduct is more than a set of rules; it is a reflection of who we are and what we stand for. It represents our shared responsibility to act with honesty, integrity, and respect in every decision and every interaction. Upholding these principles is essential to earning the trust of those we serve and to sustaining the culture that makes CuraCor Solutions exceptional.

No matter where you sit in this organization, unlawful or unethical behavior – regardless of intent – has no place. Each of us plays a vital role in protecting our values. That starts with understanding the standards that guide our work and by speaking up when something doesn't feel right.

If you have a question, ask it. If you have a suggestion, offer it. If you have a complaint, raise it. When you do this, we safeguard one another, strengthen our relationships with customers, and honor the mission that unites us.

Courage to speak up and integrity in action are the cornerstones of trust – and together, they ensure that CuraCor Solutions remains a place where doing the right thing is not just expected but celebrated. We are committed to creating a safe, supportive environment where every voice is heard. Retaliation against anyone who raises a concern in good faith will never be tolerated.

Thank you in advance for studying this document and taking personal responsibility to help maintain an ethical workplace and strengthen our company's reputation. Health care is experiencing a period of upheaval and change, and people are looking to us to lead ... and it's imperative that we lead with integrity, compassion, and care.

**Tunde Sotunde, MD, MBA, FAAP**  
President and Chief Executive Officer



# Message from the Chair of the Audit Committee of the Board

The significance of our Code of Conduct goes beyond spelling out right from wrong – it's a blueprint for living our values as a family of companies, working together to make health care work better for all.

Every individual in our organization is personally responsible for conducting business in accordance with the highest standards outlined in our Code of Conduct. Performance pressures or ease of convenience should never override these principles, and our actions should always reflect the standards spelled out here.

Living this document is about more than following the rules outlined on its pages – it's about each one of us taking an active role contributing to a shared

culture that prioritizes ethical behavior. If you know of, or suspect, any lapses in ethics or compliance, speak up. Your voice is essential. You can report these issues to your supervisor or other members of management. If you're uncomfortable doing so, or if your concern isn't addressed satisfactorily, refer to Appendix A for more information about how employees at your company can make a report. Act with confidence: Retaliation against anyone who reports a concern or assists in an investigation is strictly prohibited.

As Chair of the Audit Committee, I am honored to work alongside each of you. I encourage everyone to review the Code of Conduct and apply its principles in all actions taken on behalf of our company.

**Heather Cozart**

Chair, Audit Committee of the Board



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# Scope and applicability

## Who does the Code of Conduct apply to?

This Code of Conduct (the “Code”) applies to the CuraCor Solutions Corp. (“CuraCor”) workforce, which, for the purpose of this Code, includes employees, team members, officers, and board members of CuraCor and its wholly owned subsidiaries listed to the right (referred to collectively as “company,” “companies,” or “family of companies”).

Throughout the Code, you’ll see references to departments like “Legal,” “Compliance,” or “Human Resources.” Unless otherwise specified, those refer to the equivalent department within your specific company. There’s also a list of resources in Appendix A at the end of the Code to help you know who to contact about specific issues.

## Why does CuraCor have a Code of Conduct?

The Code serves as a foundational framework that reflects our shared values, ethical standards, and commitment to integrity across the CuraCor family of companies. It is designed to guide behavior, support sound decision-making, and foster a culture of trust and accountability throughout our organization.

While each company in the CuraCor family may have its own policies and procedures tailored to its specific operations, this Code supplements those documents by providing a consistent ethical baseline. It ensures that all employees, regardless of location or role, understand and uphold the principles that define who we are as a collective enterprise.



By aligning individual company policies with the overarching Code, we reinforce our commitment to ethical business practices, compliance with all laws and regulations that apply to our businesses, and responsible corporate citizenship.

Only the CuraCor Board of Directors may waive Code requirements.

\*Brighton Health Plan Solutions Holdings, Inc is the parent of both Brighton Health Plan Solutions, LLC and MagnaCare, LLC. The code of conduct applies to both Brighton Health Plan Solutions and Magnacare.



