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MISSION, VISION AND CORE VALUES STATEMENTS

Mission Statement:

We serve our community by increasing access to health care, building strong partnerships in the neighborhoods we serve and understanding important local issues

Vision Statement:

Every day, we work to improve health outcomes through satisfied Members and engaged communities.

Core Values:

- Integrity: We act ethically and honestly in everything we do.
- Accountability: We demonstrate responsibility for our actions that impact our stakeholders.
- Excellence: We seek to *be the best* in quality and everything we do.
- Collaboration: We work together inside and outside the organization to *give our best*.
- Results-Oriented: We put our hearts and minds in our work to *get the best*.

INTRODUCTION

NextLevel Health serves the Illinois Medicaid population, including families and children, seniors and people with disabilities, and certain qualifying adults. NextLevel Health is committed to serving its Members professionally, ethically, and with the highest degree of integrity.

The Code applies to all NextLevel Health directors, officers, managers, and employees (collectively referred to in this document as “employees”). The Code also applies to all vendors, independent contractors, and agents involved in the provision of health care products and services (collectively referred to in this document as “affiliated persons and entities”). All persons to whom the Code applies must upon starting with NextLevel

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Health and annually thereafter sign a form acknowledging their receipt, review, and understanding of the Code.

The Code sets forth the fundamental legal and ethical principles for conducting all aspects of NextLevel Health's business. Nothing contained in the Code constitutes a contract of employment, and it should not be construed as creating an express or implied contract of employment or continued employment. NextLevel Health reserves the right to modify the Code at any time.

EMPLOYEE RESPONSIBILITIES

As a NextLevel Health employee, you must always act professionally, ethically, and with the highest degree of integrity. The Code will provide you with standards of conduct for all business activities. But, you must also be aware of the following general responsibilities.

- **You** must read and understand the Code and adhere to all NextLevel Health standards, policies, and procedures.
- **You** must conduct NextLevel Health business in accordance with the Code, all applicable laws, regulations, and contractual obligations and understand that violations of any laws, regulations, the Code, or NextLevel Health policies and procedures will result in disciplinary action, up to and including termination.
- **You** must report violations of any laws, regulations, the Code, or NextLevel Health policies and procedures using proper communications procedures. Failure to report violations will result in disciplinary action, up to and including termination.
- **You** must be truthful and cooperate with any NextLevel Health-related investigation, audit, review, or survey. Failure to do so will result in disciplinary action, up to and including termination.
- **You** must complete all required compliance training, educational, and other mandatory programs within the time frame specified, and you must apply what

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you have learned to your daily business activities. Failure to do so will result in disciplinary action, up to and including termination.

EMPLOYEE QUESTIONS AND CONCERNS

NextLevel Health has the opportunity to improve every time you ask a question or raise a concern. When you ask a question or raise a concern, you are protecting our Members, your colleagues, and the Company.

You can ask questions and report possible compliance, ethics, or legal concerns to any of the following resources:

- Your manager or another Member of the management team.
- Compliance Officer or the Compliance Department
- Senior Legal Counsel

If at any time you are unsure of your obligations, or if have questions with regard to any of the standards or information provided in the Code, please contact the Compliance Department and Senior Legal Counsel. Questions and concerns can be directed to the Compliance Hotline at 888-859-2690 or emailed to compliance@nlhpartners.com. The company as a whole is here to help and protect all employees that act in good faith and in accordance with the Code.

Policies and Procedures Related to Employee Questions and Concerns

- You must also comply with the Company's Policy and Procedure for Compliance Communication which will provide you with a complete description of the reasons why employee communication and questions are vital to the Company's success.
- The Policy and Procedure will also provide you with step-by-step guidance and complete information on all the resources available to you.
- The Policy and Procedure is a separate standalone document that is maintained by the Compliance Officer and can be accessed using Compliance 360.

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NEXTLEVEL HEALTH STANDARDS

NextLevel Health employees must conduct their business activities professionally, ethically, and with the highest degree of integrity. In order to ensure all employees, understand what this means, the Code provides specific standards of conduct for some of the most important aspects of NextLevel Health's business. The following NextLevel Health Standards apply to NextLevel Health as a whole and to each of us individually.

