



CODE OF CONDUCT

"OUR CODE"

MISSION

**WE ARE
WARRIORS
FOR HOPE**

**WE FIGHT
TO SAVE LIVES
AND HELP
PATIENTS
ACHIEVE THE LIVES
THEY WANT
AND DESERVE**

CleanSlate 

VALUES

PATIENTS FIRST

**RESPECT & COMPASSION
ALWAYS**

**TOGETHER
WE SUCCEED**

**EVERYDAY
INNOVATION**

**SCIENCE &
MEDICINE MATTER**

CleanSlate 

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Mission

We are warriors for hope.
We fight to save lives and help patients achieve the lives they want and deserve.

Vision

We will offer superior access to effective medical treatment
as a leading partner in the ongoing fight against the disease of addiction.

Values

Patients
First

Respect &
Compassion
Always

Together We
Succeed

Everyday
Innovation

Science &
Medicine
Matter



Dear Warriors for Hope,

As a healthcare firm operating in a highly regulated environment, we at CleanSlate are committed to honest and ethical behavior and to delivering our services and conducting business with the highest integrity.

CleanSlate's Code of Conduct is the keystone of our corporate integrity philosophy and outlines our ethical business standards. Our Code of Conduct represents who we are as an organization, and to a great extent, as individuals. The Code of Conduct serves as the cultural True North, for our patients, staff, management, vendors, and other stakeholders that interact with CleanSlate. Behaving honestly, ethically and with integrity is an individual responsibility as well. We are accountable for the actions we take and for the way we make decisions every day and **need to be mindful that it is a privilege to care for our neighbors, friends, and family members.**

The Compliance Department oversees our Compliance Integrity Program, established to demonstrate our commitment to conducting our business with integrity. The Compliance Integrity Program is a contract among all of us to make the right business choices, in other words, we will always do the right thing. It provides the foundation for us to hold ourselves and others accountable, to be trustworthy and expect it from our colleagues and external partners, to communicate and share information in a transparent way and demands that all this be done with integrity. The Compliance Integrity Plan, with the Code of Conduct at its core, is a critical component of how we achieve our mission and vision, and it provides the safety net for us as we strive to behave according to our core values:

- **Patients First.**
- **Together We Succeed**
- **Respect and Compassion Always**
- **Science and Medicine Matter**
- **Everyday Innovation**

At CleanSlate we are the stewards of our reputation for ethical business practices and our standing as a national leader in the field of addiction medicine. We remain committed to delivering the highest quality patient care in compliance with our Code of Conduct.

Together We Succeed,

A handwritten signature in black ink that reads "Greg".

Gregory C. Marotta
President and CEO

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INDIVIDUAL INTEGRITY

The Code of Conduct and Ethics (“Our Code”)

Typically, a code of conduct and ethics generally addresses employees and sets out the limitations placed on behaviors at work; it is more compliance-focused than dedicated to values or principles.

Our Code combines compliance expectations with values to provide guidance to all at CleanSlate as they carry out their daily CleanSlate activities within an appropriate ethical and legal framework. *Our Code* aligns organizational and shared values to foster and imbue a culture of integrity.

The obligations described in *Our Code* apply to CleanSlate’s relationships with patients, employees, agents, third-party payers, subcontractors, independent contractors, vendors, consultants, and one another. *Our Code* is a critical component of our Compliance Program. *Our Code* was developed to make sure CleanSlate, including each of its employees, agents, third-party payers, subcontractors, independent contractors, vendors, and consultants, meets the ethical standards described below in addition to the laws, rules, regulations, and standards applicable to CleanSlate.

Our Code is not intended to cover every situation that may be encountered. In some cases, a subject discussed in *Our Code* involves such complexity that additional guidance may be needed. In these cases, consult your manager or the Compliance Department for additional guidance.

To provide additional guidance and supplement *Our Code*, we have comprehensive policies and procedures which may be accessed on our Intranet. Policies and procedures, including standing operation procedures and practice manuals, supplement several of the values articulated in *Our Code*. The standards expressed in *Our Code* apply to each employee, agent, and member of the Board of Directors of CleanSlate.

In addition to the guiding principles set forth in *Our Code*, each healthcare professional (e.g., physicians, physician assistants, nurse practitioner and behavioral health professionals) at CleanSlate is expected to carry all required licenses and follow the ethical and professional standards dictated by their respective professional organizations and licensing boards.

