



# ETHICS & COMPLIANCE

*Helping us stay rooted in our core values and higher purpose.*

## Health Carousel Code of Conduct

# Table of Contents

<b>Messages from Our Leadership</b>	<b>1</b>		
Letter from the CEO	1		
<b>Living Our Core Values</b>	<b>3</b>		
<b>Doing the Right Thing is Our Most Important Core Value</b>	<b>3</b>		
<b>What Doing the Right Thing Means</b>	<b>3</b>		
<b>How We Do the Right Thing</b>	<b>4</b>		
It Starts with Our Compliance Team	4		
Everyone Has Compliance and Ethics Responsibilities	5		
People Leaders Have Additional Responsibilities	5		
<b>Identifying Issues and Speaking Up</b>	<b>5</b>		
How to Report Concerns and Issues	7		
<b>Obligations to Our Stakeholders and Partners</b>	<b>8</b>		
Standards of Conduct in Government Filings and Dealings	8		
Ethical Recruitment of International Healthcare Professionals and			
Our Principles of Conduct	9		
Anti-Corruption and Anti-Bribery	10		
Sanctions and Anti-Money Laundering	10		
Client Policies and Codes	11		
Quality of Care	11		
Conflicts of Interest	12		
		Charitable Contributions	12
		Political Activities and Lobbying	12
		<b>Supporting One Another and Ensuring Workplace Safety</b>	<b>13</b>
		Discrimination and Harassment-Free Workplace	13
		Equal Employment Opportunities	13
		Open and Accepting Workplace Culture – Diversity, Inclusion and	
		Belonging	14
		Maintaining a Healthy, Safe and Secure Workplace	14
		Workplace Violence and Weapons	15
		Drugs and Alcohol	15
		<b>Safeguarding Our Resources and Information</b>	<b>15</b>
		Respecting the Confidentiality and Protection of Personal	
		Information of Others	15
		Social Media Use	16
		Responsible Use of Artificial Intelligence (AI)	16
		Using and Protecting Company Assets	17
		<b>Enforcement - Violations and Discipline</b>	<b>18</b>
		<b>Helpful Resources</b>	<b>19</b>
		Company Contacts	19
		Reference Resources	19
		Availability of Compliance Program Materials	19
		<b>Effective Date and Version History</b>	<b>20</b>

## Messages from Our Leadership

### Letter from the CEO

At Health Carousel, everything we do is guided by our vision and higher purpose – to improve lives and make healthcare better by ensuring that patients have access to qualified healthcare professionals when and where they need them. We can only achieve our higher purpose by incorporating our core values into everything we do. These core values include teamwork, excellence, service, and, most importantly, doing the right thing.

This Code of Conduct (or simply, the Code) is a statement of our higher purpose and core values. It is a roadmap for incorporating our values into how we conduct ourselves as a company everywhere, every day. The Code is a guide for doing the right thing, with ethics and integrity, even when it is hard and even when nobody is looking.

If you are ever unsure whether an issue meets our Code or our legal and ethical obligations, please do not hesitate to seek guidance from your managers or our compliance and legal personnel. And if you ever believe you have observed legal or ethical misconduct or conduct that simply does not feel right, please speak up and raise your concern. Talk to your manager, raise it with our compliance or legal personnel or report the potential issue through the confidential Ethics and Compliance Helpline system.

Thank you for all you do to help Health Carousel live our higher purpose and core values. Without your dedication to living the values reflected in this Code, we cannot accomplish our bold mission of ensuring that every patient in the United States always has access to a qualified healthcare professional.



Handwritten signature of John Sebastian in black ink.

John Sebastian, Chief Executive Officer

## Note from the Chief Compliance Officer



Welcome to the Health Carousel Code of Conduct! This Code explains our ethics and compliance obligations and the systems we have established to ensure we always do the right thing. In it, you will find information about our important compliance obligations, how to approach ethics and compliance issues, how to speak up and report issues and the systems we have established to protect our employees when they raise their voices. Open lines of communication and awareness of our compliance obligations are the bedrocks of our program. And we can only achieve our higher purpose if everyone understands and follows our Code and speaks up when we don't.

