





About This Handbook

You are employed by one of BrightSpring’s operating subsidiaries or partners. Throughout this handbook, the terms “BrightSpring” or “The Company” are used to refer to the entity by which you are employed.

This Employee Handbook replaces and supersedes all previous handbooks issued by the Company. While it is broad, this Employee Handbook will not address every situation. This Handbook will familiarize you with the benefits and responsibilities of being an employee of the Company. Please understand that this Handbook can only highlight and summarize our Company’s policies and practices.

For questions or for clarity, please contact your respective Human Resources representative or immediate supervisor.

As expressed in detail below, the Company is an at-will employer. This Employee Handbook is not an employment contract and is not intended to give express or implied right of continued employment. Due to changes in employment legislation and business conditions, the policies and procedures are subject to change. As a result, the Company reserves the right to modify, revise, rescind, or supplement these policies from time to time. Any changes in our policies take precedence over the information in this Handbook.

We operate in many states, many of which have differing employment laws and statutes. Unless specified otherwise, this Handbook, and the standards and policies set forth in it, applies to all employees at all locations. In some areas, state and local laws and ordinances are in effect that govern the workplace as to issues that may or may not be mentioned in this Handbook. The Company will fully comply with all applicable laws and ordinances and has adopted an Addendum for each site where Company employees are located to explain how these state and local laws modify a provision of this Handbook. Each Addendum applies only to Company employees located in the state referenced in the Addendum. “Handbook” as referenced in this Handbook includes policies in the applicable Addendum.

While we believe this Handbook complies with all federal, state, and local laws, to the extent there is a conflict between the terms of this Handbook and requirements imposed by any applicable law or ordinance, the Company will fully comply with the law or ordinance.

The Company reserves the right to make changes to this Employee Handbook with or without notice.



FROM OUR CEO

JON B. ROUSSEAU

As President and CEO of BrightSpring Health Services, I want to let you know that we're so happy you are a member of our team.

At BrightSpring, we have a unique mission. Our team of dedicated professionals provides home and community-based provider and pharmacy services to a variety of complex populations across the country. Our team is passionate about helping people with complex care needs live their best life possible, and we're making a difference in people's lives and communities every day.

Our diverse and complementary lines of service give us the ability to deliver quality support and care where and when people need it most. This, along with our culture of leadership and compassionate care, sets our Company apart in the health and human services industry. We're able to provide care and clinical services in ways that other providers can't.

As you continue to learn more about our organization and your role, I think you'll quickly see just how important you are to our mission and to the difference our organization makes in people's lives every day.

Again, I'm excited you are a part of our team. And whether you're in a customer-, patient- or client-facing position or an administrative support role, I know that our Company couldn't be successful without the hard work and dedication of people like you. You are making a difference in helping those you serve to live their best lives.

Work Smart. Do Good.



Jon B. Rousseau

President and Chief Executive Officer
BrightSpring Health Services

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SECTION 1

INTRODUCTION

1:1 OUR COMPANY, OUR HISTORY

BrightSpring Health Services is a leading provider of comprehensive home and community-based health services to complex populations in need of specialized care. Founded in 1974, the Company has developed a strong reputation for providing quality and cost-effective services designed to meet the needs of everyone we support.

1:2 OUR MISSION

Making a difference in people's lives and communities.

1:3 OUR VISION

To be the leading provider of comprehensive home and community-based health services to complex populations.

1:4 STANDARDS OF SERVICE

Our service standards are focused on our patients/clients, including the individuals we support, their families, other visitors and our teammates. To support this philosophy and achieve the single high standard of care to which the Company is dedicated, each employee shall meet and adhere to our "Standards of Excellence."

- **Responsiveness.** Taking the time to listen and understand our patients'/clients' needs so that we may respond in a positive and efficient manner.
 - **Professionalism.** Meeting our patients'/clients' needs with skill and care.
 - **Reliability.** Developing positive relationships by being trustworthy and dependable.
 - **Accuracy.** Checking and rechecking to ensure needs are met appropriately and completely.
 - **Flexibility.** Providing support to our patients/clients on a schedule that satisfies the wide variety of their needs.
-

1:5 LEGACY STANDARDS OF SERVICE

Our Company values are supported by the "Standards of Excellence." Each employee is a personal and valued representative of the Company and its care facilities and branches and is expected to be sensitive and responsive to the needs of the Company's patients/clients, partners, contractors, visitors, suppliers, and other employees.

1:6 LEGACY AND THE WAY WE LEAD

As an established health care leader, our culture is LEGACY focused. Each employee is called upon to study and practice our LEGACY Core Behaviors. This way, we drive LEGACY behaviors and culture throughout the organization.

L **Leadership**
be a servant leader

- Establish the purpose of every activity, so you can coach others effectively.
- Display high integrity and accountability – do what you say you are going to do.
- Balance your pride of accomplishment with real humility.

E **Environment**
people-focused environment

- Collaborate on a trusted team. Police your environment, so trust can flourish.
- Always be transparent and reward good performance.
- Focus on people – to attract, develop, and retain the best people.

G **Get Going!**
know your business

- Think, plan, and take action to set and hit goals.
- Work smart and efficiently, moving forward with purpose and urgency.
- Have rituals – be consistent with regular planning and tracking.

A **Attitude**
see the possibilities

- Take a positive, can-do approach, as that is contagious.
- Always take control and take ownership of results.
- Expect excellence from yourself first and secondly from everyone around you.

C **Communication**
everyone in the know

- Practice clear communication and coordinate effectively – so the team knows what is going on.
- Stay focused and stay organized to make meetings productive.

Y **You**
be an example

- Be authentic. Be yourself. Your character shows in everything you do.
- Always be learning, adapting, and looking for better ways of doing things.
- Do your part. Build the team. And have fun.

SECTION 2

NATURE OF EMPLOYMENT

2:1 HOW WE DO BUSINESS

We believe great companies are born from the desire to do what is right. We will be a driving force in our industry by treating our employees with dignity and respect. We will empower you to provide quality products and service excellence and to create value for our patients, providers, patients/clients, and our shareholders.

In turn, you, as an employee, have a responsibility to maintain a positive and professional work environment and to constructively bring forward ideas, suggestions, and recommendations that can better our ability to serve our patients/clients and shareholders more efficiently and effectively. It is this sense of mutual cooperation and respect that makes this Company a great place to work!

The Company maintains all exclusive rights of management and is committed to maintaining a positive relationship with our employees that promotes dignity, personal achievement, and involvement. We are dedicated to treating employees fairly, providing good working conditions and, above all, delivering the respect each employee deserves.

We seek open and direct communication, which allows employee concerns to be resolved in an atmosphere of mutual trust. We strive to meet and better these commitments to our employees.

To say it simply, our management philosophy is based on mutual respect and recognition of our employees' importance to the Company. Respecting employees' rights and contributions to the Company is fundamental to the well-being of the Company, its employees, and its business. It is the employees' individual hard work and respect for each other that has made the Company's success and stability possible.

The Company thanks all its employees for their continuing effort and belief in keeping open the lines of communication.



2:2 AT-WILL EMPLOYMENT

We are happy you are a member of the BrightSpring team and sincerely hope that your employment here will be a positive and rewarding experience. Your employment here is at will and based on the mutual consent of you and the Company. Unless otherwise provided in writing, employment with the Company is at will, so that either party may terminate the relationship at any time for any reason, with or without cause or notice. You may resign at any time, with or without reason. Similarly, we are free to separate your employment at any time, for any reason - with or without cause and with or without notice.

This at-will policy may not be modified regardless of any statement contained in this Handbook or any other Company document, whether singly or combined, that may appear to create an express or implied contract of employment for a definite period of time.

For example, statements of specific grounds for termination set forth in this Handbook or in any other Company document are examples only, not all-inclusive lists, and are not intended to restrict the Company's right to terminate employment at will.

Nothing contained herein or in any other Handbook or policy manual creates an employment contract. Any modification of the at-will employment relationship, oral or written, can only be accomplished by a written document signed by the Company's president and CEO, Chairman of the Board, Board of Directors, Head of Human Resources, or an authorized member of the legal team.

SECTION 3

HIRING PRACTICES

3:1 OUR COMMITMENT TO EQUAL OPPORTUNITY AND DIVERSITY

Fairness, equality, and respect for all guide our actions. The Company is committed to providing equal employment opportunities for all employees and job applicants. We are proud to offer a highly diverse environment in terms of the individuals and families we serve in our communities and in our workforce. Our embrace of diversity is reflected in many ways. Our efforts to create diversity support our understanding that the workplace is more collaborative through our differences than through our similarities.

The Company will recruit, hire, train, and promote persons in all job titles without regard to race, color, gender, age, pregnancy, sexual orientation, gender identity, ancestry, religion, national origin, veteran status, physical or mental disability (except where the disability prevents the individual from being able to perform the essential functions of the job and cannot be reasonably accommodated in full compliance with the law), or any other characteristics protected by local, state, or federal law. The Company also will ensure that all personnel decisions and actions, including but not limited to compensation, benefits, transfers, promotions, layoffs, returns from layoff, discipline, terminations, Company-sponsored training, education, and social and recreation programs, will be administered without regard to race, color, gender, age, pregnancy, sexual orientation, gender identity, ancestry, religion, national origin, veteran status, disability, or other characteristics protected by law.

The Company's policy of universal access applies to all lines of business and business entities operating under the auspices of the Company and/or related interactions between employees, applicants, supervisors and managers, individuals we serve, vendors, visitors, etc. Further, this policy, as with all Company policies, practices, and procedures, is intended to provide effective and meaningful opportunities for persons with disabilities to participate in or benefit from aid, benefits, services, and training. Practicing a welcoming attitude toward diversity means being inclusive of everyone and creates a culture for making differences work. Embracing diversity and respecting others allows us to learn from others who are not the same and appreciate the advantage of diverse perspectives. We encourage employees to be aware of their attitudes toward people who are different from themselves and to value differences that enrich the institution.



3:2 DRIVER'S LICENSE AND DRIVING RECORD

If you are an employee whose work requires frequent operation of a motor vehicle to perform Company business, you must present and maintain a valid driver's license and a driving record acceptable to our insurer and without restrictions imposed as a result of an accident, traffic citation, or moving violation. Any changes that may impact your ability to operate a motor vehicle for Company business, including pending charges, must be reported to your supervisor/manager immediately.

Employees who drive on behalf of the Company as part of their employment are required to have auto insurance in good standing at all times and provide coverage information to their supervisor/manager and/or Human Resources representative when asked. Employees are also required to alert their supervisor/manager and Human Resources representative of any changes in their insurance coverage, carrier, etc., that may impact their ability to drive as part of their job responsibilities.

3:3 EXCLUSION FROM FEDERAL PROGRAMS

Individuals who are excluded, debarred, suspended or otherwise ineligible to participate in federal health care programs like Medicare and Medicaid or federal procurement or non-procurement programs are ineligible to be employed by the Company.

Ineligibility for employment also extends to individuals who have been convicted of a criminal offense under a federal health care program but have not yet been excluded, debarred, suspended or otherwise declared ineligible. In the event an existing employee falls into one of these categories, it may impact their ability to remain employed with the Company and cause the employee to be subject to corrective action up to and including termination.

3:4 LICENSURE OR CERTIFICATION

The Company is committed to providing the best possible service in all lines of business. The Company is also committed to making smart hiring decisions to employ top-notch talent. It is the policy of the Company to obtain credentialing and background verification for applicants and contractors seeking employment with us.

Many positions require certifications and proof of competency. In almost all cases, offers of employment are contingent upon obtaining a completed application, a satisfactory background investigation, and a credentialing verification conducted by Human Resources or Talent Acquisition.

Knowing the expectations of the job is crucial to success. Upon hire, each employee should be provided with a copy of the competency-based job description which identifies the essential functions, primary duties, and responsibilities of the position. The job description provides the basis for performance appraisals. Questions regarding either job descriptions or performance expectations should be directed to your respective Human Resources representative or supervisor/manager.

As a condition of employment, it is your responsibility to notify your supervisor/manager within 24 hours if there has been any change to the status of your licensure/certification, including, but not limited to, an expiration or lapse, or if any action has been taken against your licensure/certification.

3:5 INTERNAL APPLICATION PROCEDURES

The Company is dedicated to the development and advancement of its employees. Consideration for promotion shall be given to employees who possess the required job-related qualifications, skills, and record of performance.

The Company provides equal employment opportunities to all employees and applicants for employment and prohibits discrimination and harassment of any type without regard to race, color, religion, age, sex, national origin, disability status, genetics, protected veteran status, sexual orientation, gender identity or expression, or any other characteristic protected by federal, state or local laws.



Employees who are interested in applying for an open position must notify their supervisor/manager and apply online via Talent Link, our Company applicant tracking system.

Prior to applying for a new role in the Company, an employee must have held their current position for at least six (6) months, received a rating no lower than “meets expectations” on their most recent performance appraisal and have no corrective actions or performance improvement plans issued during the preceding period. The employee must also meet basic qualifications, which include, but are not limited to, experience, past job performance, educational background, and ability to perform the essential functions of the job with or without reasonable accommodation.

3:6 EMPLOYMENT OF RELATIVES

We appreciate that our employees see the Company as a great place to work. However, the hiring of relatives of our employees has the potential to negatively affect the morale of other employees and to create actual or perceived conflicts of interest for the parties involved. Therefore, the Company discourages the hiring of relatives of employees and prohibits placing members of an immediate family into positions of close organizational proximity. This includes but is not limited to the following:

- A related employee may not report directly or indirectly to a member of his or her immediate family.
- Related employees may not hold positions that create a conflict of interest or the appearance of a conflict of interest.
- Related employees may not hold positions that influence the outcome of actions or decisions that impact a related employee, including influencing the relative’s work responsibilities, salary, or career progress.
- Employees who are related by blood or marriage are permitted to work in the same physical location, provided no direct or indirect reporting or supervisory/management relationship exists or the appearance of a conflict of interest.
- Employees who marry while employed are treated in accordance with these guidelines, and one of the employees may be required to transfer at the earliest practicable time if such marriage or relationship is in conflict with any of these guidelines.

Under this policy, the terms “immediate family” and “related employees” encompass, but are not limited to, the following relationships: domestic partners, parents/children, grandparents/grandchildren, spouses, siblings, and corresponding in-law or stepfamily members or other family members residing in the same household.

3:7 FRATERNIZATION IN THE WORKPLACE

While the Company understands that workplace relationships will occur, in part based on commonalities that teammates share, proximity to work, the actual work, and the amount of time spent at work, workplace relationships should not impact the ability of either employee to perform regular work duties in a business environment.

Employees should be aware that any relationship that interferes with the Company culture of teamwork, the harmonious work environment or the productivity of employees will be addressed with discipline up to and including employment termination. Further, adverse workplace behavior – or behavior that affects the workplace that arises because of personal relationships – will not be tolerated.

Anyone employed in a managerial or supervisory role must be aware that personal relationships with employees who report to them may be perceived as favoritism, misuse of authority, or potentially sexual harassment. Additionally, for the same reason, no employee may date/have a romantic relationship with another employee who is separated by more than one level in the chain of command, regardless of the reporting relationship or department. This includes an employee who reports to their boss’ counterpart in another department. Further, any fraternization with any employee who reports to the manager or whose terms and conditions of employment, such as pay raises, promotions and advancement, are potentially affected by the manager is prohibited.

The fraternization that is prohibited by this policy includes dating, romantic involvement and sexual relations, which may result in disciplinary action up to and including relocation, demotion and termination.



3:8 REPORTING ARRESTS AND OTHER SANCTIONS

If an employee is arrested (for any reason), the employee must report the arrest to their supervisor no later than 72 hours after arrest. Employees should also immediately report to the supervisor upon notice of debarment from any government agency program. This includes probations, all sanctions, revocations and reprimands. Failure to so report could lead to disciplinary action up to and including termination.

SECTION 4

INFORMATION FOR NEW EMPLOYEES

4:1 INTRODUCTORY PERIOD FOR NEW HIRES

The first 90 days with the Company, whether you are new to the Company or have accepted a new position within the Company, is considered an Introductory Period. During this Introductory Period, your immediate supervisor/manager will work closely with you during this time to help you understand the responsibilities and requirements of your position. In addition, your supervisor/manager will evaluate your skills, work ethic and attendance and will determine whether you are suited to the job and capable of satisfactorily performing the work assigned.

Your performance during this period may be documented and communicated through a periodic review process. Ideally, a written evaluation of the employee's job performance should be completed before the end of the Introductory Period.

Performance reviews play an integral role in guiding and managing career development. Employees are strongly encouraged to be active participants in reviewing their performance and are encouraged to seek out assistance and communicate regularly with their supervisors and managers.

Where appropriate, poor performance and a failure to meet expectations and/or gaps in professional development should be brought to the employee's attention. Performance shortcomings should be documented and addressed via either a plan of correction or a Performance Improvement Plan.

While employees will be allowed to continue in their new positions if they are given satisfactory evaluations at the end of their 90-day Introductory Period, successful completion of your Introductory Period does not guarantee you a job for any period of time or in any way change the at-will employment relationship. Unsuccessful performance during any portion of the Introductory Period will likely result in supportive coaching for performance improvement but may result in separation of employment.

4:2 INTRODUCTORY PERIOD FOR NEWLY TRANSFERRED OR PROMOTED EMPLOYEES

The above also applies to transferred or newly promoted employees. However, transferred or newly promoted employees who do not perform satisfactorily in their new jobs may, at the discretion of management, be returned to their original jobs if a vacancy exists. If no vacancy exists, the employee may be released from employment for poor performance.

SECTION 5

CLASSIFICATION OF EMPLOYEES

5:1 WHAT CLASSIFICATION ARE YOU?

An employee's ability to be eligible for overtime compensation depends on their employment classification. The Company fully complies with the Fair Labor Standards Act (FLSA) in determining employment classifications. Employees are generally classified as non-exempt or exempt in accordance with the FLSA.

Non-exempt employees are paid by the hour or visit and are entitled to overtime pay. Whereas exempt employees, when working in an exempt status, earn a salary and are not eligible for overtime pay. It should be noted that neither classification guarantees employment as either the employee or the Company may terminate the at-will employment relationship at any time, with or without cause or notice.

Depending on the number of hours per week you are regularly scheduled to work, you are either a full-time, part-time or PRN employee as defined below. Understanding the classification is important because, in almost all cases, classification determines eligibility for benefits.

You will be informed of your initial employment classification and your status as an exempt or non-exempt employee prior to beginning work. If your position changes during your employment as a result of a promotion, transfer, or otherwise, you will be informed of any change in your exemption status. If you are uncertain which category your position falls in, contact your Human Resources representative or speak to your supervisor/manager.

5:2 NON-EXEMPT EMPLOYEES

Non-exempt employees are entitled to overtime pay in accordance with state and federal law. Also, they must record and report their time accurately, which includes recording the time they arrive and leave work each workday. Non-exempt employees are prohibited from working "off the clock" and should record all working time.

Many operations use a time reporting system, such as Kronos, and some operations also require employees to record the time they leave for and return from lunch each workday. Please contact your Human Resources representative for the time recording details used at your operation.

- Recording hours not actually worked may be considered falsification of documentation, which may result in corrective action up to and including termination.
- An employee should not allow anyone else to record their time. Only the employee can enter their time. No one else is permitted to clock an employee in or out.
- All overtime and/or leave requests must be approved in advance by your supervisor/manager, unless a bona fide emergency exists.