The Duty of Leadership

While everyone at CleanSlate has a duty to live by *Our Code*, the expectation is that the leaders at CleanSlate set the example. Everyone at CleanSlate with supervisory responsibility is expected to exercise their authority in a manner that is kind, sensitive, thoughtful, and respectful. Supervisors and managers have a duty to maintain an environment where the ordinary

employee at CleanSlate is encouraged to raise concerns without fear of retaliation or propose ideas without fear of punitive criticism. Supervisors and managers will ensure their teams are sufficiently informed so they can be compliant and have the resources to resolve ethical dilemmas.

Leaders are expected to help maintain a culture of compliance that encourages sharing concerns when they arise and avoiding sacrificing *Our Code* in the pursuit of misaligned objectives and motives. Leaders at CleanSlate will not consider the ethics concerns of employees as threats or challenges to their authority, but rather as another encouraged form of communication that they faithfully foster. Conversations and questions about CleanSlate ethics and values should become a natural part of daily work. Ethical behavior is the product of clear and direct communication of behavioral expectations, modeled from leadership and demonstrated by their example.

The Duty of All

Each of us at CleanSlate should feel comfortable to respectfully speak our mind, particularly with respect to ethical concerns. The benefit is universal and tremendous when each of us exercises our influence to prevent mistakes or wrongdoing by asking the right questions at the right times.

If you think a law, policy or *Our Code* is not being followed, you must report it to our Compliance Department. You can report compliance concerns to the Compliance Department by:

- Calling the Compliance Department at 615-425-0220
- Emailing your concern to compliance@cleanslatecenters.com
- Contacting the ReportLine at 844-338-7287 or Reportline.EthicsPoint.com (this option allows for anonymous reporting)
- Using the Event Reporting Tool available through the intranet home page

CleanSlate maintains a process to investigate reported instances of questionable or unethical behavior. In every instance where improper behavior is found to have occurred, the appropriate action will be pursued. Retaliation against employees and others who raise genuine ethics concerns in good faith will not be tolerated.

CleanSlate's Whistleblower Policy states:

Members of the Board of Directors, employees and agents of CleanSlate are expected to be honest and demonstrate integrity in fulfilling their CleanSlate duties including their obligation to report suspected or known misconduct...It is contrary to the values of CleanSlate for anyone to retaliate against any board member, employee, or agent who in good faith reports an ethics violation, or a suspected violation of law.

Each of us has a duty to report suspected or known misconduct. We are all encouraged to address such issues with supervisors, managers, or the Human Resources Department first, as most problems can be resolved swiftly. If, for any reason, this is not possible, or if any one of us is not comfortable raising the issue with a supervisor, manager or the Human Resource Department, the Legal Department and Corporate Compliance Department both maintain an open-door policy, as well as the Reportline and Event Reporting Tool described on the previous page. CleanSlate maintains its credibility by adhering to its commitments, displaying honesty and integrity, and reaching goals through honorable conduct.

It is easy to say what each of us must do, but the proof is in the way we act. Ultimately, we will be judged on what we do as individuals and as an organization – as CleanSlate.

When considering any action, it is wise to ask: will this build trust? Will it help foster an environment that allows each of us to succeed over the long term? Is the commitment one with which I can follow through? The only way we will maximize trust and credibility is by answering “yes” to those questions and by working every day to build upon the trust and credibility each of us earned the day before.

Respect for the Individual

Each of us desires and deserves to work in an environment where we are treated with dignity and respect. That is why we strive to maintain a fair and just environment at CleanSlate where every CleanSlate patient, employee and agent is central to what we do. We seek to capture the experience, knowledge and ambitions of each employee and agent to improve our services for our patients and the broader communities we serve. All CleanSlate employees make efforts through community outreach to integrate, contribute and support the communities in which we serve to help better address their needs. To maintain such an environment, each of us must be committed to *Our Code* because it brings out the full potential in each of us, which, in turn, directly impacts our patients and ultimately dictates our success.

