

Standards of Business Conduct & Ethics

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Message from the Office of the Chief Executive Officer, Rayny Ramirez



Rayny Ramirez

Chief Executive Officer

Dear Team,

At the heart of our organization lies a commitment to service, integrity, accountability and passion. These principles are not just values we uphold — they are the foundation of everything we do. Our Standards of Business Conduct & Ethics guide us in our interactions with each other, our members, and the community we proudly serve.

As we grow and evolve, it is essential that we remain unwavering in our dedication to living up to our values and behaviors. This guiding document offers more than a set of rules; it is a reflection of who we are as an organization and the high standards we hold ourselves to every day.

I encourage each of you to take the time to understand and embrace the principles outlined in this document. By doing so, we reinforce a culture of trust, collaboration, and accountability — qualities that define us and set us apart.

Thank you for your commitment to upholding these values and for the incredible work you do to support our mission. Together, we will continue to make a positive impact on the lives of those we serve.

A stylized, handwritten signature in blue ink, appearing to read 'Rayny Ramirez'.

With gratitude,
Rayny Ramirez

Policy Statement

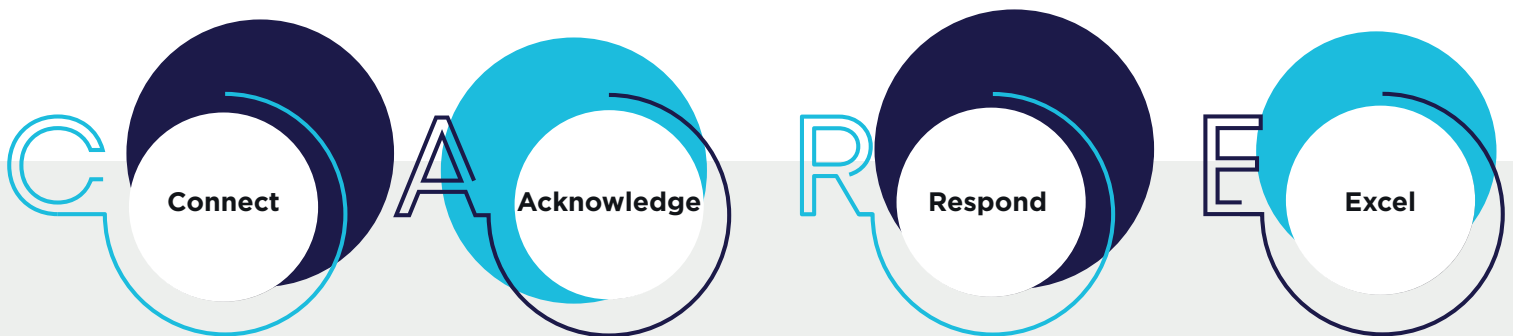
About the Standards of Business Conduct & Ethics

Community Medical Group's (CMG) Standards of Business Conduct & Ethics (Standards) has been approved by its CEO and is designed to complement Centene Corp's Code of Conduct, CMG's parent company. Centene's Code of Conduct serves as the guiding framework for the values, behaviors, and expectations for all its employees, including those at CMG. CMG's Standards of Business Conduct and Ethics adds specific guidance relevant to its unique value-based care model. If any circumstances arise in which CMG's Standards appears to conflict with Centene's Code of Conduct, Centene's Code will be considered controlling.

The Standards apply to all CMG employees, including directors, executives, providers, and support staff, as well as vendors, subcontractors, and others with whom the company does business. Employees are expected to follow the Standards and uphold the company's core values — Trust, Collaboration, and Accountability — while supporting the mission of providing high quality value-based care, one patient at a time.

Any suspected or known violations of the Standards or applicable laws should be immediately reported to the Compliance Officer, leadership team, managers, or through a third-party Ethics hotline, with assurance of protection from retaliation. By adhering to the principles in the Standards, CMG seeks to foster a positive and ethical culture that supports long-term success and a safe, supportive work environment.

All employees are required to review and acknowledge their understanding of the Standards via the company's learning management system, Reach 360, as part of their employment. CMG is committed to transparency and full legal compliance, holding the highest business ethics. Any violations of the Standards may result in disciplinary action, including termination.



