



# CODE OF CONDUCT

The information contained within Crossbridge Hospice Code of Conduct is intended to provide general guidance regarding the Company's key beliefs and policies. Changes to laws and regulations frequently occur; while we strive to ensure the Code is updated as changes occur, the Company's official policies and procedures should be considered the most up to date and detailed source of information regarding the operational standards that are intended to help ensure the Company achieve its goals in the most ethical and compliant manner possible.

**Crossbridge Hospice Code of Conduct**  
**Table of Contents**

<b>Message from Anna-Gene O'Neal, CEO</b>	3
<b>Our Mission and Values</b>	4
<b>Commitment to Patient Privacy &amp; Health Care Compliance</b>	5
<b>Team Member Responsibilities</b>	
The Role of Management	5
The Role of Personnel	5
Contractors and Vendors	5
<b>Our Commitment to Compliance</b>	
Create, Maintain, Demonstrate Ethical Culture	6
Discourage and Prevent Improper Conduct	6
Appropriate Response	6
Billing and Coding	6
Ineligible Persons	7
Antitrust	7
Marketing and Advertising	7
<b>Human Resources and Standards of Conduct</b>	
Equal Opportunity	8
Relationships Among Personnel	8
Harassment and Workplace Violence	8
Health, Safety, and the Environment	9
Substance Abuse and Controlled Substances	10
Professional Licenses, Certifications, and Credentials	11
Organizational Assets	11
Trademark and Copyright Protection	11
Patient Rights	11
<b>Outside Relationships</b>	
Conflicts of Interest	12
Referrals	12
Relationships with Vendors	12
Business Courtesies	13
Government Relations and Political Activities	13
<b>Compliance Program</b>	
Structure	13
Training, Education, and Communication	14
Auditing and Monitoring	14
Corrective and Disciplinary Actions	14
Acknowledgement Requirement	14
<b>Crossbridge Hospice Compliance Reporting Hotline</b>	
Non-Retribution and Non-Retaliation Policy	15
Protocol	15
Acknowledgement Form for Signature	16

## **Message from Anna-Gene O'Neal, CEO**

As we embark on our new journey as Crossbridge Hospice and Grace Hospice (OH), we recognize that our greatest differentiator is a team committed to fostering a culture of excellence. This Code of Conduct is foundational to everything we do: how we act, how we interact, and how we care for our patients, their families, their caregivers, and one another.

Please take the time to not only read and sign this document, but to embrace it as a guiding principle in your daily activities. If at any point you become aware of conduct that does not align with these standards, we encourage you to speak up by reaching out to your leader, Human Resources, or the Compliance team. We all share the responsibility of holding one another accountable, not just to meet expectations, but to consistently exceed them in everything we do.

When we are united and fully committed, our potential is truly unlimited. I'm inspired by what lies ahead and proud to move forward together.

Best,

Anna-Gene O'Neal

CEO

## Why Do We Have a Code of Conduct?

This Code of Conduct (the “Code”) has been adopted by the Board of Directors (the “Board”) of Crossbridge Hospice and is applicable to Crossbridge Hospice and all of its wholly owned subsidiaries and controlled affiliates (hereinafter collectively referred to as “CBH” or the “Company”) and all employees and staff, contractors, corporate officers, directors, Board members, temporary agency staff or leased employees, medical staff, and employed physicians (hereinafter collectively referred to as “Personnel”) of the Company regardless of location. This Code is designed to provide guidance to all Personnel in conducting our commitment to legal and ethical behavior.

This Code is a critical part of our overall Corporate Compliance Program (“Compliance Program”). The Compliance Program, originally adopted by the Board of Directors in 2025, outlines what we do as an organization to comply with legal and ethical requirements. We are committed to compliance with all applicable federal and state laws, rules and regulations. This commitment permeates all levels of the organization. Our Compliance Program was created to ensure that we conduct our business with integrity and in accordance with all applicable federal and state laws, as well as our Company policies. Our Compliance Program is designed to reduce the risk of misconduct and to provide a safe environment for raising compliance concerns and questions. The Chief Compliance Officer oversees the Compliance Program and ensures compliance with our Code. Anyone who does not comply with our Code may be disciplined up to and including termination.