For these reasons, we ask that each of you review this Code carefully. This Code is as important to our success as any business metric or goal. In fact, if our financial and business goals ever conflict with the ethics and compliance obligations in this Code, *we must ensure the Code comes first.*

We understand this balance is not always easy. As a result, all of us must speak up when we believe we're confronting an ethics and compliance issue. When you speak up, please understand you don't have to be right. There is no such thing as a bad or wrong report if you report an issue in good faith. And when you do speak up, we will protect you from negative consequences under our strong anti-retaliation policy. If you don't speak up, however, we may never catch issues that are going undetected. *Good faith reporting is always the right thing to do.*

Thank you for taking the time to read and understand this Code. By doing the right thing and living by our Code, we can achieve our vision and higher purpose together!

A handwritten signature in blue ink that reads "Paul Brodnicki". The signature is stylized and cursive.

Paul Brodnicki, Chief Compliance Officer

## Living Our Core Values

### Doing the Right Thing is Our Most Important Core Value

To achieve our higher purpose, all of us must ensure our core values guide our actions with other employees (both healthcare professionals and corporate employees), clients, patients and other partners like the government. Living by these values is essential to maintaining our reputation as a quality and trustworthy organization.

Values:			
<b>Integrity</b>  We Do the Right Thing	<b>Excellence</b>  We Raise the Bar	<b>Service</b>  We Go the Extra Mile	<b>Teamwork</b>  We Achieve More Together

Our most important core value is doing the right thing, with compliance, honesty and a high degree of integrity and responsibility. Even if we achieve all our other values, if we fail to do the right thing, even just once, the resulting consequences can undermine all the other good things we do as a company.

### What Doing the Right Thing Means

Doing the right thing means acting in both a compliant and ethical way. Ethics and compliance are important concepts for our business, but they do not mean the same thing.

#### *The Difference Between Compliance and Ethics*

##### **Compliance**

- Means we follow laws, regulations and internal policies
- Is guided by external standards and internal rules

##### **Ethics**

- Means we do what is morally correct even when it's not required by law or policy
- Is guided by values such as honesty, fairness and transparency

Sometimes actions can be compliant and legal but still unethical. For example, an action may not violate the law but still may be dishonest or unfair. When faced with tough decisions, first ask yourself if an action complies with applicable laws or Health Carousel policies. If it does, then ask yourself, is it ethical?



**EXAMPLES:** Let's say you have a financial stake in one of our vendors. This is a conflict of interest. While this conflict may not violate any laws, it could still be at odds with Health Carousel's interests. You and Health Carousel must still act with honesty, integrity and transparency in addressing the conflict. [Please refer to the section on Conflicts of Interest below for more information.](#)

You notice that a client has mistakenly added a bill rate to a contract that is much higher than what you agreed to over the phone earlier that day. If you execute the contract, Health Carousel will receive a windfall. You may not violate the law if you sign the contract, but it would not be an honest way to deal with the client. You should contact the client to clarify and correct the mistake.

## How We Do the Right Thing

### It Starts with Our Compliance Team

Compliance is essential to our success; however, compliance does not work without dedicated personnel, governance and support from all levels of the company. Compliance is not a set it and forget it exercise. We must continually update and improve our compliance program to respond to regulatory and operational changes and address new issues as they arise. This work starts with the Compliance Department, which includes our Chief Compliance Officer, Director of Compliance and Compliance Analysts.

To help plan, manage, assess and improve our compliance program, the company and the board of managers hold compliance committee meetings at least quarterly. The company has also appointed Compliance Ambassadors from the business units and shared services teams of the company to serve as liaisons and extensions of the Compliance Department throughout the organization. Working together, this comprehensive compliance team is focused on ensuring our compliance and ethics program meets government guidelines and continues to be a standard bearer in our industry.



## Everyone Has Compliance and Ethics Responsibilities

While the company has a robust compliance team, our compliance program cannot be successful unless everyone does their part. This means that every employee and stakeholder of Health Carousel, including our corporate employees, healthcare professionals, contractors, agents and other parties who act for Health Carousel, must live our core values and understand and follow the Code. To achieve this, everyone must:

- Follow all laws and regulations
- Adhere to our company policies and procedures, the Code of Conduct and our employee handbooks
- Respect and follow the policies of our health care clients, unless they conflict with Health Carousel's policies and the Code
- Uphold and live by all our core values to help fulfill the company's higher purpose

## People Leaders Have Additional Responsibilities

If you are a people leader, you play an important role in our compliance program. You set an example for all other employees. If you act with integrity, they will too. As a result, all people leaders must:

- Be a champion of the Code and our compliance program
- Demonstrate the highest standards of integrity
- Regularly discuss ethics and compliance issues with your team members
- Create and foster a Speak Up environment
- Be available to receive and help resolve reports of potential violations of the Code or applicable laws
- Protect reporting team members from retaliation and safeguard the confidentiality of investigations