## Leader responsibilities

An important part of a leader's responsibility is to set the standard for ethical and compliant business practices. CuraCor workforce leaders are expected to reflect our commitment to integrity in both words and actions. As a leader, you are expected to:

- Help employees understand how the Code and related policies apply to their positions and everyday behavior;
- Ensure employees are aware of the ways to report suspected unethical, illegal, or improper activity;
- Create and maintain an environment where ethical behavior is valued and encouraged, and where employees feel comfortable asking questions or reporting concerns without fear of retaliation; and
- Hold yourself and others accountable for ethical and compliant conduct, ensuring that any violations are addressed promptly and fairly.

In addition, due to the nature of their position, executives (generally Vice Presidents and above) and Board members are expected to promptly report to their Chief Legal Officer any legal, investigatory, or enforcement activity involving the executive or Board member, including but not limited to: (1) being charged with any criminal offense other than a civil traffic offense; (2) being party to any civil action involving dishonesty, breach

CuraCor workforce leaders are expected to reflect our commitment to integrity in both words and actions.

of trust or a financial dispute; (3) being the subject of any investigatory, administrative, or enforcement proceeding under state or federal law; (4) being refused the grant of any occupational, professional, or vocational license or permit or having any such license or permit you hold be subject to any judicial, administrative, regulatory, investigatory, or disciplinary action; (5) filing of personal bankruptcy; or (6) being involved in any other legal, investigatory, administrative, or enforcement activity that may cause reputational damage to CuraCor or its companies or affect a person's ability to fulfill the responsibilities of the person's role with CuraCor or its companies, including being declared unfit to serve as an officer or director by a court under the Securities Exchange Act. Once a company's Chief Legal Officer has been notified of such activity, they should promptly report the same to the Chief Legal Officer of CuraCor.

# Ethical decision making

## How do I know if I am doing something that may be unethical?

The Code does not cover every possible situation you could face, nor does it include all the possible laws and regulations applicable to our companies. If you are unsure if an action is ethical or compliant, ask yourself the following questions:

- Is my action legal?
- Is my action honest?
- Does my action align with company values?
- Is my action in compliance with company policies?
- Will my action appear inappropriate to others?
- Would I be proud to tell my co-workers or family about my action?
- Would I like to see my action on the news?

If you answered “no” to any of these questions, seek guidance from your manager before taking any actions. You can also contact the resource(s) at your company listed in Appendix A.

## What happens if I do not comply with the Code?

Violations of the Code are taken seriously, and we will take necessary steps to prevent unethical or unlawful behavior. We will also take necessary corrective actions to prevent a repeat violation.

If you fail to comply with the Code or any applicable law or regulation, you will be subject to disciplinary action that may include termination. Disciplinary measures will depend on the circumstances of the violation and will be applied in a manner consistent with applicable policies and laws.



# How to report violations and disciplinary actions

## Who should I talk to if I have questions or need to report a violation?

If you have a question about the Code, or if you believe or suspect that someone has violated the Code, you should start by talking with your supervisor. If your supervisor is unavailable to discuss the problem or concern, or if you are uncomfortable talking with them, you may present the problem or concern to your supervisor's manager or to another member of your department's leadership team. You may also contact your Human Resources department at any point.

If your report involves potential noncompliance with regulatory requirements that govern our business, you can contact your Compliance department. In addition, company attorneys have a responsibility to report a material violation of law or breach of fiduciary duty to their Chief Legal Officer, who is responsible for reporting the issue to the Chief Legal Officer of CuraCor.

In addition to those options, you can also utilize the resources listed in Appendix A. Many of those resources allow you to report anonymously.

## What happens after I make a report?

The response to any report ultimately depends on the circumstances. However, know that when you make a report, your concern will be taken seriously. Your report and any related investigation will be treated confidentially to the extent possible, consistent with legal obligations.