This Code guides Personnel in conducting our daily work and relationships with patients, independent contractors, third-party payers, subcontractors, vendors, consultants, and each other within appropriate ethical and legal standards. It is intended to be comprehensive, easily understood, and serve as an important reference source. This Code is an integral part of how we achieve our purpose and values. This Code, and/or policies and procedures may be revised, amended, or supplemented. A copy of all revisions, amendments or supplements shall be made available to all Personnel.

We must follow the laws and business requirements of the states in which we operate. Regardless of your location, you are responsible for conducting business activities in compliance with this Code and the laws of the state in which you work and live. If you encounter or suspect a conflict between this Code and the laws of a particular state, you should bring that potential conflict to the attention of the Compliance Department. Our Code of Conduct is designed to help you make ethical business decisions. It is not, however, it may not address every possible situation.

## Our Mission, Values, and Vision

### **Mission:**

Crossbridge Hospice mission is provide compassionate, patient and family-centered hospice care that honors the dignity of every individual, staying true to our belief in “people taking extraordinary care of people at the end of life’s journey.” In support of that mission, we believe the following values

### **Vision:**

Our vision is to optimize the patient, family, and community experience during life’s final journey through kindness, respect, technology, and operational efficiencies.

We will realize this vision by delivering:

- Expert clinical care
- Compassionate emotional support, and
- Meaningful spiritual guidance

We are committed to the ongoing development of our staff and volunteers, fostering growth and excellence through education and support. We actively engage with the communities we serve and empower our teams to make a lasting difference in the lives of those at the end of life's journey.

### **Core Values:**

Our values guide every action, decision, and interaction as we care for patients, families, and one another during the end-of-life journey. We believe the following values are essential:

- **Compassion:** providing care with kindness, empathy and understanding to patients and their families
- **Dignity:** honoring the worth and individuality of each person in their final stage of life
- **Integrity:** upholding honesty, ethics and professionalism in all interactions internally and externally
- **Advocacy and Education:** empowering patients, families and communities with information, resources, and advocacy, ensuring that they are active participants in their care
- **Innovation:** striving to always improve the patient, caregiver and hospice team experience

### **Commitment to Patient Privacy and Healthcare Compliance**

Crossbridge Hospice is dedicated to fostering a culture of compliance and upholding the highest ethical standards. Our focus is on delivering exceptional patient care, ensuring accurate and compliant billing practices, and protecting the privacy of those we serve. By providing compassionate, personalized care that meets each patient's unique needs, we demonstrate our commitment to the core values of compassion, dignity, integrity, advocacy and education, and innovation, and compliance in all aspects of our work. This Code of Conduct has been developed and implemented to clearly communicate our organization's expectations and commitment to all Company Personnel

### **Team Member Responsibilities**

#### **The Role of Management**

While all Personnel are expected to follow the Code of Conduct, the management team holds a special responsibility to lead by example. Leaders are expected to demonstrate the highest ethical and legal standards in their conduct and decision-making. They are also responsible for ensuring that their teams have the necessary tools, resources, and support to carry out their duties in full compliance with applicable laws, rules, regulations, and company policies.

Management is required to report any suspected or known violations of this Code, organization policy, Federal or State laws, rules, or guidance. Additionally, senior management should not discourage any Personnel from reporting concerns to their manager, the Chief Compliance Officer, or the Crossbridge Hospice Reporting Hotline.

#### **The Role of Personnel**

Every team member is expected to comply with the Code and perform their responsibilities with integrity, professionalism, and strong commitment to compliance. Personnel should notify their manager, the Chief Compliance Officer, or Crossbridge Hospice Reporting Hotline of any known or suspected violations of law, the Code, or policy. Timely reporting enables senior management and the compliance team to investigate and address concerns effectively, reinforcing our commitment to ethical conduct and organizational integrity.

