



Code of Conduct

Synergy Health Partners
Code of Conduct
Compliance Department

Policy Number: 000

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Revised from EA Health Code of Conduct 2013 and Synergy Surgicalists Employee Handbook

Introduction

Dear Synergy Health Partners Team Member:

Synergy Health Partners is committed to conducting our business with integrity through honest and ethical behavior.

Vision – To be part of a world in which patients get the care they need how, when, and where they need it.

Mission – To help bring order to disruption and ensure specialized healthcare is accessible, local, and sustainable.

Values Statements:

Wisdom – To look within. Bring solutions to problems. Own the results.

Curiosity – To think in new, innovative ways. Anything is possible when we imagine new pathways forward.

Courage – To be vulnerable. Don't be afraid to take risks, share your ideas, and let your voice be heard.

Balance – In our work and in our lives. Invest in yourself and your career.

Trust – In one another to make good decisions. The skills you and your team contribute to the company make us stronger.

Strength – To lift people up through recognition. Applaud great work.

Humility – To learn and grow with feedback and education. Discover and embrace new opportunities to achieve continual improvement.

Agility – To be flexible and creative when things don't go as planned. Be open to adapt and face all challenges.

Humor – To reduce stress and deepen our connection with one another. Laughter at work creates a sense of belonging and lightens the mood.

A Message from our Chief Executive Officer:

To assist in facilitating a strong compliance culture within our organization, Synergy Health Partners (the Company) has adopted this Code of Conduct to serve as the guiding principle for our organization. The Code of Conduct is the foundation of our Compliance Program. These basic principles provide a framework for our business decisions and should be used as a guide to support our values and our fundamental commitment to fostering an ethical work environment.

Compliance is an individual responsibility. Team members are required to be familiar with and understand the Code of Conduct. Violations of the Code of Conduct may result in disciplinary action up to and including termination.

Thank you for your support and your commitment to our organization.

Sincerely,

Daniel Siegel
Chief Executive Officer

Overview

The goal of the Company is to promote ethical, compliance, and legal behavior within the organization that encourages prevention, detection, and mitigation of conduct that does not conform to our standards, federal and state law, or federal healthcare program requirements.

To accomplish this goal, the Company has developed a Compliance Program based on guidance provided by the Department of Health and Human Services Office of the Inspector General.

The Code of Conduct is intended to guide all team members on the Company's ethical and legal standards. More complex matters may require additional guidance for those individuals directly involved through training and education, policies and procedures, and direction from managers, supervisors, and legal counsel.

If you have any questions about a compliance-related issue not covered fully within this Code of Conduct, you should:

- **Speak to the Compliance Officer, your Supervisor, HR Leader, or Executive Leader.**
- **Call the Compliance Hotline at 844-964-1673.**

Compliance is a shared activity. All team members are expected to observe high standards of business and personal ethics in performing their work.

Adherence to the Company's Compliance Program is a condition of employment or continued engagement for employees and contractors as appropriate under their agreements. This Code does not alter independent contractor relationships. Disciplinary action for violations of the Compliance Program – including this Code of Conduct, compliance policies and procedures, acts of noncompliance with state and federal laws and regulations, and federal healthcare program requirements – will be enforced according to the Company's policies and procedures.

Thank you for your commitment to the Company's Compliance Program.

Our Conduct in the Workplace

We treat co-workers, customers, suppliers, and other stakeholders with fairness, honesty, and respect. We refrain from gender or racial bias, and sexual or other harassment. We treat each other in the way we would wish to be treated.

A. Equal Employment

Synergy Health Partners believes in hiring, promoting, and compensating team members without regard to race, color, national origin, age, gender, religious preference, marital status, sexual orientation, handicap, or disability. We are committed to equal employment practices and comply with all laws, regulations, and policies related to non-discrimination.

B. Freedom from Harassment

Synergy Health Partners does not condone any form of harassment. This includes harassment based on race, color, religion, gender, national origin, age, sexual orientation, disability, or any other basis protected by law.

Remember, harassment means different things to different people, so we should all refrain from any behavior that may be construed as offensive or inappropriate. Examples of inappropriate behavior may include degrading jokes, intimidation, slurs, and verbal or physical sexual harassment. Reports of harassment will be promptly investigated, and team members engaging in this behavior will receive disciplinary action up to and including termination.