A typical response to a report includes:

- Review of the allegation(s) and assignment of the case to the most appropriate area (ex. Human Resources, Compliance, Legal);
- Interviews with possible participants;
- Reviews of relevant documents, files, and printed material;

- Interviews with possible witnesses;
- A decision-making process to determine if the report is substantiated and if a violation of the Code, company policy, or the law has occurred; and
- A determination of whether disciplinary and/or corrective action is required to avoid the likelihood of recurrence.

In the event that, at the conclusion of any investigation, it is determined that there is a financial or accounting concern or other reportable event, including, but not limited to, those required to be reported under the Significant Events Clause of CS 1039 or as outlined in 48 CFR 52.203-13, the Chief Legal Officer at your company should be consulted to determine the steps necessary to disclose the issue to the appropriate regulatory entity and/or governing company Board. Once a company's Chief Legal Officer has been notified of such concerns, they should promptly report the same to the Chief Legal Officer of CuraCor.

## Retaliation will not be accepted

We understand how important it is to provide an environment where people feel comfortable coming forward. Disciplinary action will be taken against any employee who retaliates against or intimidates any other employee who reports, or assists in the investigation of a report of, a potential violation of the Code or applicable laws or regulations. This stance on retaliation is complemented by the federal government's protections for individuals when engaging in "whistleblowing" activities related to federal grants and contracts.

There will be no retaliation against any workforce member who has knowledge of potential inappropriate or illegal activities involving federal funds and, in good faith, discloses this information to appropriate government authorities. Always keep in mind that employees who report, or who assist in the reporting of, potential violations are not exempt from accountability for their own involvement in any wrongdoing and are expected to continue to perform their job and follow all company policies.

# Work environment

## Harassment and discrimination

CuraCor and its companies are committed to providing a professional work environment that promotes dignity and respect and is free of harassment and discrimination. We provide equal employment opportunities to all employees and applicants and prohibit conduct that singles out an employee or group of employees in a negative way because of their race, color, ethnicity, religion, sex, sexual orientation, gender (including gender identity and transgender status), pregnancy, marital status, national origin, age, veteran status, medical condition, physical or mental disability, genetic information, status as a victim of domestic violence, or any other characteristic protected by federal, state, or local law.

## Alcohol and substance use

Being under the influence of illegal substances or alcohol while performing your job duties poses a serious threat to your health and safety, to the productivity of our companies, and to the well-being of all outside stakeholders. The use, possession, or distribution of any illegal substance, as well as the abuse of legal drugs or alcohol on company property or while conducting company business is prohibited. See your company's specific policy for more details.

## Safety and workplace violence

CuraCor is committed to maintaining a safe, respectful, and secure work environment for all employees. Workplace violence – including threats, intimidation, harassment, or any act of aggression – will not be tolerated under any circumstances. Possession of a firearm or any other weapon while on company property or while conducting company business is prohibited.

All employees are expected to treat one another with dignity and resolve conflicts constructively. Any behavior that creates an unsafe work environment must be reported immediately to a supervisor, Human Resources, or through the appropriate reporting channels.

Violations of this policy may result in disciplinary action, up to and including termination of employment and potential legal action.

CuraCor is committed to maintaining a safe, respectful, and secure work environment for all employees.

# Business practices

## Use of company assets

You have a responsibility to use company assets for company purposes, maintain them with care, and guard against waste, misuse, and theft. Company assets include not only company owned facilities and equipment, but also employee work time, office supplies, information systems, intellectual property, securities, and cash. Misuse of these resources can disrupt the vital flow of information or tie up resources on which our customers depend.

Company property should not be sold, loaned, given away or otherwise disposed of, regardless of condition or value, except with proper authorization. You must return all company property immediately upon request or upon termination of employment. You are responsible for the judicious and ethical use of company funds over which you have control. If you spend company money, or personal money that will be reimbursed, you should always be sure that the company receives appropriate value in return. You are also responsible for maintaining the appropriate documentation regarding the use of company funds.