All Personnel must review and attest to their compliance with the Code within 30 days of hire or engagement by Crossbridge Hospice and annually thereafter.

## The Role of Contractors and Vendors

All who do business with us, including vendors and third-party contractors, are expected to uphold the principles and values of this Code. Contractors will be required to read, comply, and attest to their understanding and agreement to abide by this Code. Vendors and other individuals who interact with the organization may be required to attest to or have similar requirements within their organization.

All individuals and vendors who meet the HIPAA definition of a Business Associate (“BA”) will be required to enter into an appropriate BA Agreement (“BAA”) with our organization.

## **Our Commitment to Compliance**

### Create, Maintain, Demonstrate Ethical Culture

Crossbridge Hospice is committed to the highest standards of business conduct in our relationships with our patients, Personnel, the companies with which we do business, and the communities we serve. This requires that we operate with the highest degree of integrity and in accordance with all applicable laws and regulations.

Our Code sets forth the fundamental principles governing our organization. The Code outlines the standards of conduct and expectations for all individuals and organizations partnering with Crossbridge Hospice.

### Discourage and Prevent Improper Conduct

Improper conduct or failure to comply with laws, regulations, or policies and procedures can significantly impact the organization, our Personnel, and/or patients in a negative manner and as such will not be tolerated.

### Appropriate Response

As Personnel of Crossbridge Hospice, we all share a responsibility to report any behavior or activity that appears inappropriate, unethical, or inconsistent with our core mission and values. This responsibility extends to safeguarding the wellbeing of our patients, fellow team members, the communities we serve, and the organization.

If you believe something is potentially inappropriate, unethical, or goes against our core mission and values, you should immediately report it to your manager, the Chief Compliance Officer or the Crossbridge Hospice Compliance Reporting Hotline.

All reports of potential violations must be made in good faith. We take all concerns seriously and are committed to handling them with care and discretion. However, knowingly submitting false or malicious reports may result in disciplinary action.

At no point in time does anyone have the authority to request or instruct you to violate any portion of the Code, and any occurrences should immediately be reported to your manager, the Chief Compliance Officer or the Crossbridge Hospice Compliance Reporting Hotline.

Maintaining the integrity of our organization is a shared duty. In addition to reporting concerns, all Personnel are expected to fully cooperate with any compliance-related investigations. Failing to report a known issue or attempting to interfere with the reporting or investigative process may lead to disciplinary consequences.

### Billing and Coding

Crossbridge Hospice policies and procedures are designed to conform to federal and state laws and regulations

in helping to ensure accurate billing of the government, commercial insurance, and patients. It is imperative that accurate and timely documentation be performed to help support accurate billing of services rendered. All Personnel are prohibited from knowingly presenting or causing to be presented claims for payment or approval which are false, fictitious, or fraudulent.

#### Ineligible Persons

At no point will we or any affiliated party contract with, employ, or bill for services rendered by any individual or entity that is (i) excluded or ineligible to participate in federal healthcare programs, or (ii) suspended or debarred from federal government contracts and has not been reinstated in a federal healthcare program after a period of exclusion, suspension, debarment, or ineligibility.

To help ensure we do not engage the services of an excluded individual or entity that is excluded from participation in federal programs, we routinely search the Department of Health and Human Services' Office of Inspector General and General Services Administration's lists of excluded and ineligible persons.

All who do business with us, including vendors and third-party contractors, must cooperate with company efforts to perform adequate exclusion checks or provide sufficient evidence of an adequate internal screening process as outlined within Company policies and procedures.

