



# **Troy Health, Inc. Code of Conduct**

The Troy Health, Inc. Code of Conduct provides our commitments and ethical responsibilities that we expect Troy's workforce, in whatever capacity, to adhere to when conducting business or other activities on Troy's behalf. This document enables our workforce to be our "eyes and ears" and encourages our workforce to report activities for investigation.

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# LIVING OUR CODE OF CONDUCT

## Introduction

Troy Health, Inc. (“Troy”) is committed to the highest standards of excellence, professionalism, and integrity in all aspects of our business. This Code of Conduct (“Code”) provides the fundamental principles and ethical expectations that govern our activities, grounding us in the applicable laws, rules, regulations, and Troy mission, vision, and values. All directors, officers, and employees must fully adhere to this Code and are accountable for understanding its provisions and reporting any possible violations of which they become aware. While the Code cannot address every circumstance, it is built on basic principles of good judgment, personal honesty, and sound business ethics. To help evaluate specific situations, consider these self-assessment questions:

- Will my action comply with the intent and purpose of Troy’s policies and practices?
- Will I compromise myself or the reputation of Troy by this action if it becomes known to my supervisor, colleagues, or friends?
- Is this action honest in every respect?
- Could this action appear inappropriate to others, even if it is ethical?

Regardless of the specific situation you face, the best course of action is always to be honest, forthright, and loyal.

## Scope

This Code applies to everyone in Troy, including the Board of Directors and all employees, when doing work for Troy. The same ethical standards apply to all, regardless of role or level in the organization. It is the responsibility of every employee to be familiar with all policies and procedures pertinent to their job functions.

## Our Principles

1. **Member Obsession:** put members first, earning their trust in the process
2. **Take Ownership:** you are accountable: measure goals, processes, and outcomes
3. **Invent and Simplify:** get creative when finding solutions, but showcase good judgment and instinct; stay curious
4. **Act Rapidly:** bias for action - speed and action over inaction
5. **Use Resources Wisely:** achieve goals with innovation and resourcefulness
6. **Earn Trust:** listen and show respect for diverse perspectives; admit mistakes and stay humble
7. **Have Backbone; Disagree and Commit:** challenge decisions with reason, but once a decision is reached, do everything you can to make it successful

## Compliance with the Law and Highest Ethical Standards

Troy is committed to upholding the highest ethical standards and complying with applicable laws and regulations, federal health care program requirements, including U.S. health care fraud and identity theft laws, this Code and any other Troy policies or requirements.

## Acknowledgment

After reviewing this Code, each employee must sign the acknowledgment on the last page of this document. New employees must sign the acknowledgment page and return it to Human Resources for personnel file inclusion within five (5) business days from their initial receipt of this Code. All employees and/or Board members are also required to complete a signed acknowledgment upon annual deployment by the deadline specified at that time. The Chief Compliance Officer will track and ensure all required signed acknowledgment statements are returned.

## Training

Troy will maintain and update training and monitoring programs to educate its employees on the legal and regulatory requirements of their respective duties and positions, and to detect possible violations.

This includes training on Troy's Compliance Program and all applicable federal and state laws and regulations, including U.S. health care fraud and identity theft laws.

### Employee Requirements:

- You are required to complete all mandated training and functional area training necessary to perform your job effectively.
- Not understanding a regulation or policy requirement is **not an excuse for non-compliance**.
- Upon completion of training, you may be asked to sign an acknowledgment or attestation form.
- If you need assistance or clarification, ask your supervisor or contact the Chief Compliance Officer.

## SEEKING ADVICE AND REPORTING CONCERNS

### When to Seek Advice

You are encouraged to seek advice whenever you are unsure about an appropriate legal or ethical course of action and should not speculate as to the correct answer. This includes situations where applicable policies are difficult to interpret, relevant laws or standards are complex, you have limited experience with the subject matter, or you find yourself in a "gray area" and need guidance. Furthermore, Troy employees are encouraged and have a duty to report potential or suspected violations of this Code, including situations where you know or suspect illegal or unethical activity, fraud, or abuse. Failure to report known misconduct may result in disciplinary action, up to and including termination of employment.

