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Purpose

The purpose of this policy is to describe the principles and values of Longevity Health, as well as address expectations of conduct of all employees, contractors, and vendors.

Definitions, Abbreviations, and Acronyms

| Acronym | Meaning |
|---------|--|
| CMS | Centers for Medicare and Medicaid Services |
| FWA | Fraud, Waste, and Abuse |
| HIPAA | Health Insurance Portability and Accountability Act of 1996 |
| HITECH | Health Information Technology for Economic and Clinical Health |

Policy

Introduction

Longevity Health maintains certain policy and reference documents to guide its employees with respect to their day-to-day conduct and performance. The information addresses expectations of conduct in areas where improper activities could damage Longevity Health’s reputation and otherwise result in serious adverse consequences to Longevity Health and to the involved employees, as well as potential member harm. This document represents Longevity Health’s Standards of Conduct (hereafter referred to as “Standards”).

These Standards describe the overarching principles and values of the organization. Compliance with these Standards is the responsibility of all Longevity Health employees, contractors, and vendors.

Longevity Health expects all employees, contractors, and vendors to conduct themselves in an ethical manner, and to report all instances of noncompliance and potential fraud, waste, and abuse (FWA) through the appropriate mechanisms. These Standards identify how issues can be reported and that such reporting can be done anonymously and confidentially, and without fear of retaliation. Reported issues will be addressed and corrected in a timely manner. In addition, compliance and ethics are valued at the highest levels of authority within the organization.

As Longevity Health continues to grow, and as federal and state laws change, the need may arise, and Longevity Health reserves the right to revise, supplement, or rescind any policies or portion of these Standards as it deems appropriate, in its sole and absolute discretion. Employees will be notified of changes to these Standards as they occur.

As a condition of employment, all new employees shall attest that they have received and read all elements of these Standards within the first 30 days of hire, and that they will comply with all of the elements in their day-to-day activities. Existing Longevity Health employees shall attest at least annually. To document having read and understood the contents of these Standards, all employees attest in the learning management system utilized by Longevity Health.

An employee's actions under these Standards are significant indications of the individual's judgment and competence. Accordingly, those actions constitute an important element in the evaluation of the employee for position assignments and promotion. Correspondingly, insensitivity to or disregard of these Standards' principles will be grounds for appropriate management disciplinary action.

All first-tier, downstream, and related entities also receive a copy of this Code on an annual basis.

Scope

These Standards apply to all Longevity Health employees, contractors, Longevity Health IPA, and any related Longevity organizations.

Business Ethics and Conduct

The successful business operation and reputation of Longevity Health is built upon the principles of fair dealing and ethical conduct of our employees. Our reputation for integrity and excellence requires careful observance of the spirit and letter of all applicable laws and regulations, as well as a scrupulous regard for the highest standards of conduct and personal integrity. Longevity Health's success is dependent upon our customers' trust, and we are dedicated to preserving that trust. Employees are expected to conduct themselves in a way that will merit the continued trust and confidence of our customers.

Longevity Health will comply with all applicable laws and regulations. As such, employees are expected to conduct business in accordance with the letter, spirit, and intent of all relevant laws and to refrain from any illegal, dishonest, or unethical conduct.

In general, the use of good judgment, based on high ethical principles, will guide each employee with respect to lines of acceptable conduct. If a situation arises in which it is difficult to determine the proper course of action, the matter should be discussed openly with the employee's immediate supervisor and, if necessary, with the Compliance Department. Disregarding or failing to comply with this standard of business ethics and conduct could lead to disciplinary action, up to and including possible termination of employment.

Conflict of Interest

Employees have an obligation to conduct business within guidelines that prohibit actual or potential conflicts of interest. These Standards establish the framework and general direction within which

Longevity Health wishes the business to operate. Where necessary, employees should seek further clarification on issues related to the subject of acceptable standards of operation. Contact the Compliance Department for more information or for any questions concerning conflicts of interest.

Transactions with outside firms must be conducted within a framework established and controlled by the executive level of Longevity Health. Business dealings with outside firms should not result in unusual gains for those firms. Unusual gains refer to bribes, product bonuses, special fringe benefits, unusual price breaks, and other windfalls designed to ultimately benefit the employer, the employee, or both. An actual or potential conflict of interest occurs when an employee is in a position to influence a decision that may result in a personal gain for that employee or for a relative as a result of Longevity Health's business dealings. For the purposes of these Standards, a relative is any person who is related by blood or marriage, or whose relationship with the employee is similar to that of persons who are related by blood or marriage.

