



# Supplier Code of Business Conduct

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## Doing what's right

Cambia Health Solutions' success and reputation is built on the trust we've earned from the people with whom we work and the customers we serve. Our reputation is one of our greatest assets. It is maintained by everyone with whom our company is associated, and we all have the responsibility to do the right thing.

We are sensitive to the impact our business decisions have on the communities where we do business. This commitment to corporate citizenship and long-term sustainability is part of who we are and is as important to our brand as the products and services we offer. *Cambia's Supplier Code of Business Conduct (Supplier Code)* outlines the principles Cambia expects our suppliers to exhibit. It describes our standards for integrity, fair dealing and sustainability.

By working with suppliers who share our commitment to these standards, we seek to:

- Maintain a mutually beneficial, long-term relationship with our suppliers
- Uphold the reputations of both Cambia and the suppliers with whom we engage

## Ethics

Cambia holds itself to the highest standards of ethical conduct in all of its endeavors. Suppliers must also conduct their business with honesty, integrity and high standards of ethical conduct, including but not limited to the following:

- Suppliers shall comply with all laws concerning accurate and timely payment of wages, including overtime wages at the legal premium rate.
- Suppliers shall ensure that their workers receive at least the legally mandated minimum wages and benefits, including benefits under the United States Affordable Care Act when applicable.







## Compliance with laws and regulations

Cambia expects suppliers to be aware of, understand and respect the principles of this code. We expect suppliers to comply with the applicable laws and regulations in the jurisdictions in which they operate. This includes not making any express or implicit agreements that violate the letter and spirit of these laws and regulations.

## Anti-corruption/anti-bribery and anti-money laundering

As a condition of contracting with Cambia, suppliers agree to abide by the Foreign Corrupt Practices Act (FCPA) and all other applicable anti-bribery, anti-corruption (ABAC) or anti-money laundering laws and to ensure that their principals and agents are also in compliance. Suppliers must never engage in or allow any conduct that would put Cambia at risk of violating any ABAC or anti-money laundering laws.

Suppliers, their principals, and their agents must disclose any relationships or dealings with government officials in writing to Cambia Ethics & Compliance.

As a condition to contracting with Cambia, suppliers further agree that they, their principals and their agents will not make “facilitating payments” (i.e., provide any payment, whether cash or in-kind, for government services, including but not limited to processing permits, providing police protection or expediting utility services).

If anyone has reason to believe that corrupt or money-laundering practices are occurring within Cambia’s supply chain, those concerns should be reported to Cambia Ethics & Compliance immediately at 1 (877) 878-2273. Concerns can be reported anonymously, and Cambia does not permit retaliation for a good-faith report.

Examples include but are not limited to the following:

- Bribery: Providing any item of value (such as a gift, favor or cash payment) that could be viewed as an attempt to influence an individual’s actions or decision. Cambia prohibits facilitating payments—providing money, often a small amount and usually cash, for securing and expediting government services—even if otherwise permitted by applicable law.
- Money laundering: A party seeking to redeem funds or “cash out” of fixed-term financial instruments for illogical, non-economic reasons, and being unconcerned about related penalties, fees and taxes.

## Conflict of interest

Any conflicts of interest—whether potential, actual or perceived—must be avoided. Any potential, actual or perceived conflict of interest must be disclosed to a Cambia management contact as soon as possible.



## Gifts and entertainment

While exchanging customary business courtesies may be appropriate in certain situations, giving or receiving a gift or offering entertainment is not appropriate if it creates a sense of obligation, is extravagant or is done with the intent to influence a business decision.

## Sustainable practices

We trust our suppliers to understand and manage environmental and social risks. These risks include the threat of adverse effects on the natural environment as well as risks to the livelihoods, health and rights of individuals and communities. We encourage suppliers to identify, adopt and integrate environmental and social best practices into business processes and facilities.

## Workplace safety, security and health

A safe work environment affects all of us. We expect suppliers to adhere to safety laws and regulations and to use equipment properly. If an accident occurs on Cambia's premises or while performing work for Cambia, suppliers must report the accident immediately to a Cambia management contact.





# Protecting Cambia assets and customer information

Protection of Cambia assets is everyone's responsibility. Cambia's assets include physical assets, such as buildings and equipment, as well as non-physical assets, such as electronic data, customer lists, provider information and all other confidential information. Suppliers are responsible for protecting Cambia assets from loss, misuse, theft, fraud, damage and unauthorized personal use.

## Computer resources

If Cambia provides access to its internet, intranet, or email systems to a supplier to assist with the performance of services for Cambia, these systems are to be used for Cambia business purposes only. Each supplier needs to be particularly vigilant when accessing electronic devices or systems that may be exposed to the internet in order to avoid compromising Cambia's systems through a cyberattack. Suppliers must never share computer IDs or passwords with another person.

## Information security

Cambia's business information is confidential and proprietary. Information provided to suppliers should not be shared with individuals outside of Cambia except as specifically directed by Cambia. Suppliers must ensure that confidential information is handled, maintained, transported and disposed of appropriately.

Cambia expects all suppliers' computers or computer systems that interact with Cambia's computer network to possess the necessary firewalls and other security features to guard against the introduction of any computer virus or other cyberthreat into Cambia's information systems. Documents and devices on which confidential information resides should be secured and never left unattended.

Suppliers must also ensure that their employees, agents and subcontractors have taken precautions to address the security of Cambia's information technology assets and have implemented plans to mitigate cybersecurity risks and vulnerabilities associated with work on behalf of Cambia. Any question as to the appropriate treatment of any information should be referred to the supplier's Cambia contact.

## Information concerning customers, suppliers and others

Suppliers are expected to treat as confidential information provided by Cambia's customers or developed as part of Cambia's business activities, and they are expected to safeguard such information against inappropriate disclosure or access. Suppliers who have access to customer information, such as customer lists, customer use data, supplier names or billing rates, must ensure that the information is not disclosed to others outside without the customer's written approval or as required by law.

Any supplier who collects, maintains, processes, transmits or accesses personal information about customers or any other person, including Cambia employees and contractors, must ensure that protected information is not disclosed in violation of applicable laws, including data protection laws, and is handled in accordance with Cambia's policies and procedures and the requirements established under the supplier's contract with Cambia.

## Diversity and inclusion

We expect our suppliers to observe laws that prohibit discrimination based on gender, race, ethnicity, sexual orientation, age, disability and work style or any other protected status. Our goal is to use diverse suppliers for our business needs. Cambia believes that including a range of diverse parties is important to our economic and competitive future in our communities. For that reason, we seek to work with suppliers who perform at a high level and also add a diverse perspective to Cambia. We encourage suppliers to identify, adopt and integrate diversity into their processes.



## Fair dealing

Suppliers are required to deal fairly and honestly not only with Cambia but also governmental and regulatory bodies, customers, other suppliers, competitors, employees and anyone else with whom a supplier may have contact in the course of performing services for Cambia. In conducting work for Cambia, suppliers must not take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts or any other manner of unfair dealing. Suppliers must represent Cambia honestly in every communication with a customer, even if it means losing a sale.