### Remember

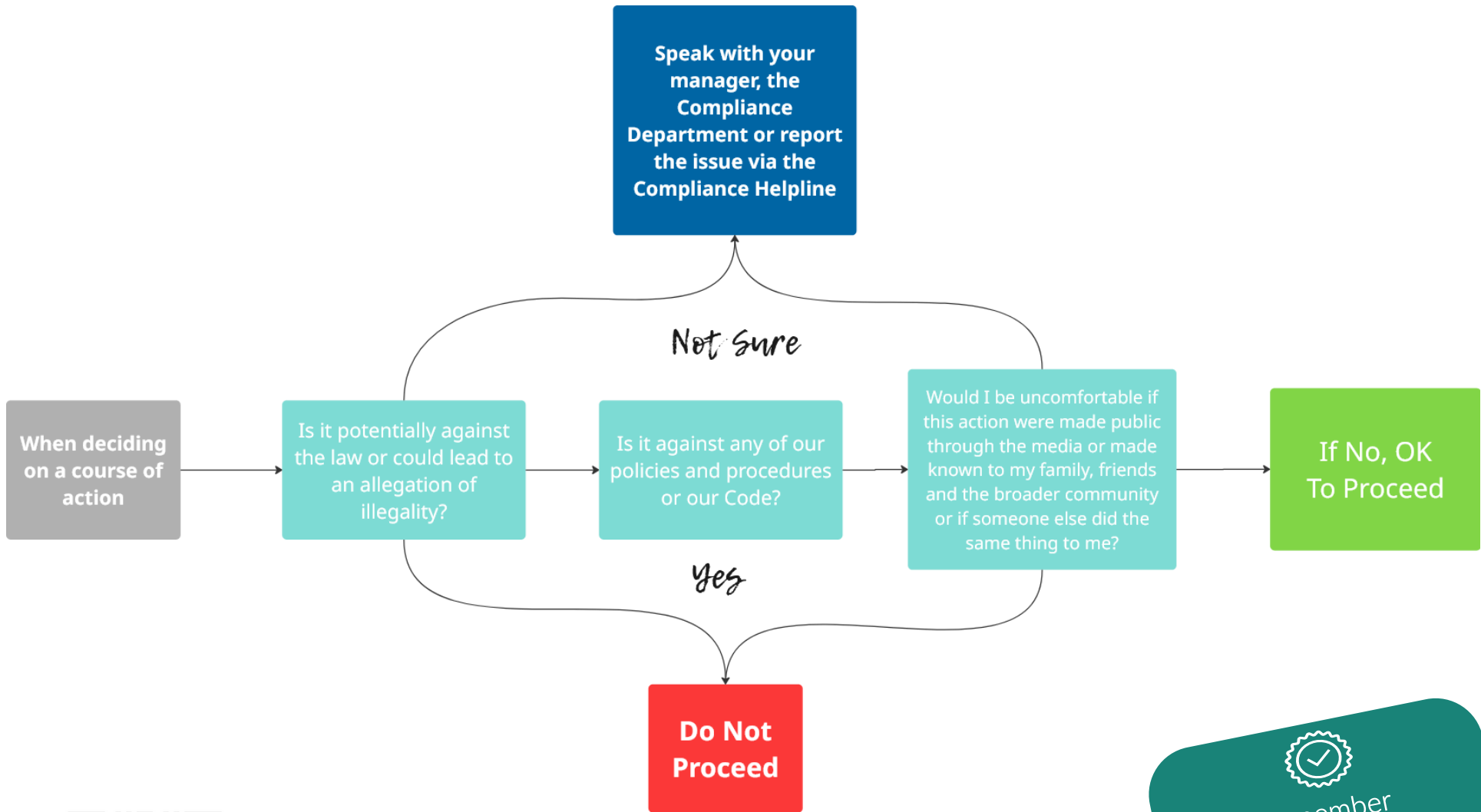
As a leader, you don't have to have all the answers. You need to support employees when they speak up and help them find the answers.

## Identifying Issues and Speaking Up



Meeting our responsibilities can be challenging and tackling ethical decisions is often complex. Our Code of Conduct and policies may not cover every possible scenario. As a result, when confronted with a difficult situation, please refer to the resources provided in this Code for guidance on how to navigate the issues. When reviewing an ethics or compliance issue, use the following Ethics and Compliance Decision Tree as your guide:

# ETHICS AND COMPLIANCE DECISION TREE



Scan for the Ethics and Compliance Helpline

**Remember**  
If you are still unsure, refer to "How to Report Concerns and Issues" below

## How to Report Concerns and Issues

Actions that are unethical, illegal, unsafe or improper go against our core values. They can harm our organization and the people we serve. By speaking up, you help protect our culture and business. We can only fix problems if we know about them.

