



LIVING OUR VALUES

CODE OF INTEGRITY

R1SM

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PREFACE

Integrity. Honesty. Professionalism. Collegiality. Ethics. Pride. Trust.
These words are some of many principles that provide the underpinning in building a great company, culture, and workplace. At R1, we are committed to these principles, and I'm delighted to share with you Living Our Values, Our Code of Integrity.

We know the importance of earning trust by leading with integrity and living our values. Our Code of Integrity is at the forefront of this effort. As our customers' trusted revenue cycle partner, we play a vital role in ensuring that patients and providers can focus on what matters most – successful health outcomes. To succeed, we are committed to building and sustaining a culture that celebrates great customer service and innovation alongside honesty, transparency, and accountability in all that we do.

And we know that there may be times when we'll face difficult decisions and challenges where the answers aren't immediately clear; that's where the Code plays a crucial role. In turn, I encourage you to read carefully and familiarize yourself with the Code. In the process, you'll be best enabled to align your actions with our policies and our values. Of course, the Code can't address every possible situation, so we encourage you to speak up and ask questions if something doesn't seem clear or right.

Great companies with great cultures are borne out of a commitment to performance with integrity. Our customers expect the best from us. Just as important, we must expect the most from each other. That's our commitment – to work together as one ethical R1 Team. When we do, we'll find that greatness is well within our reach, in all that we do.

JOSEPH FLANAGAN
President & Chief Executive Officer

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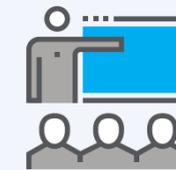
ALL ABOUT OUR CODE

Every great story needs a great beginning. Our story begins with our Code of Integrity (“the Code”), the framework that helps guide our commitment to an ethical and transparent culture. The Code of Integrity helps us live our values and enables us to do what’s right for our Company, our customers, and each other.

WHAT DOES THE CODE COVER?

The Code explains what R1 RCM Inc. (“R1” or “Company”) expects from us as associates. At first glance, you may imagine the Code as a rule book that states what not to do, but that’s only a small part of the story. The Code goes much further by presenting real situations you might encounter at work and answers to ethical and legal questions that any of us might face.

It’s possible you won’t find the exact answer or situation you’re looking for in the Code, but one thing you will find is a variety of resources: links to policies, guidelines, and other information you can reference for help. As you read through the Code, a brief overview tells you about each topic and why it’s important. You’ll also notice that each topic is set up to help you:



LEARN MORE — This feature digs deeper, highlighting specific learning points that you should know.



ADD VALUE — Here, we describe specific actions you can take and how those actions reflect our values and compliance principles.



IN PRACTICE — You’ll see questions covering real situations and guidance on how to handle them.



CHECK OUR POLICIES — Wherever a policy or other resource exists, we’ll link you to it for more information.

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ALL ABOUT OUR CODE continued

WHO MUST FOLLOW THE CODE?

In short, our Code applies to you if you work for R1 or represent our Company in any way. Whether you're full-time or part-time, hourly or salaried, that means you — wherever you work and whatever job you hold, all the way up to our leadership and our Board of Directors. Our vendors, business partners, and contractors work on our behalf as well, so they must also uphold our Code and values.

A special note about the Code: R1 understands that you have rights as an associate. That's why nothing in our Code is meant to interfere with your right to speak publicly about matters of public concern or to participate in activities that are protected under Section 7 of the U.S. National Labor Relations Act. This includes communicating about wages, hours, and other terms and conditions of your employment.

SHOULD I REALLY READ THE CODE?

Yes, you should! Carefully reading the Code empowers you to:

- Live R1's values
- Make a positive impact on our culture
- Know and follow the laws that apply to us
- Interact with others respectfully
- Make ethical decisions
- Enhance R1's reputation
- Earn our customers' trust
- Speak up for what's right

WHAT DRIVES US: OUR TEAM VALUES **R1**

At R1, our values mean a great deal to us because they reflect who we are as a Company. They inspire us and shape our actions every day. We live these values and hope that you use these values daily to guide your work, your interactions with others, and your decisions.

CUSTOMER SUCCESS

We share one mission — customer success.

We commit ourselves and our success to our customers' ability to achieve their business objectives, to support their mission and values, and to better care for their patients.

TEAMWORK

We work together the right way.

We are inclusive, collaborative, and unselfish in seeking the best outcomes for our customers and the organization; we have fun and challenge one another with respect.

PROFESSIONAL GROWTH

We learn, inspire, and grow.

We make developing others and ourselves a priority and maintain an environment where everyone has the opportunity to operate at their best and succeed.

EXCELLENCE

We strive for operational excellence.

We deliver on our commitments, differentiate on performance, and exceed customer expectations.

TRANSPARENCY

We communicate to optimize performance.

We all share a responsibility to be bold, truthful, and transparent in our communication, to listen to one another, and to seek and react to feedback constructively.



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WHAT DRIVES COMPLIANCE AND ETHICS: OUR PRINCIPLES

As associates of R1, it is essential that we exemplify our values in every aspect of our work. Living our R1 values means applying and adhering to our compliance principles which are paramount to our mission.

These four key principles are aligned to our R1 values to ensure we are committed to integrity, excellence, and doing what's right.



WORK WITH INTEGRITY

Make the right decisions, for the right reasons, every day.



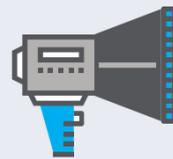
BE ACCOUNTABLE

Ask for help when something doesn't make sense or seem right.



BE COLLABORATIVE

Build a culture of compliance through partnership and teamwork.



BE VIGILANT

See a risk, make it known.

To foster a healthy and ethical culture, R1 has created a Pledge of Integrity. This Pledge affirms our commitment as associates to operating with integrity and respect by being accountable for ourselves, collaborative within our teams, and vigilant in identifying and communicating risks.

THE R1 PLEDGE OF INTEGRITY:

By taking this **Pledge**, I am stating that I understand and attest to these principles, conducting myself in a manner that supports our culture of trust, respect, and integrity.

- I will make the right decisions for the right reasons every day.
- I will operate with integrity by adhering to all R1 policies.
- I will treat others with fairness and respect.
- I will be accountable for my actions, and will ask for help when needed.
- I will support my teammates through collaboration and open communication.
- I will promote a safe work environment by reporting any risk I may see.
- I will encourage others to do the right thing.

Thank you for your commitment to this Pledge and living our R1 values and our compliance principles. Your commitment to strong corporate citizenship contributes to the success of your teammates and R1.



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OUR COMPANY, OUR RESPONSIBILITIES

There's a reason why we call ourselves the R1 Team. It's because we work as one, sharing the same mission and responsibilities with each other, our customers, and our Company.

As associates, we all have a responsibility to:

LIVE OUR VALUES — Show your commitment to values by applying them to every interaction and every decision you make.

UPHOLD LAWS, RULES, AND REGULATIONS — Learn about the laws that apply to our business and to your job. Honor them and uphold them, along with our Code and our policies.

REPORT CONCERNS — Don't tolerate any act that goes against our values or violates our Code or the law. [Speak up](#) if you see or suspect a violation.

If you're a people-manager, you have added responsibilities:

LEAD THE WAY — Show your team what it means to live our values. Demonstrate integrity in your own actions, refer to the Code often, and recognize your team when they live our values.

BE KNOWLEDGEABLE — Get to know the Code well, so you can discuss topics and answer associate questions. Be able to point them to the right resources when you don't know an answer.

KEEP AN OPEN DOOR — Make sure associates know that you're always willing to make time to listen when they have concerns. Take every concern seriously.

OFFER HELP — When an associate has a concern, don't wait. Report it to the appropriate parties. Cooperate with investigations, take recommended action, and stay alert for possible retaliation.

HOW DO I COMPLY?

R1 expects each of us to use good judgment in our work and:

COMPLY WITH LAWS, RULES, AND REGULATIONS — A number of laws apply to our business, and it's up to you to understand how they apply to your work. Ask for guidance if you're ever unsure about what's expected of you.

COMPLY WITH OUR COMPANY POLICIES — R1 maintains a variety of policies and procedures that allow us to comply with laws and regulations and do our work ethically. Visit PolicyTech, become familiar with these policies, and follow them without exception.

SPEAK UP — If you see, suspect, or become aware of a violation of any law, rule, regulation, or Company policy, you have a responsibility to promptly [report your concern](#).

WHAT IF A VIOLATION HAPPENS?

When anyone working on R1's behalf violates our Code, policies, or the law, it's also a violation of trust. We take those violations seriously, no matter who is involved, and no matter if it was a direct violation, someone ignoring or failing to report a violation, or pressuring others to act unethically. If we find that a violation has occurred, the result could be corrective action, possibly even termination of employment. If a law has been broken, the consequences can be more severe, with potential fines or criminal prosecution.

HOW OFTEN IS THE CODE UPDATED?

R1 believes in keeping our Code up-to-date, so we may make changes or amendments at any time as needed.



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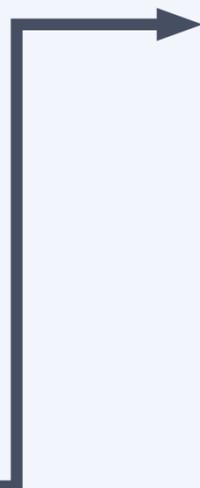
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DECIDING TO DO WHAT'S RIGHT

WE MAKE SO MANY DECISIONS IN OUR DAILY WORK. WILL THE DECISIONS YOU MAKE ALWAYS BE THE RIGHT ONES? THE ANSWER ISN'T ALWAYS CLEAR. PUT YOUR ACTIONS TO THE TEST BY ASKING YOURSELF:



IS IT LEGAL?



DOES IT REFLECT OUR VALUES?



DOES IT COMPLY WITH OUR CODE AND POLICIES?



WOULD YOU BE PROUD TO SHARE IT ON SOCIAL MEDIA?



If you answered **“YES”** to every question, that means the action is probably okay. Were any answers **“NO”** or **“MAYBE”**? Then stop what you’re doing. It’s always better to ask for guidance than to do something that might be wrong. Talk to your manager or a member of the [Compliance & Risk Team](#) before you act.

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SPEAKING UP

You have a voice at R1, and we want to hear it. In fact, it's your responsibility to ask questions and share concerns about possible violations of the law, our Code, or our policies. We also understand it isn't always easy to do. To make sure you feel comfortable and confident, we offer several different ways to speak up:

YOUR MANAGER:

Your first option is your manager, who is always willing to hear your concerns. If you are comfortable, we encourage associates to first speak with their managers or their Human Resources Business Partner ("HRBP") to address and resolve issues. However, if you're uncomfortable speaking with your manager or Human Resources, you may reach out to the Compliance & Risk Team via the methods listed below:

EMAIL:

Compliance@r1rcm.com or ComplianceIndia@r1rcm.com

MAIL:

R1 RCM Inc.
401 North Michigan Avenue
Suite 2700
Chicago, Illinois 60611

ETHICSPPOINT:

If you're uncomfortable speaking up directly, we also have the R1 EthicsPoint Hotline, a way to ask questions and share concerns 24 hours a day, seven days a week. The R1 EthicsPoint Hotline provides both telephonic and online options.