## Accuracy of records

Maintaining accurate and complete records is essential to the integrity of our operations. We rely on accurate records to make informed decisions, ensure quality care, and meet our obligations to members, patients, providers, regulators, and other stakeholders. The CuraCor workforce is expected to ensure that any information recorded – whether clinical, financial, or administrative – is truthful, timely, and properly documented. Records must reflect the actual services provided, be free from falsification or misrepresentation, and comply with applicable legal, regulatory, and contractual requirements. Any intentional alteration, omission, or fabrication of records is strictly prohibited and may result in disciplinary action, up to and including termination.

## Responsible use of artificial intelligence (AI)

CuraCor and its companies are committed to using artificial intelligence (AI) technologies responsibly, ethically, and in compliance with all applicable laws and regulations. AI tools must be designed and applied in ways that support fairness, transparency, privacy, and accountability – especially when they impact member/patient care, data analysis, or decision-making.

Employees must ensure that AI systems are used to enhance, not replace, human judgment and that any outputs are reviewed for accuracy and bias. The use of AI must never compromise the confidentiality of personal or health information.

If you are involved in using, developing, deploying, or managing AI tools, you are responsible for understanding the associated risks and for consulting with the appropriate technical, legal, or compliance teams as needed and as required by company policy.

## Fair dealing

We are committed to conducting all business interactions with honesty, transparency, and fairness. Fair dealing is essential to maintaining our reputation and ensuring equitable treatment for all stakeholders. Each member of the workforce is expected to deal fairly with members, patients, providers, vendors, regulators, and one another. This means avoiding manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other unfair practices.

## Conflicts of interest

We respect the rights of our employees to manage their affairs and investments and recognize that you may take part in financial, business, and other activities outside your job. However, all employees have a duty of loyalty to make decisions and conduct themselves in a manner that is in our company's best interest as a responsible corporate citizen.

A conflict of interest occurs when you or a family member have a personal interest that interferes with your work responsibilities or affects your ability to act in the best interest of the company and its customers. Because conflicts of interest can undermine the success and reputation of our

companies, we manage our personal interests with our company responsibility in mind, avoiding even the appearance of a conflict of interest.

Members of the Board, company executives, and all employees must disclose conflicts of interest in accordance with company policy. We recognize that it is not always easy to determine whether a situation could create a conflict of interest. Some of the more common situations that could lead to a conflict of interest (or the appearance of one) are listed below. However, if you have any questions about whether an activity creates a conflict, you should contact the appropriate resource listed in Appendix A.



### Outside activities

We are proud of our many employees who are active within the communities we serve, and we respect each employee's right to engage in activities on their own time. Employees may participate in civic, charitable, or professional activities provided that those activities do not create a conflict of interest or conflict with your duties and obligations to the company. Similarly, as your primary employment obligation is to the company, any outside employment activity such as working a second job (including as an employee, contractor, or independent consultant), or operating a personal business must not create a conflict of interest or commitment. You may not use company time, name or logos, influence, assets, facilities, materials, or the services of other employees for or in connection with any outside activity unless you are approved to do so.



### Personal relationships

Family, romantic, or close personal relationships that may adversely influence decision-making, actions, or activities at work may create a conflict of interest. Even if you are careful and work to remain objective, these types of relationships can create the perception of favoritism. Therefore, employees must avoid a direct or indirect reporting or supervisory relationship with any member of their immediate or extended family (or others with whom they have a romantic or close personal relationship). If such a relationship exists or occurs, you must report it to your Human Resources department.



### Gifts & entertainment

Offering or accepting business favors, gifts, or entertainment can build goodwill, but it can also create a conflict of interest (or a perception of a conflict) that can undermine the integrity of these business relationships and harm the reputation of our companies. We are committed to ensuring that all gifts and business courtesies, given and received, are appropriate and within the limits of the law and customary business practices. Please check your company's policies and procedures if you have any questions about whether a gift or entertainment can be given/accepted. You can also contact the appropriate resource found in Appendix A.