### Where to Go for Advice or to Report a Violation

You may ask questions about reporting violations or raise the matter with the following resources:

- Your immediate supervisor or manager;
- The Chief Compliance Officer or a member of the Compliance Department;

- The Human Resources Department; or
- Any member of the senior management team.

If you wish to report a suspected violation of this Code anonymously, you may access the Compliance and Ethics Hotline reporting portal at: [Troy Ethics & Compliance Reporting Portal](#).

You can also report a suspected violation in writing to:

- **Email:** [compliance@troymedicare.com](mailto:compliance@troymedicare.com)
- **Mail:**

Troy Health, Inc.  
Attn: Chief Compliance Officer  
PO Box 1378  
Westborough, MA 01581

If you choose to reveal your identity, it will not be disclosed unless it becomes absolutely necessary or required by law during an investigation.

## Non-Retaliation

Troy prohibits retaliation against any employee for reporting in good faith a possible violation of this Code, a law, rule, or regulation. Troy will not take or threaten any action against you as a reprisal or retaliation for making a complaint or disclosing or reporting information in good faith. Retaliation for reporting a federal offense is illegal under federal law and may result in disciplinary action up to and including termination and/or legal action.

If a reporting individual was involved in an improper activity, the individual may be disciplined appropriately, even if they were the one who disclosed the matter. In these circumstances, Troy may consider the decision to report the matter, and any subsequent cooperation, as mitigating factors in any disciplinary decision.

## AUDITS AND INVESTIGATIONS

Troy must abide by all applicable local, state, and federal laws (including U.S. health care fraud and identity theft laws) and fully and accurately respond to regulatory reviews, audits, and investigations. Failure to do so may result in sanctions, penalties, and legal action. It is Troy's policy to fully cooperate with all government agencies in their investigations.

### Employee Duty to Report and Cooperate:

- All employees have a duty to cooperate fully in all internal and external audits, inquiries, and investigations conducted by the Compliance, Finance, Human Resources Departments, the Board, or outside counsel.
- You must bring the following to the immediate attention of senior management and the Chief Compliance Officer:
  - Requests or subpoenas to appear or testify before a government body (e.g., grand jury, commission).
  - Notification of investigation by authorities responsible for enforcing laws.
  - Communications from government bodies threatening substantial fines, penalties, or injunctive action.
- **Full cooperation** requires promptly, completely, and truthfully complying with all requests for documents, information,

and interviews, including retaining and producing all relevant records and responding truthfully to all questions.

Failure to comply with this provision will lead to disciplinary action, up to and including termination.

## **DISCIPLINARY ACTIONS**

Troy leadership expects all employees to adhere to the highest ethical standards, good judgment, and consideration of others. Any act contrary to the policy and purpose of this Code, or any act harmful to an employee or Troy, may be cause for disciplinary action.

### **Actions Subject to Disciplinary Action:**

Disciplinary actions may be taken for acts including, but not limited to:

- Violating laws (including U.S. health care fraud and identity theft laws), regulations, this Code, or Troy policies and procedures.
- Directing or encouraging others to commit any of the violations listed above.
- Failing to report known or suspected violations.
- Interfering with or being uncooperative during any internal or external investigation.
- Retaliating against others for reporting a concern or violation.
- Failure by supervisors to detect or report misconduct by employees or business partners under their supervision.

### **Range of Disciplinary Action:**

Disciplinary actions for violations of this Code can range from verbal or written reprimands and suspension to termination of employment and possible external legal action.

### **Determination and Consequences:**

- The severity of corrective action will be determined by the Chief Compliance Officer in consultation with senior management, the Board of Directors, the Corporate Compliance Committee, and/or the employee's supervisor, as appropriate.
- Employees must be aware that violations of laws or regulations could trigger external legal action, including criminal or government enforcement, which may result in suspension or revocation of licenses, sanctions, monetary fines, criminal penalties, and imprisonment.

## **OUR WORK CULTURE**

### **Respect for All Employees**

We are a team, and our success depends on your contribution and ability to inspire the trust and confidence of your co-workers, supervisors, and our members. Respect for the rights and dignity of others, and a dedication to the good of Troy, is essential.