Conflicts of Interest

We must avoid any relationship or activity that might impair, or even appear to impair, our ability to make objective and fair decisions when performing our jobs. At times, we may be faced with situations where the business actions we take on behalf of CleanSlate may conflict with our own personal or family interests because the course of action that is best for us personally may not also be the best course of action for CleanSlate. We owe a duty to CleanSlate to advance its legitimate interests when the opportunity to do so arises. We must never use CleanSlate property or information for personal gain or personally take for ourselves any opportunity that is discovered through our position with CleanSlate.

Here are some other ways in which conflicts of interest could arise:

1. Being employed (you or a close family member) by, or acting as a consultant to, a competitor or potential competitor, supplier, or contractor, regardless of the nature of the employment, while you are employed with CleanSlate.
2. Hiring or supervising family members or closely related persons.
3. Serving as a board member for an outside commercial company or organization.
4. Owning or having a substantial interest in a competitor, supplier, or contractor.
5. Having a personal interest, financial interest, or potential gain in any CleanSlate transaction.
6. Placing company business with a firm owned or controlled by a CleanSlate employee or his or her family.
7. Accepting gifts, discounts, favors, or services from a customer/potential customer, competitor, or supplier, unless equally available to all CleanSlate employees.

Determining whether a conflict of interest exists is not always easy to do. If you have a conflict-of-interest question, seek assistance from your supervisor, a manager, the Human Resources Department, the Legal Department, or the Corporate Compliance Department. When in doubt, before engaging in any activity, transaction or relationship that might give rise to a conflict of interest, each of us should first seek assistance.

Anti-Harassment and Anti-Violence

The right to work in an environment free of harassment and disruptive behavior is unquestionable. We are proud of our diverse workforce. We believe conduct, acts or behaviors that create an environment of hostility, threat or coercion harms our shared values and violates CleanSlate policy. Each of us is committed to not tolerate harassment of any sort. For example, intimidation through degrading behavior or humiliating jokes or slurs is intolerable. Sexual harassment is a form of sexual discrimination and is inexcusable. Additionally, harassment may be blatant or subtle and includes unwelcome sexual advances or requests for sexual favors. Each of us has a duty to respect the rights of others, including fellow employees.

Incidents of robbery, terrorism, hate crimes, property destruction, identity theft, stalking, physical violence, or the threat of physical violence directed at individuals or CleanSlate are all forms of workplace violence. No one at CleanSlate or on CleanSlate property is permitted to engage in any act that might constitute workplace violence. If you believe you may have been a victim of harassment or workplace violence or observed an act of harassment or workplace violence against someone at CleanSlate, immediately report the event.

Professional Relationships

CleanSlate employees are expected to maintain appropriate, professional boundaries with patients, their families, fellow co-workers, outside stakeholders and those within the communities in which we serve. These boundaries may be determined by applicable state laws and regulations professional licensing boards, and enterprise policies. An employee's failure to maintain appropriate professional boundaries is a direct violation of *Our Code*.

Substance-Free Environment

Substance abuse (drug or alcohol) at CleanSlate presents a serious threat to the safety, health and productivity of employees, agents, and patients. CleanSlate is a drug-free and alcohol-free environment, and this policy extends to all locations and applies to its employees, agents, suppliers, and visitors. Each of us is committed to an alcohol and drug-free work environment. Reporting to work under the influence of any illegal drug or alcohol or having an illegal drug in one's system or using, possessing, or selling illegal drugs at work or on CleanSlate property is a violation *Our Code*.

We recognize some of us legally take prescription or over-the-counter drugs, which may impair judgment or other skills required in job performance. Each of us is encouraged to ask questions about the influence of such medication on performance or if it is observed that someone else appears to have impaired performance at CleanSlate.

Accuracy of Business Records

We strive to ensure our patients' medical records are accurate, secure, and confidential. We truthfully document the treatment we provide, supported by the accurate claims that we submit. Tampering with or falsifying medical records, including medical billing, financial documents, or other business records of CleanSlate, will not be tolerated. We create, retain, and dispose of our CleanSlate records as part of our normal course of business in compliance with all CleanSlate policies and guidelines, as well as all regulatory and legal requirements. All medical and corporate records must be true, accurate and complete, and CleanSlate data must be promptly and accurately entered. We must not improperly influence, manipulate, or mislead any unauthorized audit, nor interfere with any auditor engaged to perform an internal independent audit of CleanSlate books, records, processes, or internal controls.