You can report concerns and issues in several ways within our Speak Up Culture:

- Talk to your Supervisor or Manager
- Contact the HR Team
- Talk to a Compliance Ambassador
- Reach out to the Compliance Department or Legal Department
- Call the Ethics and Compliance Helpline at 844-236-5108
- Use the Ethics and Compliance Helpline Online Portal

If you're unsure whether to report something, use our resources: talk to a member of the Compliance Department or a Compliance Ambassador or review the Compliance and Ethics Decision Tree above. And remember, it is always best to speak up when you're unsure. *Don't stay silent if something is bugging you.*

## Zero Tolerance Policy for Retaliation

Health Carousel prohibits any form of retaliation or retribution against individuals for reporting ethical or compliance concerns. All employees should feel comfortable speaking up. You do not have to be certain that your report raises a valid concern. We only require that you submit your report truthfully and in good faith. Good faith reports will be heard and reviewed, and no one will face intimidation or other employment consequences for speaking up.

If you believe retaliation has occurred, report it immediately to Human Resources or the other reporting sources detailed in this Code.



### **DID YOU KNOW?**

Our Helpline is maintained by a 3<sup>rd</sup> party service. You can report items there anonymously and your identity will remain unknown to Health Carousel.

Check out more information on HC Connect.



**Retaliation** occurs when any action is taken that has an adverse effect on an employee for speaking up.

*Some examples include, but are not limited to:*

- Termination, suspension, or demotion
- Stalking or threats of violence
- Creating hostile or intimidating work environment
- Poor performance evaluation that's not supported by actual performance
- Exclusions from promotions or pay increases
- Online bullying
- Isolation, exclusion, or avoidance by an employee or manager
- Transferring the employee to a different position or location

## Obligations to Our Stakeholders and Partners

Now that we've covered how to review and report ethical and compliance issues, let's discuss what those responsibilities require, starting with the important obligations we owe to our key stakeholders and partners.

### Standards of Conduct in Government Filings and Dealings

Our business operations involve many transactions and interactions with federal and state governments. Health Carousel has a commitment to follow federal, state and local laws and to fully comply with all applicable laws, regulations and requirements in all government-related business activities. This includes complying with all applicable contractor responsibility requirements applicable to any government contracting or subcontracting activities, including strict compliance with the terms of any government contracts. When dealing with the government, we must take all necessary steps to fully cooperate with and assist government agencies in carrying out their oversight responsibilities. Most importantly, we must always be honest and truthful when dealing with the government. We must be truthful and accurate in filing tax forms, immigration paperwork and other official documents. We also must be truthful during meetings and appointments with government officials. Giving false or misleading information is not allowed and can lead to serious consequences, including losing your job and potential criminal sanctions and penalties for you and the company.



For example, in our business we help healthcare professionals from other countries immigrate to work in the U.S. In executing this business, we must follow all immigration laws and only hire people who are legally allowed to work here. In addition, when we sponsor someone for immigration, we and the healthcare professionals must always tell the truth, whether in immigration filings or during meetings with government officials, such as embassy interviews. Intentionally providing false or misleading information or statements to the government is fraud and will not be tolerated.



#### **DID YOU KNOW?**

Knowingly making false statements in an immigration petition or during an embassy interview is a serious criminal offense that can result in fines, immigration bans and criminal penalties (including prison)

If you're unsure about what you're allowed to say or do, ask your manager or the Compliance or Legal Departments. If you think someone gave false information to the government, report it right away through the reporting channels discussed in this Code, including anonymously through the Ethics and Compliance Helpline.

# Ethical Recruitment of International Healthcare Professionals and Our Principles of Conduct



In Health Carousel's international recruitment business, we follow several key principles of conduct to ensure we act in a legal, ethical and socially responsible way during the recruitment, sponsorship and employment of international healthcare professionals. These principles of conduct are based on the ethical codes published by trusted organizations like the American Association of International Healthcare Recruitment ("AAIHR") and the Alliance for Ethical International Recruitment Practices (the "Alliance") to make sure workers are treated fairly.