It is our policy, among other things:

- to hire, pay and assign work on the basis of qualifications and performance;
- not to discriminate on the basis of race, religion, ethnicity, national origin, color, gender, age, citizenship, veteran's status, marital status or disability;
- to attract and retain a highly talented workforce;
- to encourage skill growth through training and education and promotional opportunities;
- to encourage an open discussion between all levels of employees and to provide an opportunity for feedback from the top to the bottom and from the bottom to the top;
- to prohibit any sexual, physical, verbal or any other kind of harassment in the workplace;
- to make the safety and security of our employees while at Troy facilities a priority;
- to recognize and reward efforts that exceed our expectations; and
- to respect all workers' rights to dignity and personal privacy by maintaining the protection of employees and member confidential information, including protected health information (PHI).

Diversity, equity, and inclusion is an increasingly important topic for Troy. We aim to promote awareness and understanding of how persons with different backgrounds can work together harmoniously.

## Environment, Health, and Safety

Troy is committed to protecting the health and safety of its employees and complying with all applicable environmental, health, and safety laws and regulations. While operating as an all-remote company, all personnel are expected to comply with our policies, programs, and procedures, and to maintain a safe, ergonomic, and hazard-free remote workspace.

Key Requirements:

- **Reporting Incidents:** You must report all accidents, work-related injuries, and unsafe conditions immediately. If you are injured or become sick while working, you must inform your direct manager immediately.
- **Safety Awareness:** Safety is a priority. You must practice awareness, report unsafe conditions immediately, and never guess on a safe procedure—always ask your direct manager if you are unsure.
- **Compliance:** You must understand your job instructions and Troy policies, as a violation of a safety precaution is considered an unsafe act.

## Alcohol and Drug Use

We are committed to maintaining a drug-free work environment. The use of alcohol, illegal drugs, or legal drugs that impair your ability to safely and effectively perform your work duties while on company time is strictly prohibited. The possession of illegal substances is also prohibited in connection with Troy business or on any Troy-issued equipment.

## DOCUMENTATION

### Accurate Records and Documentation

Our commitment is to ensure all business records, documentation, and system data are complete, accurate,

and fair, reflecting our business transactions and the provision of health care services, which is critical to preventing **fraud and identity theft**.

You must:

- Ensure all system and data information is maintained in material conformity with managed care practice standards and applicable requirements of any government authority having regulatory jurisdiction over Troy.
- Always ensure that all departments, functions, and processes comply with state and federal requirements under Medicare, Medicaid, and other applicable government program(s).
- Never falsify or alter business records.
- Not create or participate in creating records that have the effect of misleading, concealing improprieties, or otherwise being dishonest or deceptive.
- Ensure full, fair, accurate, timely, and understandable disclosure in all reports, documents, and public communications made by Troy.
- Accurately document your activities within our systems or databases.

If you are not sure about the accuracy or completeness of information, do not guess; seek the correct information or discuss the situation with your supervisor.

## Records Retention

Troy's record retention policy establishes consistent practices for how long records must be kept and when they can be destroyed in the normal course of business, in accordance with federal regulations. Compliance with the record retention policy and any document or record preservation notices is mandatory.

Key Requirements:

- **Retention Period:** Records must be maintained for a duration of not less than ten (10) contract years.
- **Legal Holds:** Records that may be relevant to litigation or a government investigation must not be destroyed until the matter is concluded and the Chief Executive Officer or Chief Compliance Officer has provided written approval for destruction.
- **Prohibited Actions:** Destroying or altering documents with the intent to obstruct a pending or anticipated official government proceeding is a criminal act and can result in disciplinary action, up to and including termination, plus large fines and incarceration.
- **Definition of a Record:** A "record" is any information, regardless of physical format, that has been created or received in the transaction of Troy's business. This includes, but is not limited to, hard copy, electronic files (emails, documents, spreadsheets), and data generated by or stored on Troy computer systems and devices.
- **Individual Responsibility:** Do not destroy, conceal, or alter any paper or electronic records related to your employment with Troy Medicare, including data on Troy-issued laptops and other portable devices.