CHECK OUR POLICIES

WHISTLEBLOWER AND ANTI-RETALIATION POLICY

LIVING OUR VALUES / Speaking Up

CONTACT THE HOTLINE:



By phone:

U.S.: 800-633-9562

India: 000-800-100-1071 or 000-800-001-6112



Online: <https://r1hotline.ethicspoint.com>

It doesn't matter which method you use — what matters is that you speak up. When we identify potential violations, we're better prepared to protect our Company, our customers, and each other from harm — it's a responsibility we all share.

Something else to keep in mind: this Code is not intended to prohibit you from reporting illegal activity to the appropriate regulatory authority or from testifying, participating, or helping in any state or Federal administrative, judicial, or legislative proceeding or investigation.

WHAT HAPPENS NEXT?

After the Compliance & Risk Team receives a report of a possible violation, we evaluate it and, if necessary, conduct an investigation in collaboration, if appropriate, with other departments. All investigations are conducted promptly and as discreetly as possible. There may be cases when we must also report violations to government authorities. Remember, we all have a duty to cooperate fully with investigations into misconduct. If an investigation reveals that a violation has occurred, we then determine the appropriate disciplinary action.

WHAT ABOUT RETALIATION?

At R1, your ability to report concerns with confidence is vitally important. That's why we don't tolerate retaliation against anyone who shares a concern or cooperates in an investigation in good faith.



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Since our story began, R1 has evolved, grown, and set its sights on being an industry leader that operates with great customer service, thought leadership, and compassionate care. In doing so, the Company is continually building a talented and diverse associate population and community. That community is our heart and soul — our greatest asset, which we're committed to protecting. You play an important role by practicing respect and watching for harmful behavior.

- » HEALTHY, SAFE, AND SECURE WORKPLACE
- » RESPECT AND DIVERSITY
- » HARASSMENT-FREE WORKPLACE
- » ABUSIVE CONDUCT AND BULLYING
- » MANDATORY WORKPLACE TRAINING

HEALTHY, SAFE, AND SECURE WORKPLACE

One of the fundamentals of a great workplace is that it's a safe and healthy place to work. Each of us has the power to contribute to that environment and preserve our safety and well-being. R1 provides you with a safe and secure workplace, but it's up to us to stay alert and follow our safety and security procedures.

Support a safe workplace by always treating others with respect. Stay alert for any behavior that creates a threatening or intimidating work environment. Even threats made as a joke are prohibited, so [speak up](#) immediately. If we believe associates are in danger, we may inspect work areas or personal belongings, and R1 doesn't tolerate retaliation against anyone who speaks up about concerns.

Help us maintain a substance-free workplace by never abusing drugs or alcohol. Remember, R1 prohibits the use or possession of illegal drugs on Company property or while performing your work. Always be fit for work — never under the influence of any substance that could impair your judgment or ability to work.



LEARN MORE

Threatening behaviors might look like this: [violent comments or imagery, direct or indirect threats, property damage, bringing in weapons, derogatory remarks associated with hate crimes, stalking, bullying, or direct acts of aggression like pushing, hitting, fighting, or throwing objects.](#)



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HEALTHY, SAFE, AND SECURE WORKPLACE continued



ADD VALUE

WORK WITH INTEGRITY

- Promote a respectful environment, free from harassing or threatening behavior.
- Follow all safety, environmental, and security laws that apply to our business.

BE ACCOUNTABLE

- Report workplace injuries immediately, as well as any hazardous conditions.
- Use R1’s Employee Assistance Program (“EAP”) if you wish to speak with a professional to discuss an issue in your personal life.
- Follow our security procedures by never allowing anyone into our facilities who isn’t authorized.

BE COLLABORATIVE

- Resolve conflicts calmly and respectfully, without resorting to threats or violence.

BE VIGILANT

- Watch for signs of substance abuse or workplace violence. Call 911 in case of immediate danger.



IN PRACTICE

Q: A colleague of mine has been acting differently. Normally, he is engaged, upbeat, and very social with our team. Lately, I’ve noticed that he seems depressed, disengaged, and barely speaks to anyone. This has been occurring for several days. Should I keep this to myself?

A: No, while there are no threatening signs in his behavior, there may be an opportunity to help him before things get worse. Let your manager or other [internal resource](#) know about this change right away so they can address it appropriately and, if applicable, offer EAP.



CHECK OUR POLICIES

SEE OUR ASSOCIATE HANDBOOK FOR MORE INFORMATION (U.S. ONLY)



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RESPECT AND DIVERSITY

A spirit of teamwork and cooperation inspires our work at R1. We understand the value of a diverse workforce and are committed to equal employment opportunities for everyone. That means we never discriminate or allow unfair treatment, and we rely on you to help keep discrimination out of our business.

If you make employment decisions, such as interviewing candidates, hiring, compensation, advancement or training, or even discipline or termination decisions, make them fairly. Base decisions on relevant factors like someone's performance, qualifications, and skills – never on an individual's personal characteristics.

No matter where you work, or with whom, remember that, while we are different, we are the R1 Team, and we share the same values. Promote an inclusive culture that finds strength in diversity of experience, culture, and perspectives. Be aware of personal bias, and work consciously to avoid it.



LEARN MORE

Discrimination in employment happens if you make employment decisions based on personal characteristics like race, color, ethnicity, religion, gender, sexual orientation, gender identity, national origin, age, disability, protected military or veteran status, pregnancy, or genetic information.

Encouraging diversity helps us to attract and retain diverse talent, create opportunities, and adapt to change in our world. Diversity gives us new perspectives and the ability to meet challenges in creative ways.



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RESPECT AND DIVERSITY continued



ADD VALUE

WORK WITH INTEGRITY

- Work to eliminate barriers that may be preventing us from tapping into our diverse community.
- Respect the diversity of customers and third-parties. Be fair in every interaction.
- Treat all associates fairly and consistently.

BE COLLABORATIVE

- Invite input from everyone, especially from new sources to gain a fresh perspective.
- Support your coworkers and celebrate their achievements.

BE VIGILANT

- Stay alert and **speak up** if you suspect or have experienced discrimination.



IN PRACTICE

Q: I'm five months pregnant, and I see a job opening in which I feel I meet the qualifications. Would I be considered for this job?

A: Yes, employment decisions are not based on personal characteristics such as pregnancy. You may be considered if you meet the minimum qualifications and have the experience needed for the position.

Q: While interviewing candidates for a job, I had a definite rapport with one candidate with a similar background to mine. I'd like to hire her, but am I being discriminatory because she is most like me?

A: Maybe, but it's good that you're aware of your possible personal biases. Consider the other candidates again carefully and have other colleagues interview them as well. Then you can be sure that you're making a fair and carefully thought-out decision.



HARASSMENT-FREE WORKPLACE

We're committed to providing you with a workplace that's positive and welcoming — free from hostility or harassment. Our actions determine the kind of workplace we'll have, so make sure yours are positive.

R1 expects us all to practice respect. In your daily interactions, be courteous of others — your colleagues as well as our customers and the public. Support one another by working collaboratively and valuing others' contributions. Be positive, never targeting anyone for unfair treatment.

Stay alert for sexual harassment. It can take many different forms, and it isn't always obvious. It can be verbal, physical, or visual and almost anyone — from associates to our third-parties, of any gender — can be harassers. Watch your own actions — harassment doesn't have to be intentional to be unlawful.



LEARN MORE

Harassment is unwelcome behavior that creates an offensive, hostile work environment, or prevents someone from doing their job. It can be verbal or physical in nature and can take many different forms such as comments, gestures, suggestions, and sharing sexual or discriminatory materials. However, constructive criticism, performance feedback, and supervisory actions based on performance deficiencies or other valid workplace issues are not harassment or retaliation.

Sexual harassment involves sexual advances, requests for sexual favors, or other conduct of a sexual nature. It could also involve touching, sharing sexual materials, threatening, or continuing to make sexual advances after being rejected, or inappropriate verbal or physical conduct.



ADD VALUE

WORK WITH INTEGRITY

- Practice respect in your interactions with each other as well as third-parties and customers.
- Don't tolerate any acts of harassment.

BE COLLABORATIVE

- Support others in your work, and never single out anyone in a negative way.

BE VIGILANT

- Watch for signs of harassment in your own behavior and in others.
- Harassment is never okay, so **speaking up** if you see, suspect, or experience it.



IN PRACTICE

Q: A colleague confided in me that he had been experiencing sexual harassment by a manager. He says he doesn't want to report it, but I can tell it's bothering him. Should I stay out of this?

A: No, you shouldn't. While you want to respect his wishes, it's important that we know about this behavior, since we won't tolerate it at R1. Report your concerns to a manager or other [internal resource](#) right away.



CHECK OUR POLICIES

SEE OUR NON-HARASSMENT POLICY FOR MORE INFORMATION



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ABUSIVE CONDUCT AND BULLYING

We're all at our best when we feel comfortable and appreciated at work. But when bullying and abusive conduct are allowed to occur, the results can be devastating, from lost productivity and absenteeism to legal costs and harm to our reputation. We all have a duty to keep this behavior out of our workplace.

Treat everyone you encounter fairly and respectfully, especially if conversations become tense and tempers grow short. When you do, you help to diffuse difficult situations and set a good example.

If you see behavior like bullying occurring, speak out against it. Sometimes, that's all it takes to end the cycle of abuse — for one person to stand and tell those involved that it's unacceptable. If you feel you cannot, then speak to your manager or other [internal resource](#).



LEARN MORE

Bullying occurs when a person or group of people repeatedly mistreats someone and the bully doesn't necessarily harass based on protected characteristics like race, religion, or gender. Bullying includes verbal or emotional abuse, offensive conduct, isolation — as well as nonverbal behaviors that are threatening, humiliating, or intimidating.

Abusive conduct is similar and may include repeated verbal abuse, like using derogatory remarks, insults, and epithets. It could also be physical conduct that might be seen as threatening, intimidating, humiliating, or undermining someone's work performance.



ADD VALUE

WORK WITH INTEGRITY

- Use care in your interactions with others. Always be fair and respectful.

BE COLLABORATIVE

- Become familiar with bullying, what it looks like, and the effects it has on others.

BE VIGILANT

- Don't ignore signs of bullying or abusive conduct.
- [Speak up](#) if you see, suspect, or have experienced this behavior.



IN PRACTICE

Q: One of my coworkers has repeatedly made inappropriate comments and jokes about another associate's personal appearance. I can tell that the associate is uncomfortable. What should I do?