These ethical codes and our own requirements also make clear we do not allow practices that could lead to or even be perceived as human trafficking or forced labor. We expect all our employees to closely review, understand and incorporate the ethical codes of the Alliance and AAIHR into their day-to-day conduct with all employees, stakeholders and third parties who interact with our international recruitment business.



**Ethical Codes:**

- [AAIHR Ethical Recruiting Principles](#)
- [Alliance Health Care Code](#)

Some of the key ethical principles we follow in our international recruitment business include:



- Giving healthcare employees the AAIHR Code of Ethics
- Making sure healthcare employee contracts are fair and legal
- Being clear and transparent regarding all aspects of employment with their contracts
- Following all laws and regulations, including the U.S. Immigration and Nationality Act
- Paying fairly and according to the law
- Confirming assignments before U.S. deployment and supporting employees while in the U.S.
- Providing honest, complete and accurate information in immigration documents and communications with the government, healthcare professionals and clients

Employees should review the handbook for more details about our ethical recruitment principles. If you have any questions, talk to your manager or the Compliance or Legal Departments.

## Anti-Corruption and Anti-Bribery



Corruption and bribery are wrong. We do not give or accept bribes, and we have zero tolerance for bribery or corruption in the United States or any country where we recruit or do business. Anti-corruption and anti-bribery laws prohibit the offer or payment of anything of value to government officials in exchange for the benefits and privileges that government entities can grant to our company. Items of value that can trigger these laws are defined broadly and can include items like gifts, meals, lodging, entertainment, gift cards, travel expenses, loans, charitable and political donations and business or investment opportunities. Breaking these laws can lead to fines, penalties, loss of our business licenses and criminal sanctions (including prison sentences for the individuals involved).

Note that some payments are permitted under anti-corruption and anti-bribery laws. These include relatively small payments that are normal and customary to effectuate government actions such as customs clearing fees, fees for filing and processing of visas, permits and licenses and payments for mail delivery and government-run utilities.

If you are involved in any transactions that include domestic or international governments and government officials, please be mindful that payments or transactions with those government officials could raise anti-bribery and anti-corruption concerns. This includes transactions with employees of government-owned or sponsored entities and persons with family relationships with governmental entities that oversee our businesses or who act as agents of Health Carousel.

All such payments or transactions must be reviewed by the Compliance Department prior to Health Carousel moving forward.

## Sanctions and Anti-Money Laundering

Health Carousel follows all U.S. and international laws related to sanctions and anti-money laundering.

Sanctions are government laws, rules and orders that limit business and financial activities with certain countries, companies or individuals due to national security or foreign policy concerns. We are not allowed to transact with or provide services to entities or people on a government sanctions list. In addition, we must screen all international healthcare professional candidates to confirm they are not on a sanctions list.

 **Better Understanding**

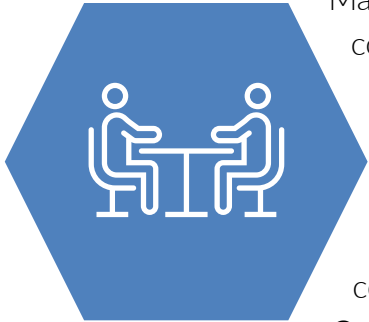
Visit our [Anti-Corruption & Anti-Bribery Policy](#) for more information on types of payments that are not permitted

Anti-money laundering laws require companies to adopt measures designed to prevent and detect money laundering or terrorist financing through transactions with third parties. These laws require us to verify counterparty identities and assess their business risks and employ processes to identify and report unusual or suspicious financial activities to governmental authorities if we discover them.

Employees must be careful when dealing with international healthcare professionals, partners or clients. If you're unsure whether someone is affected by sanctions or if certain transactions implicate anti-money laundering laws, contact the Compliance or Legal Departments before moving forward.

Breaking sanctions and anti-money laundering laws, whether intentional or not, can lead to substantial fines and criminal penalties (including prison sentences).

## Client Policies and Codes



Many of our clients are large and sophisticated healthcare systems and providers who have their own policies and codes of conduct. Just like us, they have developed their codes and policies to ensure they comply with the complex laws and regulations that apply to their role as institutional healthcare providers. Also like us, they expect and require their partners to understand and follow their codes of conduct and policies.

If you serve in a role that requires working with or transacting with our clients, make sure you take the time to read and understand their compliance codes and policies. If you are confronted with a situation where a client's code or policies conflict with ours, reach out to your managers or the other reporting channels described in this Code to ensure we review and resolve the conflict.