C. A Safe Environment

We are all responsible for creating a safe working environment. Please use safety devices and report any potential or actual hazards to your supervisor. Hazards include security violations or criminal activity that take place on company premises. In addition, please report any injuries or illnesses to your supervisor.

Violence has no place at the worksite and will not be tolerated. This includes intimidation, violent acts, and threats of violence.

We fully expect team members to report violations to the Compliance Officer, their Supervisor, HR Leader or Executive Leader, or the Compliance Hotline 844-964-1673.

Maintaining Confidentiality

We honor the privacy of patients' and team members' personal information, whether medical or otherwise, just as we expect our privacy to be protected.

We promise to protect trade secrets and the confidential information that belongs to the Company, otherwise known as "intellectual property," and to refrain from divulging information that could be harmful to the company or could provide an advantage to our competitors.

A. Confidentiality

We are committed to preserving the right to privacy for all of our patients and team members and to protecting Synergy Health Partners' interests. The following information is classified as confidential. Follow all applicable laws and company policies when using this information:

- **Patients' protected health information**, including diagnoses and treatments, personal data, and billing and contact information
- **Employee information**, including personnel files, evaluations, and disciplinary matters
- **Business information** such as financial, marketing, and statistical data, competitive information, budgets, processes, techniques, M&A, reorganizations, bid proposals, contract negotiations, layoffs, R&D, and business reports and summaries. This company-specific information is referred to as "intellectual property"

Respecting Company Property

A. Use of Resources

Synergy Health Partners discourages inappropriate use of company property. Team members are trusted to act responsibly, reasonably, and maturely, and to use good

judgment in the use of all company-provided communications and computing devices, including but not limited to:

- The Internet
- Printed and electronic media
- Copying devices
- Telephones/Cell Phones
- Tablets/desktop and laptop computers
- Remote access hardware and software

Associates should not use the computer to transmit, store, or download materials that are threatening, maliciously false, or obscene. Facilities, equipment, technology, and resources are used only for business purposes in connection with your job responsibilities.

Avoiding Conflicts of Interest

While employed with Synergy Health Partners, we refrain from any associations or activities that might conflict with the Company's interests. We also avoid doing business with competitors and accepting or giving gifts to contractors or customers. We do not take advantage of our association with Synergy Health Partners for personal gain.

A. Activities and Relationships Beyond Synergy

It is important to ensure that our outside activities do not in any way conflict with or pose a hazard to the Company. There are some simple guidelines you should follow when determining whether a conflict of interest exists. First, avoid personal outside activities or associations that might influence your business decisions or your ability to do your job objectively. Also, avoid doing business with competitors or making significant personal financial investments in competitors, suppliers, or customers.

If you are unsure whether an outside activity represents a conflict of interest, contact the Compliance Officer, your Supervisor, HR Leader, Executive Leader, or the Compliance Hotline 844-964-1673.

B. Entertainment, Gifts, and Gratuities

Some business entertaining – including meals, social events, or training and educational activities – is an accepted practice. The cost and scope of these activities should be reasonable and appropriate. Before accepting or extending such invitations, you should first check with your supervisor.

Exceptions may be approved in writing by the CMO, CFO, or CEO for bona fide business development or educational purposes, provided such activities comply with applicable Antitrust Laws, Anti-Kickback Statute (AKS), and Sunshine Act standards.

Compliance with Laws & Regulations

A. Regulatory Obligations

Synergy Health Partners operates in a heavily regulated industry, subjecting the Company and its associates to many federal, state, civil, and criminal laws, regulations, and health plan requirements. The penalties for violation of these laws, regulations, and requirements are severe and can apply to both the Company and any involved associates. Penalties include fines or other financial penalties, exclusion from participation in federally funded programs, loss of licensure, and imprisonment. All associates must be aware of and comply with the regulatory requirements applicable to their respective positions and duties.

B. Illegal Activities

Synergy Health Partners and its employees will not engage, directly or indirectly, in any corrupt business practices or other illegal activities. Such activities include but are not limited to fraud, embezzlement, kickback arrangements, and drug use.