Patient C.A.R.E. Service Standards

The Patient Experience (PX) team is dedicated to caring for the health of our community by elevating the patient experience—one individual at a time, at every encounter. The team is focused on cultivating effective customer service skills, using data and analytics to identify best practices, and collaborating with operational and clinical leadership to address barriers to care. By incorporating the C.A.R.E. standards — Connect, Acknowledge, Respond, and Excel — the PX team personalizes each patient's experience by showing empathy, actively listening, and ensuring transparency. They work diligently to provide patients with a voice in how care is delivered, always striving to improve the patient journey through constructive relationships and feedback.

Service standards are designed to maintain a professional, welcoming environment that prioritizes patient needs. Team members are expected to greet patients warmly, remain positive in all interactions, and keep patients informed about procedures and potential delays. Proper etiquette, accountability, and responsiveness are core to these standards. Staff are encouraged to empower patients by offering self-service options while proactively reducing wait times. The PX team adheres to high-quality behavioral standards, including cleanliness, privacy protection, and professionalism, while resolving complaints with empathy and urgency using the A-HEART model (A - Apologize, H - Hear, E - Empathize, A - Ask, R - Resolve, T - Thank). This approach ensures every patient receives exceptional care that aligns with the company's commitment to compliance and excellence.

Employee Rights and Responsibilities

CMG is committed to fostering a respectful, fair, and supportive workplace for all employees. Each employee has the right to equal treatment, regardless of race, color, religion, sex, pregnancy, national origin, age, disability, or marital status. Employees are also encouraged to voice any concerns, report violations, or raise ethical issues without fear of retaliation. All reports will be handled with care, and appropriate steps will be taken to ensure resolution.

Employees are responsible for understanding and upholding all company policies, including those outlined in the Standards. This includes acting with honesty and integrity, making decisions in the best interest of the company and its members, and protecting sensitive and confidential information. If employees witness or become aware of any behavior that violates these policies, they are required to report it through the appropriate channels, including

the Company's Compliance Officer, a member of the Company's leadership team, managers or via our third-party Ethics hotline.

All reasonable efforts will be made to protect the employee's identity, except where disclosure is required by law or as part of a legal process. In such cases, employees will be informed if confidentiality cannot be maintained.

Failing to report known violations may result in disciplinary action, up to and including termination. Employees are encouraged to reach out if they have any uncertainty regarding legal or ethical issues, as adherence to these standards is essential to the company's integrity and trustworthiness.





Commitment to Promoting an Inclusive and Responsible Work Environment

CMG is dedicated to promoting a diverse and inclusive workplace where all employees, partners, and community members feel valued and respected. We believe that a workforce reflecting the diversity of the communities we serve—and will serve in the future—is essential for growth, innovation, and lasting success. Our commitment to diversity and inclusion is evident in our workforce, community partnerships, and business relationships.

CMG strictly prohibits any form of harassment, discrimination, or behavior that undermines inclusivity and respect. Harassment includes any verbal or physical conduct intended to threaten, intimidate, or coerce any individual working for or on behalf of the company. Discrimination or harassment on the basis of race, color, religion, sex, pregnancy, national origin, age, disability, or marital status, or any other legally protected status is strictly prohibited.

CMG is committed to providing equal opportunities based solely on talents, skills, and abilities. We strive to create a work environment that is inclusive, free from bias, and welcoming to all. To support this

goal, we encourage employees to speak up if they witness or experience behavior that contradicts these principles. Reports of misconduct are taken seriously and are handled promptly and with respect to confidentiality, as permitted by law.

We strive to create an environment where every individual can thrive and contribute fully, recognizing that a range of perspectives enhances our ability to deliver exceptional care. We are committed to equal opportunity in hiring, professional development, and advancement, ensuring that decisions are based solely on talents, skills, and abilities. We also encourage open dialogue, mutual respect, and collaboration, fostering a culture where differences are celebrated and everyone's voice is heard.

Our commitment extends beyond our company, guiding how we engage with our business partners and support our communities. Through these efforts, we aim to promote inclusivity not just within our company but in the communities, we touch, building a future where diversity is a cornerstone of our shared success.

Accounting and Finance

We're committed to honesty in all financial dealings and reporting and maintain a high standard of conduct, protecting sensitive financial information and disclosing it only as required by law or with appropriate authorization. We adhere to all applicable laws, regulations, and accounting standards (GAAP). Employees are expected to report any suspected violations or unethical conduct to management or the Compliance Officer.

