



Signify Health, Inc. Standards of Conduct

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1 PURPOSE

The Board of Directors (the “Board”) of Signify Health, Inc., (together with all of its subsidiaries, the “Company” or “Signify”), established these Standards of Conduct (the “Standards”) to provide guidance to all members of the Signify workforce (the “Workforce”) which includes its team of employed and contracted providers and assists us in carrying out our daily activities within appropriate ethical and legal standards. These obligations apply to our relationships with members, affiliated providers, third-party payers, subcontractors, independent contractors, vendors, consultants, government regulators, and one another. While covering a wide range of business practices and procedures, these standards cannot and do not cover every issue that may arise, or every situation where ethical decisions must be made, but rather set forth key guiding principles that represent Company policies and establish conditions for employment at the Company.

These Standards are mandatory and must be followed. If you have any questions about the content of the Standards or how they apply to your job specifically, speak to your manager or contact compliance@signifyhealth.com

We must strive to foster a culture of honesty and accountability. All of our officers, directors, employees (full-time, part-time and temporary), clinicians (employed and contracted), directors, students, volunteers, contractors and vendors of Signify are all accountable for complying with these Standards and should seek to avoid even the appearance of improper behavior. There is no excuse for non-compliance. These Standards are a critical component of our overall Compliance Program. We have developed these Standards to ensure we meet our ethical standards and comply with applicable laws and regulations. Our commitment to the highest level of ethical conduct should be reflected in all of the Company’s business activities including, but not limited to, relationships with employees, customers, suppliers, competitors, the government, the public, and our shareholders. Even well-intentioned actions that violate the law or these Standards may result in negative consequences for the Company and for the individuals involved. One of our Company’s most valuable assets is our reputation for integrity, professionalism and fairness. We should all recognize that our actions are the foundation of our reputation and adhering to these Standards and applicable law is imperative.

Below please find some everyday examples of non-compliance that are not acceptable.

EXAMPLES:

- **Customary Practice:**
*"It's been done this way for years."
"Everyone else does it."*
- **Expediency:**
*"I didn't have time."
"My department is short-staffed."*
- **Competitive Advantage:**
"I do it this way because it gives us an advantage over our competitors."
- **Fear of Insubordination:**
"My boss told me to not say anything and just do it."
- **Everyone Knows About It:**
"My boss knows about it and hasn't done anything about it."

2 COMPLIANCE

2.1 Structure

Because Signify provides healthcare services in many states and as part of certain federal healthcare programs, we are committed to conducting our business with honesty and integrity and in full compliance with all applicable laws, rules and regulations. No employee, officer or director of the Company shall commit an illegal or unethical act, or instruct others to do so, for any reason.

Signify's Board of Directors, through its Audit Committee, has adopted a formal Compliance Program. The Compliance Program outlines what we do as an organization to comply with legal and other requirements, including, but not limited to, the following:

- Setting standards through written policies, procedures and these Standards of Conduct.
- Communicating standards through awareness, education, and training programs.
- Providing a process for reporting potential violations of laws, policies or these Standards.
- Identifying, investigating, and responding to potential compliance problems.
- Enforcing these Standards and disciplining non-compliant actions.

2.2 Training

Comprehensive training and education has been developed to ensure that Workforce members are aware of the standards that apply to them. Compliance training is conducted at the time an individual joins the organization and annually for all members of the Workforce. Signify's policies outline the specific training requirements. Participating in compliance education and training is a condition of employment. Therefore, failure to complete the requisite training or to participate in mandatory compliance training will result in termination.

2.3 Trading on Inside Information

Using non-public, Company information to trade in securities, or providing a family member, friend or any other person with a "tip", is illegal. All non-public, company information should be considered inside information and should never be used for personal gain. You are required to familiarize yourself and comply with the Company's Policy Concerning Trading in Company Securities, copies of which are distributed to all employees, officers and directors and are available from the Legal Department. You should contact the Legal Department with any questions about your ability to buy or sell securities.

2.4 Protection of Confidential Proprietary Information

Confidential proprietary information generated and gathered in our business is a valuable Company asset. Protecting this information plays a vital role in our continued growth and ability to compete, and all proprietary information should be maintained in strict confidence, except when disclosure is authorized by the Company or required by law.