# Computer and Information Systems

As employees, you are responsible for the appropriate use and safeguarding of all Troy-issued equipment and assets, including telephones, computers, and communication devices. This responsibility includes protecting sensitive data and systems to prevent identity theft and fraud.

## Key Requirements for System Use:

- **Business Use Only:** All Troy equipment, electronic systems, and email are for business purposes only. Personal use may be subject to access and usage restrictions.
- **No Expectation of Privacy:** You should have no expectation of privacy in your Troy email, internet use, or other electronic communications. Subject to applicable local law, Troy may review and monitor all electronic information, equipment, systems, and networks.
- **Security and Passwords:**
  - Do not share your passwords or post them in an obvious location.
  - Always lock your computer screen when stepping away.
  - You are responsible for all actions taken under your user ID.
- **Handling Confidential Information (including PHI):**
  - Emails about members (which may contain Protected Health Information/PHI) should only be shared internally with those who have a need to know for their specific job function.
  - Any emails containing confidential or private information to an external recipient must be encrypted or password protected.
  - Whenever possible, use Troy's secure faxing platform or process. If you must fax confidential information, always use a cover sheet that includes a confidentiality statement and a phone number for misdirected faxes.
- **Prohibited Content:** Employees are strictly prohibited from accessing, displaying, transmitting, or downloading websites that contain sexually explicit, illegal, or discriminatory content.
- **Reporting Concerns:** If you believe someone has accessed information inappropriately, or if you suspect identity theft, report the activity immediately to your supervisor and the Chief Compliance Officer, or use the Compliance and Ethics Hotline reporting portal. Reports may be made anonymously.

## Safeguarding Physical and Intellectual Property

Troy's success depends on protecting both its physical assets and its intellectual property. All employees, whether working remotely or at a physical location, are responsible for safeguarding Troy property. This includes taking necessary precautions to prevent theft or loss of Troy assets and data that could lead to identity theft.

- **Intellectual Property and Confidential Information**
  - All proprietary information, including data, systems, processes, and trade secrets developed or used by Troy, is the exclusive property of Troy.
  - Employees must use their best efforts to protect Troy's intellectual property, confidential information, and member data (including PHI) from theft, loss, misuse, or unauthorized disclosure.

- This responsibility continues even after an employee leaves Troy.
- **Physical Property and Assets (Including Remote Work Equipment)**
  - Employees are entrusted with Troy-owned equipment (laptops, phones, etc.) to perform their duties remotely. This equipment must be treated with care and secured at all times to prevent damage or theft.
  - When working remotely, employees must maintain a secure and private workspace to prevent unauthorized viewing or access to confidential information by family members or guests.
  - If utilizing a temporary or occasional physical office location, employees must follow all security protocols for the facility, including securing Troy assets, locking up confidential documents, and ensuring proper access control before leaving the premises.
  - Any loss, damage, or theft of Troy property must be reported immediately to a supervisor and the IT department.

## IDENTITY THEFT PREVENTION

Troy is fundamentally committed to preventing identity theft and protecting the security of all member, employee, and business data. This requires mandatory compliance with key federal statutes, primarily **Title 18, United States Code, Section 1028(a)(7) (Fraud and Related Activity in Connection with Identification Documents)**, and also the **HITECH Act, HIPAA, and Title 18, United States Code, Section 371 (Conspiracy to Commit Offense or to Defraud the United States)**.

Identity theft—the fraudulent use of personal identifying information—has severe consequences in a healthcare setting, including:

- Enrollment Fraud: Using a victim's identity to fraudulently enroll in a Medicare Advantage or other health plan.
- Financial Fraud: Submitting false claims for unrendered services.
- Medical Identity Theft: Obtaining services under a victim's identity, leading to erroneous health records.