## Quality of Care

Our mission is to ensure that patients have access to qualified healthcare professionals when and where they need them. To achieve this important mission, we must uphold the highest standards of medical care and ensure that all patients are treated with dignity and respect. If you are aware of any situation where Health Carousel is not delivering the highest level of care to its patients or where patients have been subjected to abuse or neglect, you must report the issue immediately. Reach out to the clinical staff of Health Carousel or report the issue through the reporting resources discussed in this Code.

## Conflicts of Interest



### WHAT SHOULD YOU DO?

**Q:** My spouse just accepted a position with a competitor. Should I disclose this?

**A:** Yes, you should discuss with Health Carousel as soon as possible.

We all need to act in the best interests of Health Carousel. This means we all need to avoid conflicts of interest with our company. A conflict of interest is anything that might interfere with your ability to make good decisions for Health Carousel.

If you believe you or your family members are involved in something that might be a conflict of interest, tell your manager, Human Resources or the Compliance or Legal Departments.

Here are some examples of conflicts of interest:

- o Gaining personal benefits from deals with Health Carousel, especially if you influence the company's decisions
- o Holding financial stakes in competitors, suppliers or partners of Health Carousel
- o Doing jobs or advising parties outside of Health Carousel in a way that clashes with Health Carousel's interests
- o Working with organizations that seek to obtain business or payments from Health Carousel

This isn't a complete list, so use your best judgment about activities that could conflict with Health Carousel's interests. If you become aware of any possible conflicts of interest, report the issue to Health Carousel right away. We'll investigate it and decide what to do next. Not reporting or hiding conflicts of interest may lead to disciplinary action, including termination.

## Charitable Contributions

Health Carousel supports giving back to the community. All company donations and sponsorships, however, must be legal, ethical and approved by the Health Carousel Foundation.

Employees can't use company money, time or resources for charitable giving without permission. If you want to donate to or sponsor a charitable event through the company, talk to your manager or the Foundation first.

For more details, check the employee handbook or contact the Foundation.

## Political Activities and Lobbying

Employees also need to be careful about political and lobbying activities. Lobbying means trying to influence laws or government decisions. The Federal Election Commission and state election offices have specific guidelines and rules that must be followed when corporations use their resources for political activities. You cannot lobby or make political donations on behalf of Health Carousel unless you've been given permission to do so. Also, you can't use company time or resources for personal political activities.



# Supporting One Another and Ensuring Workplace Safety

## Discrimination and Harassment-Free Workplace

We have a zero-tolerance policy for inappropriate behavior based on sex (including pregnancy), race, color, age, sexual orientation, gender (including gender identity, transgender or transsexual status), national origin, genetic information, disability, religion, citizenship, military service or any other protected characteristic. This policy applies to employees, interns, contractors, vendors, clients, patients and visitors.

Prohibited conduct includes:

- **Verbal:** Derogatory comments, jokes, unwelcome sexual advances or requests for sexual favors
- **Physical:** Assault or inappropriate touching
- **Visual:** Offensive posters, cartoons, drawings, gifts, leering or gestures
- **Online:** Offensive posts on social media like Facebook, Twitter/X, Instagram, Snapchat, etc.
- **Threats or Intimidation:** Bullying or abusive behavior



### WHAT WOULD YOU DO?

**Q:** My manager sends inappropriate jokes to our team. She and the rest of the team think they lighten the mood, but I find it offensive. How can I report my manager?

**A:** You should either call/report via the Helpline or speak with your HR business partner or a colleague in Compliance. Speak with the person that makes you most comfortable.

If discrimination or harassment occurs, report it to your manager, department head or Human Resources. You can also report through the other reporting channels described in this Code, including through the Compliance and Ethics Helpline. The company will investigate and act promptly if needed.

## Equal Employment Opportunities

We are committed to providing equal opportunities for all individuals, regardless of their class, identity or status. Employment decisions are made based on merit—qualifications and skills. This policy encompasses hiring, compensation, benefits, termination and all other terms of employment. If you or another individual experiences unfair treatment due to class, identity or status, please report it as you would with any discrimination or harassment complaint.

## Open and Accepting Workplace Culture – Diversity, Inclusion and Belonging

Health Carousel is dedicated to fostering a culture of diversity, inclusion and belonging. Our most valuable assets are our people. The sum of our different backgrounds and experiences shapes our culture, reputation and success. We celebrate the unique backgrounds, perspectives and experiences of our employees.