#### Antitrust

Crossbridge Hospice requires compliance with all laws governing competitive activities intended to promote fair competition within the industry. Individuals should refrain from conversations with competitors regarding pricing, marketing, etc. Personnel with specific questions regarding antitrust should reference Crossbridge Hospice's policies and procedures and/or contact their manager or the Chief Compliance Officer.

#### Marketing and Advertising

Crossbridge Hospice will only present truthful and non-deceptive information within its marketing and advertising media materials and announcements. Furthermore, all marketing and advertising will fully comply with all applicable laws and regulations. Details regarding our marketing and advertising practices can be found within our policies and procedures.

### **Human Resources and Standards of Conduct**

#### Equal Opportunity

Our people are the foundation of our success, bringing a rich array of talents and skills to everything we do. We are deeply committed to fostering a diverse and inclusive workforce, ensuring equal opportunity for all, and upholding full compliance with applicable laws, regulations, and internal policies.

Discrimination of any kind is strictly prohibited, including—but not limited to—discrimination based on race, color, religion, sex, sexual orientation, gender identity, national origin, age, disability, genetic information, citizenship, veteran status, military or uniformed service, or any other characteristic protected by law. We also maintain a zero-tolerance policy for unlawful harassment or retaliation. Any violation of our equal employment opportunity, anti-harassment, or anti-retaliation policies will result in disciplinary action, up to and including termination for cause.

Additional information about Crossbridge Hospice's commitment to equal employment opportunities can be found in the Employee Handbook. If you have any questions or concerns related to equal employment opportunities, harassment, or retaliation, you are encouraged to promptly reach out to any of the following: your

manager, the Chief People officer, Chief Compliance Officer, the Crossbridge Hospice Compliance Reporting Hotline, or the CEO.

### **Relationship Among Employees (Team Members)**

We understand that friendships may naturally develop among colleagues. As professionals entrusted with the care and well-being of others, we rely on our employees to maintain a clear focus on their responsibilities and ensure that personal relationships do not interfere with job performance.

While we do not impose a blanket prohibition on workplace relationships or enforce strict rules around personal interactions, we do want to address a few important considerations:

- **Gifts:** No one should ever feel obligated to give a gift to a colleague. Any gift exchanged should be modest and appropriate for the occasion. Lavish gifts, especially those given to individuals in supervisory roles, are never appropriate and are a violation of our policy.
- **Fundraising:** Participation in a colleague's fundraising efforts is entirely voluntary. Similarly, if the organization chooses to support a charitable cause, no Personnel should feel pressured to contribute. There must be no workplace consequences tied to an individual's decision to give—or not give—to any fundraising initiative.

### **Harassment and Inappropriate Behavior**

Harassment or inappropriate behavior by anyone associated with Crossbridge Hospice is strictly prohibited. Our workplace must remain respectful, inclusive, and free from any form of degrading or humiliating conduct. This includes, but is not limited to, jokes, slurs, intimidation, or any other behavior that creates a hostile or uncomfortable environment.

**Sexual harassment is expressly forbidden** and includes unwelcome sexual advances, requests for sexual favors, or any verbal or physical conduct of a sexual nature that affects employment decisions, interferes with work performance, or creates an intimidating, hostile, or offensive work environment.

While it is not possible to list every circumstance that may constitute sexual harassment, the following are examples of conduct that may be considered inappropriate and in violation of our policy:

- Unwanted sexual advances, whether or not they involve physical contact
- Sexual epithets, jokes, or references to sexual conduct—whether spoken, written, or shared via email, text, social media, or other electronic communication
- Gossip about someone's sex life or comments about an individual's body, sexual activity, or sexual performance
- Displaying or circulating sexually suggestive objects, images, or cartoons
- Unwelcome leering, whistling, brushing against someone's body, sexual gestures, or suggestive or insulting remarks
- Inquiries into someone's sexual experiences or discussions of one's own sexual activities

All team members are expected to uphold these standards and contribute to a safe and respectful workplace. If you have questions or concerns, please refer to the Employee Handbook or contact Human Resources.