### Employee Responsibility

All personnel must actively participate in preventing identity theft. You must adhere to all company policies that govern confidential data handling, including:

- Data Safeguarding: Following procedures in the Proprietary and Confidential Information section.
- System Security: Adhering to protocols in the Computer and Information Systems section.
- Data Accuracy: Upholding standards in the Accurate Records and Documentation section.
- Immediate Reporting: Promptly reporting any suspicion of data misuse or potential identity theft to your supervisor and the Chief Compliance Officer, or via the Compliance and Ethics Hotline.

**Violation of Title 18, United States Code, Section 1028(a)(7), concerning fraud and identity theft, can result in severe criminal penalties and imprisonment for the responsible individual.**

# COMPANY RELATIONSHIPS

## Conflicts of Interest

### Conflicts of Interest

A conflict of interest exists whenever an individual's personal interests influence or appear to influence your actions and decisions, or when you allow another interest to be more important to your decisions than the interests of Troy and our members. It is your responsibility to avoid situations in which your personal interest could conflict with the interests of Troy.

### Disclosure and Reporting

You must promptly seek guidance from the Chief Compliance Officer, the Compliance Department, or Human Resources if you believe a conflict of interest exists or may exist. You are responsible for identifying and disclosing any actual or potential conflict of interest.

- Troy has an **annual conflict of interest attestation process** for all employees, contractors, and Board members. Each individual is required to complete this attestation annually and upon any change.
- Troy's Conflict Committee will review all reported or identified potential conflicts to determine if a conflict exists and how to best resolve or manage it.
- Failure to disclose an actual or potential conflict of interest may result in disciplinary action, up to and including termination.

### Examples of Potential Conflicts of Interest

Conflicts of interest can arise from many sources including, but not limited to, personal financial interests or those of a family member, or use of Troy resources to benefit an outside or personal interest.

- **Financial Interests:** Having a personal or financial interest in any business with which Troy has a business relationship or in financial transactions that may affect Troy.
- **Misuse of Information:**
  - Obtaining or releasing confidential information or data concerning Troy or its operations without proper authorization.
  - Using any non-public information for personal gain in relation to the sale or purchase of stock or other securities (**Insider Trading**).
- **Employment, Memberships, and Business Relationships:**
  - Obtaining secondary employment with competitors or any company seeking to have a business relationship with Troy. **All employees must disclose all outside employment to their supervisor or senior management.**
  - Serving or accepting a position on the board of directors of another company, civic association, or non-profit organization without express written approval from senior management.
  - Using relatives of current employees in a sub-contracting arrangement, unless specifically cleared in advance.
  - Hiring relatives of current employees where the relative reports to or is evaluated by the other employee.
  - Using a former government employee on a project in which that individual personally participated while working for the government, unless the former government employee has fully complied with

the relevant state “revolving door” statutes. Questions regarding this policy should be directed to the Chief Compliance Officer.

- **Political Activities:** Exerting any form of coercion or using any form of inducement to pressure a fellow employee into participating in or contributing to a political campaign.

## Business Opportunities

Each director, executive officer, Board member, and employee owes a duty to Troy to advance our legitimate business interests when the opportunity to do so arises. You are prohibited from:

- **Diverting Opportunities:** Taking for yourself, or directing to a third party, any business opportunity that is discovered through the use of Troy property, Troy information, or your position at Troy.
- **Personal Gain:** Using corporate property, information, or your position for personal gain.
- **Competition:** Competing with Troy, directly or indirectly.

### Speaking Engagements, Honorariums, and Related Travel

If you are asked to speak at a seminar or conference on a topic related to your business expertise or Troy’s business, you must obtain approval from your supervisor and the Chief Compliance Officer.

- **Speaking Fees/Honorariums:** Generally, you may not accept a speaking fee or honorarium when conducting Troy business or for engagements offered because of your position with Troy.
- **Travel and Meals:** You may accept transportation, lodging, and meals, or payment/reimbursement for these expenses, if you speak at an approved seminar or conference and upon approval from the Chief Executive Officer or the Chief Compliance Officer.
- **Questions:** Any questions about your ability to accept additional items relating to speaking engagements should be raised with the Chief Compliance Officer.