Proprietary information includes all non-public information that might be useful to competitors or that could be harmful to the Company, its customers or its suppliers if disclosed. Intellectual property, such as trade secrets, patents, trademarks and copyrights, as well as business, research and new product plans, objectives and strategies, records, databases, salary and benefits data, employee medical information, customer, employee and suppliers lists and any unpublished financial or pricing information must also be protected.

Unauthorized use or distribution of proprietary information violates Company policy and could be illegal. Such use or distribution could result in negative consequences for both the Company and the individuals involved, including potential legal and disciplinary actions. We respect the property rights of other companies and their proprietary information and require our employees, officers and directors to observe such rights.

Your obligation to protect the Company's proprietary and confidential information continues even after you leave the Company, and you must return all proprietary information in your possession upon leaving the Company.

These are qualified in their entirety by reference to Reporting Violations to a Governmental Agency.

2.5 Conflicts of Interest

Our employees, officers and directors have an obligation to act in the best interest of the Company. All employees, officers and directors should endeavor to avoid situations that present a potential or actual conflict between their interest and the interest of the Company.

A “conflict of interest” occurs when a person’s private interest interferes in any way, or even appears to interfere, with the interest of the Company, including its subsidiaries and affiliates. A conflict of interest may arise when an employee, officer or director takes an action or has an interest that may make it difficult for him or her to perform his or her work objectively and effectively. Conflicts of interest may also arise when an employee, officer or director (or his or her family members) receives improper personal benefits as a result of the employee’s, officer’s or director’s position in the Company.

Although it would not be possible to describe every situation in which a conflict of interest may arise, the following are examples of situations that may constitute a conflict of interest:

- Working, in any capacity, for a competitor, customer or supplier while employed by the Company.
- Accepting gifts of more than modest value or receiving personal discounts (if such discounts are not generally offered to the public) or other benefits as a result of your position in the Company from a competitor, customer or supplier.
- Competing with the Company for the purchase or sale of property, products, services or other interests.
- Having an interest in a transaction involving the Company, a competitor, a customer or supplier (other than as an employee, officer or director of the Company and not including routine investments in publicly traded companies).
- Receiving a loan or guarantee of an obligation as a result of your position with the Company.
- Directing business to a supplier owned or managed by, or which employs, a relative or friend.

Situations involving a conflict of interest may not always be obvious or easy to resolve. You should report actions that may involve a conflict of interest to the Compliance department.

In order to avoid conflicts of interests, senior executive officers and directors must disclose to the General Counsel any material transaction or relationship that reasonably could be expected to give rise to such a conflict. Conflicts of interest involving the General Counsel shall be disclosed to the Audit Committee.

2.6 Protection and Proper Use of Company Assets

Protecting Company assets against loss, theft or other misuse is the responsibility of every employee, officer and director. Loss, theft and misuse of Company assets directly impact our profitability. Any suspected loss, misuse or theft should be reported to a supervisor or the Legal Department.

The sole purpose of the Company’s equipment, vehicles, supplies and technology is the conduct of our business. They may only be used for Company business consistent with Company guidelines.

2.7 Corporate Opportunities

Employees, officers and directors are prohibited from taking for themselves business opportunities that are discovered through the use of corporate property, information or position. No employee, officer or director may use corporate property, information or position for personal gain, and no employee, officer or director may compete with the Company. Competing with the Company may involve engaging in the same line of business as the Company, or any situation where the employee, officer or director takes away from the Company opportunities for sales or purchases of products, services or interests. Employees, officers and directors owe a duty to the Company to advance its legitimate interests when the opportunity to do so arises.

2.8 Fair Dealing

Each employee, officer and director of the Company should endeavor to deal fairly with customers, suppliers, competitors, the public and one another at all times and in accordance with ethical business practices. No one should take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts or any other unfair dealing practice. No bribes, kickbacks or other similar payments in any form shall be made directly or indirectly to or for anyone for the purpose of obtaining or retaining business

or obtaining any other favorable action. The Company and any employee, officer or director involved may be subject to disciplinary action as well as potential civil or criminal liability for violation of this policy.