Employees are assigned an employment status based on their work schedules:

- Regular full-time – regularly scheduled to work 30 or more hours per week.
- Regular part-time – regularly scheduled to work fewer than 30 hours per week.



5:3 EXEMPT EMPLOYEES

Exempt employees include all regular employees who are classified by the Company as exempt from overtime provisions of the FLSA and applicable state laws. Exempt employees are paid a salary for hours worked each week. Exempt employees are those who do not earn overtime.

Deductions from an exempt employee's salary may only occur when expressly authorized under the FLSA. This may occur, for example, when an employee has absences in excess of Planned Time Off (PTO), is suspended for a safety or other workplace investigation, or when unpaid leave is taken under a federal act, such as the Family and Medical Leave Act (FMLA).

5:4 SEASONAL/TEMPORARY/PRN

Seasonal, temporary or PRN employees are hired for a project, under a contract, for a limited duration or for unanticipated workloads. Other than the statutory benefits, seasonal, temporary and PRN employees are ineligible to participate in Company benefits programs unless expressly allowed by contract, collective bargaining agreement, and/or other law.

A PRN employee is defined as one whose services are required on an as-needed or per-diem basis. The employee may have periods of dormancy and may experience inconsistency in working hours. Some examples of PRN employees include those who provide on-call coverage for open shifts, pass medications, transport patients/clients, or assist with client events and activities. PRN employees are eligible for a Company-sponsored 401(k) plan.

SECTION 6

HOURS OF WORK

6:1 YOUR WORK SCHEDULE

Your work schedule, including possible mandatory overtime if you are a non-exempt employee, and the scheduling of your meal and rest periods will be determined and assigned by your supervisor/manager. Occasionally, operational requirements may necessitate schedule changes. Should you have any questions concerning your work schedule, please ask your supervisor/manager.

6:2 MEAL PERIODS

Employees in non-exempt positions who are scheduled to work more than a six (6) hour shift (or in accordance with state law if less) are permitted a 30-minute unpaid meal break during that shift. The Company may designate longer meal breaks at certain locations. It is important to clock in and out and return to work on time at the end of your meal period. Scheduling of the meal period varies among departments depending upon each department's needs.

On occasion, management may interrupt your meal period when it is necessary for you to return to work. Interrupted meals are considered time worked, and the full one-half (1/2) hour meal period will be paid. If possible, when your meal period is interrupted for a business purpose, you will be provided a complete one-half (1/2) hour uninterrupted meal period, which will not be paid.

If you are unable to take a meal period, you must notify and obtain prior approval from your supervisor/manager. While you will be paid if you work through your meal period, if you fail to notify and receive prior approval for such work, you may be subject to corrective action, up to and including termination.

6:3 VARYING WORK SCHEDULES

To provide our patients/clients with the best possible care, the Company must maintain flexible hours of operation. Management reserves the right to change and assign work schedules as needed. Work schedules differ within our Company and are subject to change. Your supervisor/manager will inform you of your schedule. If it becomes necessary to change your schedule, your supervisor/manager will give you as much notice as possible.

Also, many positions require an employee to work more hours than the normal schedule and even on days not typically scheduled. For most client-facing positions, the ability to work overtime may be considered an essential function of the position. Your ability to be flexible and provide coverage is both greatly appreciated and crucial in helping those we serve.

6:4 EXTRA TIME AND OVERTIME

On occasion, an employee in a non-exempt position may be asked and/or required based on business needs to work beyond their regular scheduled hours. While every effort will be made to provide advance notice of the need to work extra hours, it will not always be possible to notify employees in advance.

Unless required by law, employees in exempt positions will not be paid extra for working beyond their regular scheduled hours. Under the FLSA, overtime applies after a non-exempt employee has worked more than 40 hours in a workweek. State laws vary regarding overtime, and the Company will always comply with state law. Please see your local Human Resources representative for any overtime questions.

As a general policy and unless a bona fide emergency exists, all overtime must be pre-approved by a supervisor/manager. For purposes of overtime compensation, employees in non-exempt/hourly positions will be paid overtime of at least one and one-half times their regular rate of pay for hours worked over 40 during a workweek, except where state law or a collective bargaining agreement dictates otherwise.

The FLSA does not require overtime pay for work on Saturdays, Sundays, holidays, or regular days of rest unless overtime hours are worked on such days.

Employees in non-exempt positions are entitled to payment for overtime, according to the rules set forth below:

- Employees must obtain prior approval from their supervisor/manager to work overtime. Working overtime without permission is not permitted. Employees who do work overtime without preapproval will be compensated for the time worked but may be subject to supportive coaching and/or corrective action for not receiving pre-approval as per policy.
- Employees in non-exempt positions will be paid overtime in accordance with federal and state regulations.
- Holiday, planned time off (PTO), vacation/sick are not considered in the calculation of overtime hours except at operations where state law or collective bargaining agreement dictates otherwise.

Employees in exempt positions do not receive overtime pay and may be expected to work more than the normal workweek without additional compensation. No employee, exempt or non-exempt, will be given compensatory time instead of overtime hours worked.

Note: In most cases and where authorized by law, if an employee volunteers to attend special outings, picnics or trips, which are not scheduled as part of their job, they will not be paid regular or overtime pay for the event. Similarly, an employee at such an event should not be expected to perform job-related duties while in attendance.



6:5 REMOTE WORK

BrightSpring supports remote work as a flexible option for eligible employees, based on job responsibilities, business needs, and manager approval. Employees working remotely are expected to maintain the same standards of performance, availability, and professionalism as they would in the office. This includes being accessible during regular business hours, attending virtual meetings, and adhering to all company policies, including those related to data security and confidentiality. Employees must also ensure they have a reliable internet connection and a dedicated, distraction-free workspace that supports productivity. Remote work arrangements must be documented and reviewed periodically to ensure alignment with team goals and operational effectiveness.

SECTION 7

PAY POLICIES

7:1 BASIS FOR DETERMINING PAY

In general, rate of pay is influenced by several factors:

- The nature and scope of your position based upon your duties and responsibilities
- The market value for comparable positions
- The Company's compensation structure
- Individual performance, as reflected in performance appraisal ratings
- Overall Company performance

7:2 PAY CYCLE AND PAYCHECK DISTRIBUTIONS

In most cases, employees are paid by check, pay card, Daily Pay or direct deposit. Most employees are paid twice monthly or biweekly, depending on the line of business. Paystubs will be available via the payroll system on designated pay dates. Paychecks are not available in advance of the designated pay dates.

Please check with your Human Resources representative concerning your location's pay schedule. If an error occurs on your paycheck or if you have a question, please see your supervisor/manager or Human Resources representative.

The Company will investigate the employee's concern and determine whether an inadvertent improper deduction or calculation has been made. If the deduction or calculation was, in fact, improper, the Company will reimburse the employee as promptly as possible. The Company complies with all applicable laws concerning the payment of wages and will correct any inadvertent improper deduction or calculation, should it occur, and monitor the situation to ensure no further issues arise.

7:3 DIRECT PAYROLL DEPOSIT

Direct payroll deposit is the automatic deposit of your pay into financial institution accounts of your choice. To participate in the direct payroll deposit program, you must complete a direct deposit authorization form. This information can also be updated by the employee using the self-service option in our payroll/HRIS system. Direct deposit may take up to two pay periods to implement.



7:4 TIMEKEEPING RECORDS

By law, we are required to keep accurate records of the time worked by non-exempt employees. This is done by timesheets, time clocks, or other written documentation. Timekeeping records/reports are the property of the Company.

Your timekeeping record is used to document the following:

- Actual start time, lunch break and stop time
- Regular hours
- Daily overtime if overtime is paid over eight (8) hours in a day (as per applicable state law or collective bargaining agreement)
- Weekly overtime if overtime is paid over 40 hours in a week
- Total overtime for the pay period

You are responsible for accurately recording your time. No one may record hours worked on another's timecard or timesheet. Tampering with or falsifying your own or another's timekeeping report is cause for corrective action, up to and including termination of all involved. In the event of an error in recording your time, please report the matter to your supervisor/manager immediately.

All non-exempt employees will be paid for all hours worked. They must record their time immediately before starting work and immediately upon completing work and review the report at the end of the pay period. The supervisor/manager must review and approve an employee's recorded time. Working off the clock is strictly prohibited.

Pay for time not worked, such as planned time off (PTO), jury duty, and bereavement leave, is to be authorized and recorded on the timekeeping report by the immediate supervisor/manager and is not used when calculating overtime hours (unless otherwise required by applicable law or collective bargaining agreement).

Any changes to the employee's regular schedule must be pre-approved by the supervisor/manager. This includes overtime and make-up time for missed hours worked.

7:5 MANDATORY PAYROLL DEDUCTIONS

The Company is required by law to make certain deductions from your pay. These deductions include Social Security and Medicare tax, federal income tax and state and local taxes where applicable.

Wage attachments (garnishments, child support order and/or tax levy) will also be deducted in accordance with court orders and federal and state laws. In addition, you may authorize voluntary payroll deductions for benefits such as health insurance coverage and the 401(k) Retirement Savings Plan.

All deductions will be itemized on your Earnings Statement (pay stub). We advise you to check your Earnings Statement to ensure it reflects the proper withholdings. If you have a question, please see your supervisor/manager or Human Resources representative.

SECTION 8

GENERAL INTRODUCTION TO EMPLOYEE BENEFITS

As part of our commitment to our employees and their well-being, the Company provides eligible employees with a comprehensive benefits program. The benefits program is reviewed periodically to ensure it meets the needs of the Company and its employees.

Although this section of the Handbook introduces you to some of these programs, we cannot provide the details of each plan as several benefit plans and options may vary based upon, among other things, classification status, line of business, state requirements, and/or collective bargaining agreement.

As part of your new employee orientation, you will receive a summary brochure that describes the benefit plans offered as well as the eligibility requirements for participation and enrollment instructions. Your primary resource for details about your benefit plans is the benefit enrollment website.

The benefits we provide are meant to help you maintain a high quality of life - both professionally and personally. We sincerely hope that you will take full advantage of these benefits.

8:1 WHERE TO LOCATE BENEFIT PLANS

You may access benefit plan information and current coverage information any time at www.brightspringbenefits.com. You may also call the Benefits Support Center at **1-844-896-0169**.

Additionally, you can always leverage local resources such as your respective Human Resources representative or immediate supervisor/manager.

8:2 BENEFIT STATUS CHANGES

Employees are responsible for ensuring their personal information is accurately reported in Company systems. Many changes can be made in the Employee Self-Service Portal.

If you need to make changes to your benefits elections due to a qualifying life event (e.g., birth of a child, marriage, loss or gain of other coverage), you must notify the Benefits Support Center at **1-844-896-0169** or by logging into www.brightspringbenefits.com within 31 days of the qualifying life event or within 60 days if the change is due to gain or loss of Medicaid or CHIP.

8:3 TUITION REIMBURSEMENT PROGRAM

We encourage all employees to pursue career and personal development through formal education that will enhance their job knowledge, skills and performance. Sometimes additional skills or education will be required before an employee can take the next step.

Depending upon the amount of budgetary funding specifically set aside for the program, as well as a specific line of business policy variations, the Company may provide educational assistance via tuition reimbursement for courses that are part of a degree or certification program to all eligible employees who have completed a minimum of one (1) year of continuous full-time employment.

An employee who wishes to participate in the tuition reimbursement program must complete a Tuition Reimbursement Application, available on REACH, and submit it to their supervisor/manager. Generally, employees must be active and not on a written warning to be eligible for reimbursement. Funds are generally allocated to employees with a completed application on a first-come, first-served basis. Questions regarding the tuition reimbursement program should be directed to your respective Human Resources representative or supervisor/manager.

8:4 EMPLOYEE ASSISTANCE PROGRAM

We realize that life can be complicated. With our Employee Assistance Program (EAP), getting help is easy.

The EAP is just one of many benefits offered by the Company. As an important part of your total rewards package, the Company offers a comprehensive benefits program for eligible employees to help meet the needs of you and your family.

Among other things, the EAP provides confidential, easily accessible professional counseling services for our employees who have personal, financial, or medical issues. The program assists you in dealing with emotional issues, job/career issues, family/marital issues, substance abuse, financial concerns, stress, and legal issues, to name a few. This program is offered to all employees and their immediate family members. The EAP is completely confidential.

Services offered by the EAP include, but are not limited to, problem-solving support, work and life services, financial and legal services, and daily living services.

For problem-solving support, the EAP can connect and/or refer callers to a professional who can help with marriage, family and relationship issues, problems in the workplace, stress, anxiety, changes in mood, sadness, grief, loss, responses to traumatic events and concerns about the use of alcohol or drugs.

For more general support, EAP experts are available to help with:

- Childcare and eldercare assistance, including assistance with determining the type of help needed and finding local providers.
- Financial services, including talking to an advisor over the phone about budgeting, credit and financial questions, tax matters, financial planning, retirement planning, real estate concerns and estate planning.
- Legal services, including talking to a licensed attorney about civil, consumer, personal and family law matters (including, but not limited to, adoption, divorce and custody issues).
- Health and wellness resources. With the EAP, employees can take charge of their well-being! The EAP has resources to help employees assess their health and receive personalized support to set, track and reach wellness goals.

There is no charge to the employee for covered services. For questions on how to access the EAP, please contact your supervisor/manager or Human Resources representative.

SECTION 9

LEAVE AND TIME OFF

The Company recognizes that employees will need to take time off during the year for purposes of rest and relaxation or to address personal matters.

Request for approved/planned time off must be submitted to your supervisor/manager in advance of the anticipated time off. While taking time off may depend on business needs, and whereas not every request will be approved, management will make every effort to allow time off as needed.



9:1 COMPANY-OBSERVED AND UNPAID PERSONAL LEAVES, OTHER LEAVES OF ABSENCE, AND HOLIDAYS

The Company provides a certain number of paid and unpaid hours/days per year to be used for rest, relaxation, vacation, sickness, bereavement, and other personal needs. While eligibility may be determined by classification, operation and/or while it may vary from contract and line of business, the Company offers leave for the following reasons in accordance with all applicable state and federal laws:

- Paid/unpaid holidays
- Jury duty or court witness
- Bereavement
- Voting
- FMLA (Family and Medical Leave Act)
- Medical leave of absence
- General leave of absence
- Military active or reserve duty
- Domestic violence situations
- Administrative

9:2 COMPANY-OBSERVED HOLIDAYS

Full-time exempt and non-exempt employees are eligible for holiday pay as of their date of hire. Eligible employees will receive holiday pay if they work their complete scheduled hours before, during and after the holiday.

Holiday pay is prorated based on the regularly scheduled hours to a maximum of eight (8) hours per holiday. For example, an employee who regularly works 30 hours a week would receive six (6) holiday hours.

The Company may, at its discretion, adjust the holiday schedule each year for business considerations. Please contact your supervisor/manager or Human Resources representative for more information or see the recognized holidays on REACH.

9:3 PLANNED TIME OFF

The Company has a planned time off (PTO) policy that allows its full-time employees to take time off for rest, recreation, and personal reasons. At some worksites, employees are eligible for time off under a vacation and sick leave plan. The goal is to provide a flexible planned time off benefit package while at the same time ensuring the quality of services to the individuals we serve.

In general, and to the extent allowable under state and local law, PTO is accrued and is usually limited to a maximum accrual amount per year. Please consult your supervisor/manager or Human Resources representative for the PTO policy specific to your worksite. Any questions regarding PTO accruals and/or PTO usage should be directed to your supervisor/manager and/or the respective Payroll or Human Resources representative.

9:4 BEREAVEMENT LEAVE

We realize the loss of a family member can be hard. Therefore, the Company allows up to three (3) paid bereavement leave days per occurrence for full-time employees. If a death occurs in your immediate family, please see your supervisor/manager to arrange the appropriate time off. If additional time is required due to travel or other circumstances, accrued PTO may be used, if approved in advance by your supervisor/manager.

Immediate family is defined as spouse, parent, grandparent, brother, sister, child, stepchild, foster child, grandchild, mother-in-law, father-in-law, stepmother, stepfather, stepbrother, stepsister, brother-in-law, sister-in-law, daughter-in-law, son-in-law, guardian, and any other member of the employee's household. Documentation may be required by your supervisor/manager.

9:5 JURY DUTY

Regular, full-time employees will be allowed time off to perform jury duty. In the event you are called upon to serve on jury duty, you should promptly notify your supervisor/manager, who will explain the details of the jury duty leave. Jury duty leave will not be deducted from the PTO account. You may not be reimbursed for more than eight (8) hours for any one (1) jury duty day. In order to be paid for jury duty, such jury duty must fall during a regularly scheduled work shift.

9:6 PROTECTED LEAVE FROM WORK POLICIES

The Company provides leaves of absence in accordance with federal law, including leave granted pursuant to the Family and Medical Leave Act (FMLA) and applicable state and local laws, which may include leaves for pregnancy, domestic violence, or to attend to legal, civic, educational or family matters, depending on the location where you work. Additionally, we provide employees with leaves of absence as a reasonable accommodation under the Americans with Disabilities Act Amendments Act (ADAAA), and general leaves of absence for medical reasons and personal non-medical reasons.

9:7 FAMILY AND MEDICAL LEAVE ACT

The Company is a covered employer under the Family and Medical Leave Act and complies with all FMLA requirements. We will grant family and medical leave in accordance with federal law and state law.

FMLA ELIGIBILITY

Eligible employees can take up to 12 workweeks of unpaid, job-protected leave under the FMLA during a rolling backward 12-month period (measured backward from the date the leave is to commence) if the following criteria are met:

- Employed by the Company for at least 12 months; and,
- Worked at least 1,250 hours during the 12-month period immediately preceding the commencement of the leave. All time worked for the Company during the 12-month period is counted.
- Work at a worksite where 50 or more employees are employed within 75 miles of the worksite.

Note: The 12 months of employment need not be consecutive months. If an employee is active on payroll for any part of a week, including any periods of paid or unpaid leave (sick, vacation, PTO, etc.) during which other benefits or compensation are provided by the Company (e.g., workers' compensation, group health plan benefits, etc.), the week counts as a week of employment. For purposes of determining whether intermittent employment qualifies as "at least 12 months", 52 weeks is deemed to equal 12 months.

REASONS FOR TAKING LEAVE

An FMLA leave may be requested for any of the following reasons:

- For the birth of your newborn child or the placement of a child for adoption or foster care within 12 months from the birth or placement of the child.
- To care for an immediate family member (spouse, child, parent) with a serious health condition.
- When you are unable to perform the essential functions of your job due to your own serious health condition (including pregnancy or related conditions).
- Due to a qualifying exigency arising out of the fact that your spouse, son, daughter, or parent is a military member on covered active duty or has been notified of an upcoming call or order to covered active-duty status (e.g., attending certain

military events, arranging for alternative childcare, addressing certain financial and legal arrangements, attending certain counseling sessions and attending post-deployment reintegration briefings).

- To care for a covered servicemember with a serious health injury or illness if you are the spouse, son, daughter, parent or next of kin of the covered servicemember.

DURATION OF FAMILY AND MEDICAL LEAVE

The maximum amount of FMLA leave for family and medical leave will be 12 workweeks in a rolling 12-month period measured backward from the date of any FMLA usage under this policy.

If both the employee and the employee's spouse are employed by the Company, the combined time off may not exceed 12 workweeks during a rolling 12-month period for the birth or placement of a child for adoption or foster care. Each spouse is, however, eligible for the full 12 workweeks during a rolling 12-month period to care for a son, daughter, or spouse with a serious health condition or for an employee's own serious health condition. Employees are eligible for the full 12 weeks to take care of the employee's parent(s).