A: You should report this to your manager or other local resource. All associates have the right to work in a respectful environment, free from bullying or harassment.



CHECK OUR POLICIES

SEE OUR NON-HARASSMENT POLICY FOR MORE INFORMATION



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MANDATORY WORKPLACE TRAINING

We understand that an aware and well-trained workforce is central to our productivity and professional development. By providing mandatory workplace training, we're able to promote a culture at R1 that values, supports, and sets clear expectations for legal and ethical conduct.

As an R1 workforce member (associates and contractors), you have a responsibility to complete all mandatory training. Some of this training is legally required, such as discrimination and harassment training. The courses we provide will expand your knowledge of the laws, regulations, and guidelines that apply to our business and help you know what you must do to comply. Failure to complete mandatory training can negatively impact your annual performance review.



LEARN MORE

Developing others and ourselves is a top priority at R1, so we strive to maintain an environment where everyone has the opportunity to operate at their best and succeed. Training is a key component in this effort.

Proper training yields benefits beyond simply meeting legal requirements. It leads to greater long-term employment, improved associate performance, and higher productivity and morale.

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MANDATORY WORKPLACE TRAINING continued



ADD VALUE

WORK WITH INTEGRITY

- Welcome opportunities to receive training, recognizing how they benefit you and our Company.
- Ask for help whenever you have questions or if something doesn't seem right.

BE ACCOUNTABLE

- Complete your training in a timely manner to ensure you're compliant and familiar with R1 policies and regulations.

BE COLLABORATIVE

- Encourage your colleagues to take their required training and talk about what you've learned.

BE VIGILANT

- Seek out opportunities for further training and education.
- **Speak up** if you have questions or concerns about anything you have learned.



IN PRACTICE

Q: I am not technically an R1 associate. I'm a contractor through a third-party agency. Do I have to complete R1's Onboarding and Annual / Refresher Training?

A: Yes, as a contractor providing services to R1 customers, Onboarding and Annual / Refresher Training is a requirement and must be completed as assigned.



CHECK OUR POLICIES

SEE OUR COMPLIANCE TRAINING POLICY FOR MORE INFORMATION



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We share a vision of being the one trusted partner to seamlessly manage revenue so providers and patients can focus on what they do best — and what matters most. Help us achieve that goal by handling the personal and confidential information entrusted to you with the utmost care.

- » INTERACTIONS WITH PATIENTS, CUSTOMERS, AND HEALTHCARE PROFESSIONALS
- » DATA PRIVACY AND CONFIDENTIALITY
- » PROTECTED HEALTH INFORMATION (“PHI”)
- » QUALITY ASSURANCE
- » FRAUD, WASTE, AND ABUSE (“FWA”)

INTERACTIONS WITH PATIENTS, CUSTOMERS, AND HEALTHCARE PROFESSIONALS

Our work, our interactions, and our decisions all relate back to our ultimate goal of ensuring great service to our healthcare customers. Because we interact with a variety of people, everything we do must further that goal. No matter what role you play at R1, focus on living our values and always do what's right.

Remember that patients come first, a commitment which you can help us fulfill by following all of the laws and regulations that apply to our business. When you do, you instill trust in our Company and allow our customers to focus on better managing care for their patients.



LEARN MORE

A healthcare professional could be either a doctor, nurse, pharmacist, or anyone working on behalf of a healthcare practice. Our interactions with them highlight the importance of being courteous, friendly, helpful, considerate, supportive, and prompt in offering help.



ADD VALUE

WORK WITH INTEGRITY

- Follow all of the laws and regulations that apply to us in every interaction and decision.
- Respect the privacy and dignity of patients with whom you interact; protect the privacy of their personal information.

BE COLLABORATIVE

- Reflect our values in every interaction with patients, customers, and healthcare professionals.
- Be honest and transparent in all communications with patients, customers, and healthcare professionals.



IN PRACTICE

Q: A patient recently called one of my coworkers who was on his way to lunch. In a rush, my coworker wrote down some of the patient's private account information on a Post-it[®] note and left it on his desk. What should I do?

A: Remind your coworker of our policy on respecting the privacy of patient information. Make sure that he properly disposes of the note and enters the information in a secure system. Escalate the situation to a manager or another [internal resource](#) if needed.



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DATA PRIVACY AND CONFIDENTIALITY

Information and innovation drive our work. Because we develop customized strategies for our customers and integrate to their organizations, we have access to a great deal of their sensitive, confidential information – all of which they trust us to protect.

If your job gives you access to confidential information, whether it belongs to R1, a third-party, or one of our customers, you have a responsibility to protect it from possible misuse or disclosure. It's vitally important to our business and our reputation.

Only access the information you need to do your work. Never share it with anyone, either inside or outside of R1, unless they are authorized or disclosure is legally mandated. Uphold confidentiality agreements with third-parties and customers and protect their intellectual property, even if you leave the Company.



LEARN MORE

Confidential information is any information that isn't available to the public, but could benefit our competitors or harm our Company, third-parties, or customers if it was disclosed. This includes information about:

- **Our Company** – like personal information, business plans, acquisition strategies, and financial reports.
- **Third-parties** – like pricing or contract terms with vendors, contractors, and other business partners.
- **Customers** – like information on projects, transactions, financial data, patient records, and medical or personal information.



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DATA PRIVACY AND CONFIDENTIALITY continued



ADD VALUE

WORK WITH INTEGRITY

- Use care with social media, when speaking in public, or using a public Wi-Fi network. Don't discuss, send, or share confidential information of any kind.

BE ACCOUNTABLE

- Learn to recognize what information is confidential.
- Follow data privacy and protection laws when it comes to protecting sensitive personal information belonging to an associate, a patient, a customer, or anyone we work with.

BE VIGILANT

- If you suspect that confidential information has been disclosed, **speak up** immediately.



IN PRACTICE

Q: A patient contacted me requesting an associate's home address so she could send him a thank you card for his hard work. May I share this information with her?

A: No, you may not. You can't be sure that the patient will protect this information. Keep this information confidential, and only share it with those who have a legitimate business need to know. As an alternative, you could suggest that the patient send the card to the facility's address.



CHECK OUR POLICIES

SEE OUR CONFIDENTIALITY POLICY FOR MORE INFORMATION



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PROTECTED HEALTH INFORMATION ("PHI")

Our customers have entrusted us with the privacy of their health information. As health care is among the most personal services rendered in our society, we take that responsibility very seriously.

As a company, we abide by the laws and regulations related to the transmission, privacy, and security of Protected Health Information ("PHI").

THEY INCLUDE:

- The Health Insurance Portability and Accountability Act of 1996 ("HIPAA")
- The Health Information Technology for Economic and Clinical Health Act ("HITECH")
- The Privacy Rule
- The Security Rule
- The Transactions Rule
- Applicable state laws

It is expected you will follow our policies, ask questions, and report violations to stay compliant with these laws. Also, be sure to keep PHI confidential by only using it for legitimate business purposes and in ways that are consistent with any provided notice or obtained consent. Ensure that you only send the minimum necessary amount of information to accomplish the task.

Be mindful of where you discuss PHI. Inadvertent disclosure can be just as harmful as intentional disclosure, so avoid discussing such matters within hearing distance of any unauthorized personnel or the general public.



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PROTECTED HEALTH INFORMATION ("PHI") continued



LEARN MORE

Protected Health Information ("PHI") is information that could identify or be used to identify someone that relates to their health, health care, or payment for the provision of health care, past, present, or future. It can include names, addresses, phone numbers, Social Security Numbers, medical diagnoses, family illnesses, and other personal information.



ADD VALUE

BE ACCOUNTABLE

- Securely dispose of materials and documents that contain PHI.
- Lock and log off of your computer whenever it is not in use and change your passwords often.

BE VIGILANT

- Encrypt/secure all email containing PHI, especially when it is sent to recipients outside of R1.
- Never send PHI or confidential information to or from your personal accounts (email, social media, messaging, etc.).
- Report any mishandling, misuse, or misappropriation of PHI to mitigate potential risk of exposure.



IN PRACTICE

Q: A friend has asked me to access an electronic medical record to review the results of a laboratory test. Since this is my friend making this request, am I authorized to provide this information?

A: No, never access this information unless you are required to in the normal course of business.



CHECK OUR POLICIES

SEE OUR HIPAA PRIVACY SAFEGUARDS POLICY FOR MORE INFORMATION



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QUALITY ASSURANCE

We are passionate about building long-term customer relationships, and delivering a quality service is critical to meeting this goal. The emphasis we place on quality assurance starts with the integrity of our systems and our processes, but it doesn't end there. It extends to the quality of every task we do and every interaction we have.

If you are responsible for the operation of our software and platforms, monitor performance to ensure compliance with our quality standards. If you are responsible for data collection or data entry, be accurate and careful, and protect the privacy of [PHI](#).

Finally, if you are responsible for communicating with providers and patients, demonstrate honesty, integrity, and compassion in every transaction. Remember our R1 values and do your part to both maximize patients' understanding and minimize administrative burden.



ADD VALUE

WORK WITH INTEGRITY

- Look for opportunities to introduce efficiencies and improvements that will enhance the customer experience.
- Keep in mind that your work has a direct impact not only on business decisions but also on customer satisfaction.

BE ACCOUNTABLE

- Carry out your work precisely, accurately, and in conformance with standard operating procedures.
- Continually monitor our service quality to make sure it meets our high standards, and take appropriate action if it does not.



IN PRACTICE

Q: There is a test that we routinely perform on R1's operating system. I have worked here for five years and have never seen a failure associated with this test. In order to speed up our process, could we consider eliminating the requirement?

A: Discuss the test with your manager before making any changes to a standard practice or procedure. Suggestions for process improvements are welcome but must be properly reviewed and vetted to make sure there is no adverse effect on the quality of the services we provide.



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FRAUD, WASTE, AND ABUSE ("FWA")

We aim to support a healthcare system that is affordable for everyone, and addressing fraud, waste, and abuse ("FWA") is essential to achieving this goal. By working together, we can improve our healthcare system and reduce costs for our customers and workforce members.

Each of us is responsible for making a difference, so do your part by understanding what constitutes FWA. FWA can range from honest mistakes that result in incorrect billings, to inefficiencies that result in duplicate tests, and to false claims that result in improper payments.

Work to prevent all forms of FWA by identifying, investigating, correcting, and appropriately reporting any and all suspicious activity. When you do, you help protect not only our integrity, but our compliance with all relevant laws, regulations, and whistleblower protections.



LEARN MORE

Fraud includes the intentional filing of dishonest healthcare claims in order to bill for more than is proper. Examples include up-charging, billing for care that was never rendered, or providing false information when applying for programs or services.

Waste includes overusing services, or other practices that, directly or indirectly, result in unnecessary costs.