A. Ethical Financial Reporting

Financial Reporting statements are critical to management and their ability to understand the financial health of the company as well as to allow management the opportunity to make informed decisions in a timely manner. All financial statements and reports must be accurate, complete, and free from misrepresentation. Conflicts of interest must be disclosed immediately. Employees must avoid situations where personal interests conflict with those of the company.

B. Ethical Financial Reporting

Segregation of duties ensure that no single individual is responsible for all aspects of a financial transaction. For example, the person who authorizes payments does not also record them in the accounting system.

Authorization Controls - Require approval for transactions and expenditures according to approval limit thresholds, including purchase orders, invoice processing and payment approvals.

- Reconciliations - Regularly reconcile accounts, such as bank statements, to ensure that records match and discrepancies are investigated promptly.
- Physical Controls - Safeguard physical assets (e.g., petty cash, copays, P2H cards) through secure sentry safes in all locations, with periodic reconciliations or audits performed.

C. Responsible Use of Company Resources

Employees must use company resources efficiently and only for authorized purposes. Personal use of company funds or assets is prohibited unless expressly permitted by management.

Petty cash funds may be used at an administrator's discretion to pay for business items such as office supplies, postage, employee recognition events, and hurricane supplies. The custodian of the petty cash fund must obtain receipts for all expenditures to attach to petty cash reconciliation for future replenishment. Refer to the Petty Cash policy for more details.

Prepaid cards are established at the request of Department heads and Regional Managers for each medical center and subdivisions. Prepaid cards are to be used only for employee recognition and reward programs (as approved by HR), HR-planned employee lunches at the centers, monthly birthday celebrations, recognition gift cards, and office supplies or postage, as needed. Refer to the Employee Engagement Prepaid Card policy for more details.

Procurement Integrity



A. Ethical Financial Reporting

Complete required documents promptly, thoroughly, and accurately representing the facts. Ensure that travel and entertainment expenses are consistent with your job responsibilities and the needs and resources of CMG and your Operating Board. Obtain your manager's approval before participating in a non-work activity on company time. Only use equipment, supplies, materials, or services to perform any activity unrelated to your work with proper authorization.

B. Reimbursement for Business Expenses

Employees may be authorized explicitly by their direct managers/directors to incur reasonable, ordinary, and necessary business expenses for CMG, including travel and entertainment expenses. Please refer to CMG Travel and Entertainment policies for more details.

C. Avoid Conflicts of Interest

We expect you to perform your duties loyally and responsibly. You should avoid any interests or activities that conflict with, interfere with, or appear to interfere with your ability to perform your duties in a loyal and responsible manner or place you in conflict with the interests of your medical center or CMG. Avoid making any business decision that involves you, friends, and family without first making the appropriate disclosure and seeking appropriate approval. This includes activities, business relationships, or financial investments that could influence or appear to influence your judgment or performance of your duties on behalf of CMG. Disclosure of a conflict of interest is required for all matters. Disclosure may result in approval of your continued association with appropriate mitigation, or it may result in your withdrawal from conducting related business matters. Seek guidance in dealing with known conflicts of interest and refer to the applicable procurement policy guidelines. Consider all facts and circumstances. Follow the procurement policy guidelines to ensure others do not influence your business decisions improperly. Your obligation to advance CMG's interests must override prior and current relationships with customers, competitors, or suppliers.

Examples of Possible Conflicts of Interest May Include:

- Awarding business to a consultant or entity owned or controlled by a family member
- Owning (or possessing a significant ownership interest in) an entity that is a competitor or supplier of the Company
- Providing company charitable contributions to entities where a CMG staff or family member has an interest
- Receiving loans or guarantees of an obligation from a customer or vendor
- Accepting a gift that influences a decision concerning a specific vendor or customer
- Requesting a coworker to assist with personal business on company time

D. Dealing Fairly with Others and Engaging in Appropriate Marketing Activities

The Company is committed to fair competition and honest dealing with customers, suppliers, competitors, and CMG staff. CMG staff shall not engage in unethical business practices to win business, such as stealing trade secrets or proprietary information from competitors, offering bribes or kickbacks, or harassing a competitor's employees. CMG staff must be conscious of applicable laws, including Federal, State, and Local laws that may have an impact on how we conduct business. We prohibit the payment of bribes or kickbacks of any kind, whether in dealings with public officials, competitors, or business partners. We will market our services honestly and adhere to antitrust and trade regulations, encouraging competition.