## Media inquiries and public statements

To ensure clear, accurate, and consistent communication, only authorized individuals may speak on behalf of CuraCor or its companies to the media or in public forums. Company employees must not respond to media inquiries or make public statements related to the company's business, policies, or operations unless they have received prior approval from your Communications or Legal department. If you are contacted by a member of the media, promptly refer them to the appropriate spokesperson or department at your company.

## Privacy

Protecting the privacy of our members and patients is a fundamental responsibility. We are committed to complying with all applicable privacy laws and regulations, including the Health Insurance Portability and Accountability Act (HIPAA) and other federal, state, and contractual privacy requirements.

Employees must safeguard all protected health information (PHI), access it only when necessary for their job duties, and never share it without proper authorization or as permitted or required by law. This includes protecting information in all forms – verbal, written, and electronic. Any suspected unauthorized disclosure of PHI must be reported immediately to the applicable department (see Appendix A for reporting contacts).

## Protecting confidential and proprietary information

Confidential and proprietary business information is an important asset, and safeguarding it helps maintain our competitive advantage, comply with legal obligations, and preserve the trust of our stakeholders. Confidential and proprietary information includes non-public information about our operations, strategies, financials, systems, customer data, business relationships, and information about pending or contemplated business deals. The workforce is expected to protect this information from unauthorized access, use, or disclosure.

You must only access confidential information as needed for your role and must never share it outside the company – or even within the company – unless there is a legitimate business need, and you have proper authorization to do so. You must not use it for your personal advantage or for non-business-related uses. This also applies to accepting, using, or sharing confidential and proprietary information belonging to another party unless you have specific authorization to do so. These obligations continue even after your employment or engagement ends.

## Protecting employee information

If you have access to information about your fellow employees, do not reveal it to anyone except when necessary for legitimate business purposes. Confidential employee information includes information collected by your employer, including but not limited to birth dates, addresses, Social Security numbers, employment information, veteran/disability status, and information voluntarily provided for self-identification purposes such as sexual orientation and gender identity. Other personal information voluntarily disclosed by an employee to their employer, such as health status, family circumstances, or other sensitive matters, is also considered confidential and should not be disclosed without the employee's knowledge and consent. However, this does not limit an employee's choice to voluntarily share personal news with colleagues, such as the birth of a child or other life events.

When an employee receives services from a CuraCor company as a patient or member, their PHI must be treated with the same level of privacy, confidentiality, and respect as any other patient or member. Access to such information must be strictly limited to authorized personnel and used solely for legitimate clinical or administrative purposes.

This is not intended to preclude or dissuade employees from discussing wages, benefits, or the terms or conditions of employment.