Abuse includes actions that may, directly or indirectly, result in payments for items or services when there is no legal entitlement to those payments.



ADD VALUE

WORK WITH INTEGRITY

- Strive for accuracy and excellence in service, coding, and billing and make sure those around you do so too.
- If you work in billing, benchmark your billing data against similar providers and investigate any discrepancies.

BE ACCOUNTABLE

- Remember that the best way to fight fraud is to report it. **Speak up** immediately if you see or suspect a violation.
- Continually monitor the Office of Inspector General's compliance guidance documents. They are aimed at various segments of the healthcare industry and can help us remain compliant. Also keep an eye out for periodic Regulatory Alerts from the Compliance & Risk Team.
- Become familiar with common terms and examples of FWA, such as unbundling, up-coding, misrepresentation, and double billing.



IN PRACTICE

Q: I have been asked to code a procedure a particular way. In doing so, this would be unbundling the procedure. What should I do?

A: We encourage you to share your concern with your coding manager in order to receive guidance. If you are still concerned with the direction you receive, you may also reach out to the [Compliance & Risk Team](#).



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As the R1 story continues to unfold, each of us has a critical role to play. Regardless of the job you do or the location in which you do it, conduct business with uncompromising integrity. Demonstrate to coworkers, business partners, providers, and patients that our Company operates lawfully and ethically.

- » COMPLIANCE WITH LAWS, RULES, REGULATIONS, AND OUR OWN POLICIES
- » ANTI-CORRUPTION
- » HONEST AND ETHICAL CONDUCT AND FAIR DEALING
- » EXCLUSION SCREENING
- » SUPPLIERS AND VENDORS
- » GIFTS AND ENTERTAINMENT
- » POLITICAL CONTRIBUTIONS

COMPLIANCE WITH LAWS, RULES, REGULATIONS, AND OUR OWN POLICIES

R1 is a unique organization operating in both the healthcare and financial services spaces — two highly regulated industries, where the requirements are both complex and strict, and the consequences of committing a violation are serious. We also have developed detailed policies and procedures to guide our decision making in daily interactions and ensure accountability across this complex environment. Further, as a company, we understand the sensitivity of the information we handle and the vulnerability of the patients we serve.

As trust is at the heart of what we do, we each have an obligation to conduct business in compliance with all applicable laws, regulations, contractual requirements, and R1 policies and procedures. It's critical that you know how these requirements apply to you and the work you do for R1. When you do, you help us to meet both our legal and ethical obligations.

Each associate is expected to follow both the spirit and the letter of the law. Additionally, our Code of Integrity takes precedence over the law. Where our Code of Integrity sets a higher standard than the law requires, you must follow our Code. Remember, we have resources like the Code and our Compliance & Risk Team to help support you in ensuring compliance in our everyday efforts.

As an associate, we expect you to be accurate, complete, and thorough in carrying out your daily responsibilities. We also expect you to be alert to acts of fraud because this type of activity can not only violate the law, but harm the reputation we've earned as a trusted partner. If you have any questions, review applicable policies available on PolicyTech, participate in job-specific training as needed, or ask your manager or the Legal Department for guidance at any time.

DID YOU KNOW?

As a corporation based in the United States with U.S.-based customers, we comply with U.S. healthcare laws. Be sure to complete all training related to important topics, including, but not limited to:

- [The False Claims Act](#)
- [The Anti-Kickback Statute](#)
- [The Civil Monetary Penalties Law](#)
- [The Foreign Corrupt Practices Act](#)

In addition, we comply with additional country-specific and international laws in each of our offshore operations.



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COMPLIANCE WITH LAWS, RULES, REGULATIONS, AND OUR OWN POLICIES continued



LEARN MORE

Fraud includes intentionally deceiving someone — by lying about, concealing, or omitting information — in order to gain an unfair advantage or an improper benefit for yourself or for someone else. Examples of fraud include: requesting payment for a service that wasn't actually performed or billing for a more costly service than the one that was actually provided.



ADD VALUE

WORK WITH INTEGRITY

- Watch out for any acts of fraud as any misconduct can reflect negatively on our Company.
- Be especially alert to suspicious activity associated with the particular type of work you do, and be prepared to challenge any request that seems improper.

BE VIGILANT

- Raise concerns if you suspect services weren't actually provided, improper codes were assigned, or billing is incorrect.
- If you see or suspect a violation of the law, our policies, or our Code of Integrity, immediately report it to your manager, a **Compliance & Risk Team member**, or the **R1 EthicsPoint Hotline**.



IN PRACTICE

- Q:** I suspect that someone in my department is committing an act of fraud. I don't have any real evidence to support this, and I am hesitant to say anything since I don't want to get involved. What should I do?
- A:** Speaking up is never easy, but it is always the right thing to do. You have an obligation to share your concern, provided that you are acting in good faith in bringing forward your suspicion or concern. Remember, a violation, left unreported, can result in significant harm to our Company and the customers and patients we serve. Ultimately, acts of fraud affect the affordability of healthcare for all of us.



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ANTI-CORRUPTION

As a company that is committed to operating honestly and with integrity, we never offer, give, ask for, or accept any form of bribe or kickback. Doing so would violate everything that we stand for as a company. If you find yourself in a situation where the only way to close a sale or arrive at a decision is through payment of a bribe, don't do it. Business won this way is not business we value or want.

Follow anti-bribery and anti-corruption laws wherever you do business. Regardless of what local law may permit, R1 is subject to the Foreign Corrupt Practices Act ("FCPA"). As such, R1 workforce members must never offer, pay, promise to pay, or accept anything of value – either directly or indirectly – to win business, keep business, or gain an unfair advantage.

In addition to our own actions, we are responsible for the acts of third-parties acting on our behalf, and we are liable for any corrupt payments they offer. Take the time to know who we are working with, the business practices they employ, and the reputation they have for operating honestly and ethically.



LEARN MORE

A bribe can be anything of value and something other than cash, such as a gift, a job offer, a trip, or even a contribution to your favorite charity if it's offered in exchange for an improper decision.

A government official can be not only an elected official but also an employee of a government agency. It can even include individuals who work for enterprises owned or controlled by the government, such as medical personnel and employees working for a public or state-owned hospital. Bribes made to anyone are improper, but bribes made to government officials can result in even more significant repercussions.



ADD VALUE

WORK WITH INTEGRITY

- Never offer a healthcare professional anything that could be seen as an attempt to inappropriately influence a decision to purchase, use, or recommend a product or service.

BE ACCOUNTABLE

- Make sure to record all financial transactions accurately in our Company books and records.
- Follow our due diligence procedures when working with third-parties – hold them to the same high standards that we follow.

BE VIGILANT

- Avoid even the appearance of something improper.



IN PRACTICE

Q: A long-time, trusted vendor recently offered me a commission in exchange for securing an annual contract for her company. We planned on giving her the contract anyway. Is there any problem with this?

A: Yes, a "commission" for doing business is another word for kickback or a bribe, both of which are unethical and potentially illegal. You must advise the vendor that you are not permitted to accept the commission.



CHECK OUR POLICIES

SEE OUR FOREIGN CORRUPT PRACTICES ACT POLICY FOR MORE INFORMATION



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HONEST AND ETHICAL CONDUCT AND FAIR DEALING

Working honestly, ethically, and fairly is fundamental to the way we do business. We compete vigorously, embrace a free and open marketplace, and comply with competition and antitrust laws in the countries and the markets where we operate.

Uphold our reputation for fairness. Never enter into any agreement with a competitor, supplier, or other third-party – either formally or informally – that relates to a competitive matter. If your job involves participation in trade association or industry-setting groups, don't discuss any topics that could be considered competitively sensitive. Avoid even the appearance of something improper.

Be responsible in promotional efforts too, from how you interact with healthcare professionals to how you promote our services. Be truthful about the quality, features, and availability of what we offer, and never take unfair advantage of anyone through manipulating, concealing, abusing privileged information, misrepresenting material facts, or any other unfair-dealing practice.

When it comes to gathering competitive information, rely on legitimate sources. Never deceive anyone, abuse confidential information, or misrepresent who you are or who you work for in order to gain a competitive edge.



LEARN MORE

Legitimate sources are public sources and include: published industry surveys, information presented publicly at trade shows or conferences, or generally available via Internet searches and public documents.



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HONEST AND ETHICAL CONDUCT AND FAIR DEALING continued



ADD VALUE

WORK WITH INTEGRITY

- Never discuss with our competitors matters related to pricing, costs, terms, or conditions of sale, wages, or the division of customers, suppliers, or markets.
- Never make disparaging remarks about our competitors or unfair comparisons between what they offer and what we offer.

BE ACCOUNTABLE

- Compete based on the merits of our services, never on unfair or illegal practices.
- Tell the truth about our services and our capabilities, and never make promises we can't keep.
- Make sure that any claims you make are backed by the facts, and any literature you distribute accurately reflects who we are and what we do.

BE VIGILANT

- Bid fairly – never participate in any form of bid rigging if you're involved in the bid preparation process.
- Never engage in anything illegal or improper in order to gain access to a competitor's trade secrets, customer lists, or financial data.



IN PRACTICE

Q: You previously worked for a competitor, but have recently started a position with R1. A new colleague of yours is working on a project and asks you if you would reach out to your former coworkers for information related to pricing to assist with his analysis. You want to be a team player, but have concerns. What should you do?

A: It's imperative that we conduct business ethically and honestly. Even if we have connections with competitors, requesting this information would not be appropriate. Notify your team member that while you would like to help, this would not be appropriate to ask of your former colleagues and would be against our Code of Integrity. You could then see if there is an alternative way you could help to support your team member.



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EXCLUSION SCREENING

We are committed to maintaining high-quality service and integrity in our financial and business operations and to combating healthcare fraud. Therefore, we comply with all requirements and take all necessary steps to inspect and screen associates, contractors, and vendors against U.S. government and international lists of excluded individuals and entities, known as “denied parties.”

The U.S. Department of Health and Human Services Office of Inspector General (“OIG”), the General Services Administration, and various states provide lists of those that have been excluded from Federal programs. Such an exclusion is a penalty imposed by the government, on those who have engaged in fraud, abuse, or other misconduct (e.g., practicing with a revoked license) related to a Federal healthcare program.

The OIG maintains a List of Excluded Individuals and Entities – the LEIE. That list is available on the OIG’s website. Prior to hire, all associates are screened against this list, and, prior to contracting, contractors and vendors are also screened against this list. Additionally, the Compliance & Risk Team routinely searches these lists of excluded individuals on an ongoing, monthly basis to ensure that the status of our associates, contractors, and vendors has not changed. We will not employ any denied party. Further, excluded individuals are not permitted to work at R1. In addition, R1 will not use an excluded contractor’s services, nor pay for products that an excluded vendor provides.