## Proprietary and Confidential Information

Protecting the confidentiality of all business, employee, and member information is a fundamental obligation of every person performing work for Troy. This responsibility is critical to maintaining the trust of our members, preventing financial harm and identity theft, ensuring compliance with legal and regulatory requirements (including HIPAA and HITECH), and securing our competitive advantage.

This section defines three main categories of information you are required to safeguard.

### 1. Information Belonging to Troy and Our Members

#### A. Troy Confidential Information

All non-public information related to Troy’s operations, activities, and business affairs must be kept confidential. This includes all proprietary information that might be of use to competitors or harmful to Troy if disclosed.

You must:

- Never disclose confidential information without prior authorization.
- Avoid discussing confidential information in places where you can be overheard.
- Protect all information about fellow employees, members, or providers.
- Report any inappropriate access to information immediately to your supervisor and the Chief Compliance Officer, or use the Compliance and Ethics Hotline reporting portal. Reports may be made anonymously.

## **B. Member Confidential Information (PHI/Personal Information)**

As a healthcare company, we are bound by strict legal requirements, including the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and HITECH, to protect our members' medical information and other personal, confidential, or non-public information (Protected Health Information, or PHI).

You must:

- Respect and preserve the confidentiality of all member PHI and personal information.
- Access and use such information only as necessary to carry out your job responsibilities and only to the extent required for legitimate business purposes.
- Comply with all safeguards and related HIPAA policies established by Troy. A violation of these policies is subject to disciplinary actions, up to and including termination of employment.
- Except as expressly permitted by the member and by federal and state law, you must not disclose member information to any third party.
- Secure Communications: Whenever possible, use Troy's secure faxing platform or process. If you must fax confidential information, always use a cover sheet that includes a confidentiality statement and a phone number for misdirected faxes.

## **2. Information Belonging to Others**

You must also respect the confidentiality of information belonging to third parties, including trade secrets and other information given in confidence by our partners, suppliers, contractors, competitors, providers, or others, just as we protect our own.

### **A. Third-Party Confidential Information**

- You must consult with your supervisor to ensure appropriate confidentiality agreements are in place *before* receiving any confidential third-party information. These agreements must reflect a balance between the value of the information received and the cost of maintaining its confidentiality.
- Unsolicited confidential information submitted or received should be refused, returned to the sender where possible, deleted if received via the internet, and reported to your supervisor and the Chief Compliance Officer.

### **B. Former Employer Information**

- Any confidential information you possess from an outside source, such as a previous employer, must not be disclosed to or used by Troy while it remains confidential.
- If you have a valid and enforceable contract with a former employer containing confidentiality,

non-solicitation, or non-competition provisions, you should notify the Chief Compliance Officer and provide them with a copy of it.

## Business Courtesies, Gifts and Entertainment

This policy governs the giving and receiving of gifts, business courtesies, and entertainment to ensure all business decisions remain objective, ethical, and compliant with all applicable laws, especially those concerning government officials.

### Accepting Gifts and Courtesies

Troy prohibits accepting anything of value—including gifts, money, loans, or favors—from vendors, suppliers, or members that could be perceived as a bribe or unfair business inducement. You must not seek or accept personal gain from any person or entity doing business with or competing with Troy.

- **Maximum Value:** You may only accept occasional non-cash gifts with a value that does not exceed **\$50.00**.
- **Reporting:** Decline any offer of money or a gift exceeding the limit, or one believed to influence a business decision, and report it immediately to your supervisor and the Chief Compliance Officer.

### Offering Gifts and Courtesies

Money or cash equivalents (e.g., gift certificates) may **never** be offered as a gift under any circumstances. Gifts must not be offered to gain an unfair advantage.

- **Government Officials/Employees:** Prohibited, with the sole exception of nominal refreshments (e.g., coffee, snacks) provided on company property during official business (e.g., an audit).
- **Non-Government Commercial Settings:** Occasional, modest courtesies are permissible under certain conditions:
  - Promotional items of little intrinsic value (generally **\$15.00** or less).
  - Modest refreshments (soft drinks, cookies) during business activities.
  - Occasional modest business meals valued at **\$20.00** or less per person, not to exceed **\$50.00** annually per person. No meals are permitted with marketing or sales events involving current or potential members.