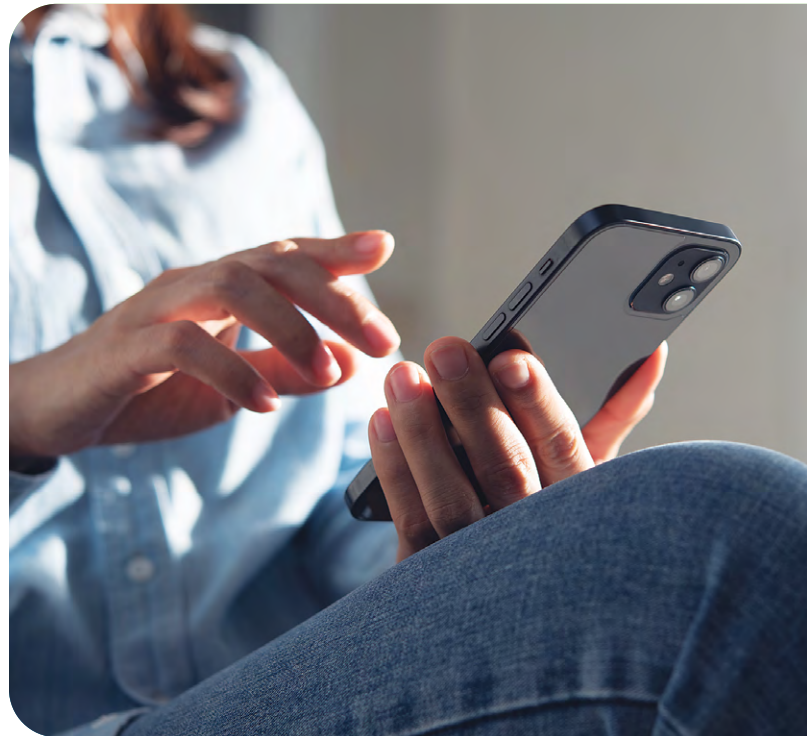
## Social media

Employees are expected to use social media responsibly and in a manner that reflects the values and reputation of CuraCor and its companies. When engaging on platforms such as LinkedIn, X (formerly Twitter), Facebook, Instagram, blogs, forums, chat rooms, or others, employees must adhere to the following principles:

- **Confidentiality and privacy:** Under no circumstances should employees disclose PHI, proprietary data, or any other confidential information related to patients, members, colleagues, or the organization. All social media activity must comply with applicable privacy laws and regulations, including, but not limited to, HIPAA.
- **Professional representation:** Employees must refrain from making statements or sharing content that could be interpreted as representing the views or positions of the company unless explicitly authorized. Personal accounts should not be used to conduct official business or communicate on behalf of the company.
- **Respectful conduct:** All interactions on social media should be respectful. Content that is discriminatory, harassing, defamatory, or otherwise inappropriate is strictly prohibited.
- **Accuracy and transparency:** When discussing health care-related topics, employees must ensure that any information shared is accurate, evidence-based, and clearly identified as personal opinion unless officially sanctioned by the company.
- **Compliance and accountability:** Employees are responsible for understanding and complying with all relevant company policies, legal requirements, and ethical standards when using social media. Violations may result in disciplinary action, up to and including termination of employment.

## Electronic communications

In order to protect confidential information, our companies have very detailed security policies and procedures that every employee must follow. While each company's security policies may vary depending on its structure, all employees are prohibited from disabling or circumventing any company security controls protecting computer systems and data sets. Examples of such security controls include but are not limited to, passwords, firewalls, encryption, and screen-locking mechanisms. Any effort to avoid these, or other security controls, is a violation of the Code.



# Legal & regulatory considerations

## Competition and antitrust

Maintaining a competitive and fair marketplace is essential to delivering high-quality, affordable health care. We are committed to complying with all applicable antitrust and competition laws. These laws are designed to promote fair competition and protect consumers, including members, employer groups, and business partners. All members of the workforce must avoid practices that could unlawfully restrict competition, such as price-fixing, bid-rigging, market allocation, or improper sharing of competitive information with other organizations.

We must never enter into agreements – formal or informal – that could limit competition or create unfair advantages. Any discussions or activities that may raise antitrust concerns should be immediately reported to your Legal department.

## False claims act

We are committed to full compliance with the False Claims Act (FCA), a federal law that imposes civil liability on individuals and organizations that knowingly submit, or cause to be submitted, false or fraudulent claims for payment to government programs, including Medicare and Medicaid. Violations may include billing for services not provided, upcoding, or submitting claims for medically unnecessary services.

## Anti-kickback

The federal and state anti-kickback statutes make it a crime to give or receive any remuneration (which is broadly defined to include money, goods, and services) in exchange for a referral or as an inducement to provide health care services paid for by any federal or state health care program, including Medicare, Medicare Advantage plans, Medicaid, Medicaid managed care plans, and other governmental health plans.

Maintaining a competitive and fair marketplace is essential to delivering high-quality, affordable health care.

In accordance with these rules, we do not pay or offer any remuneration to physicians, providers, suppliers, or anyone else, either directly or indirectly, for referrals or other business; nor do we solicit or accept any remuneration to refer patients or business to other providers, suppliers, or anyone else. This includes giving or receiving any form of remuneration, including virtually anything of value, in return for a referral.