### **Harassment, Workplace Violence, and Reporting**

Harassment in any form, including workplace violence, is strictly prohibited at Crossbridge Hospice. This includes verbal or physical assault, stalking, theft, vandalism, terrorism, and hate crimes, whether committed by current or former Personnel.

Personnel who witness or experience any form of harassment or violence are expected to report the incident immediately to their manager, the Chief Compliance Officer, or the Crossbridge Hospice Compliance Reporting Hotline. In situations where there is an imminent threat to personal safety or the safety of others, and management is not immediately available, Personnel are encouraged to contact local law enforcement without delay. Crossbridge Hospice reserves the right to prosecute any individual who engages in violence or threats of violence against the company, its employees, or its property to the fullest extent of the law. All reported incidents will be thoroughly investigated, and appropriate action will be taken. Any such behavior may result in disciplinary action, up to and including termination for cause.

### **Weapons Policy**

The possession of weapons on Crossbridge Hospice property is strictly prohibited. While on duty, employees may not carry any type of weapon. This includes, but is not limited to:

- Firearms such as handguns and rifles
- Knives intended for use as weapons (excluding pocketknives, utility knives, or tools used for work-related tasks)
- Martial arts weapons, stun guns, and tear gas

Violations of this policy will result in disciplinary action, up to and including termination for cause.

### **Protection Against Retaliation**

Crossbridge Hospice strictly prohibits any form of reprisal, retaliation, or adverse action against individuals who, in good faith, report or assist in the investigation of harassment or workplace violence. Any suspected retaliation or intimidation should be reported immediately to your manager, the Chief Compliance Officer, or the Crossbridge Hospice Compliance Reporting Hotline.

All complaints will be investigated promptly and thoroughly. Confidentiality will be maintained throughout the process to the extent possible, consistent with the need to conduct a complete and fair investigation and take appropriate corrective action.

### **Health, Safety, and the Environment**

Crossbridge Hospice is committed to providing a safe and healthy workplace for all employees, customers, and patients. We strictly adhere to all applicable environmental laws and regulations and ensure that each of our affiliated entities operates with the necessary permits, approvals, and controls.

All employees/team members are responsible for:

- Complying with health, safety, and environmental requirements
- Properly handling hazardous materials
- Safeguarding their own health and the health of their colleagues
- Understanding how their job duties may impact the environment
- Promptly reporting any unsafe, unhealthy, or environmentally hazardous conditions to their manager, Human Resources, the Chief Compliance Officer, or the Crossbridge Hospice Compliance Reporting Hotline

To ensure proper handling of potential liability and workers' compensation claims, any injury sustained by employees—or any individual—while performing job duties or while on Crossbridge Hospice-affiliated premises must be reported immediately to a manager, the Chief Human Resources Officer, or the CEO. Crossbridge

Hospice provides workers' compensation coverage in accordance with state law. Failure to report an injury may jeopardize eligibility for coverage and is considered a serious matter.

In the event of an emergency, dial 911 to activate emergency medical services, and then notify your manager or the Head of Human Resources.

### **Substance Abuse and Controlled Substances**

The inappropriate use of drugs or alcohol poses a serious risk to the safety of our workplace and the well-being of the patients we serve. All employees must understand and comply with the following expectations regarding substance use and the handling of medications and supplies:

- Employees may have access to prescription drugs, controlled substances, and medical supplies. These items must be handled only by authorized individuals and in accordance with applicable regulations and physician orders.
- Any concerns regarding the improper storage, security, or diversion of medications or supplies must be reported immediately to a manager, the Chief Compliance Officer, or the Crossbridge Hospice Compliance Reporting Hotline.
- The use, possession, or sale of illegal drugs—or being under the influence of intoxicants or substances causing impairment—while on duty or on Crossbridge Hospice or patient premises is strictly prohibited and may result in immediate termination.
- This includes the use of prescription drugs not prescribed to the employee.
- Off-duty use of substances that impair job performance or violate company policy may also result in disciplinary action.