E. Compete Lawfully in the Marketplace

We are committed to fair and open competition and will comply with all applicable antitrust laws. While we will compete vigorously in the marketplace, we will only do so according to the highest standards of business ethics. We will not make agreements with competitors to stifle competition or engage in inappropriate tactics to eliminate competition. We also will avoid any activities that may be construed as unethical, an unfair method of competition, or a deceptive or unfair practice.

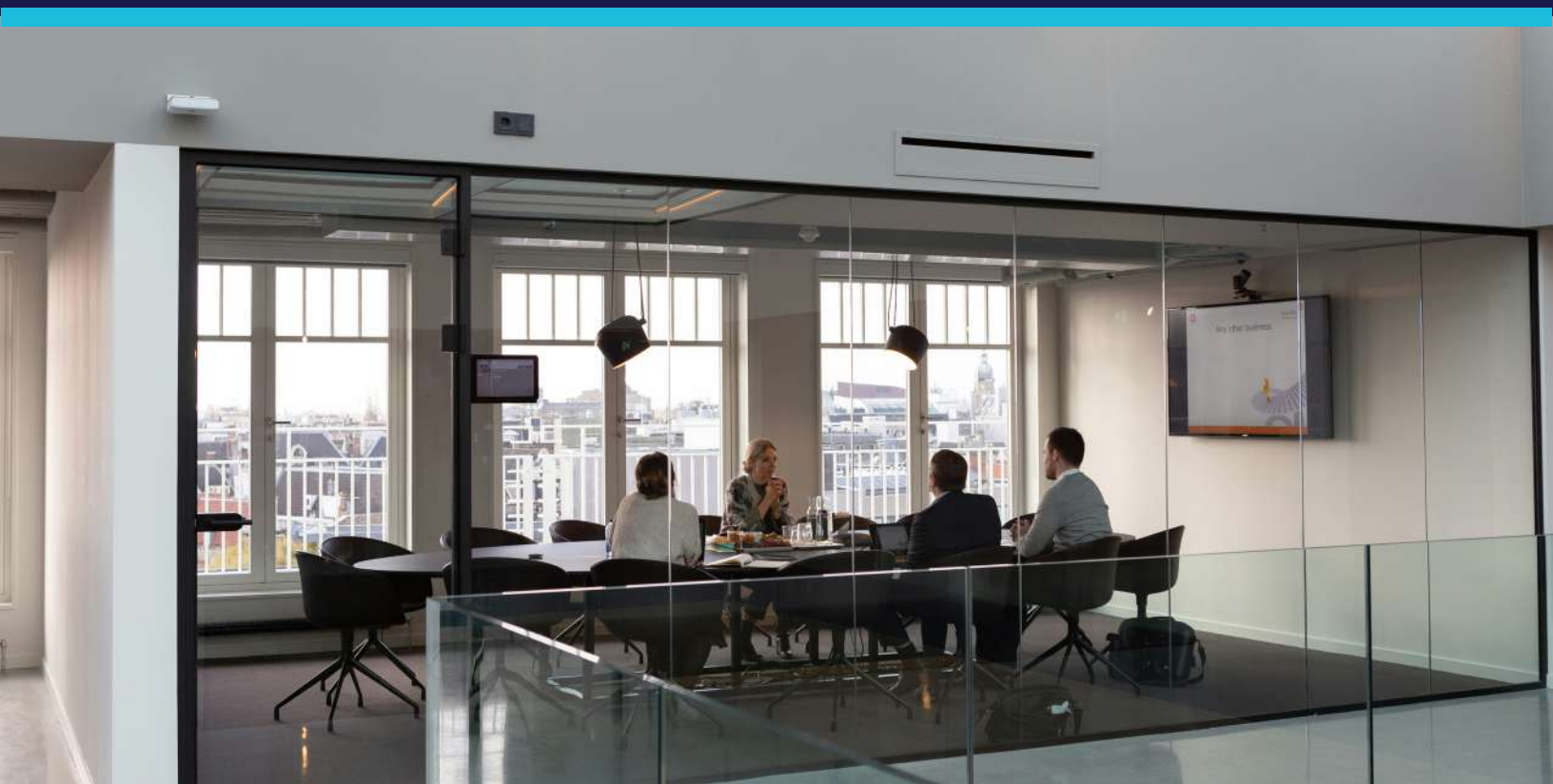
We have the right to choose which suppliers we work with and may decide not to do business with

certain suppliers, as long as those decisions are made independently and not as part of an agreement with another company or individual. While we typically avoid exclusive agreements with suppliers, some exclusive agreements may be acceptable in specific situations. Always consult the Procurement Department and Compliance Officer before entering into any exclusive supplier agreement.

