

CODE OF CONDUCT

OUR MISSION

Making Specialized Care and Treatment Accessible to Everyone

OUR VALUES

Trust

- We are honest and ethical.
- We do the right thing.
- We keep our promises.

Results-Oriented

- We focus on outcome, not just activities or milestones along the way.
- We take personal ownership and accountability.
- We act with integrity and know the ends never justify the means.

Innovation

- We embrace risk-taking.
- We challenge our own thinking.
- We experiment, learn, and improve.

Interconnected

- We bust silos and keep an enterprise-wide view.
- We seek out and connect with the right partners, internally and externally.
- We value interdependence and teamwork.

Client-Centric

- We are committed to our clients' success.
- We anticipate and respond to key needs of our clients.
- We are conscientious about how we impact our clients.

INTRODUCTION

The Thirty Madison Code of Conduct (“Code”) is one of the ways Thirty Madison puts our values into practice. The Code applies to all Thirty Madison employees and Board members. Moreover, while the Code is specifically written for Thirty Madison personnel, we expect Thirty Madison contractors, consultants and others who may perform work or services for Thirty Madison to follow the Code in connection with their work for Thirty Madison. The Code provides an overview of some of the legal and ethical standards we must follow every day. Please make sure you read, understand and follow the spirit and letter of the Code. Claims of ignorance, good intentions or poor judgment are no excuses for non-compliance. Failure to follow the Code may result in disciplinary action, including termination of employment or engagement.

If you have questions about the Code or concerns about compliance, you can contact your supervisor, a member of Human Resources, or a member of the Compliance Department. If you want to remain anonymous, you can make a report of a suspected violation or concern through the Thirty Madison Compliance Hotline at **844-990-0267** or **Thirtymadison.ethicspoint.com**. Thirty Madison prohibits retaliation against any individual who reports compliance violations or who participates in an investigation of possible compliance violations. If you believe you are being retaliated against, please contact a member of the Compliance Department.

FOLLOW THE LAW

Thirty Madison is committed to full compliance with applicable federal and state laws. You are responsible for following the laws and Thirty Madison policies and procedures that apply to your work and for asking questions when you are uncertain about the legality of particular conduct. If you are concerned about the legality of an action or decision, you should consult an attorney in the Thirty Madison Legal Department.

No instruction, excuse or pressure justifies breaking the law or encouraging someone else to break the law. Wherever Thirty Madison has an internal policy that is stricter than what is actually required by law, you are expected to follow the Thirty Madison policy.

See TM CPL 1.0 Compliance with Laws for further guidance.

BE FAIR

Thirty Madison is committed to a policy of lawful and ethical competition in compliance with all applicable antitrust and competition laws. These laws generally prohibit

agreements or conduct that may restrain trade or reduce competition. Thirty Madison believes that information about our competitors and customers is a valuable asset in a highly competitive market and strives to compete fairly. Thirty Madison will not tolerate illegal or unethical means of obtaining competitive information. Thirty Madison employees and contractors are prohibited from seeking or using information about our competitors or customers in a way that violates antitrust and competition laws or any laws or contractual requirements that protect proprietary data. All Thirty Madison personnel are expected to:

- Avoid all contracts, agreements and understandings which unlawfully reduce or eliminate competition or the production or sale of products or services.
- Refuse any agreements with competitors to establish or fix prices or to divide or allocate markets either by market segment, geography or by any other means. Do not engage in any discussions with employees or contractors of competitors about these matters.
- Take special care in ensuring that discussions and activities with representatives of other companies are in compliance with antitrust and competition laws.
- Do not use confidential information about a competitor that was obtained inappropriately.
- Be sure that you and everyone involved in gathering competitive information understand what information is needed and the legal ways to get it.
- Only use legal methods to obtain public information.
- Contact the Legal Department if you have questions about potential antitrust implications or antitrust practices or on whether gathering certain competitor information is appropriate.

Although Thirty Madison is not publicly traded, many of the companies we do business with are. During the course of your employment, you may become aware of “insider information.” It is against the law to use this information for Thirty Madison’s or your own financial gain. Do not “tip” others by sharing this information with them.

AVOID CONFLICTS OF INTEREST

A conflict of interest occurs when your personal or family interests, relationships, outside activities or the exchange of items of value influence or appear to influence your ability to do your job and make objective, sound business decisions in the best interest of Thirty Madison. Some examples of conflicts of interest include, but are not limited to:

- Having a personal interest, financial interest, or potential gain in any Thirty Madison transaction.
- Giving Thirty Madison business to a company owned or controlled by you or one of your family members.
- You or a member of your immediate family being employed by, owning, or acting as a consultant to a competitor, potential competitor, vendor, or contractor while you are working with Thirty Madison.
- Hiring or supervising family members.
- Accepting gifts, gratuities, discounts, favors or services from a customer, potential customer, competitor or vendor.