Employees/Team Members taking prescription or over-the-counter medications that may impair judgment, or performance must consult with their supervisor. Exceptions to this policy may apply in cases involving legally prescribed medications or specific circumstances involving alcohol.

Crossbridge Hospice is committed to supporting employees who may be affected by the appropriate use of legal medications. We will make good faith efforts to reasonably accommodate qualified individuals whose prescribed medications impact their ability to perform essential job duties, provided such accommodation does not impose an undue hardship on the organization. Employees seeking assistance should speak with their immediate supervisor, Human Resources, or the CEO.

Any employee found in violation of Crossbridge Hospice policies regarding the use of legally prescribed medication, or the approved consumption of alcohol is subject to disciplinary action, up to and including termination.

### **Professional Licenses, Certifications, and Credentials**

Personnel who are required to maintain professional licenses, certifications, or other credentials are personally responsible for maintaining these items in a current and up-to-date status while complying with all applicable laws or professional requirements governing their field of expertise. Proof of current professional licenses, certifications, or credentials must be supplied upon request. No Personnel requiring a professional license, certification, or credential will be allowed to perform his or her job duties or contracted assignments until such time he/she meets this requirement. Crossbridge Hospice reserves the right to perform third-party verification of any information supplied as proof of professional license, certification, etc. Falsification of documents or misleading statements regarding these items will lead to disciplinary action up to and including termination.

## Organizational Assets

We are all responsible for helping ensure organizational assets such as time, materials, supplies, equipment, and information are maintained for business-related purposes. It is impermissible and a potential violation of law to transfer any Company assets to other organizations or people except in exchange for fair market value consideration and in the ordinary course of business. Donations of Company assets may only be provided to associations or organizations such as schools, charities, or community service groups and must be done in a manner that complies with Crossbridge Hospice's policy and procedure governing this practice.

Whether it is the telephone, voice mail, fax, scanner, internet, intranet and other networks, e-mail, text messaging, or any other technology provided by the company, use should be first and foremost for business-related matters during working hours.

## Trademark and Copyright Protection

The unauthorized distribution of copyrighted materials is prohibited and may violate civil or criminal law. Please contact your manager, the General Counsel, or the Chief Compliance Officer before scanning, copying, or distributing any such materials.

## Patient Rights

As part of our daily operations, we may collect sensitive information that is critical to our ability to effectively provide care to patients. We are committed to maintaining the confidentiality of this information as required under the Health Insurance Portability and Accountability Act (HIPAA). This information shall not be used unless it is necessary to serve the patient or is required by law. In accordance with the organization's privacy and security policies and procedures, which reflect HIPAA requirements, Personnel should only access the minimum information necessary in order to adequately perform their assigned job duties. As required by HIPAA, all patients will be provided with a written copy of our notice of privacy practices at registration that outlines our obligations and the patient's rights relating to their protected health information.

In addition to complying with other long-standing and familiar Federal civil rights laws, Crossbridge Hospice must fully comply with Section 1557 of the Affordable Care Act (ACA), which prohibits discrimination on the basis of race, color, national origin, sex, age, or disability as it relates to federally funded health programs or activities.

## **Outside Relationships**

### Conflicts of Interest

Crossbridge Hospice expects all Personnel to avoid real and potential conflicts of interest. A conflict of interest can arise when outside activities, personal financial interests, or other private interests interfere, or appear to interfere, with an individual's ability to make objective decisions in the performance of their job duties. Conflicts can also occur when a Personnel or a member of their family improperly receives benefits as a result of the Personnel's association with Crossbridge Hospice. Real and/or potential conflicts can include personal or family interest in an enterprise that either has a business relationship or competes with the organization.

In addition to the completion of an annual attestation, all Personnel should discuss any new real and/or potential conflicts with the Chief Compliance Officer as soon as they become aware of the existence of the actual or potential conflict.