Occasional business gifts to, or entertainment of, non-government employees in connection with business discussions or the development of business relationships are generally deemed appropriate in the conduct of Company business. However, these gifts should be given infrequently and their value should be modest. Gifts or entertainment in any form that would likely result in a feeling or expectation of personal obligation should not be extended or accepted.

Practices that are acceptable in a commercial business environment may be against the law or the policies governing federal, state or local government employees. Therefore, no gifts or business entertainment of any kind may be given to any government employee without the prior approval of the Legal Department.

Except in certain limited circumstances, the Foreign Corrupt Practices Act (“FCPA”) prohibits giving anything of value directly or indirectly to any “foreign official” for the purpose of obtaining or retaining business. When in doubt as to whether a contemplated payment or gift may violate the FCPA, contact the Legal Department before taking any action.

2.9 Quality of Public Disclosures

The Company has a responsibility to provide full and accurate information in our public disclosures, in all material respects, about the Company’s financial condition and results of operations. Our reports and documents filed with or submitted to the Securities and Exchange Commission and our other public communications shall include full, fair, accurate, timely and understandable disclosure, and the Company has established a Disclosure Committee consisting of senior management to assist in monitoring such disclosures.

2.10 Compliance with Antitrust Laws

The antitrust laws prohibit agreements among competitors on such matters as prices, terms of sale to customers and allocating markets or customers. Antitrust laws can be very complex, and violations may subject the Company and its employees to criminal sanctions, including fines, jail time and civil liability. If you have any questions, consult the Legal Department.

2.11 Political Contributions and Activities

Any political contributions made by or on behalf of the Company and any solicitations for political contributions of any kind must be lawful and in compliance with Company policies. This policy applies solely to the use of Company assets and is not intended to discourage or prevent individual employees, officers or directors from making political contributions or engaging in political activities on their own behalf. No one may be reimbursed directly or indirectly by the Company for personal political contributions.

3 REPORTING AND NON-RETALIATION

We all have an obligation and a responsibility to report violations or suspected violations of any laws, acts, statutes, policies, procedures, or of these Standards. Situations which may involve a violation of ethics, laws, rules, regulations or these Standards may not always be clear and may require the exercise of judgment or the making of difficult decisions. Anyone aware of violations or suspected violations of laws, rules, regulations, or Company policies and procedures must report them immediately to the General Counsel or Chief Compliance Officer, the Compliance department via compliance@signifyhealth.com, directly to a Compliance team member, or, in the case of accounting, internal accounting controls or auditing matters, the Audit Committee of the Board of Directors. You may also report a violation or suspected violation 24 hours a day, 7 days a week, to the Compliance Hotline at **1-844-232-8709** or to the Compliance Hotline Website at www.signifyhealth.ethicspoint.com. You may elect to make your hotline report anonymously. Interested parties may also communicate directly with the Company's non-management directors through contact information located in the Company's annual report on Form 10-K.

Any concerns about a violation of ethics, laws, rules, regulations or these Standards by any senior executive officer or director should be reported promptly to the General Counsel or Chief Compliance Officer, and the General Counsel or Chief Compliance Officer shall notify the Audit Committee of any violation. Any such concerns involving the General Counsel or Chief Compliance Officer should be reported to the Audit Committee.

It is important to note that ***if you become aware of a potential violation but fail to report it, you could be considered a party to the violation***. This means that if you have knowledge of a violation of a law, act, statute, policy or procedure, the Compliance Program, or to these Standards, and you fail to report it and the violation is discovered (either through internal means or through an external audit or investigation by federal or state authorities), you could be held responsible even if you were not the one committing the violation.

The Company encourages all employees, officers and directors to report any suspected violations promptly and intends to thoroughly investigate any good faith reports of violations. There will never be any retaliation or retribution for making a good faith report even if that report turns out to be unfounded. Should any member of the Workforce feel retaliated against for making such a report, they should contact the Compliance department immediately. Retaliatory behavior will not be tolerated at any level of the organization.