RELATIONSHIPS: PATIENTS, ORGANIZATION AND EMPLOYEES

Our Personal Data

Respect for the privacy of patients, employees, agents, and other individuals who have entrusted their personal information with CleanSlate is paramount. Each of us is committed to handling personal information responsibly and in compliance with applicable privacy and data protection laws. Personal information includes information that directly and clearly identifies an individual (e.g., name, employee number and social security number,) or information that indirectly, through the combination of various pieces of information in CleanSlate's possession, identifies an individual.

There are several sources of personal information: forms completed by employees during the job application and hiring process; annual Human Resources Department and employee benefit processes; and routine intercompany email communications. In most cases, personal information is collected directly from you, but sometimes it may be collected from other parties.

Our Patients

Our mission is to improve the quality of life of individuals struggling with addiction. As an organization, we view addiction as a chronic disease and believe that long-term remission is achievable (for our patients) through evidence-based medical management, individualized to suit each patient's unique needs, with coordination and monitoring of behavioral therapy. Substance use disorder is a disease which affects people across all socio-economic, racial, ethnic, geographic and gender boundaries. We treat our patients with warmth, respect and dignity and provide care that is both necessary and medically appropriate.

The Rights of Our Patients

We make no distinction in the availability of our services; the admission, transfer or discharge of our patients; or in the care we provide to our patients based on age, gender, disability, race, color, religion, sex, sexual orientation, gender identity or expression or national origin. We recognize and respect the diverse backgrounds and cultures of our patients and make every effort to equip ourselves with the knowledge and resources necessary and appropriate to respect each patient's individual needs. In the promotion and protection of each patient's rights, each patient and his or her representatives are afforded confidentiality and privacy, and opportunity for resolution of their complaints. Patients have the right to an environment that preserves dignity and contributes to their positive self-image.

Each patient or patient representative is provided a clear explanation of care including, but not limited to, diagnosis, treatment plan, right to refuse or accept care, care decision dilemmas, estimates of treatment costs and procurement, as well as an explanation of the risks, benefits and alternatives associated with available treatment options.

Patient Privacy and Confidentiality

We collect information about our patients, including protected health information and personal information in the provision of quality care. We realize the sensitive nature of this information and are committed to maintaining its confidentiality along with patient privacy. Consistent with Confidentiality of Alcohol and Drug Abuse Patient Records (CADA) and Health Insurance Portability and Accountability Act (HIPAA), we do not use, disclose, or discuss patient-specific information, including patient financial information, with others without the written consent of the patient or unless required by law. Each of us is expected to refrain from using or disclosing confidential or personal information that violates the privacy rights of our patients. In accordance with our information privacy and security policies and procedures, which reflect such requirements, none of us have a right to any patient information (personal information or protected health information) other than what is necessary to perform our job.

Working at CleanSlate

CleanSlate is an equal employment/affirmative action employer and is committed to providing a workplace that is free of discrimination of all types including abusive, offensive, or harassing behavior. CleanSlate specifically prohibits discrimination based on age, color, disability, ethnicity, marital or family status or structure, national origin, race, religion, sex, sexual orientation, gender identity or expression, veteran status, genetic information, or any other characteristic protected by law. At CleanSlate, such discrimination is not allowed regardless of whether the status is legally protected, and we will take all steps necessary to ensure compliance and, where appropriate, make necessary accommodations. These principles extend to all employment decisions, including:

- Recruiting, hiring, and training.
- Promotions, pay and benefits; and
- Transfers, workforce reductions and terminations.

All these types of decisions are based on the individual applicant's or employee's qualifications as they relate to the job. In addition to complying with US Equal Employment Opportunity (EEO) laws, CleanSlate complies with all other applicable civil rights, human rights, environmental and labor laws. CleanSlate is committed to providing an environment that values diversity with a conscious desire to achieve understanding, respect, inclusion, and continuous learning.

Personal Property

All personnel shall respect and safeguard the personal property of patients and other personnel as well as the property of CleanSlate. Employees will not use or allow the use of CleanSlate's property or equipment for other than activities approved by the organization.

CleanSlate is not responsible for personal property that is not safeguarded or is left unattended.

Witnessing of Documents

Personnel shall not act as a witness to any legal documents such as Power of Attorney, guardianship, advance directives, and/or agency contracts without the expressed written approval of the Chief Legal Officer.