No "presumption of guilt" is created by the mere existence of a relationship with outside firms. However, if employees have any influence on transactions involving purchases, contracts, or leases, it is imperative they disclose any such relationships to Longevity Health management as soon as possible so that safeguards can be established to protect all parties. Personal gain may result not only in cases where an employee or relative has a significant ownership in a firm with which Longevity Health does business, but also when an employee or relative receives any reward, bribe, substantial gift, or special consideration as a result of any transaction or business dealings involving Longevity Health.

Prohibition of Improper Payments

Longevity Health expects all employees to use only legitimate practices in commercial operations and in promoting Longevity Health's position on issues before governmental authorities. As stated below, "kickbacks" or "bribes" intended to induce, or reward favorable buying decisions and governmental actions are unacceptable and prohibited.

No employee of Longevity Health or any Network or Representative acting on Longevity Health's behalf shall, in violation of any applicable law, offer or make directly or indirectly through any other person or firm any payment of anything of value (in the form of compensation, gift, contribution, or otherwise) to:

- Any person or firm employed by or acting for or on behalf of any customer, whether private or governmental, for the purpose of inducing or rewarding any favorable action by the customer in any commercial transaction; or any governmental entity, for the purpose of inducing or rewarding action (or withholding of action) by a governmental entity in any governmental matter;
- Any governmental official, political party or official of such party, or any candidate for political office, for the purpose of inducing or rewarding favorable action (or withholding of action) or the exercise of influence by such official, party or candidate in any commercial

transaction or in any governmental matter.

In utilizing consultants, agents, sales representatives or others, Longevity Health will employ only reputable, qualified individuals or firms under compensation arrangements, which are reasonable in relation to the services performed. Consultants, agents, or representatives retained in relation to the provision of goods or services to the federal government must agree to comply with all laws, regulations, and Longevity Health policies governing employee conduct.

The provisions of this section are not intended to apply to ordinary and reasonable business entertainment or gifts not of substantial value, customary in local business relationships and not contrary to the law as applied in that environment. Managers are expected to exercise sound discretion and control in authorizing such business entertainment and gifts.

When customer organizations, governmental agencies, or others have published policies intended to provide guidance with respect to acceptance of entertainment, gifts, or other business courtesies by their employees, such policies shall be respected.

Political Contributions

Longevity Health will not make any contribution to any political party or to any candidate for political office in support of such candidacy except as provided in these Standards and as permitted by law.

In the United States, federal law strictly controls corporate involvement in the federal political process. Generally, federal law provides that no corporation may contribute anything of value to any political party or candidate in connection with any federal election.

While similar laws apply in some states and their political subdivisions, in many jurisdictions in the United States, corporate contributions to candidates and political parties in connection with state and local election campaigns are lawful.

This policy is not intended to prevent the communication of Longevity Health views to legislators, governmental agencies, or to the general public with respect to existing or proposed legislation or governmental policies or practices affecting business operations.

Moreover, under these Standards, reasonable costs incurred by Longevity Health to establish or administer political action committees or activities organized to solicit voluntary political contributions from individual employees are not regarded as contributions to political parties or candidates, where Longevity Health may lawfully incur such costs.

Reporting Potential or Detected Noncompliance or Fraud, Waste, and Abuse

Longevity Health is committed to complying with all applicable laws, including but not limited to those addressing noncompliance and FWA. Employees and contractors are expected to immediately report any potential false, inaccurate, or questionable issues to their supervisors or the Longevity Health Compliance Officer in accordance with Longevity Health's policies. Any employee who is

requested to engage in any activity which is or may be contrary to the intent and spirit of these Standards must report such information to the Longevity Health Compliance Officer within 24 hours of identifying a concern.

Likewise, any employee who acquires information that gives the employee reason to believe that any other employee is engaged in conduct forbidden by these Standards must promptly report such information to his or her manager or, if the manager is engaged in such conduct, then to the Longevity Health Compliance Officer within 24 hours of identifying a concern.

Longevity Health employees can use the following information to submit questions or reports of suspected or detected noncompliance or potential FWA.

| Methods for Reporting Potential and Detected Noncompliance and Fraud, Waste, and Abuse (FWA) | |
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| Anonymous Hotline | 1-833-352-7924 |
| Confidential E-mail | Compliance@LongevityHealthPlan.com |
| Mailing Address | 11780 U.S. Hwy 1 Suite N107 Palm Beach Gardens, FL 33408 |

To support Longevity Health’s compliance structure, all vendors contracted to carry out activities on behalf of Longevity Health have an obligation to report all incidents of FWA to the Longevity Health Compliance Department. All vendors contracted to carry out activities on behalf of Longevity Health are required to have policies, procedures and training regarding the identification and reporting of potential or detected noncompliance or fraud, waste, and abuse.

Longevity Health does not tolerate fraudulent or other dishonest behavior and will take appropriate investigative and corrective action upon receiving such reports. The Longevity Health Compliance Department, under the direction of the Compliance Officer, will conduct all investigations related to reported potential or detected noncompliance or fraud, waste, and abuse.