If during the course of your R1 employment you have been excluded from participation in Federal programs and are on an exclusion list, you are obligated to inform the Compliance & Risk Team promptly. If you have a question about whether an individual or entity has been properly screened, contact a [Compliance & Risk Team member](#).



ADD VALUE

WORK WITH INTEGRITY

- Keep in mind that this policy applies no matter what program an associate or vendor has been excluded from – even if it is a program in another state.

BE VIGILANT

- Whenever you establish a relationship with a new workforce member, make sure that required screening procedures have been followed.
- R1 performs required screening procedures on an initial and monthly/ongoing basis.



IN PRACTICE

Q: An R1 colleague informed our team she was terminated as a result of being newly listed on an exclusion list, related to a situation several years ago with a prior employer. Should she really have been terminated?

A: Yes, exclusion screening is an important compliance requirement; if an R1 associate is confirmed as an excluded individual, she is no longer able to continue her employment at R1.



CHECK OUR POLICIES

SEE OUR WORKFORCE EXCLUSION SCREENING POLICY FOR MORE INFORMATION



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SUPPLIERS AND VENDORS

The best partners are not just those who deliver on time; they also work honestly and ethically and share our commitment to best-in-class service. As a company, we seek out business partners who recognize the importance of high standards and high performance. Then we work closely together, building business relationships based on mutual trust and respect.

If you are responsible for sourcing our suppliers and vendors, follow our procurement policies and make choices based on objective criteria, considering factors such as quality, service, price, experience, and reliability. We can be held responsible for acts of third-parties who work on our behalf, so exercise due diligence in making a selection.

If you are responsible for managing our relationship with suppliers and vendors, communicate our expectations. Monitor contracts to make sure they are meeting their commitments and we're meeting ours – the obligation to deal honestly and fairly goes both ways.



LEARN MORE

We expect our vendors and suppliers to:

- Ensure the quality of the products and services they provide to us
- Ensure the cost of their products and services are reasonable
- Follow the law and our Code



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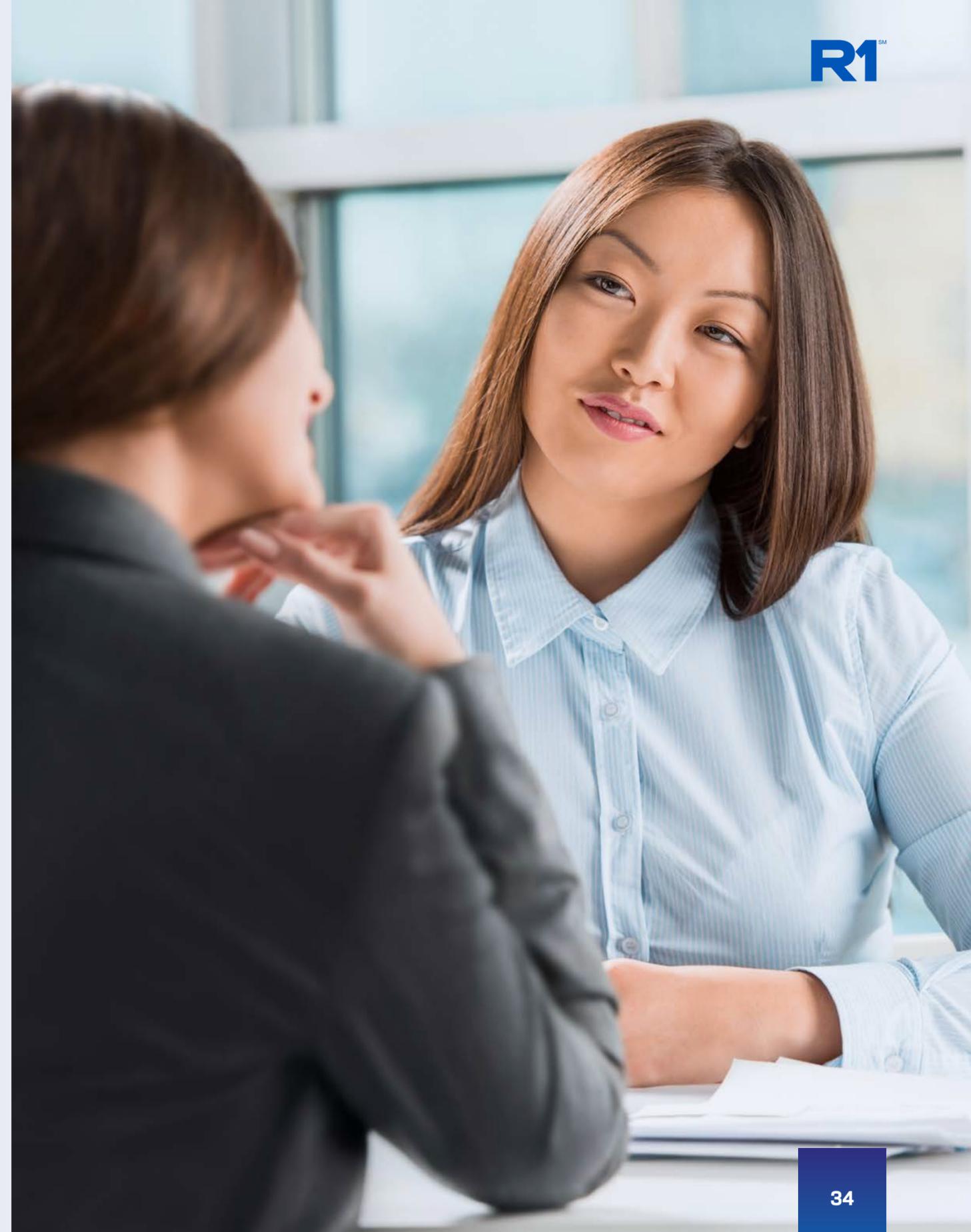
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SUPPLIERS AND VENDORS continued



ADD VALUE

BE ACCOUNTABLE

- In interacting with business partners, follow the rules related to gifts and entertainment and avoid conflicts of interest.
- Safeguard the confidential information of our business partners, protecting it in the same way we protect our own.

BE COLLABORATIVE

- Remember, our vendors and suppliers are of great strategic importance to R1 – provide clear guidance, treat them fairly, and ensure timely payment.
- Hold them to our high standards, especially with respect to preventing bribery and protecting data privacy.

BE VIGILANT

- Make sourcing decisions objectively, without regard to personal gain or relationships.
- If you see or suspect conduct by third-parties that violates our Code, address it immediately – speak with your manager or other internal resource.



IN PRACTICE

Q: I was approached by an R1 supplier who asked if I would be interested in doing some consulting work for his company. He has assured me that the work is totally unrelated to the work I do for R1 and would not interfere with my work schedule. Is there any problem with this?

A: Yes, even if the work is unrelated and doesn't interfere with the time or talent you bring to R1, you must consider how this could look to an outside observer or another supplier vying for R1's business. You have a responsibility to avoid even the appearance of an improper relationship. Speak to your manager or other internal resource about the conversation to determine the best way forward.



CHECK OUR POLICIES

SEE OUR GLOBAL SOURCE TO PAY POLICY FOR MORE INFORMATION



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GIFTS AND ENTERTAINMENT

Talking with a supplier about a project over lunch, attending a local sporting event with a vendor, accepting a nominal gift during the holidays – the offer or acceptance of business courtesies like these can foster good business relationships and would not reasonably be expected to affect an associate’s independent judgment in the performance of his/her job. However, we have a responsibility to make sure that anything we give or receive is reasonable, serves a legitimate business purpose, and is permitted by the policies of both parties.

Gifts include material goods, services, discounts or personal purchases of goods and services, non-business entertainment, personal travel or lodging, or any other arrangement that benefits the individual recipient. Acceptable gifts must be of nominal value and should be infrequent and unconditional.

When it comes to gifts and entertainment, you have a duty to know what is appropriate and what isn’t – and to seek guidance anytime you are unsure. Questions about the value of a gift or the appropriateness of an invitation should be referred to your manager or the [Compliance & Risk Team](#). Also, consider it a best practice to always seek approval before offering or accepting anything of value and to document every exchange.

When acting on behalf of R1, keep in mind that offering any gift, meal, or form of entertainment to a government official, lobbyist, or non-501(c)(3) organization is generally prohibited.



LEARN MORE

Always use good judgment and common sense. An appropriate offer:

- Is nominal
- Is occasional or infrequent (less than three times per year)
- Builds goodwill and furthers a business relationship
- Is given with no expectation of anything (or any action) in return
- Could never be viewed as a bribe or a kickback

To receive prior written approval for an item, complete the “Approval for Providing and/or Receiving Meals, Entertainment or Gifts to or from Vendors” form, provided on PolicyTech. Keep in mind that if you are approved for any item worth more than nominal value, you are expected to document it and maintain documentation for at least 12 months.



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GIFTS AND ENTERTAINMENT continued



ADD VALUE

WORK WITH INTEGRITY

- Never solicit a gift or offer.
- Think about appearances — don't engage in any activity that could raise concerns about your personal integrity.
- Report any offer worth more than nominal value to your manager, even if it is not accepted.

BE VIGILANT

- Be a good steward of R1 funds and make sound business judgments on our behalf.
- Refuse any gift that doesn't comply with the law, our policies, or our Code.
- If you purchase a gift or other item, be sure to have the required documentation (e.g., original receipts and written approvals).



IN PRACTICE

Q: One of our suppliers has season tickets for the local sports team. He can't make it to the next game and offered his two tickets to me. The tickets aren't expensive. May I accept?

A: No, even if the tickets are inexpensive, they do not advance a legitimate business purpose if you are not attending the game with the business partner.



CHECK OUR POLICIES

SEE OUR GIFTS, PRIZES, AND AWARDS POLICY FOR MORE INFORMATION



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POLITICAL CONTRIBUTIONS

We want to be a good neighbor and contribute to the health and welfare of the communities in which we operate. As a company, we support and encourage associates' involvement in political activities on a volunteer basis, but make sure you participate on your own time, at your own expense, and that your service is lawful and consistent with our policies.

You have the right to make personal contributions to a political party, campaign, or candidate; however, don't make any contributions on behalf of R1, or expect to be reimbursed for any contributions you make. Keep in mind that all gifts and donations to political parties, lobbyists, and similar organizations on behalf of the Company are strictly prohibited. Also, unless you receive approval in advance, you may not use R1 funds or assets (including time, facilities, equipment, or the R1 name) to support your personal political activities.



LEARN MORE

Political participation can mean making a contribution, speaking on behalf of a candidate, running for office, printing out/displaying campaign or political materials, or making phone calls. Give your personal time and resources to causes that you are passionate about, but take care to keep them separate from the work you do at R1.



ADD VALUE

WORK WITH INTEGRITY

- Don't pressure colleagues to get involved in the causes that you, as an individual, support.
- Don't offer gifts or payments to government officials or politicians with the hope of a business-related favor in return.
- Don't display campaign or political materials at your desk or in the workplace.