## Stark law

We are committed to full compliance with the Stark Law, also known as the Physician Self-Referral Law, which prohibits physicians from referring Medicare patients for certain designated health services to entities with which they or their immediate family members have a financial relationship – unless a specific exception applies.

This law is designed to prevent conflicts of interest and ensure medical decisions are made in the best interests of patients and not influenced by financial gain. Violations can result in denial of payment, refund obligations, civil monetary penalties, and exclusion from federal health care programs.

You must avoid arrangements that could be perceived as self-referral and must consult your Legal department before entering into any financial relationships with referring providers.

## Referral relationships

All contracts, leases, and other financial relationships with providers, suppliers and others with whom we have a referral relationship or do business will comply with the applicable anti-referral laws, including the federal and state Stark and anti-kickback laws. We will not, for instance, provide free services or items or other benefits to any party with whom we have a referral relationship; nor will we enter into commercially questionable business relationships in order to further a referral relationship.

## Marketing activities

We do not engage in deceptive or coercive marketing practices. All marketing communications – whether directed to customers, prospective customers, providers, or the public – must be truthful, not misleading, and compliant with applicable laws, regulations, and internal policies.

All promotional materials must clearly and accurately describe our services, benefits, and limitations and must not involve any promise, expressed or implied, of remuneration for referrals or other business. In addition, marketing materials should never disparage the service or business of a competitor through the use of false or misleading representations.

## Fraud, waste, & abuse

We are committed to identifying, preventing, and reporting fraud, waste, and abuse (FWA) to protect the integrity of our companies and ensure responsible stewardship of health care resources. FWA undermines trust, increases costs, and diverts resources from those who need care.

- **Fraud** involves intentional deception or misrepresentation made to gain unauthorized payments or benefits (example: Billing for services not rendered).

- **Waste** refers to overuse or misuse of services or resources, often due to inefficiencies or carelessness (example: Opening a 10mg single use vial of a medication for a treatment requiring only 5mg).
- **Abuse** includes practices that are inconsistent with accepted medical or business practices and result in unnecessary costs (example: Billing a higher level procedural code when services were not provided at that level).

We maintain systems for proactive detection of FWA, including investigations, data analysis, and training. Everyone must remain vigilant and report any suspected FWA. Reports can be made confidentially and without fear of retaliation (see Appendix A for contact information).

## Insider trading

During your employment, you may become aware of confidential or proprietary information about other companies, including publicly traded companies and companies about to go public, that has not yet been made public. This includes information about mergers, financial performance, regulatory actions, or other sensitive information. If you receive any such non-public or “insider” information about a company, you may not use that information in any way for personal gain. Specifically, you may not use material, non-public information to buy or sell securities in that company. In addition, you should not disclose that information to anyone, including family members, friends, or advisors unless properly authorized by that company.



## Government relationships

We conduct business with the U.S. government and various federal, state, and local agencies. These relationships are governed by strict and often complex laws and regulations. It is essential that we understand and comply with all applicable legal, regulatory, and contractual requirements related to government programs, contracts, and transactions. Doing so protects our reputation and ensures continued participation in government programs. If you are ever uncertain about these obligations, consult your Compliance or Legal departments.

Here are a few things to keep in mind if you directly or indirectly perform services or work related to a government program,

- Do not hire or contract with an individual or entity excluded by the government from participating in government programs unless there is a limited exception to the government's rules. Before discussing possible employment of a government employee, consult with your Human Resources department.
- Follow all applicable regulations when submitting proposals, budgets, and other reports and records to the government, and ensure that the information submitted is complete and accurate.
- Ensure that any charges to government contracts, including reporting of work time, are accurate and allowable.
- To ensure the integrity of the contracting process, never seek to obtain or use confidential information regarding the contract process from government contractors before the award of a contract.
- Do not accept or offer gifts from/to government representatives. In certain circumstances, business courtesies such as coffee, soft drinks, or light refreshments may be accepted/offered. If you are unsure whether you can offer or accept a gift, please contact your Compliance department.
- Cooperate and respond fully and truthfully with government representatives conducting audits or investigations.
- Promptly report any activity that is believed to be unlawful, could result in a false claim, or could result in an overpayment by the government to us or the retention of funds that are owed to the government. See Appendix A for a list of reporting resources.