Longevity Health is prohibited by law from retaliating in any way against any employee or contractor who in good faith reports a perceived problem, concern, or issue involving noncompliance or FWA, and will not take punitive action against an employee who reports such information.

Anti-Retaliation Policy

Longevity Health recognizes and understands the value to provide an environment where employees feel comfortable coming forward in good faith. Longevity Health will take disciplinary action against any employee who takes negative action against or intimidates any other employee who reports a potential violation of our Standards of Conduct, applicable law or regulations or who assists in the investigation of such a report. Longevity Health’s stance on retaliation is complemented by the federal government’s

protections for individuals when engaging in “whistleblowing” activities related to federal grants and contracts.

Longevity Health will not retaliate against any workforce member who has knowledge of potential inappropriate or illegal activities involving federal funds and, in good faith, discloses this information to appropriate government authorities. Employees who report, or who assist in the reporting of potential violations, are not exempt from accountability for their own involvement in any wrongdoing and are expected to continue to perform their job and follow all Longevity Health policies

Required Training and Education Activities

These Standards describe Longevity Health’s expectation that all employees conduct themselves in an ethical manner. To assist employees with understanding potential issues and to comply with Centers for Medicare and Medicaid Services (CMS) requirements, certain training and education activities are required. The rest of this section discusses those activities.

Fraud, Waste, and Abuse

Longevity Health is committed to the responsible stewardship of our resources, and maintaining a comprehensive plan for detecting, preventing, and correcting FWA. Longevity Health requires any individual who is aware of or suspects potential acts of FWA of Longevity Health resources in any departmental area, by any provider, or with any entity that Longevity Health contracts with, such as in the Medicare program, to report such acts to the Longevity Health Compliance Officer. Retaliation against any individual making a report of real or potential FWA is strictly prohibited.

All employees are required to complete the FWA training within 90 calendar days of the start of their employment. Employees are also required to complete the training at least once annually.

General Compliance

General compliance training will address preventing, detecting, and correcting noncompliance issues, a description of the compliance program, and methods for reporting potential issues of noncompliance that ensure confidentiality and anonymity. Moreover, such training efforts will highlight that Longevity Health adheres to a standard of non-retaliation for compliance-related questions or reports of potential noncompliance or FWA.

In compliance with CMS requirements, all employees and governing body members must receive general compliance training within 90 days of initial hiring, and annually thereafter.

Protecting Individual’s Health Information

The Health Insurance Portability and Accountability Act of 1996 (HIPAA) rules create a framework to protect the privacy and security of patients’ and health plan members’ health

information through appropriate safeguards and a set of limits and conditions on use and disclosure. Longevity Health supports the goals of HIPAA and documents its commitment to comply with these laws in *COM009 – HIPAA Privacy and Security Plan* policy.

All employees are required to complete the HIPAA and Health Information Technology for Economic and Clinical Health (HITECH) compliance courses within the first 90 days of hire. Existing employees are also required to complete the training at least once annually.

Violations of the Standards of Conduct

Violations of these Standards are grounds for discharge or other disciplinary action, adapted to the circumstances of the particular violation and having as a primary objective furtherance of Longevity Health’s interest in preventing violations and making clear that violations are neither tolerated nor condoned.

Disciplinary action will be taken, not only against individuals who authorize or participate directly in a violation of these Standards, but also against:

- Any employee who may have deliberately failed to report a violation of these Standards;
- Any employee refusing to complete mandatory training in a timely manner;
- Any employee who may have deliberately withheld relevant and material information concerning a violation of these Standards; and
- The violator’s managerial superiors, to the extent that the circumstances of the violation reflect inadequate leadership and lack of diligence.

Longevity Health Compliance Officer Contact Information

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| Longevity Health Compliance Officer | Beth Socoski |
| Phone | 412-260-1207 |
| E-mail | Beth.Socoski@longevityhealthplan.com |
| Mailing Address | Longevity Health Compliance 11780 US Hwy 1; Suite N107 Palm Beach Gardens, FL 33408 |



Change Log

| Document Version | Major or Minor Revision ? | Date | Name | Comments |
|------------------|---------------------------|------------|-------------------------------|--------------------------------|
| 1.0 | New | 08/30/2018 | Celeste Panaro / Deb Baverman | Initial creation; BOD Adoption |
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| 4.0 | Minor | 11/10/21 | Beth Socoski | Minor Annual Revision |
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| 6.1 | Minor | 7/3/2024 | Beth Socoski | Change in Compliance Officer |
| 7.0 | Minor | 12/1/2024 | Beth Socoski | Minor Annual Revision & Review |
| 8.0 | Minor | 1/30/2026 | Beth Socoski | Minor Annual Revision & Review |