F. Limiting Acceptance of Inappropriate Gifts or Other Benefits and Maintaining Appropriate Outside Financial Interests

Business decisions must always be made in the Company's best interests and not motivated by personal interest or gain. CMG staff should use good judgment and not participate in any activities or enter into relationships that appear to conflict with their Company policies or expectations. It is a conflict of interest for CMG staff to make any profit or personal gain due to their position with the Company, apart from the Company's compensation and benefits programs. Company CMG staff are prohibited from performing any services for their personal business interests during CMG business hours. CMG staff must avoid and promptly disclose potential conflicts of interest. Waivers or exceptions to any actual, perceived, or potential conflict of interest must be approved in writing by the CMG Compliance Officer or Centene General Counsel.

For matters that may require additional Conflict of Interest guidance, please consult Centene's Conflict of Interest Team at COI@Centene.com.





G. Maintain accurate records and follow appropriate document retention and disposal procedures

We expect you to keep accurate documents and records in compliance with regulatory and legal requirements. Do not alter or falsify information in any document. Refrain from destroying records to prevent appropriate authorities from reviewing the information for a government, internal investigation, or audit.

CMG is committed to retaining records only as long as they are helpful for business purposes or as required under federal or state law or regulation. Accordingly, everyone will follow the policies for the retention and disposal of records.

H. Preserve confidential information

Confidential information is proprietary information about us that is unknown to the public, including personnel information, patient medical and financial records, contract details, and information relating to mergers, acquisitions, divestitures, and affiliations. This information should only be distributed to employees and others who need to know such information. We expect you to maintain the confidentiality of this proprietary information and protect it against unauthorized disclosure, theft, or loss. Even if you stop working at CMG, you still are responsible for protecting our proprietary information.



Compliance & Ethics Committee (CEC)

CMG's Compliance & Ethics (CEC) Committee plays a crucial role in upholding company's Standards by promoting ethical behavior and ensuring adherence to regulatory and legal standards. The committee establishes quarterly mechanisms for monitoring compliance with the Standards, including the Company's:

- Compliance Work Plan
- Training & Education Program
- Vetting Systems
- Compliance & Ethics Committee composition and any changes to the (CEC) Charter
- Lines of Communication
- Enforcement of Standards
- Internal Monitoring and Auditing Processes
- Review and Monitoring of all Company licensure
- Policies & Procedures
- Procurement and Vendor Compliance Program
- Detecting & Monitoring of Noncompliance and Anonymous Reporting
- Information Technology and Cybersecurity Program

When noncompliance occurrences or anonymous reports are received, the committee conducts a thorough investigation to determine causation, corrective action planning, and lessons learned. The committee collectively enforces disciplinary actions as necessary, ensuring accountability and maintaining trust in the company's ethical standards. The committee seeks feedback from its stakeholders to identify areas for improvement in the Standards and compliance processes while promoting a culture of ethical reflection and growth. Through these actions, the CEC not only enforces the Standards but also cultivates an ethical company culture, ultimately enhancing the company's reputation and integrity. The committee meets on a quarterly basis and is chaired by the Compliance Officer and co-chaired by the Chief Executive Officer (CEO).



Reporting Procedures



CMG's reporting procedures provide a mechanism for employees to report unethical behavior, violations of the Standards, and any activities that may jeopardize patient safety or company integrity.

Reporting Channels

1. **Managers:** Employees are encouraged to report concerns to their manager, who are responsible for addressing the issue promptly and confidentially.
2. **Human Resources:** If the issue involves the Manager or if the employee is uncomfortable reporting to them, concerns can be reported directly to CMG's Senior Director of Human Resources, Tracy Espino at Tracy.Espino@Communitygrp.com.
3. **Compliance Officer:** For matters requiring additional confidentiality or sensitivity, employees may contact CMG's Compliance Officer, Rodolfo Lazo at Rodolfo.Lazo@communitygrp.com, who will handle the report discreetly.
4. **Anonymous Reporting:** An anonymous hotline is available for employees wishing to report concerns without revealing their identity. This option ensures confidentiality while still allowing for a thorough investigation. Below are the anonymous reporting options:
 - For concerns regarding Ethics & Compliance, please contact 800.345.1642
 - For concerns regarding Fraud, Waste & Abuse (FWA), please contact 866.685.8664.