While actual or perceived conflicts of interest cannot always be avoided, their harmful impact can be minimized by identifying, disclosing and addressing them.

See TM CPL 7.0 Conflicts of Interest for further guidance.

BE OBJECTIVE

Thirty Madison expects all personnel to maintain the highest standards of integrity and objectivity when dealing with vendors, service providers, and customers. Thirty Madison personnel are prohibited from accepting or giving gifts or gratuities beyond common business courtesies of nominal value. Thirty Madison understands that gifts and entertainment are a part of doing business, but if they are lavish or offered too frequently, they can compromise your objectivity and create the appearance of favorable treatment. Thirty Madison expects all personnel to recognize when a gift or gratuity is excessive. Remember:

- Never offer or accept gifts or items of value to or from government, public and regulatory officials and employees unless such gifts or items of value have been approved in advanced by the Legal Department and/or the Compliance Department. Restrictions exist regarding entertainment of government, public and regulatory officials and employees. Rules relative to government, public and regulatory officials and employees should always be reviewed in advance with the Legal Department.
- Never accept or give 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 or services.
- Do not accept or offer gifts, gratuities or favors except common business courtesies of nominal value (\$50 or less) that are given to or received from one source.

- Remember the value of gifts received in one year from all business sources must not exceed \$150. Gifts exceeding this policy must be approved by the Legal Department.
- Do not offer or accept gifts of cash or cash equivalents to or from any current, former, or potential vendor, customer, broker or provider. Cash equivalents include checks, money orders, honoraria, stocks and savings bonds. Gift certificates and gift cards are not considered cash equivalents, but they are subject to Thirty Madison's limits on business courtesies.
- Entertainment and meals offered or received by employees as part of legitimate business activity are not included in the \$50 gift limit, but they must be within reason and moderation.
- Although Thirty Madison does not set a dollar limit on gift-giving among employees, always use good judgment when giving or accepting gifts. Gifts of nominal value are always best and contributing to a gift is always voluntary. Never give a gift to another employee to influence or show favoritism.
- Know that when Thirty Madison awards items to employees as recognition for a business-achievement or as part of Thirty Madison-sponsored events, they are not considered gifts, but are subject to all applicable federal, state, and local tax requirements.
- Contact the Legal Department or the Compliance Department if you have any questions on whether a gift or course of conduct is appropriate.

BE LOYAL

Thirty Madison assets are here for us to run effectively, it's important that all personnel members protect them from loss, damage or misuse. These assets include corporate data, business strategies and plans, financial data, equipment, furniture, vehicles, office supplies, corporate funds, credit cards, employee time, computer supplies and software and other proprietary or confidential information about Thirty Madison, Thirty Madison clients or Thirty Madison employees. You may be periodically required to sign confidentiality attestations under which you attest and swear that you are keeping Thirty Madison assets confidential. We trust that when you use these assets it will be for you to do your job. Remember:

- Guard Thirty Madison assets against misuse, waste, abuse, loss and theft.
- Ensure that assets are only used for valid Thirty Madison purposes.
- Protect confidential or proprietary Thirty Madison information by never sharing it with unauthorized parties such as competitors, suppliers or outside contractors without proper authorization.

- If you know someone is misusing, damaging, or stealing Thirty Madison property, report it to your supervisor or the Compliance Department, who will take appropriate action.

Another category of assets we expect you to protect is our intellectual property and trade secrets. These assets include all ideas, inventions, discoveries, improvements and innovations such as:

- New product design
- Marketing and sales plans
- Detailed financial and pricing information
- Computer programs, models and databases (including source code)
- Trademarks
- Patents
- Copyrights
- Logos

Thirty Madison owns all intellectual property that you, as an employee or contractor, create, develop or write, either on your own or with another person during working hours or not that:

- Relates to – or competes with – actual or anticipated Thirty Madison business, research or development or other business, strategy or customers of Thirty Madison.
- Results from work assigned to or performed by you for Thirty Madison.
- Is created using Thirty Madison systems, equipment, materials, facilities, computer programs or other resources or ideas, trade secrets, or other confidential or proprietary information.

