



600 Holiday Plaza Drive, Suite 200, Matteson, IL 60443  
Office: 708.996.4000 Website: www.southlandccp.com

## **Southland Care Coordination Partners, Inc.**

### **Amended Code of Ethics and Business Conduct Policy (1/1/2022)**

#### **Policy**

It is the policy of the Company to provide our Code of Ethics and Business Conduct, which will serve as a guide to proper business conduct for all employees. We expect all employees to observe the highest standards of ethics and integrity in their conduct. Therefore, this document outlines a basic code of ethical behavior.

#### **Build Trust and Credibility**

The success of our business is dependent on the trust and confidence we earn from our employees, customers, and shareholders. We gain credibility by adhering to our commitments, displaying honesty and integrity, and reaching company goals solely through honorable conduct.

#### **Respect for the Individual**

We all deserve to work in an environment where we are treated with dignity and respect. SCCP is committed to creating such an environment because it brings out the full potential in each of us, which, in turn, contributes directly to our business success.

SCCP is an equal employment/affirmative action employer and is committed to providing a workplace that is free of discrimination and all types of abusive, offensive, or harassing behavior.

#### **Create a Culture of Open and Honest Communication**

At SCCP, everyone should feel comfortable to speak his or her mind, particularly with respect to ethics concerns. Managers have a responsibility to create an open and supportive environment where employees feel comfortable raising such questions. We all benefit tremendously when employees exercise their power to prevent mistakes or wrongdoing by asking the right questions at the right times.

SCCP will investigate all reported instances of questionable or unethical behavior. In every instance where improper behavior is found to have occurred, the company will take appropriate action. We will not tolerate retaliation against employees who raise ethics concerns in good faith.

To make our Code work, managers must be responsible for promptly addressing ethical questions or concerns raised by employees and for taking the appropriate steps to deal with such issues. Managers should not consider employees' ethics concerns as threats or challenges to their authority, but rather as another encouraged form of business communication. We want the ethics dialogue to become a natural part of daily work.

#### **Uphold the Law**

Our commitment to integrity begins with complying with laws, rules, and regulations related to our lines of business. Therefore, each of us must understand the company's policies, laws, rules, and regulations that apply to our specific roles. If we are unsure of whether a contemplated action is permitted by law or Company policy, we should seek the advice from our department head. We are responsible for preventing violations of law and for speaking up if we see possible violations.



### **Proprietary Information**

It is important that we respect the property rights of others. We will not acquire or seek to acquire improper means of a competitor's trade secrets or other proprietary or confidential information. We will not engage in unauthorized use, copying, distribution, or alteration of software or other intellectual property.

### **Accurate Public Disclosures**

We will make certain that all disclosures made in financial reports are full, fair, accurate, timely, and understandable. This obligation applies to all employees, including all financial executives, with any responsibility for the preparation for such reports, including drafting, reviewing, and signing or certifying the information contained therein. No business goal of any kind is ever an excuse for misrepresenting facts or falsifying records.

Employees should inform the Compliance Officer or any member of the executive staff if they learn that information in any filing, or public communication was untrue or misleading at the time it was made or if subsequent information would affect a similar future filing or public communication.

### **Corporate Recordkeeping**

We create, retain, and dispose of our company records as part of our normal course of business in compliance with all regulatory and legal requirements.

SCCP will retain all company health information records for a minimum of ten (10) years.

All corporate records must be true, accurate, and complete, and company data must be promptly and accurately entered in our books in accordance with applicable principles.

We must not improperly influence, manipulate, or mislead any audit, nor interfere with any auditor engaged to perform an independent audit of our books, records, processes, or internal controls.

### **Accountability**

Each of us is responsible for knowing and adhering to the values and standards set forth in this Code and for raising questions if we are uncertain about company policy. If we are concerned whether the standards are being met or are aware of violations of the Code, we must contact the Compliance Officer. We take seriously the standards set forth in the Code, and violations are cause for disciplinary action up to and including termination of employment.

Integral to our business success is our protection of confidential company information, as well as nonpublic information entrusted to us by employees, customers, and other business partners. Confidential and proprietary information includes such things as pricing and financial data, customer names/addresses, or nonpublic information about other companies, including current or potential suppliers and vendors. We will not disclose confidential and nonpublic information without a valid business or legal purpose and proper authorization.

### **Compliance**



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Compliance with these principles is an essential element in our business success. Our Compliance Committee is responsible for ensuring these principles are communicated to, understood, and observed by all employees. Day to day responsibility is delegated to all management members who are responsible for implementing these principles. Assurance of compliance is monitored and reported each year.

Compliance with the code is subject to review by the board and subject to audit review. Employees are expected to bring to management's attention any breach or suspected breach of these principles. Provision has been made for employees to be able to report in confidence.

From time to time, employees will likely have questions as to how this Code of Ethics and Business Conduct apply in particular situations. We expect all employees with such questions to discuss the exact circumstances with our Compliance Officer. Should the Compliance Officer be uncertain on what actions should be taken to ensure compliance with this Code of Ethics and Business Conduct, he/she will obtain further guidance by consulting with the Compliance Committee.

### **Reporting Options**

Confidential reports of ethical violations can be made to the following:

- SCCP's Compliance Department via email can be sent to [Compliance@southlandccp.com](mailto:Compliance@southlandccp.com). Phone calls can be made to 708-996-4002.
- Written correspondence can be set to: SCCP Compliance Department at 600 Holiday Plaza Drive, Suite 200, Matteson, IL 604433.
- Illinois Secretary of State can be contacted at 800-252-8980 (toll free in Illinois), 217-785-3000 (outside Illinois).
- OIG National Hotline can be contracted at 800-447-8477.