*Please note that all anonymous reporting information referenced above is located in all CMG clinic employee lounges.

What to Report

- Violations of the Standards
- Unethical behavior or practices
- Fraud or misconduct
- Harassment or discrimination
- Any activity that compromises patient safety or quality of care

Confidentiality and non-retaliation

- All reports will be treated with confidentiality to the extent possible.
- The company prohibits retaliation against any employee who reports a concern in good faith. Any act of retaliation will result in disciplinary action.

Fraud Waste and Abuse (FWA)

CMG's Standards serves as a foundation for ethical behavior and decision-making. The company maintains a strict zero tolerance for Fraud, Waste and Abuse (FWA). FWA refers to unethical or illegal activities that result in unnecessary costs or losses particularly in the healthcare sector. Defined below are the acronyms:

- **Fraud:** Deliberate deception to secure an unfair or unlawful gain. In healthcare, this might include billing for services not rendered or falsifying patient records.
- **Waste:** Overutilization or inefficient use of resources, leading to unnecessary costs. This could involve excessive tests or procedures that do not benefit the patient.
- **Abuse:** Practices that are inconsistent with accepted sound medical, business, or fiscal practices, which may lead to unnecessary costs. This can include misusing codes when billing for services.

Preventing, detecting, and addressing fraud, waste, and abuse (FWA) is essential to maintaining the trust of our patients, as well as protecting our resources for the benefit of those we serve. The sections below outline the key functions and monitoring pillars to prevent and mitigate FWA in our operations.

A. HEDIS Encounter Monitoring and Compliance

As part of our dedication to improving healthcare quality, we actively monitor and validate the data collected for the Health Effectiveness Data and Information Set (HEDIS). Reliable data ensures efficiency and effectiveness when measuring performance against established goals. HEDIS is a critical tool for evaluating the effectiveness of healthcare services provided to our patients. It is essential that all encounters are properly documented, submitted accurately, and reflect the true nature of services rendered to ensure compliance with reporting standards. This commitment to data integrity supports continuous quality improvement and helps improve outcomes by identifying discrepancies, ghost patients, compliance rates, and care gaps.

- **Accurate Documentation:** All CMG providers and staff must ensure that patient encounters are documented completely and accurately. This includes appropriate coding for diagnoses, procedures, and treatments. A sample-based review of encounters is conducted by designated staff to assess the accuracy of documentation against the HEDIS reporting technical specifications. There is a trace to the medical record, labs, progress notes, and referral. This helps identify documentation discrepancies and

to confirm accuracy of HEDIS encounters. Errors, omissions, or fraudulent reporting of services will not be tolerated.

- **Compliance with Reporting Standards:** We are committed to following all HEDIS reporting requirements to ensure data integrity. Reviewing accepted (compliant) and rejected HEDIS encounters helps with identifying work practices that improve acceptance rates. Any misrepresentation or omission of data for the purpose of inflating performance metrics, meeting benchmarks, or maximizing reimbursements will be treated as a violation of our Standards.
- **Regular Audits and Reviews:** To mitigate the risk of FWA, CMG conducts routine internal audits and reviews of encounter data. This includes the evaluation of medical records, encounter submission practices, and submission accuracy. Designated staff conduct systematic reviews routinely of the clinic's billings to ensure that the billings/encounters are not fraudulent or unlawful. The audit review process involves reviewing clinical documentation and coding information to ensure that qualifying patient encounter is captured accurately. Any discrepancies or concerns identified will be thoroughly investigated and addressed.





B. Company Expenses and Financial Oversight

- CMG's expense policy is designed to ensure that all expenses incurred are legitimate, necessary, and aligned with our mission of providing high-quality value based-care. Fraudulent, wasteful, or improper expense reporting undermines the integrity of our organization and the trust of our stakeholders.
- Clear Expense Guidelines: All employees and contractors are required to follow the company's established guidelines for submitting and approving expenses. This includes appropriate categorization, documentation, and approval of all expenditures, whether for travel, equipment, or other business-related costs.
- Monitoring for Fraudulent or Inflated Claims: The company employs robust oversight mechanisms to detect fraudulent or inflated expense claims. All submitted expenses will be reviewed for accuracy, relevance, and compliance with company policies. Claims that appear excessive, unnecessary, or unsupported by documentation will be flagged for investigation.
- Fuel Usage Tracking and Audits: Our company conducts regular audits of gas utilization, including reviewing fuel consumption reports, vehicle logs, and gas card transactions. Any unusual patterns of gas usage—such as excessive fuel consumption or frequent refueling outside of business hours—will be investigated to determine whether misuse or fraud has occurred.
- Monitoring Vehicle Maintenance and Fuel Allocation: Proper allocation of fuel resources is critical to maintaining operational efficiency. Our company ensures that fuel usage is aligned with vehicle maintenance schedules and business needs.

business-related purposes.

