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SUBJECT: Code of Ethics and Business Conduct

Disclaimer: The information and policies contained in this Code of Ethics and Business Conduct (this “Code”) do not, under any circumstances, create an employment contract between EMC and the reader.


Introduction

Our patients and the communities we serve rely on us for quality care and trust to demonstrate integrity in everything we do. This Code of EMC, together with its joint ventures and subsidiaries, including EMC is intended to guide EMC, its employees, volunteers, suppliers and related personnel in the performance of their professional duties and responsibilities in a manner that maintains a strong commitment to honesty, integrity, and quality.

EMC retains the absolute right to modify, update, disregard, suspend, or rescind any or all of this Code at any time. These policies and procedures are only guidelines provided for informational purposes and are designed to enhance EMC operations. EMC is free to deviate from or to make exceptions to these guidelines in any particular case as it deems appropriate. EMC retains the sole discretion to interpret and apply its language.

The successful business operation and reputation of EMC is built upon the principles of fair dealing and ethical conduct of its employees. EMC’s 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.

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The continued success of EMC depends on its patients' trust, which EMC is dedicated to preserving. Employees have a responsibility to EMC, its patients, and stakeholders to act in a way that will merit the continued trust and confidence of the public.


In general, the use of good judgment, based on high ethical principles, will result in acceptable and appropriate conduct. If a situation arises where it is difficult to determine the proper course of action, the matter should be discussed openly with the employee's immediate supervisor, the Compliance Officer, and, if necessary, the CEO for advice and consultation

Employees

EMC employees are the lifeblood of the organization. EMC is an equal employment opportunity employer committed to treating all employees with fairness, integrity, and respect, regardless of age, race, color, gender, religion, national origin, disability, veteran's status, or any other basis protected by applicable federal, state or local law. In addition, we strongly support the open door policy, which enables employees to speak to any member of management, without fear of retaliation, about actions, directives, differences of opinion, and any other situation concerning EMC.

Shareholders

EMC has always exercised prudent judgment with respect to asset and resource allocation decisions. EMC is committed to continue to exercise sound business judgment that is both cognizant of its shareholders' interests, particularly with respect to increasing shareholder value, and the long-term interests of EMC and its employees

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Patient Relations


EMC’s main concern is for the well-being, comfort and dignity of its patients. EMC is dedicated to providing our patients with reliable, quality services. Over the years, EMC has devoted a substantial amount of time and effort to build trusting, long-term relationships with its patients. EMC’s ability to develop such relationships is, in large part, based upon the fact that it fosters fair business practices and treats people with honesty, dignity, and respect.

All patients are provided with service and care that is medically necessary and appropriate, in a respectful and dignified manner, without regard to race, color, creed, sex, religion, national origin, sexual orientation, marital status, age, veteran status, disability, source of payment, or ability to pay. All clinical decisions will be based upon identified health care needs regardless of how EMC compensates or shares financial risk with any individual or entity.

EMC collects information about each patient's medical condition, history, medication, and family illnesses to provide the best possible care. We realize the sensitive nature of this information and are committed to maintaining its confidentiality. EMC does not release or discuss patient-specific information with others unless it is appropriate and necessary to serve the patient, or is required by law. Patients are entitled to expect the protection of confidentiality. Patient information shall be released in accordance with EMC’s policies and procedures and in accordance with state and federal laws.

Community

EMC has always been, and will always strive to be, an active participant in both the corporate and civic communities in which we operate. To this end, we strongly encourage every EMC employee to actively participate in the well-being of his or her community. Moreover, EMC remains committed to conducting its business operations in such a manner so as to avoid unnecessary harm or injury to the environment

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and surrounding communities.

Competitors


EMC firmly support the principle of fair competition and will continue to compete in the market based solely on EMC's merits.

Conflict of Interest

Every employee is prohibited from engaging in any conduct or business relationship that could result in a conflict of interest for EMC. The phrase "conflict of interest" encompasses direct conflicts, indirect conflicts, potential conflicts, and situations which could be construed as having an appearance of impropriety. Stated differently, an EMC employee must avoid business relationships and dealings that could sway or manipulate an employee's ability to conduct business affairs on behalf of EMC in an objective and fair manner. Examples of such activities include:

- Engaging in business or employment with an outside company that provides supplies, services or equipment to EMC.
- Engaging in business or employment with an outside company that competes or conflicts with the services offered by EMC.
- Accepting any gratuities from a client or service organization beyond common courtesies such as lunches or gifts of nominal value not exceeding \$50.00, except cash gifts must never be accepted.

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- Making use of employment with EMC or associating with EMC's name to enhance an outside business activity.


Compliance with Laws

EMC will comply with applicable law and regulations and expects its directors, officers, and employees 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.

