Sevita



Code of Conduct

for Business Partners

July 2025

Table of Contents

About this Code of Conduct 3

Ethics & Business Integrity 4

Compliance with Applicable Laws & Regulations 4
Anti-Bribery & Anti-Corruption 4
Conflicts of Interest 4
Fair Competition 4
Ineligible Persons or Entities 5
Labor & Employment 5
Occupational Health & Safety 5
Record Keeping & Reporting Requirements 5

Respect for the Individuals We Serve 6

Clinical Research 6

Confidentiality & Data Security 6

Marketing & Publicity 6

Environmental & Social Responsibility 7

Seeking Help & Reporting Concerns 7

About this Code of Conduct

This Code of Conduct for Business Partners ("Code of Conduct") defines the principles and expectations for ethical and sustainable business conduct. It applies to any person or organization that receives payment from any entity affiliated with the Sevita brand (collectively, the "Company" or "us") or with whom the Company engages in business transactions, hereinafter referred to as "Business Partners" or "you". By working with us, you agree to comply with the principles and expectations outlined in this document. And, as a Business Partner you recognize the responsibility for the actions of your employees, consultants, agents, and any other third party intermediaries acting on your behalf. Business Partners will be held accountable for any breaches of this Code of Conduct by such individuals or entities.

The Company reserves the right to reasonably modify this Code of Conduct. Business Partners are expected to routinely review our public-facing website for updates to this Code of Conduct. Compliance with the most current version is mandatory, and Business Partners must ensure that all employees, consultants, agents, and any other third party intermediaries acting on your behalf are aware of and adhere to the changes.

Failure to comply with this Code of Conduct may result in termination of your contract or our business relationship; legal action, where applicable and appropriate; and/or reporting to appropriate regulatory, protective services, or law enforcement authorities.

Ethics & Business Integrity

We are committed to maintaining the highest standards of integrity, ethics, and professionalism in all of our operations. As a company operating in the human services and health care industries, we uphold our core values of integrity, respect, inclusion, and growth to support the well-being of the individuals and communities we serve.

Compliance with Applicable Laws & Regulations

Business Partners must conduct their business in compliance with all applicable Federal, state, and local laws and regulations, as well as industry standards relative to their operations. Business Partners providing services directly impacting human services and health care must meet applicable licensing, certification, and accreditation standards. Business Partners with access to information about the individuals we serve or other Company information must adhere to applicable Federal and state privacy laws to appropriately protect this sensitive information, including the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and other, similar state privacy and data protection laws. Failure to do so may subject Business Partners, the Company, and or other individuals involved in misconduct to enforcement activities, such as fines, license revocation, other sanctions, damages, litigation, or other consequences.

Anti-Bribery & Anti-Corruption

Business Partners are expected to act with honesty, fairness, and transparency in all business dealings and in compliance with the applicable anti-bribery and anti-corruption laws and regulations in the United States, including the U.S. Foreign Corrupt Practices Act (FCPA) and similar state laws. Business Partners shall not offer 'anything of value' to Company employees or other third parties, directly or indirectly, with the intention of influencing a business decision or decision around the individuals we serve. This includes, securing new business, maintaining existing business, or any other unfair advantage. Anything of value is not limited to money; this includes providing business opportunities, stock options, or gifts and entertainment opportunities. Business Partners shall make sure that all transactions are transparent.

Conflicts of Interest

Business Partners must be committed to fair, honest, and transparent business transactions. Business Partners must disclose any relationships or activities that may present an actual, potential, or perceived conflict of interest with their work for us at the commencement of and during the course of our relationship. A conflict of interest arises when personal, financial, or professional interests or activities could influence your ability to act in the best interests of your business decisions related to your relationship with the Company. We strive to avoid actual, potential, or perceived conflicts of interests.

Fair Competition

Business Partners must operate with integrity and transparency in all business dealings. Business Partners are required to fully comply with all applicable anti-trust laws and regulations, such as the Sherman Act, the Clayton Act, and the Federal Trade Commission Act, and avoid any practices that could lead to anti-competitive behavior, such as price-fixing, bid-rigging, market allocation, or any other form of collusion that undermines fair competition.

Ineligible Persons or Entities

Business Partners are responsible for taking necessary steps to assure that officers, directors, employees, and contractors directly or indirectly involved in providing goods and services to the Company are eligible to participate in any federal health care program and are in compliance with Sections 1128 and 1156 of the Social Security Act and anti-money laundering and counter-terrorist financing regulations.