BE ACCOUNTABLE

- Don't make any political contributions on behalf of R1 – either directly or through trade associations.
- Make it clear in any of your political endeavors that the opinions you're sharing are yours and not R1's.



IN PRACTICE

Q: My son-in-law is running for political office and has asked if I would bring campaign brochures and yard signs into the office and distribute them to coworkers who would like to support him. I want to help him but am concerned this violates R1 policies – does it?

A: Yes, distributing literature on Company property or on Company time would not be appropriate. If any of your coworkers ask for campaign collateral, it would be best to arrange to meet after work at a non-work location.



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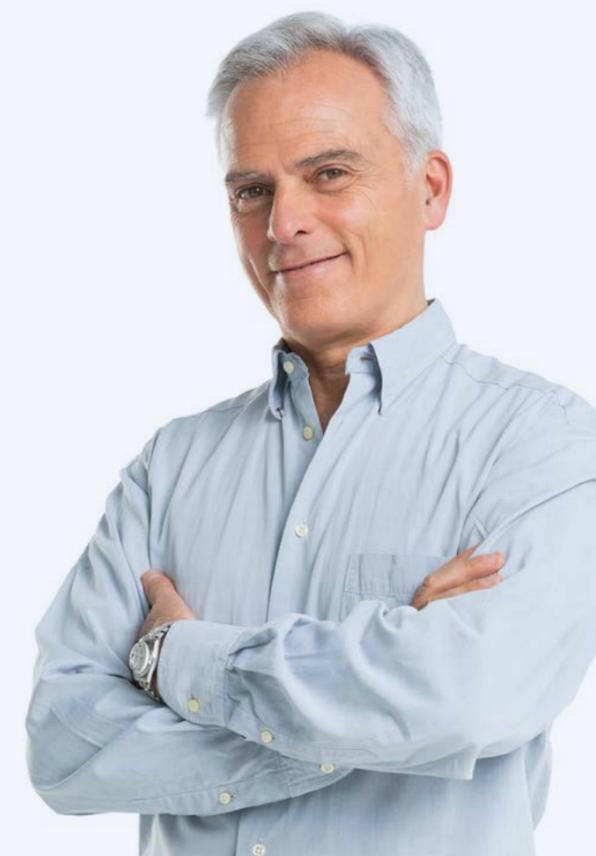
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We put our values into practice every day and use them to guide the decisions we make. This value-driven approach helps us comply with the law. It also helps us to do the right thing for each other, for our Company, and for those we serve. We can go home at the end of the day knowing we've given our very best. We make the right decisions, for the right reasons, every day.

- » FINANCIAL INTEGRITY
- » INSIDER TRADING
- » CONFLICTS OF INTEREST
- » PHYSICAL, ELECTRONIC, AND FINANCIAL ASSETS
- » INTELLECTUAL PROPERTY
- » SOCIAL MEDIA AND MEDIA RELATIONS

FINANCIAL INTEGRITY

Financial integrity requires more than the watchful eyes of good accountants; it requires a strong commitment from each of us. Whether you're filling out your timesheet, filing a benefit claim form, or completing a budgeting forecast, record transactions honestly, accurately, and completely.

When you handle business records with care, you're helping to enhance our reputation and to build our credibility with customers and shareholders. Follow all internal processes, policies, and generally accepted accounting principles so that our records accurately reflect our operations.

If you have a concern about a financial matter, speak up. You can do so confidentially and anonymously through the [R1 EthicsPoint Hotline](#), or by [contacting the Chair of the Audit Committee of the Board of Directors](#), or any other member of the Audit Committee. Your concern will be evaluated and resolved through follow-up actions if needed.



LEARN MORE

Business records include any document or data with information related to a business dealing. Examples include:

- Accounting reports
- Contracts, bids, and proposals
- Customer reports
- Emails and other correspondence
- Expense reports
- Financial records
- Meeting minutes
- Performance evaluations
- Regulatory filings
- Timesheets and invoices
- Vendor invoices

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FINANCIAL INTEGRITY continued



ADD VALUE

WORK WITH INTEGRITY

- Do not falsify or mischaracterize any record, account, or transaction.
- Never establish any undisclosed, unrecorded, or off-the-record accounts for any purpose.

BE ACCOUNTABLE

- If you submit expenses for reimbursements or make payments on behalf of R1, include supporting documentation and all necessary approvals.
- Make sure you always record and classify transactions in the proper accounting period and in the appropriate account and department.

BE COLLABORATIVE

- If your job requires that you disclose information to R1, the government, or regulatory authorities, make sure the information you provide is full, fair, accurate, timely, and understandable.
- Never destroy or dispose of information that might be needed for an investigation, an audit, or a legal proceeding.



IN PRACTICE

Q: I am responsible for approving expenses from numerous associates who report to me. Do I need to review each expense, or can I trust that the expenses are legitimate and accurate?

A: Yes, you should review each expense to determine whether it is legitimate, accurately recorded, and appropriately supported. If an expense appears unusual in any way, seek clarification from the associate. Signing off on expense reports without reviewing them could be considered a form of falsifying records, which violates our Code.



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INSIDER TRADING

At R1, fairness is important to us. As we compete in the marketplace and make investment decisions, we believe everyone should play by the same set of rules. That's why we never trade on material, nonpublic information (or "inside information") and we never tip off others so they may trade. Doing so would constitute insider trading, and insider trading is not just unfair, it's illegal. If you come across inside information during the course of your job, do not use it for your own personal gain and do not share it with others who may take advantage of it.

These actions could result in serious penalties, including termination and jail time. Even the appearance of insider trading could cause severe consequences, so ask questions before you act and consult with the General Counsel if there is something you are unsure of.



LEARN MORE

Inside Information is information that has not been released to the public, but may influence investors to buy, sell, donate, or hold stock or other securities once it is released. Examples of inside information include nonpublic details about:

- Revenues or earnings
- Mergers or acquisitions
- Changes in management
- Stock splits
- Defaults on debt

Tipping is telling someone nonpublic information about a company that may motivate that person to trade on that company's securities.



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INSIDER TRADING continued



ADD VALUE

WORK WITH INTEGRITY

- Check Company information through public sources (e.g., websites, journals, and newspaper articles) before sharing it with others.
- If you're unsure whether or not something is inside information, treat it like it is until you speak with the General Counsel.

BE VIGILANT

- Pay attention to blackout periods. There may be times when you have to refrain from trading even if you don't have inside information.
- Before trading in Company securities, double check insider trading laws and our policies to stay current.



IN PRACTICE

Q: My brother wants to know if he should buy stock in our Company. I recently learned that we will soon obtain a new customer. Would it be okay to recommend that he buy stock if I don't tell him why?

A: No, even recommending a trade without giving information as to why could be considered insider trading. Feel free to share with him information that has been released to the public, but do not encourage your brother or anyone else to buy stock based on inside information.



CHECK OUR POLICIES

SEE OUR INSIDER TRADING POLICY FOR MORE INFORMATION



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CONFLICTS OF INTEREST

When we consistently act in ways that put our customers and our Company first, we maintain an environment where everyone has the opportunity to succeed. It makes us feel connected to one another and a larger purpose, which helps keep us all accountable. Conflicts of interest can chip away at this, so we work to avoid them.

Conflicts of interest arise when your personal interests affect your ability to make objective business decisions for R1. Even the appearance of a conflict can damage our Company and our reputation. Recognize the sometimes-blurry line between personal and professional interests, and be diligent about preventing personal interests from influencing your actions on behalf of R1.

Start by getting to know the types of situations that can lead to conflicts. While it's not possible to list every situation that can present a conflict of interest, here are a few circumstances where they typically occur:

- **PERSONAL RELATIONSHIPS:** supervising or making employment decisions about a friend, family member, or someone with whom you have a romantic relationship
- **OUTSIDE ACTIVITIES OR EMPLOYMENT:** engaging in any activity that could interfere with your ability to do your job
- **IMPROPER BENEFITS:** receiving improper personal benefits as a result of your position with our Company
- **GIFTS AND ENTERTAINMENT:** exchanging excessive gifts or offers of entertainment or hospitality with people or companies that either do, or seek to do, business with our Company

- **FINANCIAL INTERESTS:** investing in or conducting outside work with a business partner, competitor, or any other organization that does, or seeks to do, business with our Company
- **BUSINESS OPPORTUNITIES:** competing with our Company, or taking advantage of opportunities discovered through a connection with our Company

Any potential conflicts should be disclosed to the General Counsel or Executive Vice President, Compliance & Risk immediately. If you are an executive officer or director, you may also have to disclose potential conflicts to the Chair of the Compliance & Risk Management Committee of the Board of Directors.



LEARN MORE

Spotting a conflict of interest is not always easy. If you find that you need additional guidance, try answering the following questions. If you can answer “yes” or even “maybe” to any of the questions below, you may be in a situation that could pose a conflict:

- Will it interfere with the decisions I make on behalf of R1?
- Will it compete against R1's business interests?
- Am I using R1 resources or my position for personal gain?
- Could it appear to be a conflict to someone else?
- Will it put me in a position of divided loyalty?



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CONFLICTS OF INTEREST continued



ADD VALUE

WORK WITH INTEGRITY

- Never use your position at R1 for personal gain.
- Disclose any actual, potential, or perceived conflict of interest immediately.
- Check with your manager, the General Counsel, or Executive Vice President, Compliance & Risk if you're unsure about a situation.

BE ACCOUNTABLE

- Recognize the kinds of situations where a conflict of interest would typically arise.
- Regularly review at-risk areas and stay current on our policies.



IN PRACTICE

Q: One of our suppliers mentioned that my manager is on the board of directors for his company. When I asked my manager about it, he said that it was nothing to worry about. Should I say something?

A: Yes, you have a responsibility to not only disclose any personal conflicts of interest, but also to speak up if you suspect that others have a conflict. Disclose the potential conflict to the General Counsel or Executive Vice President, Compliance & Risk immediately.



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PHYSICAL, ELECTRONIC, AND FINANCIAL ASSETS

Ethical behavior doesn't just apply to how you treat other people, it applies to how you treat other people's property. You may not often think about it, but during a seemingly routine workday, you have responsibility for a large amount of R1 assets, and it's up to you to protect them.

Protect Company assets against theft, fraud, loss, carelessness, and abuse. Never use them for your own personal gain, or for anything illegal or unethical. See the things around you in the proper context. Our assets support and inspire our work, and it is expected that you will keep them secure.