We will promptly investigate any reported issues suspected of being violations of these Standards, Signify policies or procedures, or applicable laws, rules or regulations. While all reported issues are treated as confidentially as possible, all employees, officers and directors are required to cooperate fully in any internal investigations of an alleged violation. If you want to remain anonymous, you need to provide enough information to allow Signify to investigate the issue.

The Company recognizes the need for these Standards to be applied equally to everyone it covers. The General Counsel of the Company will have primary authority and responsibility for the enforcement of these Standards, subject to the supervision of the Nominating and Corporate Governance Committee, or, in the case of accounting, internal accounting controls or auditing matters, the Audit Committee of the Board of Directors, and the Company will devote the necessary resources to enable the General Counsel to establish such procedures as may be reasonably necessary to create a culture of accountability and facilitate compliance with these Standards. Questions concerning these Standards should be directed to the Legal Department.

The provisions of this section are qualified in their entirety by reference to Reporting Violations to a Governmental Agency.

3.1 Discipline

All employees, directors and officers are expected to comply with all of the provisions of these Standards. These Standards will be strictly enforced and violations of these Standards that involve illegal behavior will be reported to the appropriate authorities. All violators of the Standards will be subject to disciplinary action. The precise discipline utilized will depend on the nature, severity, and frequency of the violation.

When Signify determines it is appropriate, we will report any violations of the Standards or Signify policies, Medicare program noncompliance, Medicaid program noncompliance, violations of law, criminal misconduct, any instances of abuse, neglect or exploitation, and FWA to our clients, the Centers for Medicare & Medicaid Services (CMS), CMS designees, other regulatory agencies, including state Medicaid agencies and/or law enforcement, as applicable.

3.2 Reporting Violations to a Governmental Agency

You understand that you have the right to:

- Report possible violations of state or federal law or regulation that have occurred, are occurring, or are about to occur to any governmental agency or entity, or self-regulatory organization;
- Cooperate voluntarily with, or respond to any inquiry from, or provide testimony before any self-regulatory organization or any other federal, state or local regulatory or law enforcement authority;
- Make reports or disclosures to law enforcement or a regulatory authority without prior notice to, or authorization from, the Company; and
- Respond truthfully to a valid subpoena.

You have the right to not be retaliated against for reporting, either internally to the company or to any governmental agency or entity or self-regulatory organization, information which you reasonably believe relates to a possible violation of law. It is a violation of federal law to retaliate against anyone who has reported such potential misconduct either internally or to any governmental agency or entity or self-regulatory organization. Retaliatory conduct includes discharge, demotion, suspension, threats, harassment, and any other manner of discrimination in the terms and conditions of employment because of any lawful act you may have performed. It is unlawful for the company to retaliate against you for reporting possible misconduct either internally or to any governmental agency or entity or self-regulatory organization.

Notwithstanding anything contained in these Standards or otherwise, you may disclose confidential Company information, including the existence and terms of any confidential agreements between yourself and the Company (including employment or severance agreements), to any governmental agency or entity or self-regulatory organization.

The Company cannot require you to withdraw reports or filings alleging possible violations of federal, state or local law or regulation, and the company may not offer you any kind of inducement, including payment, to do so.

Your rights and remedies as a whistleblower protected under applicable whistleblower laws, including a monetary award, if any, may not be waived by any agreement, policy form, or condition of employment, including by a predispute arbitration agreement. Even if you have participated in a possible violation of law, you may be eligible to participate in the confidentiality and retaliation protections afforded under applicable whistleblower laws, and you may also be eligible to receive an award under such laws.

4 RESPONSIBILITY AND ACCOUNTABILITY

As members of the Workforce, we are all responsible to each other, to the organization, and to those that we serve. We are responsible for what we do as well as for what we fail to do. All decisions we make, whether they be to act a certain way or not to act a certain way, will impact the end result. We all must recognize our responsibility and understand that we, as individuals, are all accountable for the choices, decisions, actions or inactions that we make.

We are all expected to conduct business in accordance with these Standards. Our goals, as members of the Workforce include, but are not limited to, the following:

- Treating one another with respect and dignity.
- Not harass co-workers, members, or any persons in our environment.
- To respectfully communicate honestly with candor and openness.
- To recruit, hire, train, and promote employees in all job classifications based on their own abilities, achievements, experiences and conduct without regard to race, color, sex, religion, national origin, age, sexual orientation, disability or political affiliation.
- To understand and adhere to our Standards.
- To discuss concerns with the appropriate party and report any suspected violations of our Standards.