Sensitive Transactions

The term "sensitive transactions" describes corporate dealings that are generally considered to be illegal, unethical, or immoral, or which reflect adversely on the integrity of management. Examples include receiving or giving kickbacks, bribes, payoffs, and extravagant gifts of significant value. Sensitive transactions may violate United States federal laws such as securities laws, domestic anti-bribery laws, mail or wire fraud statutes, anti-racketeering statutes, the Foreign Corrupt Practices Act, the False Claims Act, and provisions of the Social Security Act commonly known as the "Medicare Fraud and Abuse Statute" and the "Stark Law." EMC prohibits any employee from entering into sensitive transactions with any individual or company for the purpose of securing any contract, concession, or other favorable treatment for EMC. Employees also shall not engage in any sensitive transaction with respect to, or that could impact, EMC and/or its patients.

As EMC personnel, you may not give or receive any type of material gift, token, or favor that could reasonably be viewed as having the potential to influence how you engage in or conduct business relations with a particular patient, community, vendor, supplier, or competitor. If you are unclear about whether a particular item violates this policy, please contact a member of management for clarification.

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Corporate Governance

EMC endeavors to maintain the highest level of governance standards consistent with its Charter, Articles of Organization, and this Code.

Political Contributions and Activities

EMC is prohibited from making any form of political contribution, regardless of amount, either directly or indirectly, to candidates running for federal offices. Corporate campaign contributions include, but are not limited to, monetary funds, goods, services (i.e., employee time), and other forms of assistance.

Integrity of Records and Compliance with Accounting Procedures


Business records often serve as the cornerstone for corporate decision-making. Thus, the accuracy and integrity of these business records cannot be stressed enough. In order to ensure that these records are as complete and accurate as possible, EMC personnel must ensure that transactions are recorded as soon as possible, proper accounting methods are utilized, and reimbursements are not misrepresented or overstated. In addition, employees are prohibited from modifying EMC records or destroying such records without the prior written approval of their manager and an officer of EMC.

Senior financial officers of EMC are obligated to disclose to EMC's external auditors and to EMC's Audit Committee any material deficiencies in ERH's internal financial controls and any fraud, suspected fraud, misappropriation, or suspected misappropriation involving any member of management.

Reporting Violations

EMC's Compliance Officer is in charge of overseeing and ensuring compliance with this Code. Each employee has the ethical responsibility to notify management regarding any actual or potential conflict of interest involving EMC, or any other violation of this Code, regardless of the employee(s) involved or their position within EMC. Information received from any employee will, to the extent practical, be

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kept confidential.

As a general rule, employees should direct any inquiries, questions or concerns regarding the Code to their immediate supervisor. If the employee feels that further action or clarification is required, he or she should contact any other member of management, including the CEO. Supervisors and management are expected to listen to employees' concerns, to encourage input, and to seek resolution of such problems/complaints. Upon receipt of an alleged violation of the Code, EMC will conduct a prompt and thorough investigation and appropriate action will be taken.


Alternatively, employees may utilize a twenty-four (24) hour, seven (7) days per week anonymous hotline to report any violation of this Code by dialing [1-844-430-0009](tel:1-844-430-0009). All hotline reports will remain confidential and will be promptly communicated to EMC's Compliance Officer for investigation. Additionally, an anonymous email address of reports@lighthouse-services.com is available for reports as well.

All managers are responsible for ensuring that their own conduct complies with the policies (both in spirit and intent) set forth in this Code. Management employees must also oversee the organization as a whole, observing the conduct of others and taking the appropriate actions when needed (even when no complaint has been filed).

In sum, every employee plays a role in enforcing this Code

Anti-Retaliation Provision

No employee will be disciplined or retaliated against with respect to any term or condition of employment for exercising his or her good faith reporting obligations under this Code.

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Penalties for Violations

EMC maintains a ZERO tolerance policy with respect to violations of this Code. Employees who violate the provisions and policies set forth in this Code by engaging in unethical conduct, failing to report conduct potentially in violation of the Code, or refusing to participate in any investigation of such conduct, will be subject to disciplinary action, up to and including termination of employment.

Waivers

No provision of this Code may be waived for any reason

EMPLOYEE ACKNOWLEDGMENT

This is to acknowledge that I have received a copy of the EMC Code of Ethics and Business Conduct and understand that it sets forth the ethical standards of conduct with respect to my duties, responsibilities, and obligations of employment with EMC. I understand and agree that it is my responsibility to read the Code in its entirety and to abide by the rules, policies, and standards set forth within it. I further acknowledge that it is solely my responsibility to seek clarification of any portion of the Code that is unclear or confusing to me.

I acknowledge that my employment with EMC is an employment-at-will relationship and can be terminated at any time, for any reason, with or without cause or notice, by me or by EMC. I acknowledge that nothing in this Code can alter this premise.

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