THE LIFETIME HEALTHCARE COMPANIES

CODE OF BUSINESS CONDUCT

SUPPLIERS

Approved
January 29, 1999

Revised and Approved
May 19, 2000, March 31, 2006, March 27, 2008, June 23, 2010, March 28, 2013, June 26, 2014, June 25, 2015, March 14, 2017, May 18, 2017, June 27, 2018, June 26, 2019, June 25, 2020, June 24, 2021, June 30, 2022, June 29, 2023, June 27, 2024, June 26, 2025, June 25, 2026

Welcome to The Lifetime Healthcare Companies.

I'm pleased to share The Lifetime Healthcare Companies Code of Business Conduct (the "Code") with you. Our Code focuses on business conduct and ethics—in other words, the way we do business. We use it to apply and maintain the highest standards of ethical conduct in our business practices.

The Lifetime Healthcare Companies (collectively, the "Corporation") is committed to the values of honesty, integrity, and fairness; the implementation of our Code is proof of our commitment. Our Code educates us about the legal and ethical rules of accepted business practices, raises awareness of questionable conduct, and provides ways to report suspected ethics violations. It will help you make informed, fair business decisions for the Corporation.

You are responsible for upholding our core values of honesty, integrity and fairness and for applying them to your everyday work activities. When you are uncertain about the ethics of a business decision, use the information in our Code to help you make the right decision.

If you become aware of any unethical activities in the Corporation, you are responsible for reporting them. If you don't diligently apply our business values, the Corporation and/or you could be at risk for legal consequences.

There are several resources to help you raise concerns or report possible violations of our Code. In addition to your immediate leader, or any leader in the organization, you may speak to:

- The Ethics Office
- Regulatory Compliance
- Human Resources
- The Office of the General Counsel
- The Privacy Office
- The Special Investigations Unit

Our Ethics Hotline (800-275-0170) is staffed by an external vendor and is answered by a live operator, 24 hours a day, seven days a week. Calls to the hotline are always confidential and may be anonymous. You also can email reports to Ethics and Compliance. Please remember, our organization has zero-tolerance for retaliation against anyone who makes a report.

Please review our Code. If you have any questions, please contact the resources listed above.

Thank you for your commitment to the principles outlined in our Code. Our continued success and our future depend on it.

Sincerely,

James R. Reed
President and Chief Executive Officer
The Lifetime Healthcare Companies

SUPPLIERS

Contents

I. INTRODUCTION 4

II. ETHICS 4

III. CONFLICT OF INTEREST 5

IV. MAINTENANCE OF BOOKS AND RECORDS 5

A. Falsification of Records 6

B. Expense Records 6

C. Retention of Records 6

V. PROTECTION OF CONFIDENTIAL INFORMATION 6

A. Termination of Relationship 7

B. Information Security 7

VI. FAIR DEALING 7

A. Kickbacks and Rebates 8

B. Gifts or Gratuities 8

C. Entertainment 8

D. Agreements with Suppliers 9

E. Improper Use of Funds or Assets 9

VII. FEDERAL AND STATE CONTRACTS; FEDERAL PROCUREMENT 9

A. Gifts to Government and Public Officials 9

B. Federal Procurement 10

VIII. FEDERAL AND STATE PROGRAMS 10

IX. GOVERNMENTAL INVESTIGATIONS 11

X. WORK ENVIRONMENT 11

XI. SEEKING GUIDANCE, AND REPORTING VIOLATIONS 12

XII. AUDITING AND MONITORING, CORRECTIVE ACTION, AND/OR TERMINATION 12

SUPPLIERS CODE OF BUSINESS CONDUCT

I. INTRODUCTION

The Lifetime Healthcare Companies Code of Business Conduct (the "Code") applies to employees, directors, suppliers, and producers of Lifetime Healthcare, Inc. and its subsidiaries and affiliates (collectively, the "Corporation").

The Code was prepared with the advice and assistance of legal counsel and has been approved by the Lifetime Healthcare, Inc. Board of Directors. The Code is a formal statement of the Corporation's commitment to the standards and rules of ethical business conduct. It supplements the Corporation's commitment to conduct all activities in accordance with applicable laws and regulations.