Additionally, up to 26 weeks of leave may be granted during a single 12-month period to care for a covered servicemember with a serious health condition. A "single 12-month period" begins on the date you first use such leave and ends 12 months after that date.

If both the employee and the employee's spouse work for the Company and are eligible for leave under this policy, leave will be limited to a total of 26 weeks of leave between the employee and employee's spouse when the leave is for military caregiver leave only, or a combination of military caregiver leave, military emergency leave, bonding leave and/or family care leave taken to care for a parent. If the full 26 workweeks of leave to care for a covered servicemember during a single 12-month period is not used, the remaining part of your 26 workweeks of leave will be forfeited.

You have the right to use FMLA leave in one block of time. When it is medically necessary or otherwise permitted, you may take FMLA leave intermittently in separate blocks of time, or on a reduced schedule by working less hours each day or week.

APPLYING FOR LEAVE UNDER THE FMLA

If the eligibility requirements are met:

1. Call your supervisor/manager and/or Human Resources representative to request your absence.
2. Call Sedgwick at [1-877-659-1521](tel:1-877-659-1521) or visit timeoff.sedgwick.com to initiate a request for leave.
3. Provide information requested by Sedgwick as soon as possible.

Once you request a claim, you'll receive a packet of information to be completed and returned to Sedgwick. A Sedgwick claim representative will evaluate your request once all documentation has been received.

If the employee is not eligible for leave under this policy, the Company will review business considerations and the individual circumstances involved to determine if they may be eligible to take an unpaid general leave of absence. (See General Leave of Absence Policy.)

REQUIREMENTS AND CONDITIONS OF FAMILY AND MEDICAL LEAVE

Notification - When the need for leave is foreseeable, such as the birth or adoption of a child or for planned medical treatment, an employee must provide reasonable prior notice of the leave and make efforts to schedule the leave so as not to disrupt the Company's operations. Contact your Human Resources representative or the Sedgwick claim representative at least 30 days prior to the effective date of the leave. If 30-days' notice is not practicable, you must request the leave as soon as the need for the leave arises, ordinarily within one or two business days.



Medical certification of leave - If the request for leave is due to an employee's own serious health condition or the serious health condition of a spouse, child or parent, the employee must provide a Certification of Health Care Provider form completed by the attending physician within 15 calendar days. Any documentation received after 15 days will result in delay or denial of the FMLA, pending review of extenuating circumstances.

For leave to care for a spouse, child or parent, the certification must include a statement by the health care provider that the employee is needed to care for the spouse, child or parent and the amount of time needed to provide such care. The certification must state the date on which the health condition commenced, the probable duration of the condition and the appropriate medical facts regarding the condition. At its discretion, the Company may require recertification regarding the condition.

At its discretion, the Company may also require that the employee obtain a second medical opinion from a health care provider of its choice who has no prior or established relationship with the Company and at the Company's expense. In the event of a difference of opinions between the first and second health care provider, the Company may again, at its expense, require a third opinion by a provider approved jointly by the Company and the employee. The third opinion would be the binding opinion.

RECERTIFICATION AFTER GRANT OF APPROVED FAMILY AND MEDICAL LEAVE

In some cases, the Company may request recertification in connection with an absence that you report as qualifying for FMLA leave. For example, the Company may request recertification if:

- An extension of leave is requested.
- The circumstances of leave have changed.
- The Company receives information that casts doubt on the stated reason for the absence or the continuing validity of the existing medical certification.

PAY DURING FAMILY AND MEDICAL LEAVE

Generally, FMLA is unpaid. However, an employee may be eligible to receive benefits through state-sponsored programs or Company-sponsored disability programs. Regulatory sick leave in accordance with applicable law may be requested. The Company will require use of available PTO or sick time/vacation hours (where applicable) to cover the FMLA leave when the employee is not receiving wage replacement benefits and where otherwise permitted by applicable law. The use of paid benefits will not extend the length of the FMLA leave, as FMLA leave will run concurrently with any other type of leave or program.

If leave is requested for reasons other than an employee's own serious health condition, use of all accrued PTO/sick time/vacation hours will be required to the extent permitted by state and local law, which will run concurrently with the FMLA leave. Therefore, an FMLA leave will be paid until any accrued PTO/sick time/vacation time you have earned is exhausted. The remainder of the leave will then consist of unpaid leave.

BENEFITS DURING FAMILY AND MEDICAL LEAVE

Employees will have the option to continue or terminate benefits while on an approved FMLA leave. If an employee elects to continue benefits, they will be provided on the same terms as if the employee had continued in active employment so long as the employee is on approved FMLA leave and timely premium payments continue to be paid through our direct-bill process.

Employees will receive a monthly invoice once placed on direct bill. Payments are due on the first of every month. If an employee is more than 30 days delinquent with the premium payment, our obligation to maintain health coverage ceases, and the employee will receive a termination notice 15 days before their coverage is scheduled to terminate. If we still have not received the premium payment, coverage will be terminated retroactively to the last day the premium payment was made. In some instances, we may recover the premiums we paid on the employee's behalf if the employee fails to return to work following an FMLA leave or if the employee returns before the monthly payment is submitted and the employee has not yet exhausted the grace period.

If an employee wishes to terminate benefits while on FMLA leave, the employee will be subject to a lapse in coverage. Coverage will automatically be reinstated upon return from FMLA unless the employee notifies the Benefits Support Center at [1-844-896-0169](tel:1-844-896-0169) that the employee does not wish to be reinstated.

If the Company changes health care plans while an employee is on an approved FMLA leave, the employee will be entitled to the new or changed plan/benefits to the same extent as if they were not on leave. An employee will retain their length of service credit while on an approved FMLA leave. However, accrual of PTO/vacation benefits is suspended during leave. Additionally, an employee will not receive holiday pay during the leave.

If an employee chooses not to return to work at the end of FMLA leave, benefits will terminate, and COBRA will be offered in compliance with the law. The qualifying event date for purposes of COBRA coverage is the date the employee informs the Company that they will not return to work or the last day of FMLA leave.

You will generally be provided up to 90 days of group health benefits for the plans in which you are enrolled during a personal leave of absence. You are responsible for paying your portion of the applicable employee premium contributions. If you fail to pay your contributions while on a leave of absence, your coverage may be terminated. After 90 days, your benefits terminate, and you will be offered COBRA in accordance with applicable law.

RETURN FROM FAMILY AND MEDICAL LEAVE

Except for employees designated as “key employees,” upon return from an approved FMLA leave, the employee will be restored to the same position held at the time of leave. If we cannot reinstate the employee to the same position, we will reinstate them to an equivalent position with equivalent pay, benefits, and other terms and conditions of employment. However, an employee has no greater right to reinstatement than if they had been continuously employed rather than on leave.

Prior to being allowed to return to work, an employee wishing to return from a serious health condition leave must submit an acceptable release from a health care provider. If the leave is intermittent FMLA, such a release may be required if reasonable safety concerns exist regarding the employee’s ability to perform their duties, based on the serious health condition for which intermittent leave was taken.

Key employees may be subject to reinstatement limitations in some circumstances. If you are considered a “key employee,” you will be notified of the possible limitations on reinstatement at the time you request a leave of absence.

EXTENSION OF FAMILY AND MEDICAL LEAVE

If an employee needs to extend leave under this policy due to the continuation, recurrence or onset of their own serious health condition or that of a spouse, child or parent, the employee must submit a request in writing to their supervisor/manager and notify Sedgwick.

The Company will request recertification; extended leave is not guaranteed under this policy.

If an extension is approved and the employee’s FMLA entitlement has been exhausted, the leave becomes a general leave subject to the General Leave of Absence Policy.

FAILURE TO RETURN FROM FAMILY AND MEDICAL LEAVE

Failure to return from an FMLA leave within three days or failure to receive approval for a leave extension will be considered a voluntary termination of employment.

CONFIDENTIALITY

Documents relating to medical certifications, recertifications or medical histories for employees or family members will be maintained separately and treated by the Company as confidential medical records, except that in some legally recognized circumstances, the records may be disclosed to supervisors and managers, first aid and safety personnel or government officials.

STATE FAMILY AND MEDICAL LEAVES

It is the Company's intent to comply with all state and local leave laws. Where state or local laws provide for greater leave benefits than the FMLA, you may be entitled to the greater amount of leave under either the FMLA policy or state and local law when eligible for such policy. Leave under state or local law that also qualifies under this policy will run concurrently with FMLA to the extent permissible under applicable law, and employee obligations under this policy will apply.

RIGHTS AND OBLIGATIONS OF THE COMPANY

The Company is implementing this policy under the Family and Medical Leave Act of 1993 and the related federal/state/provincial regulations/amendments to the original Act (the "Act"). The Company's obligations under this policy do not exceed those set forth in the Act unless this policy or an applicable state, city or local statute, regulation or ordinance specifically provides otherwise. The Company reserves the right to assert all rights, exemptions, limitations, and calculation methods in the Act. The Company also reserves the right to deny or restrict the availability of FMLA to any employee who could be denied coverage under the Act.

All terms in this policy have the meaning given in the Act, except where otherwise noted. The Company reserves the right to revise, alter, amend or terminate this policy at any time in accordance with applicable law. This policy and related paperwork described do not alter the at-will relationship nor create a contract of employment between the employee and the Company. Any modification of the at-will employment relationship, oral or written, can be accomplished only by a written document signed by the Company's president/CEO, Chairman of the Board or Board of Directors.

9:8 GENERAL PROVISION AND PERSONAL LEAVES OF ABSENCE POLICIES

Under special circumstances, an employee may be granted a personal leave of absence for non-medical reasons such as educational endeavors or personal business reasons.

If an employee is not eligible for personal leave due to length of service, the employee may be granted an exception based on individual circumstances. The leave must be approved by your Human Resources representative and/or supervisor/manager.

ELIGIBILITY

- **Personal Non-Medical** - all regular full-time and part-time employees who have completed six (6) months of continuous service.

DURATION OF LEAVE

Personal leaves of absence may be granted in 30-day increments or less, not to exceed 90 days within a calendar year. The 90 days maximum leave entitlement is for any combination of Personal Non-Medical or Personal Medical Leave.

Under certain circumstances, such leaves of absence may be extended for an additional period. Employees on personal medical leave who are disabled within the definition of the Americans with Disabilities Act (or applicable state or local law) may be granted an extended leave of absence as an accommodation of their disability. Extended leaves of absence must be approved by your Human Resources representative and/or supervisor/manager.

NOTICE OF LEAVE

To request a personal leave of absence, you must notify your supervisor/manager and/or Human Resource representative. When the need for a Personal Leave of Absence is foreseeable, you must provide at least 30 days' advance notice to the Company. When the need for a Personal Leave of Absence is not foreseeable, you must provide notice to the Company of the need for leave as soon as reasonably practicable, given the facts and circumstances. Approval should be forwarded to the Human Resources representative for processing.

An employee requesting a personal medical leave must submit a physician's certification in advance of the requested leave or as soon as possible after the start of the leave in the event of an emergency. The physician's statement should identify the nature of the disability and anticipated duration of absence. The physician's statement is used for determining if the leave of absence qualifies for Family and Medical Leave (FMLA). Reference the Family and Medical Leave Act Policy. Sedgwick will provide instructions regarding the physician's statement.

BENEFITS WHILE ON PERSONAL LEAVE OF ABSENCE

You will generally be provided up to 90 days of group health benefits for the plans in which you are enrolled during a personal leave of absence. You are responsible for paying your portion of the applicable employee premium contributions. If you fail to pay your contributions while on a leave of absence, your coverage may be terminated. After 90 days, your benefits terminate, and you will be offered COBRA in accordance with applicable law.

PAY WHILE ON LEAVE

Personal leaves are unpaid. However, any accrued, unused planned time off (PTO) must be used at the beginning of and included in the requested leave period. Such PTO, vacation or sick time runs concurrently with leave time. Employees do not earn vacation, sick time or PTO while on leave.

RETURNING FROM LEAVE

The Company will make every effort to reinstate you to the position held before taking the leave of absence and at the same rate of pay. Business conditions, organizational requirements and availability of positions for which an employee qualifies, however, will be the final determining factor, and there is no guarantee of such a return.

An employee returning from a personal leave of absence for medical reasons will be required to provide a fitness for duty certification as a condition of reinstatement.

9:9 MILITARY LEAVE

The Company recognizes the civic responsibility of military service by permitting time off from work as per the Uniformed Services Employment and Reemployment Rights Act (USERRA) as necessary for an employee to fulfill required obligations. Please consult the General Leave of Absence Policy or your Human Resources representative for details.

- You are responsible for notifying your Human Resources representative and supervisor/manager as soon as military orders are received and then contact Sedgwick to initiate your Military Leave.
- Military Leave may be granted for military obligations, such as annual military reserve training camp, guard activation in a declared emergency or as otherwise required by federal law for an extended tour of duty up to five years.
- The Company will not take any adverse employment action or discriminate in employment against any employee who participates in or is a member of the armed services, Reserves, National Guard or Commission Corps of the Public Health Service. This includes employment actions before or after performance of a service obligation.

- Employees who are required as members of the National Guard or a Reserve Unit to attend an annual training period not exceeding two weeks will be granted the necessary time off and will be paid the difference between the amount they receive from the government for this training (less travel allowance) and their regular base rate for 40 hours if such period is one week or 80 hours if such period is two weeks, based upon hours normally scheduled. You must present a statement to your Human Resources representative from the commanding officer as to the length of the training allowed and the amount of money received (less travel allowance) for the period of training.

The Company will maintain health insurance for at least 90 days following the employee's departure for military service. Other benefits, including but not limited to length of service, etc., will also be maintained throughout the period of military service. At the employee's request, the Company will maintain health insurance for 24 months under a COBRA arrangement where the employee will be required to pay not more than 102 percent of the health plan premium.

Upon reinstatement and to the extent required by law, the Company will generally offer you the job position you would have attained with reasonable certainty if not for the military leave of absence, as long as you have not been absent for more than five (5) cumulative years of service. You will be rehired without loss of length of service credits; benefits and compensation are calculated based upon uninterrupted service.

Note: Service required because of a war or national emergency declared by the president in support of an operational mission for which the employee has been ordered to active duty does not count toward this five-year period.

Time limits for returning to work will depend upon the length of the individual's military service:

- Service up to 30 days: Report to work by the beginning of the first regularly scheduled workday that falls eight (8) hours after returning home from military service.
- Service of 31 to 180 days: Submit application for re-employment no later than 14 days after completing military service.
- Service of 181 days or more: Submit application for re-employment no later than 90 days after completing military service.
- Service-related injury or illness: The reporting and application deadlines are extended for up to two years for individuals who are hospitalized due to recovering from a service-related illness or injury.

9:10 NURSING MOTHERS

The Company provides support to breastfeeding mothers who wish to take breaks during their workday in order to express milk when separated from their infant children. If an employee wishes to take breaks for this purpose, they should discuss it with their supervisor to determine a reasonable schedule for such breaks. This break time will, if possible, run concurrently with any break time already provided to the employee. The Company will arrange for a private room that an employee may use. Expressed milk may be placed in a refrigerator or other cold storage space provided by the Company for that purpose. As an alternative, the employee may choose to provide their own portable cold storage device. The employee must label their milk, and it must be removed at the end of the employee's scheduled shift. The Company is not responsible for any loss or theft of expressed milk.

SECTION 10

EMPLOYEE JOB PERFORMANCE

10:1 YOUR JOB PERFORMANCE

Each and every employee contributes to the success or failure of our Company. If one employee allows their performance to decline, then peers and those we serve are negatively impacted. We expect everyone to perform to the highest level possible. Poor job performance can lead to corrective action, up to and including termination.

10:2 PERFORMANCE APPRAISALS

The Company recognizes the importance of performance appraisals as a developmental tool to assess individual achievements versus performance goals/standards and to help determine salary, promotion, and other employment decisions.

Employees will generally receive an annual performance appraisal (Employees may also participate in a mid-year check-in on progress toward current-year goals). Your performance is evaluated based on job-related criteria and assessment is based on objective and documented data.

10:3 COMPANY PHILOSOPHY ON COACHING, FEEDBACK, AND DISCIPLINE

One of the most important responsibilities of supervisors/managers is to coach and motivate employees to better job performance. Communication and feedback between supervisors/managers and employees is a critical element of the coaching process. You must always know where you stand in the organization – what you are doing well and what you could improve. It is the supervisor's/manager's responsibility to establish standards of job performance, to inform you of these performance expectations and to coach and promptly bring to your attention any unsatisfactory performance.

Employees are also expected to conduct themselves at all times in a manner that will foster good working relationships and be in the best interest of the Company. All employees are expected to meet standards of performance and behavior. Employees who are unable to meet these standards may be subject to disciplinary action which could include any or all of the following: verbal warning, written warning, suspension, and/or termination. In each instance, the Company reserves the right to take the disciplinary action which it deems appropriate in light of the severity and frequency of the occurrence.

SECTION 11

WORKPLACE BEHAVIOR

We are committed to the delivery of exceptional service to those entrusted in our care and in our communities. Because we are entrusted with maintaining and managing, among other things, the well-being, safety, security, livelihood, and financial access of those entrusted to our care and support, we expect adherence to our standards and Code of Ethics and Business Conduct.

Our standards are high, and we do expect all employees to do their best and be their best every day. The Company reserves the right to initiate corrective action up to and including termination for behavior or performance that violates our standards and Code of Ethics and Business Conduct.

Violations of our standards of conduct will be addressed with the appropriate remedy, including but not limited to retraining, demotion, and discipline up to termination.

11.1 PROFESSIONAL BEHAVIOR AND BOUNDARIES

We believe in providing safe environments for individuals entrusted to our care. There are rules surrounding the nature of tolerable relationships that employees can maintain with patients/clients, individuals entrusted to our care, and/or individuals who receive a service from the Company.

As professionals, we should always strive to be both respectful and professional. The Company expects employees to follow certain rules of conduct that will protect the interests and safety of the people we serve, our employees and the organization.

To provide a safe, effective, professional environment, employees are required to maintain professional relationships with patients/clients and their families.

Any observed or suspected violation of this policy should be immediately reported to your Human Resources representative and/or supervisor/manager. Additionally, the employee can report suspected violations to the compliance action line by calling [1-866-293-3863](tel:1-866-293-3863).

The following list outlines our professional boundaries:

- Employees must conduct themselves in a professional manner that provides respect to others.
- Employees shall always treat patients/clients in a humane manner and shall not engage in behavior that is abusive, negligent, disrespectful, or demeaning.
- Employees shall ensure patient/client rights are protected.
- Employee contact with a patient/client family members or guardian(s) is restricted to those contacts required for the services provided to the patient/client. Should an employee be associated or acquainted with a patient/client and/or their family prior to the patient/client entry into the program, the employee must notify their supervisor/manager immediately. The supervisor/manager shall confer with the respective Human Resources representative and next-level manager to determine if a shift or unit change will be necessary to ensure that the appropriate boundaries are maintained.
- If an employee has a previously established relationship with a patient/client or patient/client family, there should be no contact between those persons outside of the program during the patient/client stay or while being provided services, unless authorized by the respective supervisor/manager and next-level manager.
- Should the employee be contacted by the patient/client or patient/client family, the employee shall notify their supervisor/manager immediately.