### Entertainment

- **Accepting Entertainment:** Do not solicit entertainment. You may accept modest, infrequent entertainment that is reasonable, in good taste, and not extravagant. Report any excessive offers to your supervisor and the Chief Compliance Officer.
- **Offering Entertainment:** You are **prohibited** from offering or providing any entertainment to a government official or employee, or to an individual health care professional or employee of a healthcare provider.

## Bribes, Kickbacks and Illegal Inducements

Troy will comply with all applicable federal and state anti-kickback laws and regulations. These laws generally

prohibit giving or receiving “anything of value” that is intended to induce or reward member/patient referrals or encourage the purchase, lease, order, or recommendation of an item or service that may be reimbursed under a government health care program, such as Medicare or Medicaid. You are strictly prohibited from offering, giving, or accepting any money, gifts, loans, rewards, favors, or anything of value that constitutes, or reasonably could be perceived as, a bribe or other improper business inducement. “Anything of value” can take many forms beyond currency, including:

- Entertainment, credits, free goods, or services.
- Forgiveness of a debt.
- Sale or purchase of an item below market value.
- Compensation for unnecessary services or for legitimate services at a rate exceeding fair market value.

No illegal or improper payment from Troy funds or assets will be made directly or indirectly by any director, officer, employee, or agent of Troy. This includes, but is not limited to, political or commercial bribery, kickbacks and/or political contributions to government officials, candidates for office and public or private employees.

## Fair Competition and Antitrust Laws

### Fair Competition and Antitrust Laws

Troy is committed to full compliance with all applicable antitrust and fair competition laws. Violations can result in severe criminal penalties for both the employee and Troy.

You must not engage in the following conduct, and if a competitor proposes any such action, you must immediately consult with your supervisor and the Chief Compliance Officer:

- **Provider/Contract Terms:** Entering into any agreement, understanding, or even discussion with a competitor regarding which providers Troy will contract with or the terms of those contracts.
- **Products/Services:** Entering into any agreement, understanding, or discussion with a competitor regarding the health plan offerings, products, or services Troy will sell, including their terms.

Additionally, certain contract terms, such as those involving exclusivity, "all products" clauses, or "most-favored nation" provisions, can raise antitrust issues and must be reviewed by legal counsel.

More generally, Troy prohibits taking unfair advantage of others through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other unfair dealings.

## Money Laundering Prevention and Combating Financing of Terrorism

Troy will comply with all applicable anti-money laundering (AML) and combating financing of terrorism (CFT) laws and regulations.

Key Requirements:

- **Prohibited Activity:** Troy strictly prohibits any activity aimed at hiding the origin of unlawfully gained money.
- **Suspicious Payments:** If you suspect that Troy has received a suspicious payment, you must report it immediately to your supervisor and the Chief Compliance Officer.
- **Business Conduct:** We will conduct business only with reputable customers and vendors engaged in legitimate activities, with money derived from legitimate sources.

## Government Reimbursement and the False Claims Act

As a provider of services under government programs (such as Medicare or Medicaid), Troy is subject to federal and state False Claims Acts (FCA). The FCA prohibits the submission of a false claim or making a false record/statement to gain reimbursement from, or avoid an obligation to, a government-sponsored program.

Troy's adherence is required for:

- Filing or presenting any bid, bill, or claim for payment.
- Submitting any cost or expenditure report, encounter data, medical record reports, or any other information to federal or state health programs.

### Employee Responsibility:

If you have any uncertainty about the proper application of government program rules or the accuracy or completeness of a submission, you have a responsibility to raise the issue with your supervisor and the Chief Compliance Officer.

## Excluded Persons and Entities

The federal government has the authority to exclude individuals and/or entities from participating in Medicare, Medicaid, and other federal health care programs due to convictions for abuse, fraud, patient abuse, financial misconduct, or other offenses.

We strictly prohibit employing or contracting with any individual or entity that has been:

- Excluded by the Office of Inspector General (OIG).
- Sanctioned by the General Services Administration (GSA) from any government-funded program.
- Convicted of offenses that could result in exclusion.