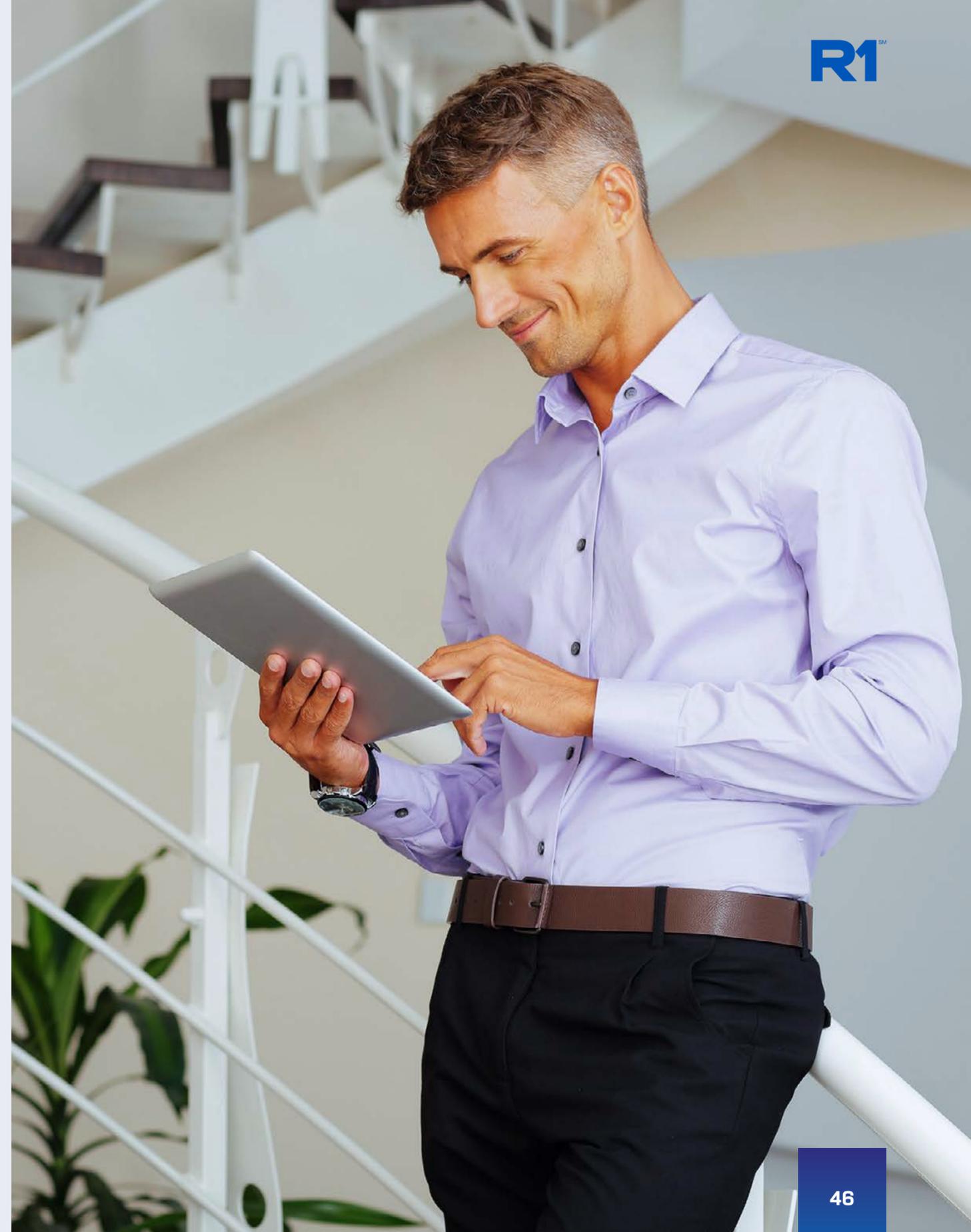


LEARN MORE

Physical Assets include material items of value that belong to our Company, including space, furniture, equipment, inventory, office supplies, phones, computers, hardware, and storage devices (e.g., USB drives).

Electronic Assets include anything accessed or stored in electronic form, including our network, email and Internet access, data, databases, and software.

Financial Assets include non-physical items of value that add to our business, including bank deposits, bonds, stocks, cash equivalents, and equity instruments.



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PHYSICAL, ELECTRONIC, AND FINANCIAL ASSETS continued



ADD VALUE

WORK WITH INTEGRITY

- Only use Company assets for legitimate business purposes. Exceptions may apply for the infrequent personal use of some assets, such as email and telephones, but use should be brief, within reason, appropriate, respectful, and lawful.
- Never borrow, lend, give away, or sell any asset without proper authorization.

BE ACCOUNTABLE

- Physically secure your office, workstation, laptops, and mobile devices by locking items and shutting systems down when stepping away.
- Update passwords and security software as directed.

BE COLLABORATIVE

- Be aware: R1 has the right to periodically monitor, access, and disclose the contents of devices containing Company or customer information (R1 systems and networks, phones with Company information, etc.) as well as to block access to those devices or Internet sites that do not support a valid business purpose.
- Make sure to return all Company-issued assets and equipment when your employment ends.

BE VIGILANT

- Tell your manager if you come across equipment that is damaged, unsafe, or in need of repair.
- Be alert to associates who misuse our networks or other assets.



IN PRACTICE

Q: I am having a hard time remembering my email password with each update. Would it be okay if I wrote it down on a sticky note next to my computer?

A: No, writing down your password would put the safety of our electronic assets in jeopardy. Try using a passphrase instead. They are easier to remember, yet still hard for potential hackers to figure out.



CHECK OUR POLICIES

SEE OUR PROFESSIONAL CONDUCT POLICY FOR MORE INFORMATION



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INTELLECTUAL PROPERTY

It's no secret that one of the major keys to our success is the unique and desirable nature of our products and services. It's our intellectual property ("IP") that sets us apart from the competition. To maintain our success, safeguard any IP that comes your way and make sure others around you do so as well.

We have a responsibility to use IP solely for business purposes and to never disclose it without Company approval. We also must respect others' IP – taking care not to infringe on patents, trademarks, and other such rights held by any third-party.

Protect IP with a passion, and remember that R1 owns any work product (such as ideas, processes, and inventions) that you develop or design as an associate, to the extent permitted by law. That ownership continues even if you leave R1.



LEARN MORE

Intellectual property is everything we create, design or develop. It's our knowledge base – our brands, creative works, and original ideas for a product or process and includes:

- Business methodology
- Computer programs
- Copyrights
- Documents with proprietary information
- Know-how
- Marketing secrets
- Patents
- Proprietary routines
- Systems
- Trade names
- Trade secrets
- Trademarks



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INTELLECTUAL PROPERTY continued



ADD VALUE

WORK WITH INTEGRITY

- Share IP information only with those who are authorized and need it to carry out their jobs.
- Honor non-disclosure agreements.

BE ACCOUNTABLE

- Never email IP information to your personal email account.
- Avoid discussing IP information in public places where others can hear you.

BE COLLABORATIVE

- Treat the IP belonging to other individuals or organizations with the same care as you would your own.
- **Speak up** if you feel that someone may be violating our IP guidelines.

BE VIGILANT

- Immediately report suspected theft or unauthorized disclosure of IP.
- Use care when discussing our research and development with customers or others outside of the Company.



IN PRACTICE

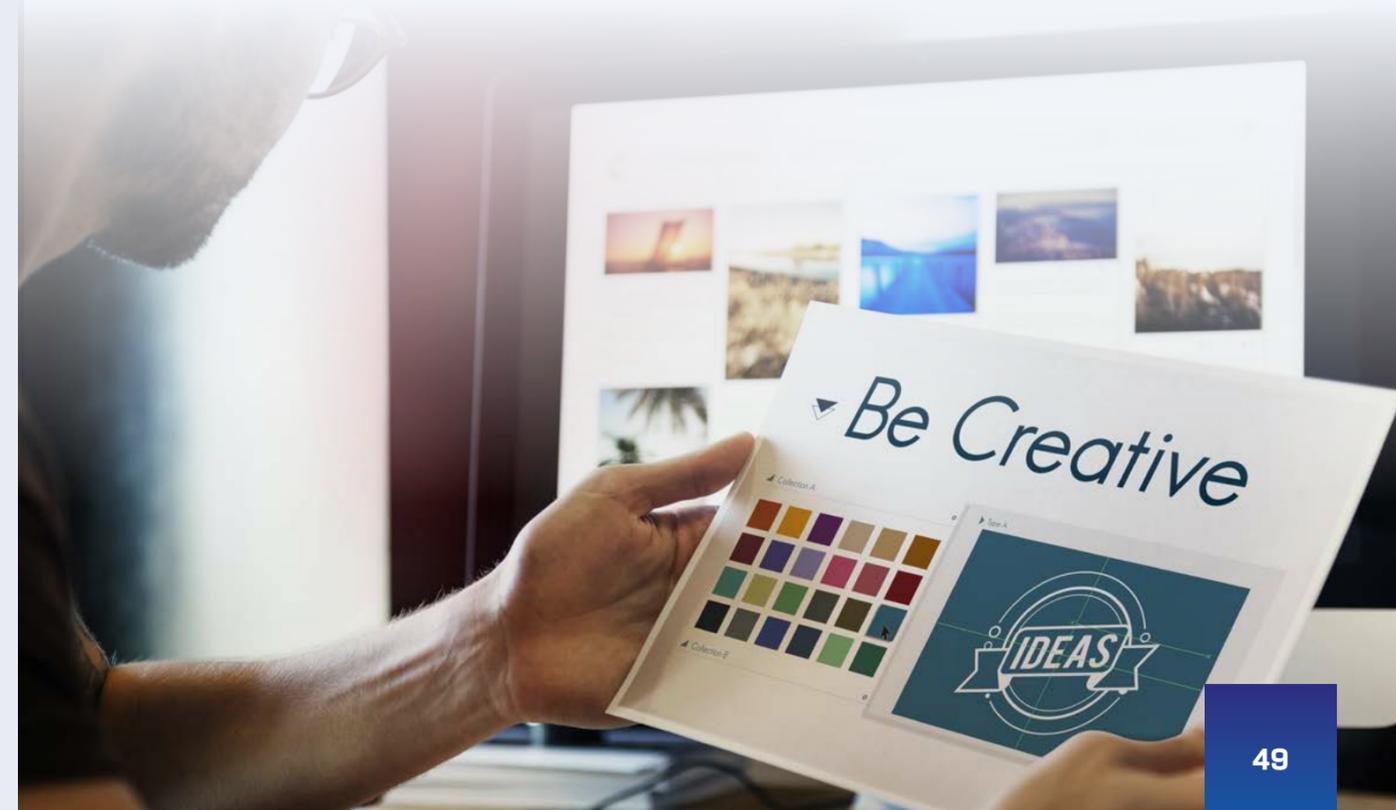
Q: I recently accepted a job offer from another company. Its hiring decision was largely based on proprietary knowledge that I gained developing a business application for R1. Since this is a project I worked on personally, can I share it with my new employer?

A: No, the excellent work you have done for R1, using R1 time and resources, is considered R1 property, and it may not be shared. Instead, use the skills that you have developed here in your next position and respect your legal and ethical obligation to protect our intellectual property.