- Employees shall not engage in interactions or discussions with patients/clients/family members that could be detrimental to the agency.
- Employee shall not encourage or promote a patient's/client's/family's negative feelings toward the agency. If a patient/client and/or family member expresses concerns or negative feelings toward the agency, the employee shall direct them to the appropriate supervisory employee or encourage them to follow the appropriate process.
- Employee contact with former patients/clients, families, or close associates shall be limited to those persons with whom the employee was acquainted prior to the patient's/client's entry into the program. Employees who are contacted by former patients/clients on an individual basis shall notify their supervisor/manager immediately.
- Current employees of the Company are prohibited from any attempts to adopt or become foster parents of any patient/client or former patient/client.

Additionally, the following actions are expressly prohibited:

- Horseplay of any kind between employees and patients/clients.
- Preferential treatment toward one patient/client or group of patients/clients.
- Revealing personal information of our patients/clients, including, but not limited to: home address, cell and home phone number, religious belief or values or family information, outside of a planned and therapeutic context.
- Employee participation in contact sports with patients/clients.
- Giving gifts, favors, or services to one patient/client or a group of patients/clients to the exclusion of others, beyond those required or authorized by the Company.
- Acceptance of gifts of monetary value, favors or services from the patients/clients or patient's/client's family or guardian(s).
- Purchasing, offering to purchase, or borrowing belongings and/or money of an individual we serve or their family/ guardians.
- Any form of sexual contact with a patient/client or a patient's/client's family/guardian(s).
- Any behavior that is provocative or overtly sexual or flirtatious, including wearing of provocative clothing.
- Conducting any sort of business relationship with a patient/client or a patient's/client's family/guardian(s).

Violations of the above professional boundaries will be subject to corrective action, up to and including termination.

11:2 STANDARDS OF CONDUCT

The following is a list of actions which will be considered a violation of this policy and subject to corrective action up to and including termination of employment:

1. Any acts of disrespect, exploitation, abuse, and/or neglect toward the individuals we serve.
2. Contributing to the delinquency of the individuals we serve, including engaging in sexual misconduct. Fraternization between employees and the persons we serve is strictly prohibited.
3. Fighting with and abusive, disrespectful, or threatening conduct or speech toward any individual(s) we serve, fellow employee(s), supervisory employees, vendors, or visitors.
4. Failure to immediately report cases of actual or suspected abuse/neglect or any incident of a reportable nature to a supervisor or other management personnel.
5. Theft, unauthorized removal, wrongful possession, mishandling, or deliberate destruction of property, merchandise, equipment, or possessions belonging to the individuals we serve, fellow employees, or the Company.

6. Unlawful manufacture, distribution, dispensation, possession, sale, purchase, or use of illegal drugs, controlled substances (including but not limited to THC), or alcohol while on the job, on Company-owned, leased, or controlled property or while operating Company-owned, leased, or controlled equipment or vehicles.
7. Intentional or flagrant insubordination or refusal to follow work instructions.
8. Failure to follow safety rules and/or health practices.
9. Possession or use of a firearm, illegal knife, explosive, or any other prohibited weapon of any kind while on Company-owned, leased, or controlled property (except where state law allows for firearms to be stored in a locked vehicle) or while operating Company-owned, leased, or controlled equipment or vehicles.
10. Deliberate falsification or alteration of any official Company document or form, including timecard, employment application, physician's statements, etc.
11. Unauthorized absence from the work area.
12. Unreported absences of two (2) consecutive scheduled workdays without directly notifying the supervisor on duty will be considered as job abandonment (extenuating circumstances may be considered) and reported as a voluntary resignation.
13. Disclosure of confidential information to unauthorized persons in violation of Company policy.
14. Dissemination of knowingly false information about the Company, employees, or the individuals we serve.
15. Sleeping during working hours.
16. Gambling on Company premises.
17. Acts of harassment, including such conduct as slurs, jokes, intimidation, or other verbal or physical attacks upon a person because of their race, color, religion, sex, national origin, age, disability, veteran status, genetic information, or any other legally protected characteristic.
18. Acts of discrimination that deny equal treatment in all terms, conditions, and privileges of employment because of an individual's race, color, religion, sex, national origin, age, disability, veteran status, political affiliation, genetic information, or any other legally protected characteristic.
19. Improper use of Company communication systems and equipment, which includes any misuse such as harassing, offensive, demeaning, defaming, intimidating, or sexually suggestive written, recorded, or electronically transmitted messages.
20. Using Company time and resources for personal gain unrelated to employment with the Company.
21. Inefficiency, incompetence, or negligence in the performance of duties, including failure to perform assigned tasks or training or failure to discharge duties in a prompt, competent, and reasonable manner, failure to provide the required supervision of the individuals we serve, or if appropriate, failure to remain awake and alert during work.
22. Prohibited from working in health care (such as expired or revoked license/certification) or excluded from Medicare or Medicaid participation.
23. Transporting an individual we serve to the employee's home or on a personal errand without prior supervisory approval.
24. Violations of the Code of Ethics and Business Conduct.
25. Failure to comply with written or verbal work instructions by supervisor or management personnel which is not conclusively interpreted as intentional insubordination.
26. Smoking in prohibited areas.
27. Failure to report reasons for absence or tardiness on a timely basis.
28. Disregard for time reporting/attendance procedures.
29. Abusive or negligent use of tools or equipment.
30. Failure to wear clean, neat, appropriate clothing.

31. Careless or blatant waste of materials.
32. Violations of Company distribution/solicitation policy.
33. Unauthorized passengers, improper parking of motor vehicles, reckless driving, speeding, and violation of motor vehicle laws while operating Company vehicles or personal vehicles while conducting Company business.
34. Excessive absenteeism or tardiness, excluding leaves authorized by the Company or law.
35. Presence in Company facilities during non-work hours without prior approval.
36. Unauthorized extended meal or break periods.
37. Excessive medication administration errors.
38. Receiving visitors at the workplace without supervisory approval.
39. Failure to follow and adhere to BrightSpring policies and practices.

While the list is long, it is impossible to compile all violations subject to corrective action. The examples above are illustrative of the type of behavior that will not be permitted but are not intended as an all-inclusive listing.

Questions regarding this policy should be directed to your respective Human Resources representative or supervisor/manager.

The Company reserves the right to increase or decrease the corrective action for any of the prohibited behavior described above for reasons that, in the judgment of the Company, are appropriately considered. Nothing in this policy is intended, nor shall it be interpreted, to modify the at-will nature of employment at the Company or to create a contract of employment.

11:3 ATTENDANCE AND TIME OFF POLICIES

Almost as much as performance, good attendance is factored into career advancement, promotions, and job transfers. All employees are expected to have regular and punctual attendance. This means employees should be at their respective workstations on time, fully able and ready to work.

Work schedules are established based on business needs and may change in accordance with the changing needs of the business. If you have questions regarding your work schedule, please check with your supervisor/manager for your exact schedule.

Sporadic attendance, excessive absenteeism and excessive tardiness negatively impact both the success of the business and the quality of care and support we can provide and will generally not be tolerated.

- Absenteeism is the failure to report as scheduled or working less than one-half of the scheduled shift without approved time off. This includes arriving late or leaving before the end of a scheduled shift.
- Excessive absenteeism is unplanned absences that occur frequently, are unplanned/unapproved, that often extend for several work shifts, and/or that, because of their irregularity, negatively impact the operation.
- While excessive absenteeism will be met with corrective action, an unexcused absence lasting two or more consecutive days that is not communicated to your respective manager will be deemed as job abandonment.
- An absence that is not communicated and that severely impacts a patient/client may be reviewed for immediate termination.
- Tardiness is arriving at the work unit after the scheduled starting time, including start of day or upon returning from a lunch or other scheduled break.
- Excessive tardiness is reporting late for duty three or more times in a calendar month. Like excessive absenteeism, tardiness that follows a set pattern and/or that negatively impacts the operation will result in the appropriate level of corrective action.

The best and most professional practice is for an employee to call their supervisor/manager as soon as possible to report that they may be tardy or absent.

Each operation may establish written guidelines that differ from this policy due to business needs. If you have questions about this section or if you need clarification as to the attendance policy for your operation, please contact your supervisor/manager or Human Resources representative.

11:4 WORKPLACE NEATNESS

Neatness and good housekeeping are signs of efficiency. You are expected to keep your work area neat and orderly at all times. Neatness is also a required safety precaution. If you spill a liquid, clean it up immediately. Do not leave tools, materials, or other objects on the floor, which may cause others to trip and fall. Keep aisles, stairways, exits, electrical panels, fire extinguishers, and doorways clear at all times. Please put all litter and recyclable materials in the appropriate receptacles and containers.

Please report anything that needs repairing or replacing to your supervisor/manager. Supervisors/managers may establish additional housekeeping and/or decorating standards to maintain the professional appearance and safety of the facility.

11:5 DRESS CODE

The Company's success in helping others live their best life and its ability to maintain a service-oriented, professional practice environment that meets or exceeds the expectations of the complex communities we serve depends on you.

Whether or not job responsibilities place an employee in direct patient/client contact, an employee's actions and appearance represent the Company.

The properly attired employee creates a favorable image for the organization to the public and fellow employees. All employees should present an appearance that is professionally appropriate for their workplace and patient/client interactions. Please check for any specific dress code for your specific operation.

11:6 TELEPHONES

PERSONAL CELL PHONES

- While at work, employees are expected to exercise discretion in using personal cell phones. Excessive personal calls during the workday can interfere with employee productivity and be distracting to others. Employees are encouraged to make any personal calls during nonwork time when possible and to ensure that friends and family members are aware of the Company's policy.
- The Company will not be liable for the loss of personal cell phones brought into the workplace.

COMPANY-PROVIDED CELL PHONES

- When job duties or business needs demand, the Company may issue a business cell phone to an employee for work-related communications. Employees who are issued a Company cell phone must review and comply with the Company's Wireless Phone Service Policy.

SAFETY ISSUES FOR CELL PHONE USE

- All employees are expected to follow applicable local, state, and federal laws and regulations regarding the use of cell phones at all times.
- Employees whose job responsibilities include regular or occasional driving and who are issued a cell phone for business use are expected to refrain from using their phone while driving; use of a cell phone while driving is not required by the Company. Safety must come before all other concerns. Regardless of the circumstances, including slow or stopped traffic, employees are required to use hands-free operations or pull off to the side of the road and safely stop the vehicle before placing or accepting a call. Employees are encouraged to refrain from discussion of complicated or emotional matters and to keep their eyes on the road while driving at all times. Special care should be taken in situations where there is traffic or inclement weather or the employee is driving in an unfamiliar area.
- Reading or sending text messages while driving is strictly prohibited.
- Employees who are charged with traffic violations resulting from the use of their phone while driving will be solely responsible for all liabilities that result from such actions.

Supervisors/managers may implement additional policies around cell phone use based on the needs of the operation.

SECTION 12

HEALTH AND SAFETY

12:1 GENERAL EMPLOYEE SAFETY

The Company is committed to promoting safety and to providing a safe place for you to work. You must keep safety in mind at all times to minimize accidents and injuries to yourself, the individuals we support and other employees. If you see something that is unsafe and could cause an accident, take appropriate action and inform your supervisor/manager.

Please observe all appropriate safety rules in every phase of your work. Use proper lifting techniques. If your job requires you to drive or ride in a Company vehicle or to use your own vehicle while on Company business, always fasten your seat belt and secure seat belts or wheelchair straps for your patients/clients.

12:2 REPORTING SAFETY ISSUES

All accidents, injuries, potential safety hazards, safety suggestions, and health and safety-related issues must be reported immediately to your supervisor/manager and Human Resources representative. If you or another employee are injured, you must seek first aid for all injuries and immediately report it to your supervisor/manager and Human Resources representative. If your supervisor/manager is not available, you should contact your Human Resources representative.

Even if an injury does not require medical attention, you still must report the situation in case you may need/want medical treatment later and to ensure that any existing safety hazards are corrected. Additionally, all employees must:

- Report any unsafe conditions, equipment or practices.
- Use safety equipment at all times.
- Exercise maximum care and report any instances where other employees are not operating in a safe manner.

Federal law requires we keep records of all illnesses and accidents which occur during the course of employment. Workers' Compensation law also requires that you report any workplace illness or injury, no matter how slight. If you fail to report an injury, you may jeopardize your right to collect Workers' Compensation payments as well as medical treatment or health benefits.

Under state and federal law, you have the right to report work-related illnesses and injuries, and the Company is prohibited from discharging or in any way discriminating against an **employee for reporting any event or exposure in the work environment that either caused or contributed to the injury or significantly aggravated a pre-existing injury or illness.**

12:3 PERSONAL HYGIENE AND INFECTION CONTROL MATTERS

Proper hygiene promotes professionalism within our organization and a favorable image to our patients/clients. Employees are expected to maintain the highest standards of personal cleanliness and present a neat, professional appearance at all times. Further, as the Company is concerned about your health, as well as the health of the individuals we support, your family, teammates, their families and other visitors, it is the responsibility of everyone to be fully aware of your agency's infection control policy and to follow infection control procedures to protect everyone involved.

The Company will provide training for infection control procedures to ensure the safest work environment possible. All employees who are at substantial risk of direct contact with blood or body fluids will be offered free hepatitis B vaccinations. Please see your supervisor/manager or Human Resources representative for complete details.

12:4 COMPANY PREMISES AND PROPERTY

You are responsible for using Company property, premises, and resources for authorized business purposes only and for protecting them to the extent possible from misuse by others, loss, theft, or damage.

"Company Premises" includes, but is not limited to, offices, work locations, break rooms, halls, common areas, kitchens, closets, lockers, outbuildings, parking lots, grounds, or locations of Company operations of any kind, and any vehicle being used for Company business.

"Company Property" includes, but is not limited to, all owned, leased or rented equipment, hardware, software, computers, electronic codes, email, medical devices, furniture, furnishings, business machines, maintenance equipment, supplies, food, keys, identification badges, name tags, credit cards, building access cards, policy and procedure manuals, training manuals, books, documents, records, handbooks, buildings, or vehicles.

To protect the health, welfare, and property of employees and the Company, as well as to ensure business is being conducted properly, the Company reserves the right to conduct inspections of Company property or premises. The Company is not responsible for anything destroyed, lost, or stolen from your locker, desk, cabinets, or other storage containers or areas on Company premises.

The Company leases many of our properties, and as a result, all employees and visitors are required to follow the landlord's building and property rules and regulations. If you have questions regarding these rules and regulations, please contact your supervisor/manager or Human Resources representative.

12:5 VISITORS IN THE WORKPLACE

Unidentified, unwelcome, or unexpected visitors can be disruptive to the workplace and can even pose a security problem. Because of the nature of our business, we must limit access to our agencies, centers, and offices to visitors, such as teammates, vendors, and suppliers, who have a clear business reason for being there. Unless otherwise directed, employees must have advance approval to have a visitor on Company premises, and the visitor must be accompanied by an employee at all times.

12:6 PREVENTING VIOLENCE IN THE WORKPLACE

BrightSpring Health Services is committed to providing a safe environment for patients and staff. Employees are expected to refrain from fighting, “horseplay,” threatening behavior, or other conduct that may be dangerous to others. Conduct that threatens, intimidates, or coerces another employee, customer, vendor, or business associate will not be tolerated. BrightSpring Health Services resources may not be used to threaten, stalk, or harass anyone at or outside the workplace. BrightSpring Health Services treats threats coming from an abusive personal relationship as it does other forms of violence.

Indirect or direct threats of violence, incidents of actual violence and suspicious individuals or activities should be reported as soon as possible to a supervisor. When reporting a threat or incident of violence, the employee should be as specific and detailed as possible. Employees should not place themselves in peril, nor should they attempt to intercede during an incident.

Employees should promptly inform the facility leadership of any protective or restraining order that they have obtained that lists the workplace as a protected area. BrightSpring Health Services will not retaliate against employees making good-faith reports of protective orders or any other issue or situation they believe to be in violation of this policy. Failure to report a violent or potentially violent situation will be subject to corrective action, up to and including termination.

BrightSpring Health Services will promptly and thoroughly investigate all reports of threats of violence or incidents of actual violence and of suspicious individuals or activities. The identity of the individual making a report will be protected as much as possible. BrightSpring Health Services will not retaliate against employees making good-faith reports of violence, threats or suspicious individuals or activities. Anyone found to be responsible for threats of or actual violence or other conduct that is in violation of these guidelines will be subject to prompt disciplinary action up to and including termination of employment.

12:7 WEAPONS IN THE WORKPLACE

All persons are prohibited from possession or use of firearms, illegal knives, explosives or prohibited weapons of any kind while acting in the course of employment with the Company, while on Company-owned, -leased or -controlled property, while operating Company-owned, -leased or -controlled vehicles, or at Company-sponsored functions, regardless of whether the person is licensed to carry the weapon or not. This includes concealed weapons.

The Company reserves the right to conduct searches of any person, vehicle or object that is on or enters onto Company property any time there is suspicion that this policy has been violated and such an inspection is reasonably necessary in the investigation of such violation(s). Pursuant to this provision, the Company is authorized to search lockers, desks, purses, briefcases, baggage, toolboxes, lunch sacks, clothing, vehicles parked on Company property and/or any other item in which a weapon may be hidden. Failure to abide by all terms and conditions of this policy may result in corrective action up to and including termination.

Note: Carrying a weapon onto Company property is in violation of this policy and will be considered an act of criminal trespass, will be grounds for immediate removal from Company property and may result in legal prosecution. Refusal to leave the Company premises will be grounds for notification of local law enforcement. Because safety is everyone’s responsibility, the Company strongly encourages employees to immediately report any perceived, potential, or real incident(s) that may involve a violation of this policy to their supervisor/manager and/or the Human Resources representative. Failure to report weapon possession on Company property will be subject to corrective action, up to and including termination.

Note: Some state and local laws allow for the limited possession of firearms in locked vehicles, and to the extent there is any conflict between the terms of this policy and such applicable laws and regulations, the latter shall be controlling. Please see your site Human Resources representative for any questions regarding this policy.

12:8 EMERGENCY PREPAREDNESS

Employees are expected to make every effort to report for work. In the event of adverse weather conditions designated as such by management, employees not able to report to work must use paid time off, if available. If the employee's facility is closed due to severe weather conditions, the employee will be instructed by local management as to where to report for work under the facility's emergency preparedness plan.

It is likely we will experience some type of severe weather during the year that will make coming to work more difficult than normal. Due to the nature of our services and the patients/clients we serve, it is imperative that the Company continues to operate despite severe weather conditions. Barring unusual emergencies, it is the Company's intention to keep all facilities open and operating during all normally scheduled working days and hours. As such, employees are asked to report for duty as scheduled, keeping in mind that they are expected to act in a way that protects their own safety while meeting the needs of our patients/clients.

If roads and/or streets are not closed and travel to and from work is possible, employees will be expected to report for duty as scheduled. In most instances, preparing ahead of time and leaving for work earlier may be necessary to safely arrive at work on time.

If conditions are such that they may impede travel somewhat, employees must notify their supervisor/manager that they are reporting to work but may be late due to weather conditions.

If employees are not able to report to work, they must follow the normal "call-in" procedures to report their absence in a timely manner. Due to the nature of the work, non-exempt/hourly employees may not work from home during inclement weather without seeking prior approval from their supervisor/manager. Additionally, non-exempt/hourly employees are not paid for work hours missed due to inclement weather. For all employees, missed hours due to inclement weather must be taken as paid time off, if available.