BE HONEST

You are expected to act ethically and honestly. Thirty Madison does not tolerate cheating, stealing, deception or acts of fraud. Fraud is an intentional misrepresentation of fact through use of words, conduct, concealment of important information to induce someone to act in a way that causes them injury or harm. Some examples of fraud, waste, and abuse may include, but are not limited to:

- Submitting false information to the government to obtain money or some benefit.
- Misrepresenting or falsifying health insurance claims, invoices or reports.
- Abuse or misuse of Thirty Madison equipment, material, property or credit cards.
- Dishonest accounting practices.

Our business records are of critical importance to decision-making processes. We believe in being accurate, honest and complete in preparing these records and in fulfilling our financial, legal and reporting obligations.

Thirty Madison expects you to keep accurate and reliable records, which means never misrepresenting facts or falsifying or suppressing records. Another important responsibility is the proper maintenance of records for retention periods required by Thirty Madison. Always make sure that documents or records created on your computer are stored on the Thirty Madison network and shared drives and not on your desktop. To ensure the integrity of our records and reporting:

- Ensure that all Thirty Madison records, including business expense reports, vouchers, bills, payrolls, service records, sales reports, timesheets, benefit selections, operating statistics and measurements and other performance and utilization records, whether electronic or on paper, are reliable, timely, accurate and complete.
- Promptly and accurately enter transactions between Thirty Madison and outside individuals and organizations in Thirty Madison records.
- Do not alter or make false entries on any Thirty Madison record or document or facilitate the creation of false or misleading records. Such entries are unlawful and could subject Thirty Madison and possibly yourself to fines and other civil and criminal penalties.
- If you are unsure if information is accurate or reliable, or you are being asked to help create false or misleading records for anyone, verify it or contact your supervisor or the Compliance Department for help.
- Charge all items to the appropriate account, regardless of the financial status of the line of business, contract or cost center.
- Never maintain secret or unrecorded funds.
- When errors are found, follow appropriate Thirty Madison procedure and/or notify your supervisor to ensure that errors are corrected through credits, refunds or other mutually acceptable means.

Never takes steps to impede, obstruct, improperly influence or affect the integrity or availability of any audit, review, or investigation, whether it is performed by Thirty Madison clients, internal personnel, external personnel, or by the government.

KEEP CONFIDENTIALITY

Thirty Madison must protect the confidential information of our members, the members, patients and providers of the KMG Medical Groups, as well as our employees' sensitive personal information and other particularly sensitive information. Only share this

information with authorized people. Follow all federal and state laws, corporate and departmental policies and procedures for handling protected health information, personally identifiable information and other sensitive information. Know that these protections extend both inside and outside of Thirty Madison. Thirty Madison must protect the privacy of each individual's health and sensitive information because:

- Improper uses and disclosures can invade someone's privacy, damage his/her reputation, cause embarrassment or identity theft, violate federal and state privacy or security laws and expose Thirty Madison to lawsuits.
- Violations of law can carry serious penalties, possibly for both individuals and companies.
- Improper use may also violate Thirty Madison's agreements or contracts with clients.

Thirty Madison often needs to retain sensitive personal information and other information about individuals and clients in a secure fashion for an extended period of time. It is important to protect the confidentiality and integrity of information used to access our systems, including but not limited to logins, passwords, security codes, and the locations of sensitive data sites. Keep your passwords and other security codes confidential and know that you are responsible for the actions resulting from your use of your passwords. Do not share your passwords or let others use your computer while you are logged in. If you walk away from your computer you are required to lock the computer or log-out until you return. This protection is important because:

- All of Thirty Madison's information security mechanisms utilize user IDs and passwords to authenticate an individual's identity and establish approved access rights.
- If multiple individuals have access to the same user IDs and passwords, it is impossible to tell who did what.
- Often our license agreements with system vendors allow only a certain number of users.

Store all Thirty Madison documents and files on corporate servers, so they may be recovered and accessed by the proper individuals. It is also important not to share your entry badges and to keep your work areas locked when you are away.

COMMIT TO QUALITY

Thirty Madison clients are the reason we are in business. We are committed to providing products and services of the highest quality and value to our clients. In providing services, you should strive to:

- Provide prompt and accurate services consistent with contractual obligations, corporate policies and regulatory requirements.
- Serve our clients professionally and with integrity, honesty and respect.
- Comply with all applicable federal and state laws.
- Every day work toward finding new ways to increase the quality of the services we deliver to our clients while ensuring that it is delivered in a cost-effective manner.

I Policy

It is THIRTY MADISON, Inc's Policy that the Code of Conduct annually must be attested to by all employees, temps and contractors.

II Document Management

Revision Date	Annual Review	Sections Revised	Description of Changes	Changes By:
05/01/2019		All	Document Creation	Jstone