The NextLevel Health Standard for Legal Obligations

NextLevel Health serves the Illinois Medicaid population, including families and children, seniors and people with disabilities, and certain qualifying adults.

NextLevel Health has a special obligation to the State and to the federal government, our Members, and the public at large to ensure we comply with all applicable laws, regulations, and contractual obligations seriously.

You must understand and follow the terms of any laws, regulations, and contractual obligations that apply to NextLevel Health and your work activities.

You must:

- Comply with all state or federal laws or regulations, including laws that apply to insurance practices (especially related to Medicaid and, where applicable, Medicare), government contracting/procurement, and employment.
- Notify the Compliance, Legal, and Human Resources Departments immediately if you have been debarred, excluded, or suspended from working with any federally sponsored program (e.g., Medicaid or Medicare).
- Maintain all business records – whether in electronic or paper form – in a complete and accurate manner and in accordance with NextLevel Health's record retention obligations.

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You must not:

- Take unfair advantage of anyone or any situation through manipulation, concealment, abuse of protected or confidential information, misrepresentation, or unfair dealing.
- Destroy or modify any document that could potentially be relevant to reasonably anticipated or pending litigation or investigation.
- Offer, accept, or approve of any inappropriate inducement such as a bribe, kickback, or other illegal payment.
- Solicit, accept, or use confidential information that was obtained improperly.

Information on Legal Obligations

You may bring any questions or concerns regarding specific laws, regulations, contractual obligations, or any other legal issue promptly to the attention of the Compliance Department.

The NextLevel Health Standard for Compliance

NextLevel Health established and maintains a Compliance Program that meets State and federal requirements. The term “Compliance Program” means all Company efforts to establish and maintain a culture of compliance, professionalism, ethics, and integrity. The Compliance Program applies to all employees and affiliated persons and entities.

NextLevel Health must ensure that all employees and affiliated persons and entities are trained, educated, and informed of the compliance obligations that apply to their work activities and NextLevel Health business.

You must understand and follow the compliance obligations, policies, and procedures that apply to your work activities.

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You must participate in all required compliance-related training and education and apply what you learn to your work activities.

You must understand your compliance-related communication and reporting obligations.

Information on the Compliance Program

The Compliance Program consists of a governance and management structure, as well as a set of guidance documents, through which the Company incorporates its compliance obligations into all aspects of its day-to-day business. The Compliance Program applies to all employees and affiliated persons and entities.

Through the Compliance Program, NextLevel Health has:

- Established written policies, procedures, and standards of conduct to prevent, detect, and remedy unethical and non-compliant conduct.
- Designated a Compliance Officer as an integral part of a compliance structure with the authority to oversee and implement the Compliance Program.
- Enforced policies and procedures through well-publicized disciplinary guidelines.
- Required effective compliance training and education.
- Opened and maintained clear lines of communication at all levels of the Company for compliance related matters. All Members of NextLevel Health can contact Compliance to report issues and concerns at 888-859-2690 or email at compliance@nlhpartners.com
- Created internal monitoring and auditing procedures to prevent, detect, and remedy unethical and non-compliant conduct.
- Provided a system for prompt and appropriate responses and corrective action to detected problems.

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- Developed a plan to prevent, detect, remedy, and report Fraud, Waste, and Abuse.

The NextLevel Health Standard for Fraud, Waste, and Abuse

NextLevel Health must prevent, detect, remedy, and report Fraud, Waste, and Abuse. State and federal agencies and law enforcement are increasingly focused on Fraud, Waste, and Abuse. NextLevel Health has zero tolerance for any activity that constitutes Fraud, Waste, and Abuse.