This chapter of the Code specifically applies to suppliers of the Corporation, including vendors, consultants, and/or other contractors/business partners. All suppliers of the Corporation must comply with this Code, immediately report any alleged violations and/or non-compliance, and assist the Corporation's compliance personnel in investigating allegations of wrongdoing and problem resolution. The policy of the Corporation is to prevent the occurrence of unethical, non-compliant, and unlawful behavior, to halt and/or correct such behavior as soon as reasonably possible after its discovery, and to sanction suppliers who violate the Code, including suppliers who neglect to report a violation.

It is your responsibility to understand the requirements of the Code. You may need to develop and/or maintain operational policies and procedures to ensure your compliance with the Code.

No code of conduct can cover all circumstances or anticipate every situation. Consequently, suppliers encountering situations not addressed specifically by this chapter of the Code should apply the overall philosophy and concepts of the entire Code to the situation, along with the highest ethical standards observed by honorable people everywhere. If you are still unsure, review the particular circumstances with the Ethics Office. The Ethics Office may be reached by contacting the Ethics & Compliance Hotline (1-800-275-0170) and requesting that the Ethics Office return the call.

II. ETHICS

It is the long-standing policy of the Corporation to observe all laws applicable to its business. Even where the law is permissive, the Corporation chooses the course of highest integrity. While local customs, traditions, and mores differ from place to place, honesty is valued in every culture.

Suppliers of the Corporation must understand that how results are obtained, not just that they are obtained, is important. Suppliers are expected to keep the Corporation apprised of their activities; to record all transactions and non-compliance with applicable laws, rules, and regulations accurately; and to be honest and forthcoming with the Corporation, the Corporation's regulatory agencies, and internal and external auditors.

The intent of this Code is that the entire Corporation, and its suppliers, function with honesty in internal operations and in dealing with members/insureds, accounts, providers, suppliers, and all others with whom the Corporation does business.

III. CONFLICT OF INTEREST

Suppliers must not allow any outside financial interest or competing personal interest to influence their decisions or actions taken on behalf of the Corporation. Suppliers must avoid any situation where a conflict exists or might appear to exist between their own interests and those of the Corporation. The appearance of a conflict of interest may be as serious as an actual conflict of interest.

Suppliers with questions regarding conflicts of interest should contact the Ethics Office or The Office of the General Counsel.

The Corporation will not be inappropriately influenced to purchase goods or services from any business in which a supplier has a substantial interest. (A substantial interest is determined under the following test: Is the supplier, its business affiliates, subsidiaries, subcontractors, or members of its board of directors or any of its key management or executive staff an officer, director, or owner of more than 10% of the stock of a corporation whose aggregate sales to (i) hospitals; (ii) licensed medical professionals; and (iii) facilities of health service, hospital service, and medical expense indemnity corporations; exceed 5% of its total sales?).

Only the Corporation's Communications department is authorized to initiate contact with and/or issue official corporate statements regarding policy, opinions, and actions to any and all media. If a supplier is contacted by the media for any information related to the Corporation, the supplier should refer reporters to the Corporation's Communications department.

IV. MAINTENANCE OF BOOKS AND RECORDS

Suppliers must record and report all transactions and/or compliance activities with or on behalf of the Corporation fully, accurately, and honestly. Records include, but are not limited to, accounting books or records, financial reports, business and time records, expense reports, vouchers, bills, payroll, membership/insured records, correspondence and other records of communication, and claims payments records. No relevant information may be omitted or concealed, nor may any secret or unrecorded funds or assets be created for any purpose.

A. Falsification of Records

False entries must never be made in any of the Corporation's books or records or in any public record for any reason. No permanent entries in the Corporation's records may be altered in any way. No payment or receipt on behalf of the Corporation may be approved or made with the intention or understanding that any part of the payment or receipt is to be used for a purpose other than that described in the documents supporting the transaction. "Slush funds" or similar off-book accounts, where there is no accounting for receipts or expenditures on the corporate books, are strictly prohibited. It is very important that suppliers not create or participate in the creation of any records that are intended to mislead or to conceal anything that is improper.

B. Expense Records

Expenditures must always be charged accurately.

C. Retention of Records

The retention, disposal, or destruction of records of or pertaining to the Corporation must always comply with legal and regulatory requirements and corporate policy. Records pertaining to compliance investigations and litigation are not to be destroyed without express written authorization from the Office of the General Counsel or from the Chief Compliance Officer when the matter involves a government investigation or audit.