The Company is committed to conducting its business in compliance with all applicable environmental and workplace health and safety laws and regulations. The Company strives to provide a safe and healthy work environment for our employees and to avoid adverse impact and injury to the environment and communities in which we conduct our business. Achieving this goal is the responsibility of all officers, directors and employees.

4.1 Substance Abuse and Mental Acuity

- All members of the Workforce must report for work free of the influence of alcohol and illegal drugs. Reporting to work under the influence of any illegal drug or alcohol; having an illegal drug in a Workforce member's system; or using, possessing, or selling illegal drugs while on Signify work time or property may result in immediate termination. We may use drug testing as a means of enforcing this policy.
- It is also recognized that individuals may be taking prescription or over-the-counter drugs which could impair judgment or other skills required in job performance. Workforce members with questions about the effect of such medication on their performance or who observe an individual who appears to be impaired in the performance of his or her job must immediately consult with their supervisor.
- If you believe you have experienced or witnessed someone under the influence while performing services for Signify or on Signify premises, you must report it to your manager or Human Resources.

5 WORKPLACE VIOLENCE

Signify has zero tolerance for violent acts or threats of violence against its Workforce, applicants, regulators, providers, members, visitors, contingent Workforce members or vendors. Signify will not tolerate threatening, violent or abusive conduct. Examples of this prohibited conduct include:

- Intimidating or hostile behavior
- Physical or verbal abuse
- Assault
- Battery
- Vandalism or destruction of Signify Property or the personal property of others

You may not have firearms or other weapons on Signify property, in Signify owned or leased vehicles, member's homes or healthcare facilities, or at work sponsored events.

6 RESPECT AND DIGNITY

Signify is committed to a policy of nondiscrimination and equal opportunity for all qualified applicants, Workforce members and contract providers. The Company's policies for recruitment, advancement and retention of employees forbid discrimination on the basis of any criteria prohibited by law, including but not limited to race, color, sex, gender, religion, age, national origin, ancestry, disability, sexual orientation, pregnancy, physical or mental disability, medical condition, gender identity, marital status, citizenship, veteran status or any other characteristic protected by law. Our policies are designed to ensure that employees are treated, and treat each other, fairly and with respect and dignity. We will foster a work environment free of abusive conduct, including sexual harassment or harassment on any other basis. We will treat others with respect and dignity. We do not tolerate discrimination, harassment or retaliation. In keeping with this objective, conduct involving discrimination or harassment of others will not be tolerated. All employees are required to comply with the Company's policies on equal opportunity, non-discrimination and fair employment, which are accessible via the Employee Handbook..

7 COMPLIANCE WITH LAWS, REGULATIONS, POLICIES AND PROCEDURES

Signify shall conduct its business in compliance with all applicable Federal, state and local laws and regulations and in accordance with all applicable Medicare laws, regulations, CMS instructions and accreditation organization standards ("Applicable Laws"). Further, Signify is committed to remaining in compliance with the Applicable Laws. As members of the Workforce, we are responsible for complying with both "every day" laws and regulations as well as those specific laws and regulations that pertain to healthcare and corporations. We are all responsible and are expected to familiarize ourselves with the laws and regulations that pertain to our areas of responsibility. These Standards are not designed to list out each and every law or regulation that we must comply with. Rather, they provide a guideline for compliance. Signify addresses many, but not all, of the laws and regulations that govern our operations in our policies and procedures. Violating a law or regulation can result in serious consequences for both Signify and for the person or people involved in the violation.