12:9 COMPANY IDENTIFICATION

In facilities that require it, all employees must wear identification badges when on Company premises or when providing care in patient/client locations.

12:10 SAFEGUARDING PERSONAL PROPERTY

The Company will not assume any responsibility for replacing or repairing an employee's personal property that is lost, stolen, vandalized, damaged, or taken from an employee during work time and/or on Company premises, including Company-owned vehicles or leased vehicles.

Each employee is expected to exercise reasonable care to safeguard personal items brought to work. Develop habits that ensure security as a matter of course. For example:

- Always keep personal property properly secured.
- When you leave the Company's premises, make sure that all entrances are properly locked and secured.
- Report any suspicious behaviors or potential security risks to management.



12:11 TOBACCO USE

The Company complies with all applicable federal, state, and local regulations regarding smoking in the workplace. The use of tobacco, including smokeless tobacco, electronic or other artificial cigarettes, is not permitted in Company work locations.

The leadership at each location may choose to designate an area outside of the building where employees may use tobacco products. Designated areas should comply with all applicable federal, state, and local regulations. Employees who elect to use these products should do so only while on approved breaks. The use of tobacco products in other than designated areas, or other violations of this policy, will result in corrective action that may include termination.

12:12 DISEASE PREVENTION

The Company observes applicable federal, state, and local health standards and guidelines concerning employees with infectious diseases. In addition, employees who are sick are expected to let their supervisor/manager know and to remain at home to limit the spread of infectious illnesses. All employees will be familiar with the Company Infection Control policies found on REACH and practice standard and universal precautions. The Infection Control policies are also available in your location. Please contact your supervisor/manager or Human Resources representative for policy location information.

In the event of local or widespread infectious illnesses, employees will be required to follow Company-issued guidance relating to controlling the spread; this may include, but not be limited to, quarantine, the use of face coverings or masks, etc.

SECTION 13

EMPLOYEE PRIVACY

13:1 SEARCHES

The Company reserves the right to conduct, without prior notice, searches and inspections of the work area and/or Company-provided materials. Examples include, but are not limited to, lockers, boxes, desks, computer files, file cabinets, and Company vehicles. It should be noted that all offices, desks, closets, files, and lockers, etc., are the property of the Company and are for employee use only during the period of your employment. An employee should have no expectation of privacy in your use of Company property, premises, or resources.

13:2 COMPANY POLICY ON THE USE OF RECORDING DEVICES IN THE WORKPLACE

BrightSpring prohibits the employee use of cameras, tape recorders, or other recording devices, including digital recording devices, in the workplace. We believe this is necessary to secure employee privacy, privacy of the individuals we serve, trade secrets, and other business information.

1. Employees are prohibited from using cameras or other video or audio recording devices in the workplace unless specific advance written authorization has been obtained from their supervisor/manager. This prohibition includes the use of cell phones with built-in cameras or other recording capabilities to make audio or video recordings or to take pictures.
2. Authorization may be granted when a specific business purpose will be served by the use of such a device and when its use will not violate the privacy of employees, individuals served, visitors, vendors, etc. In such cases, all parties to the meeting or conversation that is to be recorded must have been informed at its outset that it will be monitored, transcribed, intercepted, or recorded, and they must have consented to such actions prior to the conversation, preferably in writing.

3. Employees are also prohibited from arranging for others, including non-employees, to engage in any recording of conversations, phone calls, or other activities in the workplace.
4. Employees should regard this policy as an explicit statement that the employer does not consent to the recording of any meetings or discussions without prior authorization as discussed above.
5. Employees with questions about this policy should contact their Human Resources representative or the Legal Department.

13:3 THE IMPORTANCE OF MAINTAINING SAFE, SECURE COMMUNICATIONS AND HIPAA

The safeguarding and the secure protection of sensitive information is the responsibility of all employees. The Company must keep confidential, secure, and private patient health information as per the Health Insurance Portability and Accountability Act (HIPAA).

At some point in your career with the Company, you will come into contact or be made privy to confidential medical records. HIPAA affects all covered entities, including health plans, health care facilities, health care providers and employees of health care companies. All of us have a mandatory obligation to keep protected health information secure and confidential. The purpose of HIPAA was to improve the efficiency and effectiveness of the health care system by standardizing the electronic exchange of administrative and financial data and to protect the security and privacy of protected health information (PHI). As a health care provider that conducts transactions electronically, the Company is a covered entity under the rule and is required by federal law to implement certain standards and regulations.

HIPAA has three main parts that may be likened to three legs of a stool. If any one leg is removed, the stool will fall. The three parts are privacy, electronic security, and electronic transactions:

- **Privacy** - The HIPAA privacy rule protects the privacy of every person's health information (PHI). It applies to health information in all forms; written, oral, electronic and any other form. The term "health information" is broadly defined to include medical records, claims, payment information and almost all information related to a person.
- **Electronic Security** - The electronic security rule ensures the integrity of, and controls access to, electronic health information. It's designed to protect electronic information from alteration, destruction, loss and accidental or intentional disclosure to unauthorized persons.
- **Electronic Transactions** - The electronic transactions rule enables entities to communicate efficiently with one another regarding claim processing, payments, establishing who is and isn't covered under a health plan and determining a patient's level of eligibility for services.

Another safeguard against the unlawful disclosure of protected health information is the **minimum necessary rule**. The rule states that only those who must know information to provide care or do the work necessary to complete business responsibilities are legally and ethically allowed to know and use the information. They must make sure they guard PHI, so it does not become known or used by anyone else. PHI must be kept confidential.

In other words, do not give information about a patient/client to anyone who is not directly involved in the care of the patient/client unless the patient/client gives official consent or unless the law requires it.

As an employee, your obligation to confidentiality does not stop there. The Company owns and/or controls all forms of information technology utilized by its employees, which includes but is not limited to equipment, software, networks, electronic mail (email), telephone, voicemail, and intranet discussion forums (also known as user forums, bulletin boards, chat rooms, user groups, news groups). Data and information produced on, with, or from these systems are also the property of the Company. The use of these systems should be consistent with current job responsibilities and is intended for legitimate business purposes only.

EVERYDAY WAYS TO COMPLY WITH HIPAA TO PROTECT HEALTH AND OTHER SENSITIVE INFORMATION

CONFIDENTIAL CONVERSATIONS

- Do not talk about patients in public places where you can be overheard, such as hallways, lobbies, lounges, and waiting rooms.
- Do not leave sensitive information on answering machines or emails because you do not know who may retrieve the messages.
- Make sure you are in a private area when listening to or reading your messages.
- Do not post the name, condition/diagnosis, doctor's name, or any other private patient/client information in any public area.
- Do not email patient/client information when sending from outside of the Company's authorized computer system.

PROTECTION OF ASSETS

- Laptops cannot be left in cars.
- Keep your computer screen shielded and log off when not in use.
- Never share your access/password.
- Change your password and notify your supervisor/manager if your password becomes known by anyone.
- Laptops should always be carried onto an airplane and not checked in baggage.

MEDIA

- Do not take pictures or videos of patients/clients or of sensitive documents belonging to a patient/client or participant that may identify the patient/client/participant or the reason why the individual is seeking/obtaining care or services from the Company.
- Never leave documents containing sensitive information unattended (store, file, shred or destroy according to departmental policy).

While this list is long, it is not exhaustive and does not cover everything. You are encouraged to use your best judgment and if you are unsure, ask your supervisor/manager or Human Resources representative. The Company will address all inappropriate disclosures of protected information with the appropriate level of corrective action, up to and including termination.

13:4 RIGHT TO PRIVACY

Be advised that employees do not have a right to privacy when utilizing company owned computers, iPads, telephones, electronic devices, or systems. These systems may be subject to monitoring at all times by any lawful means.

This may include utilization of a comprehensive desktop analytic and monitoring solution, to both support remote work management, enhance productivity, and improve efficiency. This solution includes keystroke tracking, mouse activity, and screen navigation which captures active/inactive time, application usage, and data entry behavior.

SECTION 14

COMPUTERS, EMAIL, AND THE INTERNET

14:1 COMPUTER EQUIPMENT AND TECHNOLOGY

Almost every role will have interactions with technology. There will be times when the Company will provide either phones or computer equipment for use when performing the work activities for the Company. The Company owns and/or controls all forms of information technology utilized by its employees, which includes, but is not limited to: equipment, software, networks, electronic mail (email), telephone, voicemail, and intranet discussion forums (also known as user forums, bulletin boards, chat rooms, user groups, news groups). Data and information produced on, with or from these systems are also the property of the Company. These devices are intended for Company use, not personal use. While personal use is discouraged, excessive personal use to the extent it interferes with the business of the Company will be addressed by the appropriate level of corrective action.

All computer equipment and programs must be installed, physically secured, inventoried, and approved by the appropriate management and/or IT employee. Because doing so would pose a security risk, employees should not share IDs, passwords, or access. Employees should log off the network or activate a password-protected screen saver whenever computer equipment or a data device is unattended or unsecured. Computers and Company cell phones may not be left in unsecured locations – such as vehicles or unlocked offices.

Note: The use of non-Company-sponsored or personal communication systems, including the use of personal email addresses to conduct Company business, is strictly prohibited. Texting, email messages, voicemail messages, fax messages, computer information, and data obtained by or stored on Company computers or electronic equipment are property of the Company.

Care must be taken not to destroy Company-owned information. The Company reserves the right to inspect and/or monitor all transactions that are conducted on Company equipment, including monitoring email communication as necessary for business needs.

In some cases, the Company will provide approval to use a personal cell phone for Company business. Please refer to the Bring Your Own Device policy on REACH for details and guidance.

14:2 EMAIL/TEXTING

The Company provides many of its employees with computer equipment, which may include an internet connection and access to an electronic communications system, to enable them to perform their jobs successfully. Company email addresses should not be used for personal correspondence or mailing lists. Additionally, carbon copying or forwarding of any Company emails containing PHI or business information or any sensitive/protected information to any personal email addresses is against Company policy.

USE OF THE EMAIL SYSTEM

The email and texting systems are intended for official Company business only. The use of the electronic mail systems may not be used to solicit for commercial ventures, religious or political causes, or outside organizations. In addition, the electronic mail systems may not be used to send (upload) or receive (download) copyrighted materials, trade secrets, proprietary financial information, or similar materials. Use discretion as to the number and type of messages you send.

As a general guideline, confidential, proprietary, or sensitive legal or financial matters should be communicated via telephone or in person, and NOT by email or texting. Any employee who abuses this privilege may be subject to corrective action up to and including termination.

EMAILS/TEXTS ARE NOT PRIVATE

Email and text messages sent using Company communications equipment are the property of the Company. We reserve the right to access, monitor, read and/or copy email messages at any time, for any reason. An employee should not expect that any message sent using Company equipment – including messages considered to be, or labeled as, personal – will be private.

EMAIL/TEXT RULES

All our policies and rules of conduct apply to the use of email and text systems. This means, for example, that an employee may not use the email or texting systems to send harassing or discriminatory messages, including messages with explicit sexual content or pornographic images; to send threatening messages; or to solicit others to purchase items for non-Company purposes.

We expect employees to exercise discretion in using electronic communications equipment. Make sure that messages are professional and appropriate in tone and content. Remember, although email or texts may seem like a private conversation, they can be printed, saved, and forwarded to unintended recipients.

Company email/texts are used for business communications. Slogans or signatures that promote political, religious, or other ideals, or contain “humor” that could offend a customer, vendor, or teammate, cannot be used on Company email.

14:3 USING THE INTERNET

Like a computer, the internet is a business tool that provides useful information that is needed to accomplish the work we perform. While it’s a useful tool, like a cell phone, it can be a distraction. During the workday, internet usage should be solely focused on business needs.

Below are some guidelines:

- Exploring the internet should be kept to a minimum, within the reasonable before or after work hours or during the lunch break. Personal use of the internet while on Company systems, network and/or equipment should be kept to a minimum. Using appropriate sites for business purposes is unrestricted if it is reasonable.
- Downloading files, software or other offers from the internet should be done only with IT approval.
- Streaming media uses a large amount of bandwidth and should be used for job-related functions only.
- The display or transmission of sexually explicit images, messages, cartoons or any transmission that contains ethnic slurs, racial epithets or anything that may be construed as harassment or disparagement of others based on their race, color, religion, religious expression, age, disability, sex (including pregnancy, childbirth and related medical conditions, transgender status and gender identity), gender, color, disability, sexual orientation or gender identity or expression, national or ethnic origin (including limited English proficiency), political affiliation, status as a protected veteran or any other classification protected by state or federal laws is strictly prohibited and not permitted before, during, or after business hours and may be subject to corrective action up to or including termination.

Note: The Company has the right and capability to monitor internet browsing by each user on our system.

14:4 COMPUTER SOFTWARE (UNAUTHORIZED COPYING)

The Company does not condone the illegal duplication of software. The copyright law is clear. The copyright holder is given certain exclusive rights, including the rights to make and distribute copies. Title 17 of the U.S. Codes states that “it is illegal to make or distribute copies of copyrighted material without authorization.” (Section 106) The only exception is the users’ right to make a backup copy for archival purposes. (Section 117) Unauthorized duplication of software is a federal crime. Penalties include substantial fines and jail terms. For this reason, the Company follows certain rules related to software. These include the following:

- With regard to use on local area networks or on multiple machines, use the software only in accordance with the software publisher’s license agreement.
- An employee should notify their supervisor/manager, IT Department, or the Legal Department immediately if any misuse of software or related documentation within the Company is suspected.
- Use of unauthorized copies of computer software for either business or personal use will be subject to corrective action, up to or including termination.
- Use of USB flash devices, or removable media is strictly prohibited as they can be used as a means for viruses to infect the infrastructure, or for sensitive information to leak.

14:5 PASSWORD MANAGEMENT

You should always keep your user IDs and passwords confidential. Under no circumstances should you share or disclose your account and password information with anyone else. Sharing or disclosing account information may lead to corrective action against all parties involved. Passwords should also not be written down unless they are properly protected or encrypted. If an employee feels their password has been compromised, they should notify their supervisor/manager as well as the IT Department immediately.

14:6 VIRUS PROTECTION

Only Company-provided virus detection software should be run on Company provided workstations, laptop computers and computer servers. If infection by a computer virus is suspected, immediately stop using the involved computer and call the IT Help Desk to report the incident. Do not attempt to eradicate the computer virus yourself.

SECTION 15

EMPLOYEE RECORDS

15:1 PERSONNEL FILES – ACCESS TO PERSONNEL FILES

The Company maintains a personnel file for each employee. The purpose of this file is to allow us to make decisions and take actions that are personally important to you, including notifying your family in an emergency, calculating income tax deductions, and withholding and paying for appropriate insurance coverage. Although we cannot list here all of the types of documents that we keep in your personnel file, examples include forms that you filled out on the first day of work, records of changes in salary or promotion, written warnings, records of training, Handbook acknowledgment page, confidentiality agreements, etc.

You are responsible for making sure your personnel records are up to date and current. You can make changes to your own record by logging in to the Employee Self Service (ESS) portal.

Information changes, such as a change of name, address, telephone number, marital status, dependents, payroll deductions, or emergency contact, can be updated at any time. If you are unable to log in or if you need assistance, please reach out to your supervisor/manager or Human Resources representative.

Only current employees may review the contents of their personnel file in the presence of the Human Resources representative. Current employees may even request copies of documents in the personnel file. However, no records or documents may be removed from the file, and the file must remain in the possession of the Company.

If an employee wants to inspect their personnel file, the employee must submit the request in writing. Past and/or former employees will not be granted access to personnel files unless required by applicable law.

15:2 EMPLOYEE SELF-SERVICE/UPDATING YOUR EMPLOYEE RECORD

The Company is committed to protecting your privacy and ensuring that only employees can access their personal information. By accessing the ADP Self-Service portal through REACH on the Company intranet, employees can update address and phone numbers, view and print pay and tax statements, update tax withholdings and update emergency contacts. Questions regarding this policy should be directed to your respective Human Resources representative or supervisor/manager for the site.

SECTION 16

DRUGS, ALCOHOL, AND BACKGROUND CHECKS

16:1 A SAFE WORKPLACE IS A DRUG-FREE WORKPLACE

The Company is committed to providing an environment that promotes the welfare of the individuals we serve, employees, and visitors. In accordance with the federal Drug-Free Workplace Act of 1988 and state/provincial (for Canadian operations) law, the Company strictly prohibits employees from the unlawful manufacture, distribution, possession, sale, purchase, or use of illegal drugs, controlled substances, or alcohol while on the job, working as a representative of the Company, on Company-owned/-leased/-controlled property or while operating Company-owned/-leased/-controlled equipment or vehicles. In addition, the Company is committed to helping those employees who have an abuse problem.

DRUG-FREE WORKPLACE POLICY AND GENERAL REQUIREMENTS

- All employment applicants will be subject, where applicable, to testing for illegal or controlled substances in connection with the pre-employment process. Testing may include blood, breath, urine, or other testing.
- Employees who work, or report to work, with detectable levels of prohibited, controlled or illegal drugs in their systems will be considered in violation of this policy.
- The use, possession, sale, or distribution of illegal drugs or controlled substances on Company property or during working hours, including paid break periods, is strictly prohibited. Any suspected illegal substance found on Company property or during working hours shall be given to the appropriate law enforcement agency and may result in criminal prosecution.

- Prescription drugs must be used in the manner and quantities prescribed by a licensed medical practitioner and only by the employee for whom they were prescribed. Improper use, or misuse, of prescription substances by someone other than the person receiving medical treatment is prohibited.
- Any employee whose prescription drug abuse results in excessive and repeated absenteeism or tardiness, is the cause of accidents or poor work performance, or imposes problems upon the workforce or workplace shall be subject to disciplinary action, up to and including termination.
- An employee must inform their Human Resources representative when taking prescription drugs that may affect job performance, the ability to safely operate a Company vehicle or may impair the employee's ability to work safely to the point he or she is a danger to themselves or their teammates.
- Any employee charged/indicted for violation of a criminal controlled substance statute must notify their supervisor/manager immediately. If convicted, the employee must report the conviction to their supervisor/manager immediately but no later than within seventy-two (72) hours.
- The use of an alcoholic beverage or other intoxicant on Company property, including parking areas, or during Company business at any time is prohibited.
- Any violation of these policies may lead to discipline up to and including termination.

Note: On rare occasions, there may be exceptions to this policy to include certain sanctioned Company conferences, gatherings, recreational activities, or other Company-approved functions where alcohol is served. Such exceptions must have prior approval from management.

DRUG-FREE WORKPLACE DEFINITIONS

Controlled substances: The term "controlled substances" includes mind-altering and/or addictive substances included under the provisions of the United States Government's Controlled Substances Act of 1970, as amended. Examples include:

- Opiates (heroin, morphine, codeine, etc.)
- Cocaine
- Cannabinoids (marijuana, hashish)
- Amphetamines
- Barbiturates
- Buprenorphine
- Methylenedioxymethamphetamine (MDMA)
- Meperidine
- Oxycodone
- Tramadol
- Phencyclidine (PCP)
- Methaqualone (Quaaludes)
- Darvon/Darvocet
- Benzodiazepines (Valium)
- Other narcotics and hallucinogens (LSD, methadone, etc.)

Illegal drugs: The term “illegal drugs” means any controlled substance other than one purchased and used pursuant to a prescription written by the employee’s medical doctor or treating physician.