V. PROTECTION OF CONFIDENTIAL INFORMATION

Suppliers may be entrusted with important confidential information that may not be released without proper authorization. Such authorization must come from corporate officials with the authority to authorize the requested disclosure. The Privacy Office or the Office of the General Counsel can help suppliers identify an appropriate corporate official. When questions arise regarding whether authorization has been appropriately given, doubts should be resolved in favor of non-disclosure. The Privacy Office and the Office of the General Counsel are available to assist in analyzing these issues.

Confidential information includes member/insured medical and claims information, and personnel information, as well as information regarding the Corporation's business activities.

Protected health information, personal information, employment records, financial data, sales figures, planned new products/projects or planned advertising programs, areas where the Corporation intends to expand, lists of suppliers, lists of accounts, lists of prospects, lists of member/insureds, provider data, capital investment plans, projected earnings, changes in management or policies of the Corporation, testing data, suppliers' prices to the Corporation, or any plans the Corporation may

have for any of its products are also confidential information.

All suppliers must abide by the confidentiality obligations imposed by the Corporation. Suppliers must avoid even inadvertent disclosures of confidential information.

A. Termination of Relationship

Once a supplier's relationship with the Corporation ends, the supplier may not take or use any confidential information gained from the relationship with the Corporation. Suppliers may not take or use originals or copies of any reports, manuals, proposals, or any other property belonging to the Corporation at any time.

During the term of the supplier's contract with the Corporation and at all times thereafter: (i) supplier will hold in confidence and not disclose any confidential information, and (ii) supplier will not use any confidential information for any purpose, except for the sole benefit of the Corporation.

B. Information Security

Suppliers are responsible for properly using information stored and produced by all of the Corporation's systems. System usernames and passwords may not be shared between individuals. Any use of a username or password, other than the supplier's own, without the express permission of an appropriate official of the Corporation, shall be considered theft of service and a violation of corporate policy.

Microcomputers, personal computers, Internet access, e-mail, or other office communications systems are intended for business-related purposes only and not for use that may be considered discriminatory, disruptive, offensive, harassing, or creating a hostile work environment. Occasional Internet or e-mail use is permitted, though, so long as such does not interfere with the security or effectiveness of the system, adheres to Company standards, and does not interfere with job performance.

Any questions concerning information security may be directed to the Chief Information Security Officer.

VI. FAIR DEALING

Conducting business with providers, other suppliers, producers, accounts, and members/insureds on behalf of the Corporation can pose ethical problems. This Code is intended to assist in making appropriate, responsible, and correct decisions. Suppliers are expected to exercise good judgment and discretion in these and all matters.

A. Kickbacks and Rebates

The purchase or sale of goods and services must not lead to suppliers' or their families' receipt of kickbacks or rebates. Kickbacks or rebates may take many forms and are not limited to direct cash payments or credits. If a supplier or a member of their family stands to gain personally in the form of a kickback and/or rebate from a transaction, the transaction is prohibited. Such practices are not only unethical, but are, in many cases, illegal.

B. Gifts or Gratuities

Suppliers may never accept a gift if it is offered or appears to be offered in exchange for any type of favorable treatment or advantage. Suppliers must be aware that, in their role representing the Corporation, they may not accept or encourage gifts of money under any circumstances. They may not solicit non-monetary gifts, gratuities, or any other personal benefit or favor of any kind from providers, suppliers, producers, accounts, or members/insureds.

Suppliers and their immediate families may accept unsolicited, non-monetary gifts from a business firm or individual doing or seeking to do business with the Corporation if the gift is primarily of an advertising or promotional nature. Suppliers may accept a gift or gratuity of a nominal value that a business firm or individual provides to a wide spectrum of existing and potential customers. Nominal value shall be as defined by corporate policy and may be amended from time to time.

If protocol, courtesy, or other special circumstances require it, in their role representing the Corporation, suppliers may accept gifts or gratuities of more than a nominal value; however, any gift or gratuity of more than nominal value must be reported to the Ethics Office who will use The Lifetime Healthcare Companies Business Courtesies Policy as a guide to determine whether the supplier may keep the gift or gratuity.

C. Entertainment

Suppliers must be aware that, in their role representing the Corporation, they may only accept entertainment if it:

- is not excessive;
- does not involve lavish expenditures; and
- is compliant with corporate policy and any applicable laws and regulations.

