

# Third-Party Code of Conduct

## OBJECTIVE

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, R1 RCM Inc. (hereafter “R1”) seeks out business partners who recognize the importance of high standards and high performance to work closely together, building business relationships based on mutual trust and respect. This Third-Party Code of Conduct is meant as a guide to ensure that third parties are aware of R1’s expectations to deliver services with integrity and excellence in alignment with R1’s Code of Integrity.

## SCOPE

This Third-Party Code of Conduct (the “Code”) applies to all contractors, subcontractors, and vendors who perform work or services under the indirect control of R1 as part of the R1 Workforce.

## CODE OF CONDUCT

### **Adherence to all Applicable Laws, Rules, and Standards**

R1 expects all third parties to conduct themselves in a safe, ethical, and professional manner, adhering to all applicable local, state, and federal laws in the jurisdiction in which they operate, as well as in accordance with the provisions set forth in the third party’s service agreement. All third parties will comply with R1 policies that specifically apply to contractors, subcontractors, and/or vendors as part of the R1 Workforce as defined by policy.

### **Business Conduct and Integrity**

R1 strives to provide a healthy, safe, and productive work environment and expects third parties to do the same by promoting a respectful work environment, free from harassment, bullying, or threatening behavior, discrimination, and retaliation. Additionally, R1 is committed to fostering an inclusive and diverse workplace, including through its third-party programs, and expects its third parties to do the same.

R1 provides a safe work environment and promotes the health and well-being of its workforce. Third parties will likewise create and maintain a safe work environment that promotes the health and safety of its personnel. R1 does not tolerate harsh or inhumane treatment towards its workforce members, including to or from third parties.

### **Freely Chosen Employment, Anti-Slavery, and Child Labor**

R1 recognizes the importance of human rights and respects the rights of its workforce by adhering to all applicable human rights laws and guidelines as outlined by the International Labour Organization (ILO). Third parties will not use forced, bonded, or indentured labor or involuntary prison labor. All work performed by a third party's employees or contractors will be voluntary, and workers will be free to leave upon giving reasonable notice and at their own free will.

R1 opposes and prohibits the use of human trafficking, slavery, and slave labor and requires third parties to comply with all laws, statutes, and regulations in the country in which they operate. Children have the same human rights as adults and R1 upholds the abolition of child labor within its sphere of influence.

### **Financial Integrity, Anti-Bribery, and Corruption**

R1 is committed to upholding and promoting lawful and ethical business practices across R1's domestic and foreign operations. However, a single document cannot address all cases of corruption and influence peddling that may arise within the framework of daily activities; each person must therefore exercise reasonable judgment and common sense.

R1 and its workforce, including third parties, will maintain accurate books and records that accurately reflect their operations.

In accordance with the Foreign Corrupt Practices Act of 1977 (FCPA), the American Anti-Corruption Act, and applicable laws and regulations, R1 associates and third parties, henceforth are referred to as R1 Workforce are prohibited from influencing government officials with personal payments, rewards or promising anything of value with the intent to obtain or retain any business advantage. R1 Workforce are prohibited from instructing, authorizing, or allowing a third party from both making and receiving either bribes or gratuities knowing or having reason to know that it will likely be given with corrupt intent to a government official.

### **Conflicts of Interest**

R1's continued success with customers, business partners, and investors is attributable to trust in R1 as an ethical and compliant company. R1 builds this trust by conducting business with integrity and ensuring that all associates, contractors, subcontractors, and vendors proactively disclose and account for potential conflicts of interest. R1 expects that all third parties be transparent in its business dealings and refrain from improperly influencing R1 associates in the procurement of services.

### **Gifts, Travel, Meals, and Entertainment Restrictions**

Reasonable judgment and moderation should prevail in business entertainment engaged in on behalf of R1, including the giving or receiving of gifts, travel, meals, entertainment, or other favors to or from any customer, vendor, or other persons doing or seeking to do business with R1, and should be done only if intended to serve legitimate business goals. All appropriate and reasonable gifts of nominal value, should be given openly and transparently, properly recorded in the giver's books and records, provided only to reflect esteem or gratitude, and permitted under local law. R1 prohibits the giving or receiving of gifts from a third party during procurement and selection processes.

### **Data Privacy and Confidentiality**

In accordance with the laws and directives that regulate the processing or exchange of personal information or personal data relating to individuals, third parties will abide by the privacy and data protection laws that are in effect in countries in which the third party conducts business with respect to R1. Third parties are responsible for protecting personal information as required by applicable law and will ensure that the information is not disclosed in violation of applicable laws, rules, or regulations, in addition to any additional contractual obligations.

### **Non-Retaliation and Reporting Concerns**

R1 requires all workforce members, including contractors, subcontractors, and vendors, who suspect or become aware of a violation of any law, rule, or regulation to promptly report such concern. R1 prohibits taking adverse action against any workforce member for reporting activities he or she believes in good faith to be illegal, dishonest, unethical, violation of corporate policy, otherwise improper, or cooperating in an investigation.

Any person who wishes to report an issue they believe to be illegal, dishonest, unethical, or a violation of corporate policy may do so, anonymously if they wish, through R1's EthicsPoint Hotline, or by reaching out directly to R1 through the methods available on its website.