Prescription drug or medicine: Refers to a medicine, drug or other substance legally prescribed to an individual by a licensed, authorized medical doctor or practitioner. The possessor of the prescription drug or medicine must be the person to whom the item was originally prescribed and must not be expired, voided, or invalid.

Company premises or Company property: Includes facilities, vehicles, or offices owned, rented, or used by the Company, including employee-owned or rented vehicles while on the property of the Company and any other location where the employee represents the Company in any capacity.

Company time or work hours: All working hours or hours paid for work, including paid meal and break periods, regardless of whether on Company premises. This also includes time while on Company premises that may not be paid time, such as visiting the workplace, visiting Company locations or while on Company premises prior to beginning the workday or after the workday has ended.

Administrative action: This is non-disciplinary action; however, failure to abide by the terms of the Administrative Action may result in corrective action up to and including termination of employment.

Corrective action: May include written warnings, suspension without pay or termination of one’s employment. Management shall determine the form of corrective action appropriate for the violation. Termination of employment is a likely consequence of violating this policy.

Alcohol Is Included in the Drug-Free Workplace

The same prohibitions apply regarding the use of alcohol.

- Employees who work, or report to work, with a blood alcohol concentration (BAC) of 0.04 or greater will be considered in violation of this policy. The 0.04 detection level is consistent with USDOT safety rules and regulations pertaining to safety sensitive work.

Company Reservations of Fitness for Duty and Alcohol Examinations

Fit for duty means that an employee is in a physical, mental, and emotional state that enables the employee to perform the essential tasks of their work assignment in a manner that does NOT threaten the safety or health of oneself, patients/clients, teammates, property, or the public at-large.

An employee who is observed as potentially unfit for duty due to suspected use of alcohol, controlled substances, or prescription drugs may be sent to a designated facility for a “fitness-for-duty” examination.

The “fitness-for-duty” examination may include breath, blood and/or urine screenings or any other testing that may reveal the presence of alcohol or commonly abused drugs. Any confirmed positive test result for a controlled substance or a BAC of 0.04 or greater will be considered a policy violation.

Failure to comply with either the requirement to submit to or provide consent for the examination will be cause for disciplinary action, up to and including termination. An employee may be subject to a “fitness-for-duty” examination if one or more of these conditions occur.

- An employee’s behavior is observed as being erratic and not reflective of normal or expected behavior.
- Any employee involved in an accident while operating a Company vehicle or who incurs a work-related injury which requires outside medical treatment may be required to be tested for the presence of illegal drugs or alcohol when, in the judgment of management, the results are necessary to rule out the use or misuse of these substances as a contributing factor to the accident. The employee has the definitive obligation to immediately report all vehicle accidents or accidents



that result in a work-related injury that requires outside medical treatment to their supervisor/manager. Drug and alcohol testing will be required if the employee's involvement in a vehicle accident results in the issuance of a citation under state or local law for a traffic violation.

- There is credible information and/or reasonable suspicion that an employee has violated this policy.
- The Company has reasonable belief, due to observations, demonstrations, signs, or symptoms of erratic or uncharacteristic behavior or physical evidence indicating the possibility of an "unfit-for-duty" status.
- As mandated by law or any governmental regulatory agency.

16:2 ESTABLISHED DRUG AND ALCOHOL TEST PROCEDURES

Drug and alcohol screening will be conducted in accordance with accepted federal guidelines for chain-of-custody and testing procedures.

- Oral swab is the preferred method for sample collection where available and where allowed by the applicable contract.
- Reasonable suspicion drug and alcohol tests will be performed as an observed sample collection or under similar controlled conditions.
- In addition to controlled or illegal substances, testing for adulterates also may be done to ensure the quality of the sample. If an adulterate is found in the sample, it will be automatically considered as a positive drug test result.
- If the employee is unable to provide the required minimum sample amount or the collector believes the sample is tainted, the sample will be discarded, and the employee must provide another sample within 24 hours or within the amount of time directed by the collector.
- Detectable levels have been established in accordance with federal guidelines to preclude false-positive test results because of passive inhalation of marijuana or use of over-the-counter drugs.
- Any employee attempting to evade testing, falsify test results through chemical, mechanical, or other means, or attempting to provide a false, adulterated, or corrupted sample will be terminated.

16:3 BACKGROUND CHECKS

The Company conducts background checks through a reputable third-party consumer reporting agency. Continued employment with the Company is contingent upon a satisfactory background check. Background checks may be conducted as outlined below:

- As a condition of employment, a background check is conducted on all candidates upon hire.
- Backgrounds may be checked on any current employee who is offered a promotion or transfer if the new position warrants such a check.
- Employees with driving responsibilities will undergo a Motor Vehicle Report (MVR) check at hire, and at least annually thereafter.
- Periodic credit checks may be conducted on employees with financial responsibilities.
- With reasonable cause, the Company may conduct a background check on any current employee.
- The Company will conduct additional background checks as required by law or regulation.

The Company will not knowingly employ individuals listed on the United States Department of Health and Human Services, Office of the Inspector General (OIG) List of Excluded Individuals/Entities (LEIE), or the United States General Services Administration's (GSA) System for Award Management (SAM) list. OIG/SAM exclusions are confirmed through the background check upon hire and monitored at least monthly thereafter.

Background checks will be conducted in compliance with federal and state law, and may include, but not be limited to the following:

- Criminal history report
- Social security number verification
- National sex offender registry search
- Credit history (for positions with financial responsibilities)
- Abuse registry search
- OIG/SAM
- Motor vehicle report
- Reference checks
- Previous employment verification
- Education verification
- Professional license verification

In the event an employee that is involved in the direct or indirect care of clients/patients is arrested or charged with a crime other than a routine traffic offense, such person must report in writing the arrest/charge to their manager or Human Resources immediately but no later than within seventy-two (72) hours. Such person will be suspended and may be terminated from employment until an order finding that employee “not guilty” is entered in a court of competent jurisdiction, or charges are dropped. “Care of a client/patient” as used in the provision means that the employee has day-to-day contact with clients/patients.

In the event a plea is entered, BrightSpring will consider this a finding of guilty and continued employment or re-employment may be denied. BrightSpring is committed to the safety and security of its clients/patients and a less than “not guilty” finding indicates a propensity to commit a crime. Balancing the rights of clients/patients and employees will result in a balance in favor of the safety and security of clients/patients.

16:4 MINIMUM HIRING AGE

Employees must be hired in compliance with the Fair Labor Standards Act (FLSA) and applicable state/provincial (for Canada operations) laws and regulations. Persons eighteen (18) years of age or older will receive preferred consideration in hiring. Persons under the age of eighteen (18) are not eligible for hire.

SECTION 17

CODE OF ETHICS AND BUSINESS CONDUCT

17.1 COMPLIANCE PROGRAM – CODE OF ETHICS AND BUSINESS CONDUCT

We have high ethical standards and know that we can only live up to those standards if each individual employee performs their duties in an ethical and compliant manner. You are responsible for reporting suspected violations of the Code of Ethics and Business Conduct, the False Claims Act, or other health care laws or regulations. It is not acceptable to overlook actual or potential wrongdoing.

The Company's policies and procedures have been established to provide the best possible environment for employees in which to work, learn and provide services to the public. Such policies include guidelines for employees and administration that protect employee rights and provide an atmosphere in which everyone's highest potential can be reached.

It is not always easy to know the right thing to do in business situations that you may encounter. Accordingly, we aim to help you understand what is expected of you and how to carry out your responsibilities. These expectations and responsibilities can seem quite complex, as we operate under many different laws and regulations, but the important thing to remember is, to be honest, fair, respectful, and responsible with each other and those with whom we come into contact.

The goals of the Company's corporate Compliance Program are to:

- Safeguard the Company tradition of strong moral, ethical, and legal standards of conduct.
- Ensure the Company conducts its business lawfully and ethically and in full accordance with applicable federal, state, and local laws, regulations, and policies.
- Identify and prevent criminal and unethical conduct.
- Establish a structure that encourages employees to report concerns without fear of retaliation.

Reporting a potential compliance concern is as simple as "See it, Say it." If you have questions or concerns about a compliance-related issue, you should first try to voice your concerns through your usual communication channels, such as your supervisor or other local management.

However, if the existing communication channels seem inappropriate, or if you would rather not involve your manager, you can always report concerns regarding compliance matters, dishonest actions, or unethical behavior on the Compliance Action Line at [1-866-293-3863](tel:1-866-293-3863).

You can remain anonymous if you choose. All matters reported to the Compliance Action Line will be treated confidentially to the extent possible and will be promptly investigated by a trained employee. There is a non-retaliation/non-intimidation policy in place to protect the employee by the employer for reporting any illegal activity or violations to the Code of Ethics and Business Conduct; this policy protects all "good faith participation" in the Compliance Program.



SEE IT, SAY IT. DO IT THE RIGHT WAY, EVERY DAY!
COMPLIANCE ACTION LINE
1-866-239-3863

“Good faith participation” includes, but is not limited to:

- Reporting of actual or potential issues or concerns, including but not limited to, any action or suspected action taken by or within the Company that is illegal, fraudulent, or in violation of any adopted Company policy;
- Cooperating with or participating in the investigations of such matters;
- Assisting with or participating in the self-evaluations, audits, and or implementation of the remedial actions; or
- Reporting to appropriate regulatory officials.

The Company prohibits any form of retaliation against an employee for reporting a possible violation of the Code of Ethics and Business Conduct in good faith. If you conduct or condone any form of retaliation against another employee for reporting a potential Code of Ethics and Business Conduct or regulatory violation, you will be subject to corrective action up to and including separation from employment. No violation reported by an employee in good faith will be the reason for subjecting an employee to discipline.

17:2 CONFLICTS OF INTEREST

A conflict of interest occurs when the private interests of an employee or person acting on the Company’s behalf interfere in any way with the interests of the Company. A conflict of interest also may exist if the demands of outside activities distract the employee from the performance of the job or cause the employee to use Company resources for other than Company purposes.

Employees and others acting on the Company’s behalf must be free from conflict of interest that could adversely influence their judgment, objectivity, or loyalty to the Company in conducting business activities and are required to avoid and disclose ethical, legal, financial, or other conflicts of interest involving the Company. Further, when a potential conflict of interest arises, employees are obligated to remove themselves from a position of decision-making authority with respect to any conflict situation involving the Company.

The partial list below will help guide you in avoiding and reporting potential conflicts of interest.

- **Services during nonworking time:** Performing any services for patients/clients on nonworking time that is normally performed by Company personnel.
- **Outside business:** Conducting outside business during your work time.
- **Company equipment/accounts:** Using Company equipment, Company purchasing accounts, Company software systems or other Company applications for unauthorized personal use.



- **Confidential trade information:** Unauthorized use of any confidential trade information or techniques.
- **Guardianship:** Acting as the legal guardian of a patient/client in Residential, Home Care or Youth Services that is not a family member.
- **Foster/host homes:** Providing foster or host home services to a patient/client of the Company.
- **Property transactions:** Directly or indirectly leasing, renting, trading, or selling real estate or personal property to or from the patients/clients or the Company.
- **Employ patients/clients:** Employing patients/clients in personal business ventures.
- **Self-benefit:** Using your position or relationship with the Company to promote your own interests or those of your family, including using confidential or privileged information gained while employed at the Company for personal benefit or gain or for the personal gain or benefit of family members to the detriment of the Company.
- **Employment for exempt employees:** Working or consulting with a business (outside Company responsibilities) that is in competition with any business of the Company; OR: Having a second job where your other employer is a direct or indirect competitor, distributor, supplier, or customer of the Company.
- **Financial interest:** You, a family member or a supplier having a direct or indirect financial interest in (more than \$5,000) or a financial relationship with a competitor, supplier, or customer of the Company except for insignificant stock interests in publicly held companies (less than \$100,000).
- **Business decisions:** Taking part in any Company business decision involving a Company that employs a spouse or family member.
- **Investing in business opportunity:** Investing in an outside business opportunity in which the Company has an interest, except for having an insignificant stock interest in publicly held companies (less than \$100,000).
- **Personal discounts:** Receiving personal discounts or other benefits from suppliers, service providers or customers that is not available to all employees.
- **Gifts:** Receiving a gift from a patient/client or patient/client family member to include loans or assignment as a beneficiary or an insurance policy. Employees may not receive or offer any gift or anything else of significant value (greater than \$50) for influencing the action of the Company.
- **Board membership:** Unauthorized participation on another organization's Board of Directors.

DISCLOSING CONFLICTS OF INTEREST

At hire, employees should disclose any conflicts of interest activities or relationships using the Employment Eligibility Form or Disclosure form. During the year, employees should disclose any new potential conflicts of interest to Human Resources.

On an annual basis, employees should attest that they are not involved in or have disclosed any conflict-of-interest activities or relationships via the Annual Employment Eligibility Certification.

The "family" of an individual includes their spouse, domestic partner, parents, siblings, children, and any other relative who resides in the same household or any member of the household.

In the event of a conflict of interest, steps will be taken to resolve the conflict. For example, if a new employee is the landlord for Company patients/clients, the lease should terminate at the one-year termination period and alternative housing will be obtained.

If the conflict of interest involves guardianship, foster placement or host home placement, the relationship will be evaluated by a committee of members from the quality assurance and training department with input from the legal department.

Circumstances may exist that give the appearance of impropriety or an actual conflict of interest. Employees in operational positions of Executive Director/Regional Director/Center Director or above, Support Center Directors or above, Board of Directors members and any employee tasked with operating a satellite office should present the potential conflict of interest to the legal department (in conjunction with the leadership team, operations management, and compliance) to achieve resolution.

17:3 BRIBERY AND THE ANTI-BRIBERY POLICY

Bribery is the payment, receipt, or solicitation of an offer, promise or gift of anything of value to obtain or retain business, gain an improper advantage or induce official action.

A bribe is an offer, promise, or gift of anything of value to any government official, business partner, employee, or any other person or entity for “improper purposes” and includes authorization to pay or payment of offers, promises, or gifts.

The Company does not and will not use bribery to conduct our business, and the Company will not partner with any other businesses that tolerate bribery. It is the Company’s policy to comply with all applicable anti-bribery laws and to require all agents, consultants, and business partners who work on the Company’s behalf to comply with these same laws and practices.

Neither the Company nor any third party acting on the Company’s behalf shall offer, pay, give, or promise to pay or give “anything of value” to any government official, business partner, employee, or any other person or entity for “improper purposes.”

Further, the Company prohibits employees from authorizing such offers, payments, gifts or promises of anything of value to government officials, business partner employees, or any other person or entity for improper purposes, either affirmatively or implicitly. The Company prohibits employees from receiving anything of value from a customer or any other person or entity when the offer, payment, gift, or promise of anything of value is intended to induce, either affirmatively or implicitly, the employee to use his or her position or provide an improper advantage to the donor or another third party.

EXAMPLES OF AN “IMPROPER PURPOSE” FOR PURPOSES OF BRIBERY

- Inducing a beneficiary to assist the Company in obtaining or retaining business for or with, or directing business to, any person for purposes of securing any improper advantage (for example, acquiring confidential information) to assist the Company in obtaining or retaining business.
- Providing a financial or other advantage to a beneficiary, with knowledge or belief that the acceptance of the advantage constitutes a breach of the beneficiary’s expected performance in a relevant function or activity.
- Inducing a government official to use their influence to affect or guide any decision of such government (or another instrumentality thereof) to assist the Company in obtaining or retaining business for or with, or directing business to, any person.
- Occurs when a person is either induced or rewarded for performing a function or activity in a way that is in breach of the expectation for that person by his or her employer or those to whom that person owes a fiduciary duty.

If you have questions or concerns about a potential act of bribery, please contact the Compliance Action Line at [1-866-293-3863](tel:1-866-293-3863). All calls will be treated confidentially, and you can remain anonymous if you choose.

17:4 COMPANY POLICY ON TALKING TO THE MEDIA

To ensure the consistency of information disseminated to media sources and to prevent confusion or misinterpretation, please keep in mind the following:

- All media inquiries from reporters or questions about the Company’s position or commentary should be referred to the primary spokesperson at 502-630-7412 or Communication@brightspringhealth.com.
- There is no need for you to collect information or ask questions about the inquiry. There is no need for you to answer any questions that the reporter asks, even if they are basic questions.
- Politely let the reporter know that your Company policy requires you to refer all inquiries about the Company’s position on any issue or matter to BrightSpring Corporate Communications.



- After you refer the media inquiry, contact your supervisor/manager, and log the inquiry into the critical incident database on REACH.
- You/your supervisor/manager should provide Corporate Communications with a courtesy notice about the media inquiry (email or call the contact information above).
- Even if a reporter asks a simple question, employees should not engage in any conversation other than to refer them politely to Corporate Communications.
- If media personnel are on your property, you can choose not to answer or refer them politely to Corporate Communications.
- Media should not talk with a minor without a guardian's permission – on or off Company property.
- Employees are not authorized to go on camera on behalf of the Company without the approval of Corporate Communications.

The internal and confidential business affairs and information of the organization represent proprietary assets that each employee has a continuing obligation to protect. All media inquiries should be referred to Corporate Communications at [502-630-7412](tel:502-630-7412) or Communication@brightspringhealth.com.

Other employees are not authorized to speak with the media on behalf of the Company and shall not discuss information “off the record,” as such discussions could violate federal/state/provincial (for Canadian operations) regulations and result in negative repercussions for the Company.

Information requested regarding Company records shall be released only after the approval of the Company representative responsible for the respective information requested.

17:5 COMPANY POLICY ON SOLICITATION AND DISTRIBUTION

The work we perform is important and requires singular focus. Because successful accomplishment of the Company's mission requires all our attention, the distribution of nonwork-related materials or solicitation by an employee is prohibited while on working time or at any time while in working areas.

Working time includes the working time of both the employee doing the soliciting and distributing and the employee to whom the soliciting or distributing is being directed. Working time does not include meal/break periods or any other specified period during the workday when employees are not performing their work tasks. Working areas include all areas where work is customarily performed.

17:6 CONFIDENTIAL INFORMATION AND NON-DISCLOSURE POLICY

All Confidential Information concerning the Company and any other Company or business about which Company personnel obtains information in the course of their employment must be kept strictly confidential and should not be discussed with any person inside or outside of the Company except to the extent necessary to perform work for the Company, nor should such information be discussed with any person within the Company under circumstances where it could be overheard. Written information should be appropriately safeguarded and should not be left where it may be seen by persons not entitled to the information.

The unauthorized disclosure of such information could result in serious consequences to the Company, whether or not such disclosure is made for the purpose of facilitating improper trading in securities of the Company or other such corporation or business.

The trade secrets, proprietary information and other internal information, data, and materials (the “Confidential Information”) of the Company, its subsidiaries and affiliates are valuable assets. Protection of this information plays a vital role in the Company’s continued growth and in its ability to compete. Each employee has a continuing obligation to protect this information.

Employees shall not, either directly or indirectly, divulge, disclose, or communicate to any person, firm or corporation (other than required by law) information protected by the Health Insurance Portability and Accountability Act (HIPAA) or by state or federal laws governing trade secrets, intellectual property rights, privacy or other similar limitations or communication, or information that the Company has otherwise designated private or confidential. This prohibition includes information relating to the individuals we serve and their records.