Offering entertainment that is not a reasonable addition to a business relationship but is primarily intended to gain favor or to influence a business decision is not permitted.

D. Agreements with Suppliers

Agreements between the Corporation and a supplier must clearly and accurately describe the services to be performed or items purchased, the performance standards, and applicable compensation, if any. Compensation must be reasonable in amount. For example, payment may not be excessive in terms of industry practice, may not be in violation of applicable laws and regulations, and must equal or match the value of services rendered.

Each supplier will receive instructions for electronic access to the Corporation's Code of Conduct. By signing an Agreement with The Lifetime Healthcare Companies, a Supplier agrees that it has received, and will comply with, the Code of Conduct. Each Agreement will also include confidentiality terms or a separate Business Associate Agreement, if applicable.

E. Improper Use of Funds or Assets

Use of the Corporation's funds or assets for any improper purpose is prohibited. Examples of improper use of funds or assets include:

- payments for any unlawful or unethical purposes;
- payments outside the scope of agreements entered into by or on behalf of the Corporation; and,
- use of the Corporation's assets in violation of corporate policy or any applicable law or regulations.

A supplier who knows, or has reason to know, of an actual or potential improper use of the Corporation's funds or assets has an obligation to report it to the Ethics Office. The Ethics Office may be reached by contacting the Ethics & Compliance Hotline (1-800-275-0170) and requesting that the Ethics Office return the call.

VII. FEDERAL AND STATE CONTRACTS; FEDERAL PROCUREMENT

A. Gifts to Government and Public Officials

Federal and state statutory provisions prohibit public officials, including employees, from accepting anything of value, subject to reasonable exceptions such as modest items of food and refreshments. No supplier shall either offer or make a gift to a federal or state public official on behalf of the Corporation.

It is also illegal for any person to give a gift or to offer or promise anything of value to a public official for or because of any official act performed or to be performed by such official. Additionally, it is a crime to make a payment to a public official as compensation for public duties performed.

B. Federal Procurement

The Corporation is subject to the Federal Procurement Integrity Act when bidding on a federal contract, such as a Medicare Advantage contract. This law restricts certain business conduct for a company seeking to obtain work from the federal government. During the bidding process, suppliers, on behalf of the Corporation, may not:

- offer or discuss employment or business opportunities with any agency procurement official;
- offer or give gratuities or anything of value to any agency procurement official; or,
- seek to obtain any confidential information about the selection criteria before the government awards the contract. This includes information submitted by another company in a bid or proposal and marked "Proprietary," as well as the selection criteria and the evaluation of bids and proposals.

VIII. FEDERAL AND STATE PROGRAMS

The Corporation is committed to abiding by the laws and regulations that govern the state and federal programs with which it participates. Accordingly, in addition to the government programs contracts with state and federal regulators, you are required to comply with all applicable statutory, regulatory, and other requirements of the Medicaid program, the Medicare program, including the requirements applicable to Dual Eligible Special Needs Plans (D-SNPs) and the Medicare Part D program, and the Patient Protection and Affordable Care Act. You are also required to comply with the Corporation's fraud, waste, and abuse policies and procedures. Part of your responsibility includes making sure that you and your staff understand the compliance standards that impact you or their job responsibilities and providing or arranging for training as appropriate and maintaining reference materials and other job aids, if appropriate.

The key federal and state laws with which you must comply in the administration of federal and state programs include, but are not limited to, the following:

1. False Claims Acts and related whistleblower (anti-retaliation) protections
2. Federal Administrative Remedies for False Claims
3. Anti-Kickback Statutes
4. Health Insurance Portability and Accountability Act (HIPAA), as amended under the Health Information Technology for Economic and Clinical Health (HITECH) Act, and the regulations at 45 C.F.R. Parts 160, 162, and 164
5. Patient Protection and Affordable Care Act
6. Beneficiary Inducement Statute
7. Physician Self-Referral (Stark) Laws
8. Fraud Enforcement and Recovery Act of 2009