CHECK OUR POLICIES

SEE OUR CONFIDENTIALITY POLICY FOR MORE INFORMATION



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SOCIAL MEDIA AND MEDIA RELATIONS

We've worked hard on our journey to become one of the most trusted revenue cycle management companies in the world, and it shows. Through clear and accurate messaging, we have developed a reputation for being responsible in all that we do.

We maintain that reputation by only authorizing certain associates to speak on our behalf and by requiring all of our associates to use social media responsibly. Keep in mind that everything we communicate about our Company can have an impact.

Use social media in accordance with our policies and, unless you are a designated spokesperson, forward any media inquiries that you receive to the appropriate Company resource. These two actions will help us make sure that information posted and published about R1 remains consistent and accurate.



LEARN MORE

In regard to matters of public concern, we comply with laws that protect the rights of associates to speak publicly about matters of public concern and engage in protected concerted activities related to the terms and conditions of employment. Nothing in our Code or our policies is intended or should be construed to interfere with or limit your legal rights.



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SOCIAL MEDIA AND MEDIA RELATIONS continued



ADD VALUE

WORK WITH INTEGRITY

- Never post anything that would be discriminatory or constitute a threat, intimidation, unlawful harassment, or bullying.
- Never make a post containing PHI, including names, related to a customer, patient, or coworker.
- Be careful about what you publish even if speaking on your own behalf. If you wouldn't feel comfortable sharing something at work, then don't share it publicly.

BE ACCOUNTABLE

- Understand that you are personally responsible for anything you publish.
- Seek approval before participating in a speaking engagement or publishing an article on behalf of R1.

BE COLLABORATIVE

- Remember that only the R1 Marketing Department is authorized to create and manage Company social media sites, web pages, networks, etc.
- Unless designated to do so, never claim to be a spokesperson for R1.

BE VIGILANT

- Never share confidential information (including PHI) on social media. If you see an online posting made by an R1 associate that contains PHI, **speak up** immediately.
- If commenting on anything related to R1, make it clear within your social media postings that your views are your own.
- Stay current on our Media Relations policy. It applies to press releases, analyst reports, contributed articles, presentations at conferences, and any official communications with the media or in a public forum regarding R1 work.



IN PRACTICE

Q. I'm a new R1 associate. May I update my LinkedIn profile with my job title and where I work?

A: Yes, there's nothing wrong with sharing your job title or where you work as long as you follow our policies and make sure it's clear that you're not speaking for R1 when you share online.



CHECK OUR POLICIES

SEE OUR SOCIAL MEDIA POLICY FOR MORE INFORMATION

SEE OUR MEDIA RELATIONS POLICY FOR MORE INFORMATION



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We believe in caring for our community with the same devotion we give to our amazing products and services. We're committed to being good stewards of our environment, giving charitably, and engaging responsibly. Do your part to bring about positive change by investing in the communities where you live and work.

- » THE ENVIRONMENT
- » CORPORATE SOCIAL RESPONSIBILITY
- » CORPORATE CITIZENSHIP

THE ENVIRONMENT

We are fortunate to be one of the most successful providers of revenue cycle management services in the world. But we realize that successful business operations do more than affect our bottom line — they impact the people and the planet in countless and profound ways.

That's why we work to reduce the environmental impact of our operations. Help us work in an environmentally responsible manner and minimize our carbon footprint. Comply with environmental laws and regulations and look for ways to address sustainability challenges in all that you do.



LEARN MORE

Sustainable business practices start with our daily office operations.

To help conserve energy:

- Try double-sided printing and say no to unnecessary packaging.
- Turn off the lights if you're the last to leave the office.
- Opt for energy-efficient settings on all of your devices and energy-efficient devices when possible.



ADD VALUE

BE ACCOUNTABLE

- Conserve, recycle, or re-use natural resources whenever possible.
- Use essential resources, like water, paper, and electricity, responsibly.

BE COLLABORATIVE

- Consider third-parties that share our commitment to sustainability.
- Set a good example by demonstrating environmental stewardship every day.

BE VIGILANT

- Be proactive and look for ways to improve the efficiency of our operations.
- Identify and report any environmental concerns.



IN PRACTICE

Q: I have some thoughts about how we dispose of paper at our facility. What we do now doesn't violate any laws, but I think we could do better. What should I do?

A: We encourage you to speak up and share any ideas you have about how to lessen our environmental impact. Talk to your manager or other [internal resource](#) right away to see if your idea can be implemented.



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CORPORATE SOCIAL RESPONSIBILITY

Engaging civically and giving charitably are some of the best ways to truly live our values. By striving to act in ways that support the areas where we live and work, we create stronger communities and help build a happier society for everyone.

Recognizing the importance of giving back, we created R1 Helping Hands, a U.S.-based organization whose mission is to help those in greatest need. We also regularly partner with charities and nonprofits to support efforts such as hurricane relief, education reform, and economic empowerment.

We encourage you to become involved in any of these corporate initiatives or to participate personally in charitable initiatives that are meaningful for you.

If you do choose to volunteer your personal time, please do so responsibly. Make sure your volunteer work is done legally and without the use of Company equipment, like computers, phones, and printers and that you don't make any comments or take any actions in the name of R1 unless authorized.



LEARN MORE

In the U.S., R1 Helping Hands not only promotes sustainable partnerships with local networks, it offers exciting opportunities to volunteer with organizations throughout the community. Look out for emails from R1 Helping Hands if you're trying to find a way to make a difference. If you're interested in reaching out directly, you can contact them at R1HelpingHands@r1rcm.com.



ADD VALUE

WORK WITH INTEGRITY

- Make sure your charitable activities are lawful and consistent with our policies.
- Contact the Company's General Counsel or Chief Compliance Officer if you have a question regarding work with an organization that provides services or seeks to conduct business with R1.

BE ACCOUNTABLE

- Only engage in charitable activities when they don't interfere with your work at R1.
- Be on time when engaging in R1-sponsored charitable activities.
- For non-R1 sponsored charitable activities, please participate on your own time, using your own resources.



IN PRACTICE

Q: I am involved in a personal charitable activity in my community. May I obtain a list of R1 vendors that I work with and use our R1 letterhead to solicit them to contribute to my personal charitable activity?

A: No, soliciting R1 vendors for personal charitable activities may create the appearance of impropriety or a conflict of interest. Relationships with vendors should be based solely on legitimate business needs.



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CORPORATE CITIZENSHIP

Although we strive to perfect our products and services, we also take time to invest in our corporate culture. We recognize the importance of a respectful work environment, our Company mission, and our shared values. These characteristics reflect who we are as a Company and they inspire us and shape our actions every day.

We aim to hire and retain associates who value corporate citizenship as much as we do. We know that if we believe being a good corporate citizen is important, then we are each more likely to feel like part of the team and enjoy our time in the workplace.

Happy associates lead to productive and healthy work environments, which can make a business thrive. Do your part to contribute by respecting our Company values and our compliance principles – work with integrity, be accountable, collaborative, and vigilant.



ADD VALUE

WORK WITH INTEGRITY

- Complete all required trainings on time and within required deadlines. You will be doing your part to create a productive work environment.

BE ACCOUNTABLE

- Manage your role and responsibilities well. Arrive to work on time with an understanding of team goals and offer solutions.
- Be a good manager by delegating wisely, setting goals, communicating, making time for your associates, and recognizing their achievements.

BE COLLABORATIVE

- Interact respectfully with others. By actively listening, making a positive contribution, and respecting differing opinions, you can help create a more effective work environment.
- Be timely in responses to emails and phone calls. Maintaining high standards in business communication will make customers and coworkers feel appreciated.

BE VIGILANT

Learn about who R1 is. Ask questions and seek transparency. It will increase your workplace satisfaction.



IN PRACTICE

Q: I'm fairly new to R1 and have already completed my required training. Are there any recommended next steps?

A: We encourage associates to become familiar with and stay up-to-date on R1's policies, business model, and history. Work with your leader to understand his/her expectations and continue to build trust with your colleagues. All of these actions will help support you and your team in fostering a strong and healthy corporate culture.



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EPILOGUE

An ethical and compliant culture is the fabric of a great workplace, no matter the industry in which you work. At R1, we are building that culture each and every day, knowing that ethics, integrity, and compliance are part of the journey in building that great workplace. And we know that each of you are committed to that journey, working with pride and commitment in the right way, for the right reasons, every day.

As leaders in healthcare, we're also entrusted with valuable and sensitive information and interactions. In turn, it is paramount that we act with an uncompromising commitment to integrity, accountability, collaboration, and vigilance – our compliance principles. Our Code is the guidebook on how best to follow these principles.

And don't forget – we're a team with colleagues, partners, and resources ready to help and support one another. We know that the healthcare landscape and workplace can be complex and complicated. Reach out and know that we'll offer our best guidance and direction in a helpful, transparent, and efficient manner. If you have any questions about what's included in the Code, ask your manager, the [Compliance & Risk Team](#), or look to our [Resources](#) for help. If you see someone or something that you believe may violate our Code, speak up. When you do, you'll help in ensuring that R1 is leading the way in building and sustaining a workplace that is committed to conduct predicated on acting with integrity every day.

Finally, thank you for your commitment to our Code and for helping us live our values and adhere to our Compliance principles each day.

Regards,

COREY PERMAN
Executive Vice President, Compliance & Risk



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NEED ADDITIONAL HELP? We have a variety of resources available to answer any questions you may have and to help you report concerns:

<p>To ask questions and share concerns</p>	<p>CONTACT YOUR MANAGER, ANOTHER MANAGER OR YOUR LOCAL HUMAN RESOURCES BUSINESS PARTNER, USING OUR OPEN DOOR PHILOSOPHY; or CONTACT THE GENERAL COUNSEL AND/OR EXECUTIVE VICE PRESIDENT, COMPLIANCE & RISK; or CONTACT THE COMPLIANCE & RISK TEAM:</p> <p>By email: Compliance@r1rcm.com or ComplianceIndia@r1rcm.com</p> <p>By mail: R1 RCM Inc. 401 North Michigan Avenue Suite 2700 Chicago, Illinois 60611</p> <p>Via the R1 EthicsPoint Hotline, 24/7 anonymously or in name:</p> <p>By phone, 24/7: U.S.: 800-633-9562 India: 000-800-100-1071 or 000-800-001-6112</p> <p>Online at: https://r1hotline.ethicspoint.com</p>
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<p>For questions on the R1 Code of Integrity</p>	<p>CONTACT THE EXECUTIVE VICE PRESIDENT, COMPLIANCE & RISK (CHIEF COMPLIANCE OFFICER).</p>
<p>To view our policies</p>	<p>Access PolicyTech.</p>
<p>For media inquiries</p>	<p>Email media@r1rcm.com.</p>

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