

Code of Ethics and Business Conduct

Dear Colleagues:

T-System and RevCycle+ (“Company”) continues to have a tremendous impact on the episodic care industry through documentation solutions and medical coding services and software. For more than 20 years, the Company has been committed to doing great things the right way. This has ensured that our reputation, one of our most valuable assets, has remained strong.

Our founders built the Company on the foundation that maintaining our client’s trust and respect was a critical part of being successful. Every single one of us is responsible for ensuring that our Company continues to operate without ever compromising our integrity.

My personal litmus test when making decisions is to sleep well each night, at peace with my personal integrity as well as the Company’s integrity. I believe that to continue to foster a culture of high integrity, each of us must:

- Treat everyone, including each other, with respect
- Be honest and transparent in all our actions and decisions
- Take personal responsibility for our behavior and choices
- Say something when we have concerns with actions or decisions that do not appear to be in alignment with our values
- Be unwilling to compromise our reputation both as individuals and as an organization

Your commitment to the Code of Ethics and Business Conduct helps the Company ensure that both our performance and reputation continue to surpass the market’s expectations. Your commitment to doing the right thing supports the type of environment that we are happy working in and helps us to always be our best. I fully support the expectations laid out in the Code and I expect that each of you will join me in committing each day to conducting business in the right way.

No one is expected to have all the right answers all the time. If you are ever unclear of what the right thing is, the Code is certainly a good reference point. You are also always welcome to talk to me, Charlotte, our Vice President of Compliance, or any other member of management for guidance.

When each of us makes a personal commitment to the Code, we are positively contributing to the future of our Company. And, most importantly, we will all be able to rest easy feeling proud of our organization.



Best regards,

Bob Wilhelm
Chief Executive Officer

Integrity

The history of the Company is rooted in innovation and a legacy of integrity. Every day, the decisions we make and the work that we do contributes to our reputation. We take pride in being a high-performance workforce committed to performing every task, big or small, to best of our ability. We ensure that all decisions made and actions taken are made with the highest integrity. We accept that customers and governmental entities watch our performance closely. We understand that compromising our integrity is not reflective of our CHART values and negatively impacts our Company and its reputation. We accept that it is each workforce member's personal responsibility to come forward when we have concerns and that silence is never acceptable.

CHART Values

The Company believes strongly in its core values (CHART). The Company carries these values in its daily life and conducts its business in alignment with the values.

Client Focus: Involve the customer in everything we do... proactively

Honesty: Transparent... internally as well as with our customers

Accountability: To each other... we do what we say we are going to do

Respect: Treat people warmly... treat issues coldly

Teamwork: We only win when the team wins... we work as teams and communicate clearly. The Code of Ethics and Business Conduct supports these values and provides further guidance on how our decisions and behaviors align with the CHART values.

T-System and RevCycle+ Code of Ethics and Business Conduct

The Company's Code of Ethics and Business Conduct ("the Code") applies to all members of the T-System and RevCycle+ workforce including temporary employees, contractors, vendors and anyone authorized to act on the Company's behalf. The Code is a statement of the Company's commitment to high ethical standards and helps define the expectations for all of us to do the right thing in performing our duties. We embrace that adherence to the Code drives a culture rich in trust. While it is impossible for a document to cover every issue or concern that may arise in the course of business at our Company, the Code addresses the most common issues related to our business. By following this Code, the policies and procedures of the Company, adhering to laws and regulations that affect our business and using good judgment, we can demonstrate our commitment to our core values and doing the right thing every day in everything that we do. Please refer to the Company's policies regarding Rules of Conduct for further details.

Ethics and Compliance Program

The Code is a crucial part of the Company's Ethics and Compliance Program ("Program.")

The Program:

- Develops and manages a Compliance Program that is outlined in the Federal Sentencing Guidelines and the Officer of the Inspector General Compliance Program Guidance for Third Party Billing Companies
- Provides guidance and direction on Ethics and Compliance issues
- Prevents, detects and responds to business conduct and behaviors that are inconsistent with the CHART values, Federal and state laws and the Code
- Promotes a culture where employees are empowered to and responsible for reporting violations of law and the Code
- Creates and maintains awareness of Company values and government expectations through education, policies and procedures
- Ensures that auditing and monitoring is conducted in various risk areas

The Program is led by the Vice President, Compliance and is supported by the Compliance Committee, Senior Leadership, Human Resources, Legal, Information Technology Security and Operations. It's important to understand that each and every employee is an important component of an effective Program.