You must be familiar with Fraud, Waste, and Abuse concepts and your obligations to report any suspected Fraud, Waste, and Abuse. Even if you do not intentionally lie or misrepresent facts, you could still be committing Fraud, Waste, and Abuse if your business activities result in payment that NextLevel Health is not actually entitled to. Fraud, Waste, and Abuse have the following definitions:

Fraud, Waste, and Abuse have the following definitions:

- **Fraud** is knowing and willful deception, or a reckless disregard of the facts, with the intent to receive an unauthorized benefit.
- **Waste** is the overutilization or misuse of covered and non-covered services, resources, or materials that results in unnecessary costs to the healthcare system and, as a result, to the Medicaid program.
- **Abuse** is a manner of operation that results in excessive or unreasonable costs to federal or State healthcare programs.

Policies and Procedures for Fraud, Waste, and Abuse

- You must also comply with the Company's Policy and Procedure for Fraud, Waste, and Abuse, which will provide you with a complete description of the

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reasons why preventing, detecting, remedying, and reporting Fraud, Waste, and Abuse are vital to the Company's success.

- The Policy and Procedure will also provide you with step-by-step guidance and complete information on all the resources available to you.
- The Policy and Procedure is a separate, standalone document that is maintained by the Compliance Officer and can be accessed using Compliance 360.

The NextLevel Health Standard for Conflicts of Interest

NextLevel Health must act in good faith in all aspects of its business, ensuring that all business decisions are made for the benefit of NextLevel Health, its Members, State and federal governments, and the public at large.

You must avoid situations in which personal interests, activities, or relationships create or appear to create a conflict of interest, because such situations may damage NextLevel Health's reputation and jeopardize your ability to perform your job objectively.

Information on Conflicts of Interest

A "conflict of interest" is any circumstance that would cast doubt on your ability to act with total objectivity with regard to NextLevel Health's interests.

- The Company's goal with regard to conflicts of interest is to determine whether a conflict exists, and if so, whether it can be managed. Steps taken to manage an identified conflict may include recusal from certain decision-making processes, termination of the conflicting relationship, reassignment of job duties, and any other step deemed appropriate under the circumstances.
- You may have a conflict of interest if your private activities or interests (or the activities or interests of your family Members, friends, or business associates) could interfere or even appear to interfere with the actions or decisions that you conduct on behalf of NextLevel Health.

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- You must fully and timely disclose all actual or potential conflicts of interest of which you are or may become aware to the Compliance Officer.
- You must follow all Company instructions regarding how to manage an identified conflict of interest.

Policies and Procedures for Conflicts of Interest

- NextLevel Health will follow the Company's Policy and Procedure for Conflicts of Interest which provides a complete description of the reasons why disclosing and managing conflicts of interest are vital to the Company's success.
- The Policy and Procedure is a separate, standalone document that is maintained by the Compliance Officer and can be accessed using Compliance 360.
- The Policy and Procedure will also provide you with step-by-step guidance and complete information on all the resources available to you.

The NextLevel Health Standard for Work Environment

NextLevel Health must provide a safe, healthy, and professional work environment that maintains equality, dignity, and respect.

NextLevel Health serves a diverse community and strives to have its employees represent that community. Diversity is a great asset, and valuing that diversity creates a more productive and fulfilling workplace.

NextLevel Health strictly prohibits discriminatory practices including sexual harassment as well as harassment or disparate treatment due to race, color, religion, national origin, ethnicity, ancestry, age, gender, height, weight, marital status, sexual orientation, physical or mental disability, or any other status or condition protected by applicable state or federal law.

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NextLevel Health strictly prohibits any acts or threats of violence by any employee against any other employee, Member, or visitor at any time, regardless of where such threats or violence take place.

NextLevel Health prohibits the possession and/or use of weapons by unauthorized persons in or around NextLevel Health property.

You must treat others with respect.