EXAMPLES:

- **Every Day Law:** *Stealing is stealing, regardless of whether it is addressed in a healthcare specific law or not.*
- **Healthcare Specific Law:** *Some of the laws that govern referrals are specific to healthcare. An auto mechanic can refer a customer to his brother-in-law's tire store, but a nurse practitioner who refers a member of a physical therapy clinic owned by her daughter may be violating the law.*

You should seek guidance from the Legal or Compliance team whenever unsure about whether a law or regulation is applicable to any given situation. Violations can affect Signify's reputation and its ability to provide services to our customers. We must all conduct Signify business legally. Signify's policies and procedures provide the Workforce with a point of reference that outlines responsibilities, minimum standards and expectations. Members of the Workforce are expected to read, understand and follow the policies and procedures that pertain to their area of responsibility. All Signify business is expected to be conducted in compliance with these policies and procedures. You are encouraged to consult these written policies and procedures and to seek clarification from your manager or supervisor whenever you have reason to believe a policy or procedure is outdated, unclear or at odds with Signify's objectives. Signify's policies and procedures are available to all employees via the company intranet.

We are all expected to comply with the policies and procedures. Choosing to ignore a policy or procedure or refusing to comply with a policy or procedure is unacceptable behavior.

Certain professions have their own code of conduct or code of ethics that you may be subject to as well. If you are a member of such profession, you must also comply with any such codes of conduct or codes of ethics.

8 GIVING AND RECEIVING GIFTS, FAVORS AND ENTERTAINMENT

Never give or take a gift that could be perceived as a bribe or an attempt to influence business decisions. Bribery is illegal and prohibited by Signify. The safest course of action is not to give or receive any gifts at all. However, circumstances may arise where that's not possible. If you must give or receive a gift, inexpensive or promotional items are appropriate if the item is widely available to others and if the exchange is legal. Even inexpensive gifts should not be given or accepted if they are intended as, or could be perceived to be, a bribe or an attempt to influence business decisions. A good rule of thumb is that any gift or entertainment in any form that would likely result in a feeling or expectation of personal obligation should not be offered or accepted. Ask your manager or the Compliance team for help any time you are unsure about giving or receiving a gift. Practices that are acceptable in a commercial business environment may be against the law or the policies governing federal, state or local government employees. Therefore, no gifts or business entertainment of any kind may be given to any government employee without the prior approval of the Compliance team.

HealthCare Providers may not accept any gifts of any value, unless approved by Compliance and Legal.

For all other members of the Workforce, gifts valued at more than \$50.00 to or from one person are not appropriate. Group gifts -- those meant for, or received on behalf of multiple people, e.g., a unit, office, department, etc.-- can exceed this limit, but must be reasonable in relation to the size of the group and purpose for the gift. Also, we cannot accept or give gifts of cash or cash equivalents, such as non-merchant-specific gift certificates or gift cards (e.g., VISA or American Express) regardless of the amount. If you are offered or receive a gift not permitted by this policy, politely refuse by explaining Signify's policy on accepting gifts. Any gifts given must be accurately and fully disclosed in an expense report with enough detail to reflect the true nature of the expense and the full names and business affiliations of those involved.

If you use a Signify supplier or contractor for personal purposes, you must pay full market value for the services and materials. You may not get discounts or preferential treatment offered to you because of your position at Signify unless the same treatment is offered openly to all Signify employees.

8.1 Business hospitality, entertainment, travel and meals

Signify pays your work-related travel and related expenses in accordance with Signify's travel and entertainment reimbursement standards. In general, others should not pay for these costs. You may occasionally offer or accept meals or entertainment offered in conjunction with meetings to discuss Signify business. At least one Signify employee must be present at each such event. Entertainment in excess of \$50.00 per attendee must be approved by a member of the Executive team prior the entertainment occurring. Signify will pay for business-related hospitality offered to others if permitted by Signify's policies. Any such expenses must be recorded accurately and with enough detail to reflect the true nature of the expense and the full names and business affiliations of those involved. We will never – either personally or through a third party, such as a broker or consultant – accept, make, or approve bribes or the promise of an improper benefit.

8.2 Honoraria and Fees from Others

Members of the Workforce may be asked to participate in professional activities, professional forums or surveys that are related to Signify or our business interests. For example, you may be asked to serve on a committee or make a speech. You may not be paid a fee (often referred to as an honorarium) for this work. In general, you may accept an offer to cover reasonable travel and lodging costs as long as other committee members or speakers who are not Signify employees are treated equally.