Confidentiality and Non-Retaliation

Reporting concerns that you may have reflects your commitment to the Code. If you prefer not to be identified when reporting a concern, we will do our best to protect your privacy. We do not tolerate retaliation. Because every employee of the Company is empowered and expected to voice concerns in good faith, no employee will be subjected to retaliation or negative consequences for reporting concerns. We also prohibit retaliation against any employee or individual who assists or participates in an investigation related to a reported concern. In the event retaliation is reported and substantiated, anyone who retaliates against an employee that reports a concern in good faith, will be subject to disciplinary action up to and including termination of employment. If you believe that you have been retaliated against for reporting a concern, you should report the suspected retaliation using one of the many means the Company has to report such issues.

"9 times out of 10, compliance issues are not the result of anyone deliberately doing something wrong. They are usually the result of someone not knowing any better or they didn't take the time to think about the potential problems associated with an action or decision."—Charlotte Nafziger, Vice President, Compliance

Compliance with the Code

As a member of the T-System and RevCycle+ workforce, you are expected to act in a manner consistent with the Code. It is the intent of the Company to ensure compliance with the Code and will not accept any behavior that does not support the Code. All concerns related to the Code will be investigated and all members of the workforce are expected to cooperate with any investigation. If any member of the workforce is found to have violated the Code, they are subject to disciplinary action, up to and including termination of employment. Criminal misconduct may be referred to the appropriate legal authorities for prosecution as applicable. Disciplinary actions will be determined by Company Management.

We do the right thing by:

- Speaking up when something doesn't seem right
- Treating each other with dignity and respect
- Taking accountability for our actions, decisions and choices
- Fostering an environment free from harassment and discrimination
- Valuing safety and maintaining a productive alcohol and drug free workplace
- Avoiding and resolving conflicts of interest that interfere with the interests of the Company
- Ensuring our leaders understand and accept the critical role they play in the Ethics and Compliance of the company
- Complying with all federal and state laws and regulations as well as internal policies and procedures
- Treating Protected Health Information as if it were our own information
- Meeting our obligations to our clients
- Protecting our operations from fraud, waste and abuse
- Ensuring that our financial reporting accurately represents our business transactions
- Cooperating with all internal and external audits and avoiding the manipulation or fraudulent influence of anyone engaged in an audit
- Being good stewards of the Company resources such as money, time, equipment and technology
- Retaining Company documents for the appropriate time periods and ensuring proper and appropriate disposal of documents
- Safeguarding Company confidential and proprietary information by not sharing information with anyone that does not have a need to know including co-workers

In Conclusion

Ethics and Compliance are part of every employee's job. We are committed to living the Values and demonstrating behaviors that are in alignment with the Code. If you are ever in doubt about what the right thing to do is or have a concern that the right thing is not being done, each member of Company management, or Compliance, Human Resources and Legal team members are all available to listen to your concerns. By working together, we can ensure that the future of the Company is as strong as its past.

To report an issue or concern:

- Escalate the concern to your immediate Supervisor, or any other member of the Company's management team.
- Contact the Vice President, Compliance
- Notify your Human Resource Representative
- Call the Employee Help Line at: **(844) 240-0005**

“When each of us makes a personal commitment to the Code, we are positively contributing to the future of our Company. And, most importantly, we will all be able to rest easy feeling proud of our organization.”

*Bob Wilhelm
Chief Executive Officer*

ACKNOWLEDGEMENT

By demonstration of my signature below, I have read the Code of Ethics and Business Conduct. I have directed any questions regarding the Code to a member of Company management, or a Compliance, Human Resources or Legal team member. By signing this form, I am demonstrating that I will:

- Align my behaviors to support the Code
- Promptly report any concerns I have related to the Code or compliance with Company policies and rules, laws and regulations
- Cooperate during any investigation related to the Code or other Company matter.

I understand that the Company does not tolerate retaliation and that retaliating against someone for reporting a concern is grounds for disciplinary action, up to and including termination of employment.

I understand that individuals that violate the Code are subject to disciplinary action, up to and including termination of employment.

Employee Signature _____

Employee Name (printed) _____

Department _____

Date _____