Personnel are authorized to countersign documents such as intake forms, authorizations (i.e., release of information form), treatment plans, etc. as directly related to their job duties.

Personal Fundraising

Personal fundraising by employees should only occur in employee only areas and may only be directed to employees. Patients should never be approached to participate in any employee's personal fundraising. Personnel may post items regarding personal fundraising on employee only bulletin boards in break rooms with manager permission. Any personal fundraising activity should not take place in front of any patients and should not interfere with patient care or employee job functions.

Personal fundraising includes any employee's soliciting of money or donations of any kind on behalf of a personal cause, charity, religious organization, child's school etc.

Political Activities

CleanSlate, including its employees and agents, complies with all federal, state, and local laws governing participation in government relations and political activities. As a general policy, CleanSlate funds or resources are not contributed directly to individual political campaigns, political parties or other organizations which intend to use the funds primarily for political campaign objectives. Those who seek exceptions to this general rule may only do so after obtaining the appropriate approvals required in relevant policies.

Environmental, Health and Safety

We are expected to obey all state, federal and local environmental and workplace safety laws, regulations, and rules, including those promulgated by the Environmental Protection Agency (EPA) and the Occupational Safety and Health Administration (OSHA). Health and safety form an integral part of the work environment and CleanSlate is committed to promoting the practice of a healthy and safe environment. CleanSlate's program of environmental, health and safety include continuous employee education and compliance with all local, state and federal laws, regulations, policies and ethical standards governing the professional practice of safety and health and related activities.

Each of us is responsible for following appropriate health and safety procedures to protect themselves, other employees, and the public from conditions where injury and damage are reasonably foreseeable. We should seek the assistance of supervisors and others when there are questions or concerns. It is also important that we immediately advise a supervisor or manager of any workplace injury, or a situation which presents a danger of injury, so that appropriate corrective action can be taken to immediately resolve the issue.

RELATIONSHIPS WITH OTHER PARTIES

Drug Enforcement Agency

The United States Drug Enforcement Agency ("DEA") is in charge of monitoring the supply and distribution of all pharmaceutical controlled substances in the United States. Any medical provider, including those working at CleanSlate, who desire to prescribe, administer, or dispense controlled dangerous substances must be registered with the DEA. To help our patients find relief from opioid addiction, we use Suboxone (a schedule III-controlled substance) for maintenance and detoxification. For this reason, CleanSlate is a DEA registrant and as such, we are subject to DEA regulation and audit at any time without prior notice and limitation. Some say that because we are Suboxone prescribers, we are at higher risk of DEA audits.

Under the direction and guidance of our Legal Department, each of us will fully cooperate with DEA audit requests. Prior to DEA audits, we will ensure that we conduct ourselves in a manner consistent with *Our Code* and make sure that CleanSlate operations are in compliance with DEA regulations.

Billing and Claims

Our billing practices must comply with applicable federal and state laws, rules and regulations and payer policies, in addition to CleanSlate policies and procedures, including *Our Code*. Each of us will assist CleanSlate in identifying and appropriately resolving any coding and billing issues or concerns when possible. CleanSlate will promptly refund overpayments made by a federal healthcare program or other payers in accordance with applicable laws and policies.

We maintain and follow our policies and procedures and implement and sustain systems to ensure accurate billing to government payers, commercial payers, and patients. Our policies and procedures are aligned with pertinent federal and state laws and regulations. In support of accurate billing, medical record documentation will provide reliable evidence of the services and treatment we provide, and outcomes of care, including unanticipated outcomes. Our policies, procedures and systems facilitate the provision of accurate information and protect against inappropriate destruction of any information considered part of the legal medical record. We also periodically engage external auditors to evaluate our coding and billing services and maintain internal compliance auditing activities.

Gifts and Entertainment

No employee of CleanSlate is permitted to accept a gift, gratuity or business courtesy from its vendors and contractors or potential business affiliates if the value is more than nominal and it is intended or could be construed to influence business opportunities awarded to any such vendor or contractor. Likewise, no employee is permitted to give gifts of more than nominal value to persons or businesses in a position to influence the referral of business to CleanSlate. Further, no employee or agent of CleanSlate may solicit or obtain any improper personal benefit by virtue of their work or employment with CleanSlate. Exceptions may apply under specific circumstances, so, if you have questions, please contact the Legal Department or Corporate Compliance Department.