Clinical decisions must be based solely on the best interests of the patient and must never be influenced by compensation, financial gain, or potential risk to any Crossbridge Hospice Personnel or their immediate family

members. A conflict of interest does not arise when a Personnel or their immediate family holds a minimal or nominal investment in publicly traded companies that may do business with or compete against the organization.

Crossbridge Hospice reserves the right to prohibit any Personnel's participation in any activity which may conflict with or undermine a Personnel's responsibilities to the Company. Any such prohibition will be carried out in accordance with applicable laws and policies.

### Referrals

We have established policies regarding the Company's financial relationships with physicians to help ensure compliance with all applicable federal and state laws, including the Anti-Kickback Statute and Physician Self-Referral Law (or the Stark Law). All agreements for the payment or receipt of money, goods, services, or anything of value with physicians must be in writing and should be reviewed and approved by appropriate personnel within the Legal and/or Compliance departments.

We do not pay for referrals, and we do not accept payment in exchange for referrals to other organizations. Patient referrals must be based solely upon the patient's medical needs. The value or volume of referrals or other business generated between parties should never be a factor when making or receiving referrals. Please refer to the Fraud, Waste & Abuse Policy for further information on identifying and reporting known or suspected violations of the Anti-Kickback Statute and/or Physician Self-Referral Law.

### Relationships with Vendors

Our relationships with vendors must be fair, transparent, and aligned with generally accepted business practices, always conducted at arm's length. Business decisions should be based on objective and measurable criteria, such as quality, technical capability, pricing, delivery timelines, service, reliability, and availability of supply.

Vendor selection must be driven by the organization's needs and the vendor's ability to meet those needs. Personal relationships or friendships must never influence vendor decisions. We are expected to uphold the highest ethical standards throughout the vendor engagement process, including selection, negotiation, contract awards, and ongoing vendor management.

### Business Courtesies

We recognize that business courtesy is a common business practice, and that in certain settings, exchanging gifts or engaging in hospitality events involving meals and/or entertainment can help build goodwill and strengthen business relationships. However, offering or accepting such courtesies can potentially influence, or appear to influence, objective decision-making. In some cases, these actions may also violate laws, including the Anti-Kickback Statute. It is essential that all business interactions remain transparent, ethical, and in full compliance with applicable regulations.

Personnel are strictly prohibited from offering or receiving anything of value that is intended to induce, influence, encourage or reward the provision or receipt of referrals. To ensure compliance with the Anti-Kickback Statute and other applicable laws, Crossbridge Hospice has adopted an Anti-Bribery, Anti-Corruption, Gifts & Interactions with Referral Sources Policy that addresses the giving and receiving of business courtesies. Personnel who wish to give or receive business courtesies must comply with this policy.

### Government Relations and Political Activities

The Company and its representatives must comply with all federal, state, and local laws governing participation in government relations and political activities.

## Compliance Program

### Structure

Crossbridge Hospice's compliance program represents our commitment to establishing and maintaining the highest standards of compliance. The Compliance Committee and Board of Directors are responsible for providing broad scope of guidance, oversight, and direction of organizational efforts to achieve our compliance objectives. The Chief Compliance Officer oversees the day-to-day function of the program as it relates to policies and procedures, training, and education, maintaining open lines of communication, monitoring and auditing, disciplinary guidelines, and necessary corrective action.

Individuals are strongly encouraged to report issues to their immediate supervisor prior to escalation. However, the Crossbridge Hospice Compliance Reporting Hotline is available to all Personnel wishing to report known or suspected conduct or activities by any person who violates the Code, any compliance and privacy policy, or laws. Individuals wishing to report known or suspected violations may do so anonymously by contacting the Crossbridge Hospice Compliance Reporting Hotline via one of the methods identified at the end of this Code. Individuals are encouraged to provide as much information as possible when making a report as it contributes to our ability to perform as thorough of an investigation as possible. There shall be no retribution or discipline for anyone who reports a concern in good faith. Personnel who deliberately make false accusations with the intent of harming or retaliating against another Personnel are subject to discipline, up to and including termination.