- Inappropriate behavior, including any sexual or other unlawful harassment, whether verbal or physical, is unacceptable and will not be tolerated, whether it occurs in the workplace or in conjunction with an outside work-sponsored event or activity.
- Unwelcome or potentially offensive or abusive verbal or physical behavior is not tolerated, including slurs, jokes, name-calling, unwanted physical contact, or any other harassing or intimidating behavior.
- If you believe you have been harassed or discriminated against or if you witness harassment or discrimination against another employee, contact Human Resources as soon as possible. All claims of harassment and discrimination are serious and will be treated as such

The NextLevel Health Standard for Gifts

NextLevel Health must maintain the highest standards of professionalism, ethics, and integrity in its dealings with vendors, service providers, and Members. Gifts and entertainment are a part of doing business, but if they are expensive or offered too frequently, they can compromise your objectivity and create the appearance of favorable treatment.

You must not accept or give gifts or gratuities beyond common business courtesies of nominal value (\$50 or less) that are given to or received from one source with which the Company does business or has the potential to do business. All gifts received regardless of value must be reported to the Compliance Department.

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You must never:

- Offer or accept gifts or items of value to or from government employees; such conduct may be illegal.
- Offer or accept kickbacks when obtaining or awarding contracts, services, referrals, goods or business. A kickback is an offer to receive, request or pay anything of value, even nominal value, to reward business referrals, including goods, meals or services.

The NextLevel Health Standard for Protecting Information

NextLevel Health must protect the confidentiality of information concerning our Members, providers, vendors, business operations, and employees.

You must participate in all Company training and education that addresses how to protect and handle information, including Health Insurance Portability and Accountability Act (HIPAA) training. You must apply what you learn to your daily business activities.

You must take precautions to protect the privacy and security of information, such as protected health information and other sensitive information related to NextLevel Health Members, providers, and employees.

- Only share protected health information or other sensitive information when you have a legitimate business or Member care purpose.
- If you have access to protected health information or other sensitive information, you must be knowledgeable of your obligations under HIPAA.
- Follow all federal and state laws and regulations for handling protected health information and other sensitive information.
- Violations of laws pertaining to protected health information and other sensitive information carry serious individual and corporate penalties.

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- Violations pertaining to protected health information and other sensitive information may also relate to contractual agreements, leading to serious financial and other consequences.

You must take precautions to protect NextLevel Health’s confidential business information, intellectual property, and other proprietary information.

- Never give confidential or proprietary information to competitors, suppliers, outside contractors, or others without proper authorization. Confidential or proprietary information includes – but is not limited to – financial information, customer lists, discounts, special prices, computer data, and computer programs, as well as descriptions of processes or operations.
- Do not discuss potential business relationships, purchases, mergers or acquisitions, or other organizational changes with competitors, suppliers, outside contractors, or others without proper authorization.

Information on Protecting Information

Although NextLevel Health is not publicly traded, many of the companies that we do business with are. During the course of your employment, you may become aware of information that the general public may not have access to. Such information is commonly referred to as “inside information.” It is against the law to use this information for NextLevel Health’s or your own financial gain. It is also against the law to share this information such that it may be used for someone else’s financial gain.

Policies and Procedures for HIPAA Compliance

- You must also comply with the Company’s Policy and Procedure for HIPAA Compliance, which will provide you with a complete description of the reasons why safeguarding protected health information and other sensitive information is vital to the Company’s success.

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- The Policy and Procedure will also provide you with step-by-step guidance and complete information on all the resources available to you.
- The Policy and Procedure is a separate, standalone document that is maintained by the Compliance Officer and can be accessed by Compliance 360.

The NextLevel Health Standard for Cooperation with the Government

NextLevel Health serves the Illinois Medicaid population, including families and children, seniors and people with disabilities, and certain qualifying adults. NextLevel Health must therefore comply with and follow all applicable laws, regulations and contractual obligations.

NextLevel Health must also be cooperative and respectful when working with government officials.

You must:

- Always be respectful to government officials.
- Forward any verbal or written requests for information other than routine inquiries you normally receive in the normal course of business with that particular governmental entity to the Compliance and Legal Departments.
- Work with the Compliance and Legal Departments on information requests and treat such request for information from the government as one of your highest priorities.
- Respond to requests for information within the requested timeframe and ensure that the information you have provided is truthful and accurate.

