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| Subject: Reporting Compliance Issues/<br>Compliance Action Line   | Effective Date: January 1, 2018 |             |
|   | Reviewed Date: January 1, 2024  |             |
| Approval: Chief Compliance Officer  |                                 |             |

## 1.0 Purpose

To provide BrightSpring Health Services employees, clients, vendors, and any other individual or entity the means of reporting compliance concerns and compliance violations without fear of retaliation or retribution.

## 2.0 Scope

Anyone, including employees, clients, vendors, and any other individual or entity, aware of any suspected, actual, or potential violation of laws, policies, Code of Ethics and Business Conduct, or other unlawful or unethical behavior, practices, or actions.

## 3.0 Policy

BrightSpring employees are required to report in good faith<sup>1</sup> any suspected, actual or potential violation of law, regulations, BrightSpring policy and procedure or BrightSpring Code of Ethics and Business Conduct.


### 3.1 Practice

**3.1.1** Employees must immediately report knowledge of suspected, actual or potential violations of law, regulations, BrightSpring policies and procedures, or violations of the BrightSpring Code of Ethics and Business Conduct.


**3.1.1.1** Reports should be made to a supervisor, manager, or other management staff within the employee's specific chain of command. If employees are uncomfortable about raising concerns directly to a supervisor or if a concern has been raised and not addressed, employees should report their concern through one of the following methods:

- a. contact the BrightSpring toll-free Compliance Action Line by phone at 1.866.293.3863 or online at [brightspringhealth.ethicspoint.com](https://brightspringhealth.ethicspoint.com),
- b. call the Compliance Department at 1.502.630.7023 or write to the BrightSpring Support Center 805 N. Whittington Parkway, Louisville, KY 40222,
- c. email the Compliance Department directly at [compliance@brightspringhealth.com](mailto:compliance@brightspringhealth.com),
- d. contact the Compliance Department through BrightSpring's website: [www.brightspringhealth.com/contact-us/](https://www.brightspringhealth.com/contact-us/), and / or
- e. access the Action Line QR Code.



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- 3.1.1.2** Employees who wish to remain anonymous may use the Compliance Action Line to report concerns.
- a. The Compliance Action Line is accessed only by authorized Compliance Department personnel.
  - b. No caller is required to disclose their identity and no attempt is made to trace the source of the call or identity of the caller when the caller requests anonymity. If the caller has revealed his or her identity, confidentiality will be maintained to the extent practicable and allowed by law. Callers should be aware, however, that it may not be possible to preserve anonymity if they identify themselves, provide other information which identifies them, if the investigation reveals their identity, or if they inform people that they have called the Compliance Action Line. Callers should also be aware that BrightSpring is legally required to report certain types of crimes or potential crimes and infractions to external agencies.
- 3.1.1.3** All reports of compliance concerns or compliance violations will be investigated in a prompt and reasonable manner and in accordance with BrightSpring’s Investigation Policy. *See Compliance Policy 7.0.*
- 3.1.1.4** For issues reported directly to the Compliance Department, the Compliance Director will make a preliminary inquiry into the allegations set forth to ensure that he or she has obtained all of the information necessary and to determine whether further review should be conducted.
- 3.1.1.5** Authorized business line, support center management or their designee, or Compliance Department personnel will conduct an internal review of allegations and ensure that proper follow-up is conducted.
- 3.1.1.6** Individuals who report possible compliance violations, in good faith, will not be subjected to retaliation or retribution for reporting such concern. *See Compliance Policy 4.0: Prohibition of Retaliation for Reporting Compliance Concerns.*
- 3.1.1.7** The non-retribution or non-retaliation provisions of this Policy do not permit employees to avoid the consequences of their own wrongdoing by reporting it to the Compliance Action Line or other reporting avenues.
- 3.1.1.8** Any person using the Compliance Action Line to purposely report false information or to attempt to settle personal grievances by making false reports or repeating reckless gossip is subject to corrective action in accordance with BrightSpring’s Progressive Disciplinary Action Policy. (See *HR Policy 7.3*)
- 3.1.1.9** The Compliance Department will maintain a confidential database, which will include a record and summary of each allegation received, the status of the respective investigations, and any corrective action taken in response to the investigation.
- 3.1.1.10** In the event the investigation reveals or uncovers what appears to be criminal activity, local, state, or Federal agencies will be notified as appropriate.

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**3.1.1.11** The Compliance Department will provide routine reports to the Compliance and Audit Committees of the BrightSpring Board, and BrightSpring’s Corporate Compliance Committee, and Executive Leadership regarding types of reports made to department, findings of investigations, emerging trends, and corrective actions.

Employees may report any violations or suspected violations of accounting or auditing matters, applicable laws and regulatory requirements or the Company’s non-retaliation policies (as detailed below) openly, confidentially, or anonymously. Such persons can report any “Accounting Allegation,” “Compliance Allegation” or “Retaliatory Act” to the Audit Committee, Chief Legal Officer, Chief Accounting Officer, or Chief Compliance Officer using the same methods set forth above and specifying the nature of the Report (as set forth in our Policy Regarding Reporting of Accounting Allegations, Compliance Allegations and Retaliatory Acts). Unless necessary to conduct an adequate investigation or compelled by judicial or other legal process, the Company will protect the identity of any person who reports potential misconduct and who asks that their identity remain confidential. The Company will also use reasonable efforts to protect the identity of the person about or against whom an allegation is brought, unless and until it is determined that a violation has occurred. Any person involved in any investigation in any capacity of possible misconduct must not discuss or disclose any information to anyone outside of the investigation unless required by law or when seeking his or her own legal advice and is expected to cooperate fully in any investigation.

In particular, as an employee, you are required to report suspected Medicare and Medicaid ***Fraud, Waste and Abuse*** (FWA).

Neither the Company, the Audit Committee, the Compliance and Governance Committee nor any director, officer, employee, contractor, subcontractor or agent of the Company will, directly or indirectly, discharge, demote, suspend, threaten, harass or in any manner discriminate or retaliate against any person who, in good faith, makes a report to or otherwise assists the Audit Committee, management or any other person or group, including any governmental, regulatory or law enforcement body, in investigating a report. These prohibitions also apply to the Company’s subsidiaries and affiliates whose financial information is included in the consolidated financial statements of the Company. Any person who engages in any such retaliation is subject to discipline, up to and including termination, and in appropriate cases, civil and/or criminal liability.

Any use of these reporting procedures in bad faith or in a false or frivolous manner will be considered a violation of the Code of Ethics and Business Conduct.