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| COMPLIANCE |  From DentaQuest | | | |
| | <i>Policy and Procedure</i> | | | |
| | Policy Name: | Anti-Bribery & Corruption | Policy ID: | PLANCG-71 |
| | Approved By: | Courtney Ransom, Head of Risk Management, Ethics & Compliance | Last Revision Date: | 12/28/2023 |
| | States: | Oregon | Last Review Date: | 01/04/2024 |
| Application: | Medicaid | Effective Date: | 01/04/2024 | |

PURPOSE

The DCO has established an Anti-Bribery and Corruption policy to reinforce our intention and obligation to act honestly and ethically in all of its business dealings. Bribery and corruption are not only against The DCO’s values; they are illegal and can expose both employees and The DCO to fines, penalties and reputational damage.

POLICY

The DCO does not permit employees, agents, subcontractors or vendors to engage in or commit bribery on its behalf. No individual may seek to influence others, either directly or indirectly, by paying or receiving bribes or kickbacks, or by any other means that is considered unethical, illegal or harmful to our reputation for honesty and integrity. Employees, agents, subcontractors or vendors of The DCO are expected to decline any opportunity which would place its ethical principles and reputation at risk.

REFERENCES

- Foreign Corrupt Practices Act of 1977, 15 U.S.C. §§ 78dd-1, et seq.
- Sarbanes-Oxley Act of 2002, Pub.L. 107–204
- Dodd-Frank Act of 2010, Pub.L. 111–203

DEFINITIONS

- **“Bribe”** means offering, giving or receiving anything of value with the intention of inducing a person to act or to reward a person for having acted. Items of value can include, but are not limited to the following: Cash and cash equivalents; Gifts, meals, entertainment and travel; Political contributions; Charitable contributions (if made to a charity at the request of a government official or private business partner); and/or Job offers or internship awards.
- **“Government Official(s)”** means any:
 - Official (elected, appointed, career, or member), employee, or other representative of a Government;
 - Official, employee, or other representative of a public international organization (e.g., Red Cross, United Nations, World Bank, European Union, World Trade Organization, World Customs Organization, North Atlantic Treaty Organization);
 - Individual acting for or on behalf of a Government, even though he or she may not be an employee of such Government (such as an uncompensated honorary official or a member of a royal family);
 - Official of a political party or candidate for political office outside the U.S.; and
 - Individual who is considered a Government Official under applicable local (non-U.S.) law

- **“Kickback”** means an illegal payment intended as compensation for favorable treatment or other improper services. The kickback may be money, a gift, credit, rebate, or anything of value that is made for the purposes of inducing the Governmental Official to award, recommend, or refer business or otherwise provide favorable treatment.
- **“Representative(s)”** means any agent, contractor, consultant or third party intermediary, including any owner, director, officer, and/or employee of such entity who provides services to, or on behalf of, The DCO in connection with obtaining or retaining business from or delivering services to its customers, or who interacts with Government Officials on its behalf.

PROCEDURE

A. Employees Duty to Report

1. *Obligation to Report.* An employee shall report to the Compliance Department and The DCO’s General Counsel immediately upon being:
 - a. offered a Bribe or Kickback from a person or entity doing business with or seeking to do business with The DCO; or
 - b. requested to provide a Bribe or Kickback to any person or entity with whom The DCO is doing or seeking to do business.
2. *Responding to Requests.* When responding to a request for an improper payment, an employee or agent shall refuse to make the payment and explain that The DCO does not make such payments and that doing so would violate this Policy, The DCO’s Code of Business Conduct and Ethics, and anti-corruption laws.
 - a. Make it clear that the refusal is absolute and ensure his or her body language and choice of words will not be misunderstood.
 - b. Immediately report the request to his or her manager, The DCO’s Compliance Department, and The DCO’s Legal Department or the The DCO Alert Line.
 - c. If a Representative is involved, explain that they are not authorized to make an improper payment on behalf of The DCO and The DCO will terminate the Representative’s contract if such a payment is made.

B. Third parties

The DCO cannot avoid liability by using a third party to give or receive a bribe. A third party includes, but is not limited to consultants, agents, representatives, subcontractors, and sales people. The DCO has strict guidelines that must be followed anytime The DCO seeks to engage a third party that may interact with a Government Official for or on behalf of the Company. The DCO requires third parties to agree in writing to remain in compliance with all relevant laws and policies, including anti-corruption laws in addition to our The DCO’s anti-bribery and corruption policy.

C. Government Officials

Law and regulations are strict when dealing with Government Officials. Reasonable corporate hospitality that is acceptable with other business associates might not be allowable when Government Officials are involved.

D. Whistleblower Protection

The DCO does not retaliate against individuals who report violations of this policy.

F Revision History

| Date: | Description |
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| 2/27/2018 | Conversion to revised policy and procedure format and naming convention. |
| 11/12/2018 | Corporate Compliance Committee approval |
| 11/10/2020 | ADS Compliance Committee approval |
| 10/05/2021 | Updates based on annual review. |

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| 12/31/2022 | Updates based on annual review. |
| 12/28/2023 | Updates based on annual review. |