Information on Cooperation with the Government

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- If you have any doubt about how to respond, or about the accuracy of the information you are providing, consult Compliance and Legal Departments before responding.
- If the government or regulatory agency has a vendor working on their behalf, deal with that vendor as if it were the government itself.
- If you are approached by any person identifying themselves as a government representative, immediately contact the Compliance and Legal Departments before responding or providing any information. Compliance and Legal Departments personnel will assist you in following proper procedures for cooperating with the investigation.
- If you feel pressured at any time to interact in any way (including over the phone or through e-mail) with a government representative, contact the Compliance and Legal Departments.

The Compliance and Legal Departments will consult with any employee who is contacted in connection with a government investigation. You can advise the government representative that you need to contact the Compliance or Legal Departments for further direction, and you may ask for the representative's contact information. Please advise the government representative that someone from NextLevel Health will get back to them as soon as possible.

The NextLevel Health Standard for Record Keeping

NextLevel Health business records are of critical importance to its decision-making process. All records must be accurate and complete so that NextLevel Health can fulfill its financial, legal, and reporting obligations.

You must:

- Ensure that all NextLevel Health records, including business expense accounts, vouchers, bills, payrolls, service records, sales reports, operating statistics and measurements, and other performance and utilization records, whether electronic

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or on paper, are reliable, accurate and complete and properly maintain records for the retention periods that are applicable to your business activity.

You must never:

- Misrepresent facts, falsify records, or withhold information for record keeping. Such actions are illegal and may subject you or NextLevel Health to criminal or civil penalties.
- Maintain any records outside of NextLevel Health record keeping processes or maintain any unrecorded funds or sources of funding.

Policies and Procedures for Record Keeping

- You must also comply with the Company's Policy and Procedure for Record Keeping, which will provide you with a complete description of the reasons why keeping accurate and complete records is vital to the Company's success.
- The Policy and Procedure will also provide you with step-by-step guidance and complete information on all the resources available to you.
- The Policy and Procedure is a separate, standalone document that is maintained by the Compliance Officer and can be accessed using Compliance 360.

The NextLevel Health Standard for Political Activity

NextLevel Health encourages its employees to vote and participate fully in the political process, but such activities must be done on personal time and at the employee's own expense.

NextLevel Health will not reimburse you for personal contributions to political candidates, including any expenses related to personal political contributions (e.g., travel or meals).

You may not use NextLevel Health resources to vote or take part in political activities.

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You may speak at a local meeting or event, as long as you make it clear that you are speaking for yourself and not as an official NextLevel Health spokesperson. If you are asked to represent NextLevel Health in a formal capacity, you will need prior approval from the Human Resources, Compliance, and Legal Departments.

The NextLevel Health Standard for Code Enforcement

NextLevel Health strictly enforces the Code. All employees are subject to discipline, including termination of employment, for noncompliance.

Noncompliance includes, but is not limited to:

- Failure to follow the Code or any other NextLevel Health policy, procedure, or program.
- Failure to follow any applicable state or federal laws, regulations, or contractual obligations.
- Failure to report noncompliance.
- Concealing a violation or obstructing an investigation.
- Engaging in retaliation against an employee who has reported a suspected violation.

Policies and Procedures Related to Code Enforcement

- NextLevel Health will follow the Company's Policy and Procedure for Compliance Enforcement and Discipline, which provides a complete description of the reasons why enforcement and discipline of compliance obligations are vital to the Company's success.
- The Policy and Procedure will also provide you with step-by-step guidance and complete information on all the resources available to you.

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- The Policy and Procedure is a separate, standalone document that is maintained by the Compliance Officer and can be accessed using Compliance 360.

The NextLevel Health Standard for Non-Retaliation

NextLevel Health must foster a culture of openness and disclosure.

- NextLevel Health will not retaliate against any person because of a good faith complaint or report of suspected misconduct.
- NextLevel Health will not retaliate against any person for good faith cooperation with an internal or external investigation, audit, review, or survey.
- NextLevel Health will discipline any employee that violates this non-retaliation policy.
- The Policy and Procedure is a separate, standalone document that is maintained by the Compliance Officer and can be accessed using Compliance 360.

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