9 KEEPING ACCURATE RECORDS

Each member of the Workforce is responsible for the integrity and accuracy of our organization's documents and records, not only to comply with regulatory and legal requirements but also to ensure records are available to support our business practices and actions. No one may alter or falsify information on any record or document. Records must never be destroyed in an effort to deny governmental authorities that which may be relevant to a government investigation. Medical and business documents and records are retained in accordance with the law and our record retention policy, which includes comprehensive retention schedules. Medical and business documents include paper documents such as letters and memos, computer-based information such as e-mail or computer files on disk or tape, and any other medium that contains information about the organization or its business activities. It is important to retain and destroy records only according to our policy. Members of the Signify Workforce must not tamper with records. No one may remove or destroy records prior to the date specified by applicable law and/or our retention policy without first obtaining permission as outlined in Signify's corporate records management policy. Finally, under no circumstances may a member of the Workforce use a member's, colleague's or any other individual's or entity's information to personally benefit (e.g., insider trading or marketing of the data). If you suspect improper record keeping, report it immediately to your manager, the Chief Compliance Officer or other contact provided on the Resources page at the end of this document. You may also report your concern anonymously via the **Compliance Hotline** at **1-844-232-8709** or on the Compliance Hotline website www.signifyhealth.ethicspoint.com.

10 FALSE CLAIMS AND WHISTLEBLOWER PROTECTIONS

As a healthcare service vendor, Signify receives payments from Medicare Advantage Plans, which are part of the Federal Medicare Program, and Medicaid Plans, which are a joint federal and state healthcare program. As such, we are required to comply with both federal and state false claims acts. These acts prohibit knowingly and willfully submitting false claims for payment to state or federal governments.

False claims take on many forms. They can be obvious such as billing for services never provided or billing twice for something that was provided once. They are sometimes not as obvious. A provider who files claims for a covered procedure even though providing a non-covered procedure is submitting a false claim. We all play a role in ensuring that Signify only submits accurate claims to our clients, both with respect to the service(s) provided to, and the diagnoses supported by the services, for the member. If you have reason to believe that false claims are being submitted, you have an obligation to report this. You should immediately contact the Chief Compliance Officer, your manager, the General Counsel or Human Resources whenever you suspect false claims. You can also call the **Compliance Hotline** at **1-844-232-8709** or report via the Compliance Hotline website www.signifyhealth.ethicspoint.com at any time.

Both the federal and state false claims acts provide whistleblower protections for individuals who, in good faith, report suspected violations of these acts. These are similar to our own internal non-retaliation policies. Basically, anyone who files a false claim report, in good faith, has internal protection against retaliation under Signify's compliance program and has protection under federal and state law. See Signify's Deficit Reduction Act Policy for more information on Whistleblower protections.

11 HEALTH, SAFETY AND ENVIRONMENTAL

Signify will comply with all applicable health and safety laws and regulations. We ask that all those working for or with Signify, perform work in a way that will protect themselves, co-workers, and the public, and comply with all safety and health rules and procedures at all times. Safety compliance concerns can be reported by contacting the Human Resources Department. In addition, Signify asks that its employees strive to utilize resources appropriately and efficiently, to recycle where possible and otherwise dispose of all waste in accordance with applicable laws and regulations.

12 WAIVERS AND AMENDMENTS

Any waiver of the provisions in these Standards for executive officers or directors may only be granted by the Board of Directors and will be disclosed to the Company's shareholders within four business days. Any waiver of these Standards for other employees may only be granted by the Legal Department. Amendments to these Standards must be approved by the Board of Directors and amendments of the provisions in these Standards applicable to the Chief Executive Officer and the senior financial officers will also be promptly disclosed to the Company's shareholders.

13 CONCLUSION

These Standards apply to all members of the Workforce. Our actions as Workforce members indicate our ability to use good judgment as well as our competence to work in the healthcare field. Use your judgment and make the right decision. Whenever the right decision is unclear, consult these Standards or Signify's policies and procedures. Involve a manager or supervisor whenever needed. Contact Compliance, Legal, Human Resources or call the Compliance Hotline at 1-844-232-8709 if you need guidance. We are all in this together. Adherence to these Standards will ensure that Signify Health continues to exceed the expectations of our customers and their members.