## Consultants, Agents and Representatives

All delegates, representatives and consultants must be willing to certify their compliance with Troy's policies and procedures and must never be retained to circumvent Troy's ethical and business standards.

## Marketing, Promotion and Enrollment

When marketing or promoting our program benefits and services, representatives must **not provide any information that is inaccurate or misleading to prevent health care fraud**. Compliance with these rules is

also essential to protect member information and **prevent identity theft**.

Federal and state laws and regulations, including U.S. health care fraud and identity theft laws, particularly those governing Medicare Advantage, Medicare Part D, and Medicaid, impose very specific restrictions on marketing to beneficiaries. These laws can dictate:

- The acceptable format and setting for information presentation.
- The compensation that may be offered to marketing representatives.
- The manner in which member enrollments may be conducted, including rules on offering gifts of nominal value to encourage attendance.

Anyone involved in marketing, promoting, or participating in an enrollment must be familiar with and comply with all applicable rules and regulations.

## **COMMUNITY RESPONSIBILITY**

### **Social Media and Public Relations**

All information disseminated about Troy must be full, fair, accurate, timely, consistent, and understandable. For this reason, the Chief Executive Officer is responsible for all internal and external media communications, including communication with spokespersons in routine and crisis situations. Furthermore, no employee is allowed to post Troy information unless it is part of their job duty and approved by the Chief Compliance Officer, and it is strictly against Troy policy for any employee to create a Troy social media account outside of the official Troy suite. Any communications deemed inaccurate or inappropriate will lead to disciplinary and/or legal action.

### **Political Contributions and Activities**

Troy encourages active participation in civic affairs and the political process, provided it is always clear that the participating individuals are not speaking or acting on Troy's behalf. You may participate in partisan political activities only in your individual capacity, on your own time, and at your own expense. When engaging in personal political activities, you must ensure you do not leave the impression that you speak or act for Troy, excluding limited situations where participation is for the direct benefit of Troy. Furthermore, federal law and statutes prohibit Troy from contributing to political candidates or parties, and you are strictly prohibited from using Troy funds, facilities, or other assets to support, either directly or indirectly, any political candidates or political parties inside or outside the United States.

### **Quality of Care**

Troy is committed to providing quality care to all members and is subject to federal and state laws intended to assure that members enrolled in government healthcare programs receive services appropriate to meet their needs.

You must remain aware of the need to arrange for the provision of quality care to all our members and guard

against the underutilization of care. This means, among other things that it is unacceptable to:

- Deny payment of claims that qualify and are authorized for coverage;
- Delay approval of, or fail to approve, timely submitted, medically necessary referrals; or
- Fail to contract with sufficient providers in a geographic area to meet the needs of enrollee membership, as defined by federal or state law.

## HEALTHCARE FRAUD, WASTE, AND ABUSE

Troy has a strong commitment to prevent, detect, and correct fraud, waste, and abuse (FWA). FWA directly impacts our members, health care providers, the Medicare program, and Troy's financial stability.

Definitions:

- **Fraud:** Intentional deception or misrepresentation with the knowledge that it could result in an unauthorized benefit to the entity or person. *A person has not committed fraud unless he or she has been convicted of it.*
- **Waste:** Practices that, directly or indirectly, result in unnecessary costs, such as the misuse of resources.
- **Abuse:** Unintentional practices inconsistent with sound business or medical practices, resulting in unnecessary costs to a government health care program or health plan.

**Identity theft** may also lead to fraud or abuse. A person using a false identity may obtain medical services or submit false claims for payment and may also result in erroneous health information added to the victim's medical record.

All employees are responsible for understanding the signs of potential FWA and reporting any suspicions to the Compliance department or via the Compliance and Ethics Hotline reporting portal. All reports will be investigated, and no one may punish or seek retaliation against any individual who reports in good faith potential FWA.

## AMENDMENTS AND UPDATES

From time to time, Troy will update and amend certain provisions of this Code. When updated or amended, the revised document will be distributed for review, acknowledgment, and attestation of receipt and understanding.

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**Your Actions Matter - Every Employee. Every Decision. Every Day.**