C. Fleet Utilization and Resource Management Oversight

In an effort to promote operational efficiency and minimize waste, our company maintains a robust system for monitoring the use of gas and other transportation-related expenses. The company recognizes that gas utilization is a significant operational cost, and as such, we strive to manage it effectively and ethically.

- Efficient Use of Resources: We encourage the responsible and efficient use of company vehicles and fuel resources. Personal use of company gas cards, unnecessary trips, or failure to account for mileage will not be tolerated. Employees must only use company gas resources for approved
- **To reinforce our commitment to ethical conduct and compliance, we provide ongoing education and training to all employees regarding FWA prevention. Our training programs emphasize the importance of integrity, ethical decision-making, and adherence to company policies related to HEDIS Encounters, Company Expensing and Financial Oversight, and Fleet Utilization and Resource Management Oversight**
- **Annual FWA Training: All employees must complete annual training on FWA prevention, ensuring they are up-to-date on the company's policies, legal requirements, and their role in maintaining compliance.**
- **Employees can report concerns confidentially through established channels without fear of retaliation:**
- **Reporting internally through management and directly to CMG's Compliance Officer at Rodolfo. Lazo@communitygrp.com**
- **Reporting anonymously to 866.685.8664 (FWA Hotline)**



Provider Continued Education

At CMG, we emphasize the importance of continuous education for all CMG providers to maintain the highest level of patient care. Providers are expected to meet ongoing licensing and certification requirements, which vary based on their specialty. Adult providers certified by the American Board of Family Medicine or American Academy of Family Physicians must maintain their board certification by completing necessary CME credits, passing recertification exams every five years, and completing quarterly educational updates with associated questionnaires. Additionally, they must fulfill state-specific CME requirements for license renewal every two years. Pediatric providers certified by the American Board of Pediatrics or American Academy of Pediatrics follow similar requirements, including board certification maintenance, quarterly educational updates, and CME for license renewal.

APRNs must also maintain certification through the American Academy of Nurse Practitioners Certification Board by completing required continuing education credits and recertification processes. They are responsible for tracking CME credits for license renewal, and participating in specialized education related to the Risk Adjustment Model for Clinicians. Our organization provides resources and tracks compliance to ensure all providers meet their respective continuing education and certification obligations.

Risk Management (RM)



The company's Risk Management (RM) function is designed to provide a systematic approach to identifying and addressing risks across the company, including operational, financial, legal, strategic, and reputational risks. RM allows for CMG to anticipate challenges, prepare for uncertainty, and safeguard against potential threats. This preemptive approach ensures that risk considerations are embedded in every decision and across all levels of operations. Risk identification and reporting also takes place in the quarterly CEC meetings. All Committee leaders are expected to take ownership of the risks within their area and to ensure that effective mitigation activities are in place to control or manage those risks. In addition, all employees have a responsibility to identify emerging business risks and escalate those concerns to management in a timely manner. Business risks may arrive in many diverse forms such as: operational deficiencies, unethical conduct, violations of Company policy, illegal activities or other.

Social Media Usage

Social media has become an essential communication tool for both personal and professional purposes. As a company committed to maintaining a positive and respectful workplace, it is important to establish clear guidelines for employees on how to use social media in a manner consistent with our Standards. Employees are encouraged to use social media in a way that reflects the company's core values of integrity, professionalism, respect, and accountability. When using social media for personal reasons, make it clear that you do not speak on behalf of the company. You should always:

- Refrain from utilizing any Company uniforms or branding while posting on social media without authorization.
- Refrain from sharing any content that could be linked to CMG or make it seem like you are authorized to represent the Company.
- Be mindful of your language on social media, avoiding any form of harassment, discrimination, or threats.
- Refrain from sharing internal strategies, financial data, or any other private business information. Doing so violates the principles of confidentiality and can expose the company to legal risks.
- Avoid engaging in arguments, posting inflammatory comments, or participating in online behavior that could be perceived as unprofessional or harmful to the company's image.
- Respect intellectual property rights, avoiding defamation, and ensuring that content shared on social media does not violate any applicable privacy or copyright laws.