### Training, Education, and Communication

The Company will educate and train Personnel to help ensure they are familiar with the standards that apply to the performance of their job duties.

Training specific to the Code must be completed within 30 days of an individual's first day of performing duties for the organization and annually thereafter. Additional compliance training relating to specific job functions may be required as outlined within Company policies and should be communicated to such Personnel via management.

Accurate and complete documentation regarding the completion of all training must be performed at the time training is completed and retained based upon retention schedules set forth within Company policies.

### Auditing and Monitoring

Crossbridge Hospice is committed to ensuring compliance with its policies and procedures and, as such, performs a variety of monitoring and auditing activities, as further described in the Auditing and Monitoring Policy.

### Corrective and Disciplinary Actions

When the Company confirms a suspected violation through the internal review or investigation process, it must take corrective action. When appropriate, the Company will notify the relevant regulatory agencies and refund all confirmed overpayments in a timely manner. The Company will also take corrective action to help ensure such activities do not recur.

Individuals involved in violations of the Code are subject to Crossbridge Hospice's standard disciplinary procedures. Disciplinary action may include, but is not limited to, informal counseling, verbal and/or written warnings, written reprimand, suspension, termination, probation, demotion, and/or the withholding of incentive compensation.

### Acknowledgement Requirement

All Personnel must acknowledge via physical or electronic signature that they have reviewed this Code and agree to abide by this Code and all applicable laws and regulations. Additionally, Personnel must reaffirm their

knowledge via completion of annual training regarding the Code as required by Crossbridge Hospice's policies and procedures.

### **Crossbridge Hospice Compliance Reporting Hotline**

#### Non-Retribution and Non-Retaliation Policy

Crossbridge Hospice is committed to promptly and thoroughly investigating all reported concerns and strives to protect the confidentiality of individuals who raise issues or report potential misconduct. Personnel who report concerns in good faith will not be subject to retaliation, retribution, or disciplinary action for doing so. In other words, no individual will face adverse consequences intended as punishment, revenge, or payback for speaking up. Any Personnel who deliberately makes a false accusation or takes action with the purpose of harming or retaliating against another Personnel, however, is subject to disciplinary action, up to and including termination.

#### Protocol

Crossbridge Hospice is committed to doing business in an ethical and compliant manner and to correcting identified issues that may run contrary to this commitment. All Personnel are responsible for reporting any activity that appears to violate this Code or any applicable laws, rules, regulations, policies or procedures. Personnel are encouraged to report issues to their immediate supervisor. However, if a reporting individual doubts the issue has been given sufficient or appropriate attention, the individual should report the matter to higher levels of management, the Chief Compliance Officer or the Crossbridge Hospice Compliance Reporting Hotline.

Personnel should always feel free to contact the Crossbridge Hospice Compliance Reporting Hotline in one of the following ways:

Telephone: 1-833-718-5683

E-mail: [compliance@crossbridge-hospice.com](mailto:compliance@crossbridge-hospice.com)

Online: [crossbridgehospice.ethicspoint.com](http://crossbridgehospice.ethicspoint.com)

Mail: Crossbridge Hospice

103 Forrest Crossing Boulevard, Suite 101  
Franklin, TN 67064

QR Code:



### **EMPLOYEE ACKNOWLEDGMENT: CODE OF CONDUCT**

I acknowledge that I have received, read, and understand the Crossbridge Hospice's Code of Conduct. I understand that failure to comply with the Code could result in disciplinary action up to and including termination of employment for good cause.

Signature: \_\_\_\_\_

Print Name: \_\_\_\_\_

Date: \_\_\_\_\_

Please sign and return to the Chief Compliance Officer or the approved designee of the Chief Compliance Officer.