- Employees authorized to have access to confidential information must treat the information as proprietary Company property. Employees are prohibited from attempting to obtain confidential information for which they have not received authorization. Employees in violation of this policy will be subject to corrective action, up to and including termination, and may be subject to legal action.
- Employees shall not remove any confidential information from the premises of the Company except while performing assigned duties on behalf of the Company.
- Employees are under a “duty of loyalty,” which means employees are not permitted to induce current customers/individuals we serve, suppliers or other employees to leave the Company, nor are they allowed to operate a competing business while still employed by the Company.
- Employees in violation of this policy will be subject to corrective action, up to and including termination, and may be subject to legal action.

Note: This list is not exhaustive. It’s always best to check if you have doubts. If you have questions or concerns, please contact your Human Resources representative.

17:7 FRAUD PREVENTION AND CONTROL

The Company is committed to preventing fraud, waste, or abuse of resources belonging to the Company or the individuals we serve. Fraud is when someone misrepresents or lies about something to obtain a benefit to which they are not entitled. It also includes when someone acts in “deliberate ignorance” or recklessly disregards the accuracy of reported information.

Management is ultimately responsible for the detection and prevention of fraud, but it is the obligation of all employees to immediately report any suspected fraud and/or whistleblower complaint to a supervisor/manager or to the Compliance Department at **1-866-293-3863**. Employees will not be punished for making any good faith complaint, even if the complaint ultimately turns out to be incorrect.

Employees are subject to discipline up to and including termination for making deliberately false allegations or reporting deliberately false information. Employees must disclose their own errors immediately after discovery to ensure that the Company does not unintentionally bill for services it has not provided. Examples of fraud, waste, or abuse of resources would include but are not limited to forging documents, taking office supplies for personal use, committing identity theft, profiting from insider information about corporate activities, or providing false billing information to the Company or its funding sources.

Individuals should not attempt to conduct their own fraud investigations but should report whatever information they have to their supervisor/manager or to the Compliance Department at 1-866-293-3863. When fraud is substantiated, it is reported to senior management, including general counsel, and to the Board of Directors through its audit committee and the Quality and Compliance Committee. Company investigators have full access to all Company records and premises and the authority to review all Company property, including physical files or computer storage, without prior knowledge or consent of the individual employee whose files are reviewed.

The Company maintains several fraud prevention controls. It maintains a Code of Ethics and Business Conduct, which is given to all employees upon hiring and is available on the Company's intranet. These documents emphasize the Company's commitment to its mission, compliance with all applicable laws, the responsibility of all employees to report suspicion of fraud, the consequences if fraud is detected and the Company's prohibition of retaliation against persons making good faith reports. Each year, employees are required to sign a reaffirmation of their adherence to these codes.

17:8 FEDERAL FALSE CLAIMS ACT

The Federal False Claims Act is a law that authorizes private individuals to file lawsuits on behalf of the federal government against people or companies who make false claims for payment of services. The purpose of this law is to prevent fraud, waste, or abuse of government resources. Any person or entity that makes a request for payment from the government knowing the request is false or submits false documentation can be prosecuted. The federal law, and some state laws, provide protection to employees who file False Claims Act complaints in good faith.

These laws apply include, among other things:

- Billing Medicare and Medicaid for services not rendered
- Billing Medicare and Medicaid for undocumented services
- Making improper entries on Medicare and Medicaid cost reports
- Billing Medicare and Medicaid for medically unnecessary services
- Assigning incorrect codes to secure higher Medicare and Medicaid reimbursement
- Characterizing non-covered services or costs in a way that secures Medicare and Medicaid reimbursement, and
- Participating in kickbacks

A violation of the False Claims Act may result in considerable monetary penalties per false claim plus three times the amount of damages the government sustains and exclusion from Medicare and Medicaid programs (penalty is adjusted periodically for inflation). Private citizens, including employees, may file a lawsuit on behalf of the federal government and, in return, may share a percentage of any monetary recovery or settlement. The False Claims Act prohibits employers from retaliating, discriminating or harassing employees because of their lawful participation in a Federal False Claims Act investigation, report, claim, or legal proceeding.

The Program Fraud Civil Remedies

The Program Fraud Civil Remedies Act of 1986 provides federal agencies the ability to obtain administrative remedies, separate from and in addition to compensatory and punitive damages available under the Federal False Claims Act. The act applies to corporate entities and individuals. The statute authorizes a federal agency to seek administrative remedies in the event a corporation or individual knowingly submits false claims or statements to the agency. Available remedies include civil penalties of up to \$5,000 for each false claim or statement and assessments of up to twice the amount of each false claim or statement (may be updated for inflation).

17:9 STATE FALSE CLAIMS ACT

In addition to the Federal False Claims Act, the Deficit Reduction Act of 2005 contains additional provisions aimed at reducing Medicaid fraud and abuse. Among these provisions are financial incentives for individual states to develop their own false claims acts with provisions that meet or exceed those of federal law. Each state in which the Company conducts business may or may not have such laws. Please see the attachments at the end of this Handbook for more information concerning specific laws.

SECTION 18

DISCRIMINATION AND HARASSMENT AND OUR COMMITMENT TO EQUAL EMPLOYMENT OPPORTUNITY

18:1 EQUAL EMPLOYMENT OPPORTUNITY

The Company does not discriminate in recruitment, employment or policy administration on the basis of race, color, religion, religious expression, age, disability, sex (including pregnancy, childbirth, and related medical conditions, gender, transgender status, gender identity/expression), sexual orientation, national or ethnic origin (including limited English proficiency), political affiliation, status as a protected veteran or any other classification protected by city, state and federal laws.

As part of the Company's commitment to this overall process, it will seek to provide equality of opportunity in all aspects of employment. All personnel activities, such as the recruitment, selection, training, compensation, benefits, discipline, promotion, transfer, layoff, and termination processes, shall remain free of illegal discrimination and harassment based upon race, color, religion, religious expression, age, disability, sex (including pregnancy, childbirth, and related medical conditions, gender, transgender status, gender identity/expression), sexual orientation, national or ethnic origin (including limited English proficiency), political affiliation, status as a protected veteran, or any other classification protected by city, state, and federal laws.

The Company reaffirms its commitment that there shall be no discrimination against employees or applicants for employment based on race, color, religion, religious expression, age, disability, sex (including pregnancy, childbirth, and related medical conditions, gender, transgender status, gender identity/expression), sexual orientation, national or ethnic origin (including limited English proficiency) political affiliation, status as a protected veteran, or any other classification protected by state, or federal laws.

This practice applies to all terms, conditions, and privileges of employment, including, but not limited to, recruitment, selection, promotion, demotion, transfer, layoff, recall, rehire, termination, development and training, compensation and benefits, social and recreational programs, retirement, and assignment of work (federal, state, or local regulations require otherwise) to ensure that employment decisions are in accordance with the principles of equal employment opportunity.

Any employee who feels they are the victim of discrimination and/or any employee who is witness to a potential act of discrimination has a responsibility to report the matter to their respective Human Resources representative, supervisor/manager or to the Head of Human Resources. Additionally, the employee can report the matter on the Compliance Action Line by calling **1-866-293-3863**.

In the event it is determined this policy has been violated, appropriate corrective action, up to and including termination, will be taken promptly, maintaining confidentiality to the extent possible. Any retaliation against an employee for reporting discrimination or participating in an investigation is prohibited.

18:2 COMPLIANCE WITH THE AMERICANS WITH DISABILITIES ACT/AMENDMENTS ACT

The Company is committed to ensuring equal access to its programs and activities for qualified individuals, including individuals with disabilities. Therefore, the Company supports and adopts as its own the standards set forth in Section 504 of the Rehabilitation Act of 1973 and the Americans with Disabilities Act Amendments Act (ADAAA) of 1990, as amended, and similar state laws (hereinafter “applicable law” or “law[s]”), which are designed to eliminate discrimination against qualified individuals with disabilities.

The Company is committed to making reasonable accommodations for qualifying individuals with a disability or disabling illness or condition as required by applicable laws. The Company’s policy of universal access applies to all lines of business and business entities operating under the auspices of the Company and/or related interactions between employees, applicants, supervisors and managers, individuals we serve, vendors, visitors, etc. Further, this policy, as with all Company policies, practices and procedures, is intended to provide effective and meaningful opportunities for persons with disabilities to participate in or benefit from aid, benefits, services, and training.

This policy applies to all employment practices and actions, including, but not limited to, recruitment, the job application process, hiring, training, disciplinary actions, rates of pay or other compensation, advancement, classification, transfer and reassignment, promotions, selection, or appointment to boards and/or other activities.

This policy applies to all employees or applicants regardless of title, salary grade or existence of a collective bargaining agreement.

The Company strives to provide qualified employees who have a disability or disabling illness or condition with the following:

- Equal access to all opportunities, programs, services, benefits, promotions, and activities or incentives offered through and/or by the Company;
- Equal opportunity to participate in retention and upward mobility of qualified employees with disabilities;
- An equal opportunity to request and receive reasonable accommodations;
- Appropriate confidentiality of all information regarding the covered condition;
- Equal accessibility to procedures for resolution of complaints arising out of this policy.

Therefore, the specific language of such laws and controlling interpretations thereof are incorporated by reference herein, and in the event of any apparent discrepancy between the language of this policy and such legal authority, the Company’s obligations will be determined exclusively by the latter.

As per applicable laws, the Company endeavors and reserves its right to:

- Identify, establish, and regularly review essential functions, abilities, skills, knowledge, and standards for employment, programs, services, and activities offered through and/or by the Company.
- Establish and adhere to an interactive and engaged process that allows for a review of conditions that may/may not be covered under the Act/applicable laws.
- To request/require documentation from a medical provider or other objective professional qualified to diagnose a disability or disabling illness or condition for purposes of determining the existence of a covered condition.
- As per its established processes, grant an accommodation request that is deemed to be reasonable and/or reasonably calculated at facilitating universal access and participation.
- As per its established processes, deny a request for accommodations if the documentation reveals that the request is not warranted, or if the individual fails to provide appropriate documentation, and/or if the accommodation constitutes undue hardship.
- Refuse an unreasonable accommodation, adjustment, and/or auxiliary aid and service that imposes a fundamental alteration of the essential functions of the job.

- Request and receive current documentation that supports requests for accommodations.
- Provide information, in accessible formats, to covered employees and applicants with a covered condition upon request.
- Review programs, services and activities and strive to make them available and usable in the most integrated and appropriate settings.
- Evaluate applicants and/employees on their abilities as demonstrated with or without reasonable accommodations, if necessary, in the selection, appointment and/or promotion process.
- Provide for or arrange reasonable accommodations and/or auxiliary aids and services for covered individuals, whether employee, applicants, patient/client or participant in Company-provided opportunities, programs, services, and activities.
- Maintain appropriate confidentiality of records and communication, except where disclosure is permitted or required by law.

The Company is committed to safeguarding the right of all employees to privacy in the use and disclosure of protected health information, including genetic information. Each employee's protected health information is confidential. It will be safeguarded in accordance with the Company's policy and all applicable legal requirements. The Genetic Information Non-Discrimination Act of 2008 ("GINA") prohibits employers and other entities covered by GINA from requesting or requiring genetic information of an individual or family member of the individual, except as specifically allowed by this law. To comply with this law, the Company is asking that employees refrain from providing any genetic information when responding to a request for medical information. Genetic information, as defined by GINA, includes an individual's family medical history, the results of an individual's or family member's genetic tests, the fact that an individual or an individual's family member sought or received genetic services, and genetic information of a fetus carried by an individual or an individual's family member or an embryo lawfully held by an individual or family member receiving assistive reproductive services.

How to Request a Reasonable Accommodation

Employees covered by the ADAAA and who would like to request a workplace accommodation for a covered condition should inform their respective Human Resources representative or supervisor/manager and contact Sedgwick. You may reach Sedgwick by calling 877-659-1521. Upon receiving or becoming aware of a request for accommodation, Sedgwick will communicate with you and engage in the interactive process to determine the nature of the request and will identify potential accommodations. Upon receiving complete documentation from Sedgwick, the Company will determine what, if any, reasonable accommodation may be appropriate.

18:3 PROHIBITION OF HARASSMENT

Because we value the dignity of all people, the Company is committed to maintaining a work environment that is free from discrimination and harassment on the basis of race, color, religion, religious expression, age, disability, sex (including pregnancy, childbirth, and related medical conditions, gender, transgender status, gender identity/expression), sexual orientation, national or ethnic origin (including limited English proficiency), political affiliation, status as a protected veteran, or any other classification protected by city, state, and federal laws.

It is our goal that all employees are free to devote their full attention and best efforts to their jobs. Harassment, either intentional or unintentional, has no place in the Company. The Company's policy and federal and state/provincial (for Canadian operations) laws prohibit discrimination and harassment of any employee or applicant for employment, male or female. Examples of conduct prohibited by this policy include using slurs or making jokes about gender, race, or ethnicity, making offensive references to stereotypes, or making inappropriate comments about characteristics protected by law. With this policy, the Company prohibits not only unlawful harassment but also other unprofessional and discourteous actions. Any such harassment is prohibited by this policy whether or not the conduct also violates federal or state law.

This policy applies to all employees, directors, officers, and agents of the Company, including its Executive Officers and the Board of Directors. All employees must, as a condition of their employment, adhere to this policy.

OVERVIEW OF THE TYPES OF BEHAVIOR THAT MAY CONSTITUTE SEXUAL HARASSMENT

Unwelcome sexual advances, requests for sexual favors, and other verbal or physical contact of a sexual nature constitute sexual harassment.

Sexual harassment may be verbal, physical, written, or visual. Examples of sexual harassment may include, but are not limited to, sexual or suggestive comments, repeated propositions, offensive sexual joking, the display of sexually suggestive objects or pictures, sexually oriented comments about an individual's body, offensive touching, patting, or grabbing and pressure for sexual favors in return for special treatment on the job.

All such conduct violates this policy.

- All employees are responsible for conducting themselves in a professional manner that provides respect to others. Any behavior or action that is unduly coercive, intimidating, harassing or sexual in nature is inappropriate and strictly prohibited. This guideline applies to all business or related interactions between employees, applicants, supervisors, and managers, individuals we serve, vendors, and visitors.
- All employees are urged to exercise common sense and respect for others.
- Unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature constitute sexual harassment when;
 - submission to such conduct is made, either explicitly or implicitly, a term or condition of an individual's employment;
 - submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting such individual; and/or
 - such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating intimidating, hostile, or offensive working environment.
- Sexual harassment may involve the behavior of a person of the opposite or same sex.

REPORTING HARASSING BEHAVIOR

Any employee who feels they are the victim of harassment and/or any employee who is witness to a potential act of harassment has a responsibility to report the matter to their respective Human Resources representative, immediate supervisor, or to Human Resources. Additionally, the employee can report the matter on the Compliance Action Line by calling [1-866-293-3863](tel:1-866-293-3863).

Appropriate corrective action, up to and including termination, will be taken promptly, maintaining confidentiality to the extent possible. Any retaliation against an employee for reporting harassment/sexual harassment or participating in an investigation is prohibited.

Any officer, employee or agent found to be guilty of such misconduct shall be subject to appropriate sanctions, depending on the circumstances, which may result in disciplinary action up to and including termination.

SECTION 19

COMPLAINT PROCESS

19:1 OPEN-DOOR POLICY/FORMAL COMPLAINT PROCEDURE

The Company maintains open and free communication with all employees throughout the Company. Employees should feel motivated to provide excellent performance in an environment in which they feel engaged.



Senior managers and directors should hold regularly scheduled employee meetings and meet with frontline employees periodically to discuss goals, policies, plans, progress, developments, and problems. Further, and in the interest of keeping employees informed, bulletin boards, communication logs and Company newsletters will often be used for official notices, Company rules, notices of job vacancies, announcements, and other Company-related information.

Employees are also encouraged to share suggestions and/or ideas for work or product improvement with their teammates, manager, and other Company leaders.

KEEPING YOU INFORMED AND UP TO DATE

How we talk to each other is important. There are many ways in which you may keep up to date of activities in your own department and other parts of the Company.

- **Internal communication** – Your first and most important link is your supervisor, who will answer questions about your job, keep you informed of events in your own and related areas and discuss Company policies and practices. Bulletin boards, communication logs, the intranet, REACH, and Company newsletters are used for official Company notices, rules, notices of job vacancies, announcements, and other Company-related information. You should check them frequently.
- **External communication** – No employee should speak to the media on behalf of the Company without express authorization from the communications department or senior management. Instead, all media inquiries for Company information should be referred to your respective Human Resources representative or immediate supervisor, who will coordinate the appropriate response with the Company's communications department.

FORMAL COMPLAINT PROCESS

If unable to resolve issues informally, BrightSpring believes that employees should have an opportunity to present their work-related concerns – including those regarding management decisions – for review. Therefore, if an employee has an issue/concern not addressed in Section 18 of this Handbook (for Section 18 issues/concerns the employee should follow the process outlined in that Section) the employee may file a formal complaint with the Head of Human Resources. The complaint should be filed using the written form provided by HR. Once the complaint is received, it will be reviewed by the HR team (along with the relevant documentation information) and the Head of Human Resources will provide a response to the complaint in a timely manner.

SECTION 20

ENDING EMPLOYMENT

20:1 SEPARATION

The Company expects that all employees will offer at least two (2) weeks' notice in the event of resignation. Directors and above are expected to give a minimum of thirty (30) days' notice in the event of resignation. Lack of notice may influence future re-employment. PTO may not be used during your notification period. The Company will consider you to have voluntarily separated your employment if you do any of the following:

- Resign from the Company.
- Fail to return from an approved leave of absence on the date specified by the Company, or its designated Administrator, without contacting your supervisor/manager in advance.
- Fail to report to work or call in for two (2) or more consecutive workdays.

20:2 EXIT INTERVIEWS

The Company may conduct an exit interview with employees who leave the Company voluntarily. This provides you with the opportunity to tell us about your employment experience here - what you liked, what you didn't like, and where you think we can improve. We greatly value these comments.

20:3 RETURN OF COMPANY PROPERTY

Any Company property issued to you, such as computer equipment, cell phone, keys, parking passes or Company credit card must be returned at the time of your separation of employment. You will be responsible for any lost or damaged items.

20:4 COBRA BENEFITS

According to the federal Consolidated Omnibus Budget Reconciliation Act (COBRA) of 1985, in the event of a "qualifying event" such as your termination or loss of eligibility to remain covered under our group health insurance program, an employee and eligible dependents may have the right to continue coverage under our health insurance program. This coverage will be for a limited period of time, and it will be at the employee's expense. Contact the Benefit Support Center at [844-896-0169](tel:844-896-0169).

20:5 VERIFICATION OF EMPLOYMENT

Because we value confidentiality, under no circumstances do we condone, support, or allow a current employee to provide an external entity any information or reference check regarding the employment status of a former employee of our organization. Employment verification can be obtained from our third-party vendor, The Work Number. Verification of employment can be obtained at www.theworknumber.com or by calling [1-800-367-5690](tel:1-800-367-5690). The requestor will need to provide the employee's Social Security Number and the BrightSpring Employer Code of 26012.

20:6 REINSTATEMENT OF EMPLOYMENT

A former employee who is reemployed will be considered a new employee from the date of reemployment unless the break in service is less than 30 days, in which case the employee will retain accumulated Company service. Length of service for the purposes of benefits is governed by the terms of each benefit plan.

If you are rehired within 30 days of separating from a previously eligible position, you will automatically be re-enrolled in the benefits you had before your separation, with coverage effective the first day of the month following your rehire date. You will not be given an opportunity to make new elections until you experience a qualifying life event or at the next Open Enrollment period.