We believe everyone deserves dignity, respect and human rights. We expect everyone to respect each other's differences and boundaries, whether at work, company events or in other social situations. We promote a culture of belonging where everyone feels included and supported. We encourage open dialogue and collaboration across all levels of the organization, fostering an environment where every employee can thrive. Creating and maintaining a sense of belonging for our employees makes us better together and helps us fulfill our higher purpose. This is how we achieve more together.



## Maintaining a Healthy, Safe and Secure Workplace

For our company to be successful we must ensure that employees can work in a safe and secure environment. All employees are accountable for maintaining a safe working environment and complying with all relevant safety and health laws, regulations and workplace safety rules. A safe workplace ensures that we achieve more together.

During assignments at a client's healthcare facility, the company prioritizes employee safety and caution. Employees must adhere to the on-site safety practices, procedures and policies of our clients. If you feel inadequately trained on facility practices or believe a client has not provided access to necessary procedures or policies, promptly contact your Health Carousel advisor or a member of the clinical nurse team at Health Carousel.

Employees should refrain from performing any work for which they are unqualified or cannot become qualified with appropriate training. In addition, employees should not operate any equipment without proper training. While on assignment, if requested to work under unsafe conditions or in a unit where you lack sufficient knowledge, skills or training, contact your Health Carousel advisor or a member of the clinical nurse team immediately. If you have questions about how to perform tasks safely or whether a particular job or task should be conducted, seek guidance or assistance from a qualified person on-site or your facility supervisor. Unsafe conditions must be reported immediately to both the client facility and Health Carousel. Report any requests to perform work for which you are unqualified to your Health Carousel advisor or a member of the clinical nurse team immediately.



### CONTINUAL IMPROVEMENT

We regularly review and analyze worksite incidents to ensure your safety and patient safety and avoid future incidents.

This dedication to ongoing vigilance and improvement is aligned with our core values of striving for excellence and doing the right thing.

## Workplace Violence and Weapons



We do not allow threats, intimidation or violence. If you see any of this, tell your manager or department head right away. This applies to everyone—employees, clients, vendors or anyone else. Be specific and detailed in your report and let your Health Carousel manager or client supervisor know about any suspicious people or activities at client sites.

You cannot bring firearms, weapons or dangerous devices or substances onto Health Carousel premises or client sites.

## Drugs and Alcohol

Using alcohol and drugs while working your job can affect your judgment and lead to safety risks, injuries at work and bad decisions. That's why you can't have, use, buy or sell alcohol or illicit drugs on company property or at client locations. At approved company events, alcohol may be served, but employees should drink responsibly and stay professional.

## Safeguarding Our Resources and Information

### Respecting the Confidentiality and Protection of Personal Information of Others

In our work, we handle sensitive information that must stay private. This includes personal and confidential details about employees, clients and other individuals, health and other information about patients, as well as company trade secrets. We must keep this confidential information secure unless we have permission to share it.

We must ensure that confidential information stays private and is only used when needed for our jobs and consistent with company policies. It's important not to share any details that could identify patients or reveal their health information.

Everyone must follow the laws and rules that protect patient health information, along with client policies. If we don't keep patient and healthcare professional information private, it can lead to disciplinary actions, including losing our jobs.

If you have questions about privacy rules or client policies, ask your manager for more information or guidance. If your manager can't help or if you have unresolved issues about a patient's private health information, you can also report your concerns to the sources listed in the "How to Report Concerns and Issues" section of this Code.



### USE CAUTION

When sharing information, only access and disclose the minimum information necessary to perform your job consistent with company policies.

If you're uncertain whether you can share information, ask your manager or reach out to the other reporting sources identified in this Code.

## Social Media Use

The internet and social media are great tools for connecting with people and sharing our brand. But remember, anything we post on behalf of the company is public and will be viewed as representing the position and views of the company. Follow the Code, company policies and laws when using these platforms.



Make sure your team knows how to use social media responsibly.

Report any conduct that could be considered illegal or unethical

Don't share confidential information about our company, employees, healthcare professionals, patients or clients. Avoid posting anything that could be seen as threatening, discriminatory, harassing, inappropriate or obscene.

Before you post, ask yourself: Would I want my friends or family to see this? Does it have private company info or protected personal information? Could it be seen as discriminatory, harassing or insensitive?