Please keep in mind that interactions on social media should always remain professional and respectful. When identifying as an employee of the company, individuals should make it clear that the opinions expressed are their own and not necessarily those of the company. Any violation of these guidelines referenced above can result in disciplinary action, up to and including termination, depending on the severity of the breach. Employees should understand that their social media conduct can have significant implications for both their personal reputation and the company's brand.

Information Technology Security and Privacy

As employees of CMG, each of us plays a critical role in protecting the company, our patients, and each other by adhering to the Standards and IT Security Policies and Procedures. Our shared commitment to security and privacy is the foundation of CMG's ability to provide high-quality care while safeguarding the sensitive information entrusted to us.

A. Your Role in Protecting CMG

Whether you're in the office, working remotely, or traveling, you are the first line of defense in securing our company's most valuable assets—our patients' trust, sensitive data, and operational integrity. Every action you take, no matter how small, helps maintain the safety of our systems and ensures we comply with legal and ethical obligations.

- **Wear Your Badge Proudly**
By displaying your identification badge at all times, you contribute to building security and ensure that only authorized personnel have access to our facilities.
- **Challenge What Doesn't Feel Right**
If you see someone who seems out of place or if you notice an unusual occurrence, take the initiative. Whether it's a person in a restricted area or a suspicious email, speak up and report it. Your alertness could prevent a breach.
- **Know Your Environment**
Our locations have varying levels of complexity, risks and exposure to individuals who should not have access to our sensitive information. It is critical that you assess your environment and remain vigilant and protect our devices to ensure the proper level of confidentiality. Based on your work setting, you will have different controls to help reduce our risk.

B. Secure Your Devices

From locking your computer when stepping away to ensuring your laptop is safely stored when out of the office, protecting CMG's devices and data is a non-negotiable part of your job. Each of us is responsible for making sure our devices never become a weak point in the system.

C. Use IT Resources Responsibly

CMG provides internet, email, and communication tools for business purposes. By using these resources appropriately, you not only support the company's operations but also help prevent misuse that could expose us to cyber threats. Non-compliance with our Standards and IT Security Policies and Procedures can lead to severe consequences. Unauthorized system access, sharing confidential information, or bypassing security protocols are not only violations of company policy but also legal breaches that can result in disciplinary action, or even criminal charges. We are all responsible for protecting our company and the sensitive data we handle. Each time you make a decision in line with these Standards; you reinforce the company's security and prevent risks that could have long-lasting impacts.

D. Incident Reporting: It's Everyone's Job

Security threats, IT malfunctions, or suspicious activities must be reported immediately. No issue is too small. Whether you notice an unrecognized person, receive a suspicious email, or face a system malfunction, take action by contacting the appropriate personnel. Rapid response can be the difference between a minor issue and a full-scale breach.

E. Telecommuting & Remote Work Security

When working remotely, you are still accountable for securing CMG's data as if you were in the office. From using VPNs to ensuring your workspace is private, remote work comes with added security risks. Your diligence in protecting sensitive information in these environments ensures that CMG's operations remain safe no matter where you work.

F. Data Protection, Retention & Disaster Recovery

In the event of an emergency or disaster, every one of us must be prepared to follow the protocols in place to protect CMG's data and recover operations swiftly. CMG has comprehensive backup and disaster recovery plans to ensure that we can continue serving our patients under any circumstances. Your familiarity with these plans can help reduce downtime and ensure a quick recovery.

G. Ensure We Adhere to Data Retention Guidelines

As employees of CMG, it is essential to take full responsibility for adhering to our data retention and destruction requirements as outlined in our Standards of Business Conduct & Ethics. Our commitment to protecting sensitive information begins with your dedication to following these guidelines. You are entrusted with the responsibility of ensuring that all documents related to patient information—such as uses and disclosures, authorization forms, business partner contracts, patient requests for amendments, statements of disagreement, and complaints—are retained for a minimum of six years. This retention period is not just a requirement; it's a fundamental part of how we ensure compliance with state and federal laws and protect our patients' trust.