9. Medicare, Title XVIII of the Social Security Act
10. Medicaid, Title XIX of the Social Security Act and New York Social Services Law Article 5, Title 11
11. Federal and New York Criminal False Claims Acts
12. Civil Monetary Penalties Law
13. Mental Health and Substance Abuse Parity Laws, including the Paul Wellstone and Pete Domenici Mental Health Parity and Addiction Equity Act, 29 U.S.C. section 1185a (MHPAEA) and 11 NYCRR Part 230 (Regulation 218)
14. New York State Insurance Law sections 3216, 3217-a, 3217-b, 3221, and 4303
15. New York State Office of the Medicaid Inspector General (OMIG) Compliance Program Requirements, including 18 NYCRR Part 521-1 – 521-3
16. Prohibitions against Employing or Contracting with Excluded Persons or Entities
17. Out-of-Network and No-Surprise Billing Laws
18. Department of Health and Human Services Office of Inspector General's (OIG) Compliance Program Guidance publications

In addition to the laws and regulations specifically referenced above, you must comply with the accompanying federal and state regulations (found in the Code of Federal Regulations (CFR), and the New York State Codes, Rules and Regulations (NYCRR)) as well as regulatory/policy guidance issued by the Centers for Medicare and Medicaid Services, Health and Human Services, Office of Inspector General, New York State Department of Health, Office of Medicaid Inspector General, and other government program authorities, including requirements in the Medicare Managed Care Manual and the Prescription Drug Benefit Manual. If you have any questions regarding the obligations set forth in these laws, contact a representative of the Regulatory Compliance Government Programs team, the Medicare Compliance Officer, or the Chief Compliance Officer.

IX. GOVERNMENTAL INVESTIGATIONS

From time to time, the Corporation may be asked to cooperate with a governmental examination or investigation or respond to a request for information. A request may be addressed formally to the Corporation or directed informally to an individual within the Corporation by a regulator or enforcement agency. All suppliers are required to report requests for information or cooperation to the Chief Compliance Officer by contacting the Ethics & Compliance Hotline (1-800-275-0170) and requesting that the Chief Compliance Officer return the call.

X. WORK ENVIRONMENT

All suppliers must comply with all applicable laws and regulations and corporate policies affecting safety, health, and the environment. It is the policy of the Corporation to maintain an environment that is free from violence, drugs, alcohol,

and the effects of violence, drugs, and alcohol.

The Corporation is committed to providing a work environment that is free of unlawful harassment and discrimination in all aspects. All suppliers are required to support the Corporation's commitment to a safe and professional work environment and to conduct themselves appropriately in dealing with the Corporation's employees. Suspected violations of any corporate policies must be reported as detailed below in Section XI "Seeking Guidance and Reporting Violations."

XI. SEEKING GUIDANCE, AND REPORTING VIOLATIONS

Suppliers must report and keep records concerning any actual or suspected violation of this Code; and/or non-compliance with any applicable law or regulation; or any corporate policy, practice, or procedure that could adversely affect the Corporation. Suppliers may contact the Ethics & Compliance Hotline (1-800-275-0170) and/or access the Ethics and Compliance Online Reporting tool to file a report, 24 hours a day, seven days a week. Reports involving state or federal programs may be made to the Corporation, as described above, the Centers for Medicare and Medicaid Services, or law enforcement.

When a report is made, steps will be taken to protect anonymity and confidentiality, where warranted and appropriate. The Corporation will not tolerate any form of retaliation against a person who makes a good faith report in accordance with this Code.

All suppliers have an obligation to cooperate with the Corporation's Ethics Office openly and honestly in any corporate investigation into a reported violation of this Code, any corporate policy, practice, or procedure, compliance risk area, or any applicable law or regulation, and must also assist in the resolution of compliance issues.

XII. AUDITING AND MONITORING, CORRECTIVE ACTION, AND/OR TERMINATION

Any supplier must follow the auditing and monitoring and record keeping requirements of their applicable business contract with the Corporation, including those concerning auditing and monitoring and record keeping of the supplier's compliance activities.

Any supplier who violates, enables, encourages, directs, facilitates, allows, or knowingly fails to report any violation of this Code; any non-compliance with applicable law or regulation; any Medicare sub-regulatory guidance; or any corporate policy, practice, or procedure; may result in termination of the relationship with the Corporation.

The Corporation may take other actions as appropriate to address violations of the Code by any supplier.

Any supplier who harasses or threatens a person or people for reporting violations will be subject to contract termination. The Corporation will not tolerate such retaliation.