Stick to sharing positive news about our brand and values. Employees should affirmatively state that their opinions expressed are their own and not of Health Carousel. Don't claim your statements represent the company unless you have permission from Health Carousel. This includes your use of social media for personal purposes. If you identify yourself as a Health Carousel employee, you may not identify yourself as speaking on behalf of Health Carousel on personal social media. Instead, where you do identify as a Health Carousel employee, you should affirmatively state where possible the opinions you express on personal

social media are your own views and not those of Health Carousel. If your social media use would violate Health Carousel's policies in another setting, it will also violate those policies on social media.

For more details on Health Carousel's social media policies, check your employee handbook. If unsure about a post, talk to your manager, the Marketing Department or the Compliance or Legal Departments.

## Responsible Use of Artificial Intelligence (AI)

Health Carousel uses AI tools to improve how we work, but they must be used responsibly. Employees should never use AI to harm, mislead, discriminate or violate privacy. AI cannot be used to replace human judgment in sensitive areas like legal analysis, immigration decisions or HR decisions without proper review and human oversight and management. In addition, personal and company confidential information cannot be used in open AI environments where the information is shared outside the company.



Always follow company policies and ask your manager or the Compliance or Legal Departments if you're unsure whether AI usage is proper and authorized. Misusing AI can lead to serious consequences.



## Using and Protecting Company Assets

It is imperative to utilize the company's resources exclusively for work-related purposes. This includes all equipment, office spaces, email and other communication systems and funds provided by the company. Employees must ensure proper usage of these resources. The following actions are required:

- Inform your manager if any Health Carousel property requires maintenance
- Report any instances of potential fraud or theft involving Health Carousel property to your manager or the Compliance or Legal Departments
- Utilize Health Carousel property solely for lawful Health Carousel business activities
- Maintain the security of Health Carousel's systems and information

Health Carousel's IT resources are intended for Health Carousel's business-related tasks and job performance. They should not be used for harassment or engaging in offensive activities. Do not use personal accounts or resources for company activities and refrain from using personal usernames and passwords for Health Carousel work accounts. For guidelines regarding limited personal use of the company's IT resources, please refer to the employee handbook.

## Enforcement - Violations and Discipline


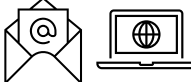






If someone violates the basic tenets of business integrity and honesty in this Code, our company policies or laws and regulations, we will consider multiple factors to decide what to do next. We will consider how bad the behavior was, the intent of the actor, whether it happened more than once and if it broke any laws, as well as other relevant information. The company will then decide the best way to handle it in a way that is consistent with company policies. This might include providing guidance, training, counseling, warnings and potential terminations. Discipline will be enforced regardless of status, from employees to officers of the company.

The company doesn't have to give employees or officers multiple chances to address or fix an issue. Some serious rule-breaking may lead to immediate firings of the offending employees or officers. If breaking the rules includes illegal activity, the company may also report the matter to appropriate government authorities. These serious violations could result in government investigations and punishments like fines, penalties or charges against the company and/or the employees and officers involved. Simply put, nothing good comes from violating the Code, our company policies or the law.

	<b>Know and Live the Code</b> Read, understand and use
	<b>Following Training, Policies and Handbooks</b> Make sure to timely complete mandatory training and follow policies and handbooks
	<b>Adopt an Ethical Mindset</b> Use good judgement and focus on making the right decisions by doing the right thing
	<b>Ask for Help</b> When you are unsure, ask for guidance before action
	<b>Speak Up</b> If you see it, report it

## Helpful Resources

### Company Contacts

	Compliance and Ethics		Human Resources
	Legal		Quality Improvement Nursing Department
	Marketing		Health Carousel International (HCI)
	IT		Health Carousel Travel Network (HCTN)

### Reference Resources

- Employee Handbook
- HCI Professional Handbook
- HCTN Professional Handbook

### Availability of Compliance Program Materials

At Health Carousel we are committed to providing written materials and training related to the Compliance Program in English and any other language necessary to ensure employee understanding. You can submit a request to the Compliance Department at [EthicsandCompliance@HealthCarousel.com](mailto:EthicsandCompliance@HealthCarousel.com) if you would like to receive any Compliance Program materials (including this Code) in another language.

## Effective Date and Version History

This Code is effective as of April 28, 2026.

Policy Review Date: October 7, 2026

Revision History:

Revised On	Version	Description	Approved By:
12/2023	Created	First adoption of uniform Code	Paul Brodnicki
12/10/2024	First annual update	First revision of the Code	Paul Brodnicki
10/7/2025	Second annual update	Code was fully restated to include new provisions and substantially revise existing provisions	Paul Brodnicki
04/28/2026	Limited revisions	Code updated to align with DHS Administrative Agreement	Paul Brodnicki