Fraud includes falsifying timecards and expense reports. ***Healthcare fraud*** occurs when someone schemes to defraud any health benefit program, including false pretenses, representations, or promises to get money or property from any healthcare program for benefits, goods, or services.

A kickback arrangement involves accepting or offering bribes or payoffs intended to induce, influence, or reward favorable decisions of any person or entity in a position to benefit the Company. Such persons or entities include customers, contractors, vendors, and government personnel.

C. Antitrust and Unfair Competition

Antitrust laws make sure competition between companies is fair. These laws also protect the public against business competitors who band together or “collude” to set prices unfairly. You could be breaking these laws if you discuss with competitors pricing; terms and conditions of sales; or dealings with customers, suppliers, or other competitors. **Our competitors include other managed care organizations,**

healthcare delivery companies, and insurance companies that operate in our markets. You should be particularly sensitive to antitrust rules if you participate in trade associations or other meetings where competitors are likely to be present.

D. Sales, Marketing, and Advertising Standards

We are committed to growing our business through well-trained, highly professional sales associates. All sales associates are committed to fair, forthright, and legally compliant sales and marketing practices. We adhere to any state regulations that require sales representatives to be licensed.

We do not engage in corrupt marketing practices, including misrepresentation of our covered services and “redlining,” which refers to the practice of avoiding sales in specific geographic areas or neighborhoods.

When advertising our products and services, we will present only truthful, non-deceptive information. In many cases, advertising and marketing materials require approval from regulatory agencies before distribution. When required, the Company will submit materials to agencies and ensure they are in full compliance with applicable regulations.

E. Copyright Law

We follow state, federal, and foreign laws about copyright protection. This includes laws that prohibit duplication of print materials, licensed computer software, and other copyright-protected works.

Responsibilities and Consequences

A. Team Member Responsibilities

Synergy Health Partners will provide you with the training and education you need to be knowledgeable about our ethics and compliance initiatives. In return, the company relies on you to help ensure that those initiatives remain a priority. This involves upholding all the standards outlined in this Code of Conduct, as well as reporting any suspected violations of those standards.

If you observe potential violations of law or the Code of Conduct, you should not hesitate to report such issues. Failure to do so could pose a risk to the Company or, in the case of illegal activities or regulatory violations, a risk to you or your co-workers.

B. Reporting Suspected Violations

If you have a compliance concern, talk to your Supervisor. If he/she is not available or is unable to assist you, contact your HR Leader or your Executive Leader.

You may also report issues through the **Compliance Hotline** – a service that allows violations or concerns to be reported anonymously. The Hotline is operated offsite by a third-party administrator and is available toll-free, 24 hours a day, seven days a week, at **844-964-1673**.

C. Resolution, Communication, and Non-Retaliation

Once a problem or suspected violation has been reported, the Company pledges to investigate and resolve the problem quickly.

The Company will not retaliate against you for reporting compliance violations in good faith.

D. Consequences of Violations

The Company will be thorough and fair when investigating potential compliance violations.

Associates who are deemed to have committed violations will be subject to disciplinary action up to and including termination.

Where to Find Answers to Questions

The Code of Conduct Guidelines are meant to provide an overview of the Company's policies on ethics, compliance, and conduct-related issues.

This publication is a living document and is subject to change as we refine our policies and procedures and as government agencies and regulators modify their rules.

If you need more information, or if you have a compliance-related question or concern, the best thing to do is talk with your Supervisor, your HR Leader, or your Executive Leader. These are the best sources when you need help understanding the laws, regulations, and practices that affect your work. Calling the Compliance Hotline is also an option to seek information on a specific company policy or standard.

For questions regarding this Code of Conduct, or to report questionable activity, please:

- **Contact the Compliance Officer, your Supervisor, your HR Leader, or your Executive Leader.**
- To report a concern anonymously, call the **Compliance Hotline at 844-964-1673.**

In addition, associates are encouraged to explore the following resource:

- **Synergy Health Partners Employee Handbook** – The handbook covers various topics, including employment, benefits, check-in discussions, wage and salary, and employee relations subjects such as dress code, workplace conduct, counseling, and health and safety issues.