Employees who have been separated for more than 30 days will need to complete the rehiring screening, including background check and drug screening, and attend new hire orientation.

Note: To the extent different than the above policy, the Company will follow all applicable state/local laws and contractual obligations regarding the payment of PTO. Check with your Human Resources representative for specifics.

YOUR FEEDBACK IS ALWAYS WELCOME!

Should you have questions or comments about any information provided in this Handbook, please contact the Human Resources representative for your area.

In conclusion, this Employee Handbook is an overview of some of the Human Resources policies and practices established to help you in your job. If you have questions that have not been answered in this Handbook, be sure to ask your supervisor/manager or Human Resources representative.



STATE FALSE CLAIMS ACTS & GENERAL STATUTES

The Company is committed to preventing fraud, waste or abuse of resources belonging to the Company or the individuals we serve. In addition to the Federal False Claims Act, the Deficit Reduction Act of 2005 contains additional provisions aimed at reducing Medicaid fraud and abuse. Please see the specific State False Claims below:

STATE	REGULATION	OIG. CERT.
Alabama*	No State FCA. Ala. Admin. Code Rule 560- X-4; Ala. Code §22-1-11; Ala. Code §§ 13A-5-6, 13A-5-11.	NO
Alaska	State FCA (Medicaid Only). AK Stat. §§ 09.58.010 - 09.58.110; AK Stat. §§ 47.05.200 - 47.05.290; AK Stat. §§ 39.90.100 - 39.90.190; 7 AAC 105.400 - 105.490.	NO
Arizona*	No State FCA. Ariz. Rev. Stat. Ann. §§ 36-2918 - 36-2918.01; Ariz. Stat. Ann. § 13-2311; Ariz. Rev. Stat. Ann. §§ 23-1501 - 23-1502.	NO
Arkansas *	State FCA (Medicaid Only). Ark. Code Ann. §§ 20-77-901 - 20-77-912; Ark. Code Ann. §§ 5-55-1-1 - 5-55-115.	NO
California	State FCA. Cal. Govt. Code §§ 12650 - 12656; Ca. Welf. & Inst. Code §§ 14107, 14107.1, 14107.11, 14107.12, 14107.13, 14123, 14123.2, 14123.25.	YES
Colorado	State FCA (Medicaid Only). Colo. Rev. Stat. §§ 25.5-4-303.3 - 25.5-4-310; Colo. Rev. Stat. § 18-5-114.	YES
Connecticut	State FCA. Conn. Gen. Stat. §§ 4-274 - 4-289.	YES
Delaware	State FCA. Del. Code tit. 6 §§ 1201 - 1211; Del. Code tit. 31 §§ 1001 - 1009.	YES
Dist. of Columbia	State FCA. D.C. Code Ann. §§ 2-381.01 - 2-381.10; D.C. Code Ann. §§ 4-801 - 4-805.	NO
Florida	State FCA. Fla. Stat. §§ 68.081 - 68.092; Fla. Stat. § 112.3187; Fla. Stat. § 409.920; Fla. Stat. § 409.913; Fla. Stat. § 414.39; Fla. Stat. § 812.035; Fla. Stat. § 817.155; Fla. Stat. § 837.06; Fla. Admin. Code r. 59G-9.070	NO
Georgia	State FCA (Medicaid Only). Ga. Code Ann. §§ 49-4-168 - 49-4-168.6; Ga. Code Ann. § 49-4-146.1.	YES
Hawaii	State FCA. Haw. Rev. Stat. §§ 661-21 - 661-31; Haw. Rev. Stat. §§ 46-171 - 46-181.	YES
Idaho*	No State FCA. Idaho Code §§ 56-226 - 56-227C.	NO
Illinois	State FCA. 740 Ill. Comp. Stat. 174/1 - 174/40; 740 Ill. Comp. Stat. 175/1 - 175/8.	YES
Indiana	State FCA. Ind. Code §§ 5-11-5.5-1 - 5-11-5.5-18; Ind. Code §§ 35-43-5-0.1 - 35-43-5-23.	YES
Iowa	State FCA. Iowa Code §§ 685.1 - 685.10; Iowa Code §§ 249a.39 - 249a.57.	YES
Kansas *	State FCA. Kan. Stat. Ann. §§ 75-7501 - 75-7511; Kan. Stat. Ann. §§ 21-5925 - 21-5934; Kan. Stat. Ann. §§ 75-725 - 75-726.	NO
Kentucky	No State FCA. Ky. Rev. Stat. §§ 205.8451 - 205.8483; Ky. Rev. Stat. § 534.030; Ky. Rev. Stat. § 534.050.	NO
Louisiana	State FCA (Medicaid Only). La. Rev. Stat. Ann. §§ 46:437 - 46:440.16; La. Rev. Stat. Ann. § 14:70.1.	NO
Maine*	No State FCA. 22 Me. Rev. Stat. Ann. §§ 1-a, 13 - 15; 26 Me. Rev. Stat. Ann. §§ 831 - 840.	NO
Maryland	State FCA (Medicaid Only). Md. Code Ann. Health General T. 2 §§ 2-601 - 2-611; Md. Code Ann. Crim. Law §§ 8-508 - 8-519; Md. Code Ann. Health Occup. T. 1 §§ 1-501 - 1-506.	NO
Massachusetts	State FCA. Mass. Gen. Laws ch. 12, §§ 5a - 5o; Mass. Gen. Laws ch. 266, § 67B.	YES
Michigan	State FCA (Medicaid Only). Mich. Comp. Laws Ann. §§ 400.601 - 400.615; Mich. Comp. Laws Ann. § 400.11b(16).	NO
Minnesota	State FCA. Minn. Stat. §§ 15c.01 - 15c.16; Minn. Stat. §§ 609.466, 609.52.	NO
Mississippi *	No State FCA. Miss. Code Ann. §§ 43-13-201 - 43-13- 233; Miss. Code Ann. § 43-13-129.	NO
Missouri *	State FCA (Medicaid Only). Mo. Rev. Stat. §§ 191.900 - 191.914.	NO
Montana	State FCA. Mont. Code Ann. §§ 17-8-401 - 17-8-416; Mont. Code Ann. § 45-6-313.	YES
Nebraska *	State FCA (Medicaid Only). Neb. Rev. Stat. §§ 68-934 - 68-947; Neb. Rev. Stat. Ann. §§ 48-1114, 48-1119; Neb. Rev. Stat. Ann. § 71-445; Neb. Rev. Stat. Ann. § 28-631; Neb. Rev. Stat. Ann. § 44-6604.	NO
Nevada	State FCA. Nev. Rev. Stat. Ann. §§ 357.010 - 357.250; Nev. Rev. Stat. Ann. §§ 422.450 - 422.590.	YES
New Hampshire	State FCA (Medicaid Only). N.H. Rev. Stat. Ann. §§ 167.58 - 167.62;	NO
New Jersey	State FCA. N.J.S. 30:4D-17(a)-(d); N.J.S. 30:4D-7.h; N.J.S. 30:4D-17(e)-(i); N.J.S. 30:4D-17.1.a; N.J.S. 2C:21-4.2, 2C:21-4.3; N.J.S. 2C:51-5; N.J.S. 34:19-1.	NO
New Mexico	State FCA. N.M. Stat. Ann. §§ 27-14-1 - 27-14-15; N.M. Stat. Ann. §§ 30-44-1 - 30-44-8.	NO
New York	State FCA. N.Y. Fin. Law §§ 187 - 194; N.Y. Lab. Law § 740; N.Y. Soc. Serv. Law § 145-b; N.Y. Soc. Serv. Law § 366-b.	YES
North Carolina	State FCA. N.C. Gen. Stat. §§ 1-605 - 1-629; N.C. Gen. Stat. §§ 108a-70.10 -108a-70.17; N.C. Gen. Stat. § 97-88.3.	YES
North Dakota*	No State FCA. N.D. Stat. Ann. §§ 75-02-05-05 - 75-02-05-09; N.D. Cent. Code § 34-01-20.	NO
Ohio	No State FCA. Ohio Rev. Code § 5162.15; Ohio Rev. Code § 2913.40; Ohio Rev. Code § 5164.35; Ohio Rev. Code §4113.52.	NO
Oklahoma	State FCA (Medicaid Only). 63 Okla. Stat. §§ 5053 - 5054, 5015; 56 Okla. Stat. §§ 1005 - 1007; 21 Okla. Stat. §§ 358 - 359.	YES
Oregon *	State FCA. Or. Rev. Stat. §§ 180.750 - 180.785; Or. Rev. Stat. §§ 411.593 - 411.703; Or. Rev. Stat. §§ 165.690 - 698; Or. Rev. Stat. §§ 659A.199, 885.	NO
Pennsylvania	No State FCA. 62 Pa. Stat. §§ 1407 - 1409; 55 Pa. Code § 1101.75; 43 Pa. Stat. §§ 1421 - 1428.	NO
Rhode Island	State FCA. R.I. Gen. Laws §§ 9-1-1-1 - 9-1-1-9; R.I. Gen. Laws §§ 40-8.2-1 - 40-8.2-23; R.I. Gen. Laws §§ 28-50-1 - 28-50-9.	YES
South Carolina*	No State FCA. S.C. Code Ann. § 38-55-170; S.C. Code Ann. §§ 43-7-60 - 43-7-90; S.C. Code of Regulations R. 126-403; S.C. Code Ann. §§ 8-27-10 - 8-27-60.	NO
South Dakota*	No State FCA. S.D. Codified Laws §§ 22-45-1 - 22-45-11; S.D. Codified Laws § 27B-8-43.	NO
Tennessee	State FCA. Tenn. Code Ann. §§ 4-18-101 - 4-18-108; Tenn. Code Ann. §§ 71-5-182 - 71-5-183.	YES
Texas	State FCA (Medicaid Only). Tex. Hum. Res. Code Ann. § 36.001 - 36.132; Tex. Hum. Res. Code § 32.039, 32.0391.	YES
Utah *	State FCA. Utah Code Ann. §§ 26-20-1 - 26-20-15.	NO
Vermont	State FCA. Vt. Stat. Ann. tit. 32 § 630 - 642; Vt. Stat. Ann. tit. 33 §§ 141, 143, 143a; Vt. Stat. Ann. tit. 13, § 3016; Vt. Stat. Ann. tit. 21 §§507 - 509.	YES
Virginia	State FCA. Va. Code Ann. § 8.01-216.1 - 8.01-216.19; Va. Code Ann. §§ 18.2-498.1 - 18.2-498.5; Va. Code Ann. §§ 32.1-312, 32.1-314, 32.1-315.	YES
Washington**	State FCA (Medicaid Only). Wash. Rev. Code §§ 74.66.005 - 74.66.130; Wash. Rev. Code §§ 74.09.210, 74.09.315, 74.09.230, 48.80.030, 42.40.020, 49.60.250.	YES
West Virginia	No State FCA. W.Va. Code §§ 9-7-1 - 9-7-9; W.Va. Code §§ 6C-1-1 - 6C-1-8.	NO
Wisconsin	No State FCA. Wis. Stat. §§ 49.49, 49.485; Wis. Stat. § 146.997; Wis. Stat. § 111.39.	NO
Wyoming *	State FCA (Medicaid Only). Wyo. Stat. Ann. § 42-4- 303(a), et seq.	NO

Note: This list is believed to be up-to-date and complete, but as a result of the incentives contained in the Federal Deficit Reduction Act of 2005, additional states are considering legislation. (Updated 03/2020).

* Without a Qui Tam Provision

** The qui tam provisions of the Washington Medicaid Fraud False Claims Act established under 74.66 terminate on June 30, 2023. See Wash. Rev. Code §43.131.419. Wash. Rev. Code 74.66.050 through 74.66.130 are scheduled for repeal effective June 30, 2024. See Wash. Rev. Code §43.131.4

NEW JERSEY FALSE CLAIMS ACTS & GENERAL STATUTES

New Jersey Insurance Fraud Prevention Act (IFPA), codified at N.J.S.A. 17:33A-1 et seq., is a comprehensive law aimed at combating insurance fraud in the state.

The Act was enacted to (1) aggressively confront insurance fraud, (2) facilitate detection and prevention, (3) require restitution for fraudulently obtained benefits, and (4) reduce premium costs by minimizing fraudulent claims.

- **Violations:** It is illegal to knowingly submit false or misleading statements in support of insurance claims or applications. This includes concealment of events affecting benefits or residency misrepresentation for auto insurance.
- **Penalties*:** Civil penalties range from \$5,000 for the first violation, \$10,000 for the second, and \$15,000 for subsequent violations. Restitution may also be ordered. Severe cases may lead to criminal prosecution.
- **Enforcement:** The Commissioner of Banking and Insurance may pursue civil actions or administrative penalties. Criminal prosecution may be initiated by the Attorney General.

*The penalties may be adjusted periodically according to inflation.

NEW JERSEY FALSE CLAIMS ACT

The New Jersey False Claims Act (“NJFCA”) makes it unlawful for any person to: (1) knowingly present, or cause to be presented, a false or fraudulent claim for payment or approval; (2) knowingly make, use, or cause to be made or used, a false record or statement material to a false or fraudulent claim; (3) knowingly make, use, or causes to be made or used, a false record or statement material to an obligation to pay or transmit money or property to a government entity, or knowingly conceal or knowingly and improperly avoid or decrease an obligation to pay or transmit money or property to a government entity; or (4) conspire to commit one or more of the above listed violations. See N.J. Stat. § 2A:32C-3.

A violator of the NJFCA will be liable to the State for three times the amount of damages sustained by the State and attributable to the violator, plus a civil penalty of at least \$14,308 but no more than \$28,619, updated for inflation. Certain liabilities may be reduced if the violator furnishes the New Jersey Attorney General with all information known to the violator within thirty (30) days of receiving such information, provided that the violator does not have knowledge of an investigation at the time the violator furnishes such information. See N.J. Stat. 2A:32C-4.

The New Jersey Attorney General shall investigate suspected violations of the NJFCA and may bring a civil action against a person that has violated the NJFCA. An individual may also bring a private civil action on behalf of the individual and the State. If the New Jersey Attorney General proceeds with a qui tam action, the private plaintiff may receive a percentage of the funds recovered. See N.J. Stat. 2A:32C-7.

WHISTLEBLOWER PROTECTIONS

The NJFCA contains an employee protection provision that prohibits an employer from discharging, demoting, suspending, threatening, harassing, or otherwise discriminating against an employee for lawfully disclosing information regarding a false claims action against the employer. An employer who violates the employee protection provision is liable to the affected employee for all relief necessary to make such person whole, including reinstatement with the same seniority status as if the discrimination had not occurred, twice the amount of back pay, interest on the back pay and compensation for any special damages sustained as a result of the discrimination, including litigation costs and reasonable attorney’s fees. See N.J. Stat. 2A:32C-10.

Additionally, New Jersey’s Conscientious Employee Protection Act (the “NJCEPA”) contains an employee protection provision that prohibits an employer from taking any retaliatory action against an employee because such employee discloses or threatens to disclose, or objects to participate in, any activity, policy or practice of the employer that the employee reasonably believes is in violation of a law, rule, or regulation, or is fraudulent or criminal. Retaliatory action includes discharging, disciplining, or otherwise penalizing or threatening to penalize such employee. The protection against retaliatory action only applies to an employee who first brings the offending activity, policy, or practice to the attention of their supervisor and affords the employer a reasonable opportunity to correct such activity, policy, or practice. An employer who violates this employee protection provision may be liable to the affected employee for reinstatement, restoration of benefits, back pay and reasonable costs, and attorney’s fees. Such employer may also be subject to punitive damages and a civil penalty of up to \$20,000, updated for inflation. See N.J. Stat. 34:19-3; 34:19-4; 34:19-5.

Individuals may report fraud to the NJ Medicaid Fraud Division Hotline: 888-937-2835 or <https://www.nj.gov/comptroller/about/work/medicaid/complaint.shtml>. NJ Insurance Fraud Prosecutor Hotline: 877-55-FRAUD or <https://njinsurancefraud2.org/#report>.

NEW JERSEY HEALTH CARE CLAIMS FRAUD ACT

New Jersey’s Health Care Claims Fraud Act (the “NJHCCFA”) prohibits any person from making or causing to be made a false, factious, fraudulent, or misleading statement of material fact in, or omitting a material fact from, or causing a material fact to be omitted from, any record, bill, claim or other document that a person submits, attempts to submit, or causes to be submitted for payment or reimbursement for health care services. The NJHCCFA is a criminal offense, and any person who is found guilty of violating the NJHCCFA may be subject to a fine of up to five times the pecuniary benefit obtained or sought to be obtained by such person as well as loss of professional licensure and all other penalties allowed by law. See N.J. Stat. 2C:21- 4.2; 2C:21-4.3.

NEW JERSEY MEDICAL ASSISTANCE AND HEALTH SERVICES ACT

New Jersey's Medical Assistance and Health Services Act (the "NJMAHSA") contains a statute that prohibits certain fraudulent activities in connection with certain New Jersey health care benefit programs, including New Jersey's Medicaid program. The NJMAHSA's antifraud statute prohibits a person from (1) knowingly and willfully making or causing to be made any false statement or representation of a material fact in any cost study, claim form, or any document necessary to apply for or receive any benefit or payment under New Jersey's Medicaid program; (2) knowingly and willfully making or causing to be made any false statement or representation of a material fact for use in determining a person's right to any benefit or payment under New Jersey's Medicaid program; or (3) concealing or failing to disclose the occurrence of an event which affects the right of any person to receive payment or benefits under New Jersey's Medicaid program with an intent to receive payments or benefits to which a person is not entitled. Any person or entity that violates the NJMAHSA is guilty of a criminal offense punishable by fines and imprisonment. Additionally, a violator may be subject to civil monetary penalties of (1) payment of interest on the amount of the excess benefits or payments made to such person or entity; (2) up to three times the amount of excess payment or benefits received by such person or entity, plus interest; and (3) additional penalties ranging from \$14,308 to \$28,619 per claim as allowed under the federal False Claims Act. See N.J. Stat. 30:4D-17. The federal False Claims Act's minimum and maximum civil monetary penalty amount may be adjusted for inflation by the Federal Civil Penalties Inflation Adjustment Act of 1990. The amounts listed above shall automatically adjust accordingly. Providers that violate the NJMAHSA may also be subject to disbarment from the New Jersey Medicaid program and loss of professional licensure.

EMPLOYEE ACKNOWLEDGEMENT

I understand this Employee Handbook has been prepared as a guide to BrightSpring's policies, benefits, and general information. The Company reserves the right to make changes in the content or application of its policies as it deems appropriate, and these changes may be implemented even if they have not been communicated, reprinted, or substituted in this Employee Handbook. I acknowledge receipt of the Employee Handbook and understand my ongoing obligation to follow BrightSpring's policies and practices and any changes that may be made in the content or application of the Employee Handbook.

I understand that nothing in this Employee Handbook or any other policy or communication creates an employment contract or changes the fact that employment is at will for an indefinite period unless terminated at any time by the Company or me. I understand that no employee or representative of the Company, other than the Company's president and CEO, Chairman of the Board, Board of Directors, Head of Human Resources, or an authorized member of the legal team, has any authority to enter into an employment contract or to change the at will employment relationship or to make any agreement contrary to the foregoing.

Please sign below and return to your supervisor or Human Resources Representative. This Employee Acknowledgement will be maintained in your personnel file.

Employee Signature

Date

Supervisor/Human Resources Representative Signature

Date