# Appendix A

## Company resources

This Code does not address all ethical situations that may arise, and employees are not expected to know the answer to every compliance or ethics question. However, we do expect employees to know when to ask for assistance and how to access such assistance. Below are the applicable contacts/resources at each CuraCor company.

### ACS Benefit Services

Report a Code violation or compliance issue	Hotline: 888-486-1554 (anonymous)
Privacy	Email: <a href="mailto:compliance@acsbenefitservices.com">compliance@acsbenefitservices.com</a>
IT Security	Email: <a href="mailto:help@acsbenefitservices.com">help@acsbenefitservices.com</a>
Human Resources	Email: <a href="mailto:hrdept@acsbenefitservices.com">hrdept@acsbenefitservices.com</a>

### Blue Cross NC

Report a Code violation or compliance issue	Hotline: 888-486-1554 (anonymous) <b>Code of Conduct reporting form</b> (anonymous) Mail: Blue Cross NC Ethics Office, P.O. Box 2291, Durham, NC 27702-2291 <b>Code of Conduct inquiry form</b> (for questions – anonymous)
Privacy	Email: <a href="mailto:privacyoffice@bcbsnc.com">privacyoffice@bcbsnc.com</a> File a report: <b>Incidents</b>
IT Security	IT service desk: 919-765-2824 Email: <a href="mailto:VulnerabilityManagement@bcbsnc.com">VulnerabilityManagement@bcbsnc.com</a>
Special Investigations Unit (SIU)	SIU toll free hotline: 800-324-4963 SIU internal hotline: 919-765-2464 Email: <a href="mailto:SIU@bcbsnc.com">SIU@bcbsnc.com</a> <b>Internal online fraud reporting form</b> <b>External online fraud reporting form</b> Mail: Blue Cross NC SIU, P.O. Box 25431, Durham, NC 27702-5431
Company Policies	<b>All policy manuals</b>
Human Resources	<b>Human Resources contacts &amp; information</b> <b>Ask@Work</b>

## Brighton Health Plan Solutions and Magnacare

Report a Code violation or compliance issue	Hotline: 800-806-4463 Email: <a href="mailto:compliancehotline@magnacare.com">compliancehotline@magnacare.com</a>
Privacy	Email: <a href="mailto:compliancehotline@magnacare.com">compliancehotline@magnacare.com</a>
IT Security	Email: <a href="mailto:InfoSec@brightonhps.com">InfoSec@brightonhps.com</a>
Company Policies	<a href="#">ADP Workforce Now</a>
Human Resources	Email: <a href="mailto:HumanResources@brightonhps.com">HumanResources@brightonhps.com</a>

## FastMed, LLC

Report a Code violation or compliance issue	Compliance officer phone: 919-550-0821 Email: <a href="mailto:compliance@fastmed.com">compliance@fastmed.com</a> Hotline: 919-763-1428
Privacy	Email: <a href="mailto:compliance@fastmed.com">compliance@fastmed.com</a> Chrystal Pettitt, privacy officer – <a href="mailto:cpettitt@fastmed.com">cpettitt@fastmed.com</a>
IT Security	Email: <a href="mailto:tdxmonitor@avancecare.com">tdxmonitor@avancecare.com</a> Kyler Stalte, security officer – <a href="mailto:kstalte@avancecare.com">kstalte@avancecare.com</a>
Company Policies	<a href="#">FastMed Policies and Procedures</a>
Human Resources	Email: <a href="mailto:humanresources@fastmed.com">humanresources@fastmed.com</a>