Our Competitiveness

We operate in a highly competitive environment. Our competitive activities must conform to the high standards of integrity and fairness reflected in *Our Code*. We comply with antitrust and other laws governing competitive activities, and we adhere to our written policies governing interactions with competitors and suppliers.

Fraud, Waste and Abuse Laws:

There are several laws that describe activities that may constitute fraud, waste, and abuse, included but not limited to, the False Claims Act, the Anti-Kickback Statute and the Physician Self-Referral Law called the Stark Law. These laws generally prohibit the following:

- Submitting inaccurate or misleading claims for services provided
- Submitting claims for services not provided
- Submitting claims for medically unnecessary services not covered by the payor
- Submitting reports to any federal or state agency with inaccurate information or untimely
- Making false statements or representation to obtain payment for services or to gain participation in a healthcare program
- Concealing or improperly avoiding an obligation to repay a healthcare program
- Offering money, gifts, goods, services, or anything of value to encourage or reward the referral of patients to a healthcare provider

Our Marketing Activities

Consistent with laws and regulations that may govern such activities, we may use marketing and advertising activities to educate the public, provide information to the community, increase awareness of our services and to recruit high caliber colleagues. We strive to present only truthful, fully informative, and non-deceptive information in these materials and announcements.

CLEANSLATE COMPLIANCE PROGRAM

CleanSlate monitors and investigates compliance concerns relating to laws, regulations and/or CleanSlate policies including *Our Code*. When a violation is substantiated, CleanSlate will initiate corrective action including, as appropriate, resolving overpayments, making required notifications to government agencies, implementing systemic changes to prevent recurrences, and instituting disciplinary action.

Employees and agents are committed to complying with all applicable laws and regulations, wherever we do business. Regardless of geographical location, everyone at CleanSlate must be familiar with and comply with the standards set out in *Our Code*. CleanSlate's Compliance Program is designed to prevent, detect, and correct unethical or non-compliant behavior.

The Compliance Program is intended to demonstrate in the clearest possible terms the absolute commitment of CleanSlate to the highest standards of ethics and compliance. The elements of the

program include setting standards (*Our Code* and Policies and Procedures), communicating the standards, providing a mechanism for reporting potential exceptions, monitoring, and auditing, and maintaining an infrastructure that sustains the program.

WHERE TO FIND HELP AND RAISE QUESTIONS

The Reportline is another way to communicate concerns about a potential unethical situation at CleanSlate. The Reportline is toll-free and available seven days a week, 24 hours a day, all year long. When calling the Reportline, you may either disclose your identity or remain anonymous throughout the reporting process. No call-tracing or recording devices are ever used by the Reportline. If you do choose to give your name, your call will be handled with confidentiality, and only those with a need to know based on the information reported will be informed. Reportline operators are employed by an external service provider who is hired by CleanSlate (the operators are not CleanSlate employees).



CleanSlate's Reportline

We pledge to comply with all applicable laws and regulations, including those designed to prevent and deter fraud, waste, and abuse. If someone knows or is suspicious of wrongdoing, they are encouraged to report the matter promptly and candidly. There are many ways to report suspected improper conduct. In most cases, concerns should be brought to the attention of a supervisor first. If this does not result in appropriate action, or if personnel are uncomfortable discussing these issues with their supervisors, they can use one or more of the other reporting methods described below:

- Report to an immediate supervisor, manager, the Human Resources Department, the Legal Department, or the Corporate Compliance Department.
- Use CleanSlate's toll-free **Reportline (1-844-338-7287)** or complete a written form via the internet at Reportline.EthicsPoint.com — these reports may be made anonymously.

Self-reporting is encouraged — anyone who reports their own wrongdoing or violation of law will be given due consideration in potential mitigation of any disciplinary action. Retaliation in any form against anyone who makes a good faith report of actual or suspected wrongdoing or cooperates in an investigation is strictly prohibited. Anyone who feels that they have been retaliated against should report this immediately, using any of the methods described above.

ACKNOWLEDGEMENT

I have received and reviewed CleanSlate's 2021 Code of Conduct.

Signature

Name

Date