Labor & Employment

Business Partners must comply with applicable labor and employment laws, including fair wages, non-discrimination, employment and labor conditions, break and rest times.

Occupational Health & Safety

Business Partners are required to maintain appropriate licenses and certifications required by all applicable laws and safety orders of the state, county, and city where the Business Partner is located and where services are delivered or performed, including the Occupational Safety and Health Act (OSHA).

Record Keeping & Reporting Requirements

Business Partners shall provide truthful, accurate, and timely invoices, reports, and records and in compliance with applicable financial recordkeeping, anti-money laundering, and reporting laws and regulations. All financial books and records shall comply with applicable laws, regulations and generally accepted accounting practices. Business Partners shall refrain from failing to record applicable entries or documenting false entries; Business Partners should have internal controls and processes in place to support compliant practices. All records must be truthful, accurate, and timely; reliable and reasonable documentation to support accurate billing must also be maintained. Business Partners will participate in audits or reviews as requested to support compliance with legal, regulatory, quality, safety, or other requirements.

Respect for the Individuals We Serve

In the human services and health care industries, respect for human dignity and protecting the well-being of the individuals we serve against abuse, exploitation, and neglect is paramount. Under applicable state laws, most of our Business Partners are also considered mandated reporters and required by law to report observed or suspected abuse, exploitation and neglect. Business Partners must protect the individuals we serve and avoid practices that could harm or exploit individuals under their care or influence.

Clinical Research

Business Partners shall conduct clinical trials in accordance with local, national, and international laws and regulations, including Good Clinical Practice (GCP) guidelines and the Declaration of Helsinki. Business Partners must demonstrate that all research protocols are scientifically sound, ethical, and provide written approval by relevant Institutional Review Boards (IRBs) or Ethics Committees. Business Partners must ensure that all participants in clinical trials have provided approved informed consent and understand their rights to withdraw from the trial at any time.

Confidentiality & Data Security

Business Partners must comply with all applicable laws, regulations, and contractual terms when collecting, using, disclosing, storing, and processing data that is shared by the Company, processed on the Company's behalf, or data Business Partners become aware of given the nature and scope of our business relationship. Business Partners' systems that contain the Company's confidential information or data shall be appropriately managed and protected against unauthorized access, use, disclosure, modification or destruction. Business Partners are also required to notify the Company of any data breaches or security incidents impacting the Company and fully cooperate with the Company in an investigation and remediation efforts related to data protection.

Marketing & Publicity

Business Partners shall refrain from using the Company's name, tradenames, trademarks, logos, brand, or similar markings or provide the Company's name to current or prospective customers as a reference without first receiving prior written approval from connect@sevitahealth.com.

Environmental & Social Responsibility

Business Partners are required to comply with all applicable environmental laws and regulations. Business Partners are encouraged to adopt practices that support sustainability and social responsibility. This includes minimizing environmental impact by reducing waste and conserving resources. Business Partners are also encouraged to engage in ethical labor practices throughout the supply chain and within your scope of services.

Seeking Help & Reporting Concerns

Business Partners must promptly report any suspected violations of this Code of Conduct, your contractual terms, or any illegal or unethical activities related to your work with the Company. Retaliation against those who report concerns in good faith or participate in an investigation into concerns is strictly prohibited.

If you have further questions or would like to make a report, you may:

- Contact your local program staff;
- Email Compliance.Officer@sevitahealth.com; or
- Make a report through our Compliance Hotline, operated by an independent third-party at (toll free) 800-297-8043; if you are in need of hearing- or speech-related assistance or supports, dial 7-1-1 and ask to be connected to the Compliance Hotline at (800) 297-8043. The Compliance Hotline is available 24 hours a day, 365 days a year; translation services are available. You may choose to remain anonymous.

Sevita

Our Family of Services

Through our Family of Services, we provide quality services and supports to individuals across the country. This collection of sub-brands includes the primary brands you'll see used in local markets, with a close connection to our local programs.

Mentor Behavioral Health
a part of the Sevita family

Pediatric Partners
a part of the Sevita family

Advanced Therapy Solutions
a part of the Sevita family

D&S Community Services
a part of the Sevita family

Mentor Community Services
a part of the Sevita family

REM Community Services
a part of the Sevita family

Bright Light
a part of the Sevita family

Futures
a part of the Sevita family

Just Family Center
a part of the Sevita family

Mentor Foster Care
a part of the Sevita family

Mentor South Bay

NORTHWAY ACADEMY
a part of the Sevita family

Neuro Restorative™
a part of the Sevita family

*Our sub-brand portfolio is subject to change based on business development.