



Code of Ethical Conduct

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If you have a concern to report, you may:

- Contact our Compliance Officer directly at healthcarecomplianceofficer@brightstarcare.com
- Call our confidential compliance hotline at **866-903-0186, ext. 186**

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A Message from Our CEO



At BrightStar Care, we aim to provide **A Higher Standard®** every day. This is only possible because of the integrity and dedication of our entire network—our franchise owners, the caregivers and clinical team members they employ, their office teams, and the support of our BrightStar Care’s franchise support center. Every interaction, every decision, and every service delivered across this network reflects our shared commitment to doing the right thing.

We ask that our employees and those affiliated with the broader BrightStar Care network read this Code of Conduct carefully, ask questions when they’re unsure, and speak up if they have concerns. Commitment to these principles strengthens our entire organization and ensures we continue to deliver on our promise to those we serve.

Andy Ray, CEO

Our Core Values

BrightStar Care’s core values are the foundation of our culture, guiding our behavior. We strive to provide A Higher Standard of Care to every client, every day, and these values help us achieve that goal.

Everyone **G R O W S** when we...

MAKE IT GREAT	Play to win Continuous improvement Exceed expectations Bring out the best in others Detail oriented
DO THE RIGHT THING	Honest Ethical Tell the truth Treat everyone with respect
BE OPEN & HONEST	Approachable Fun Unflappable Kind Empathetic
DO WHAT YOU SAY	On time Finish what you start Accountable Take responsibility
SERVE WITH PASSION	Be a great team player Help first Confident yet humble For the greater good Make a real difference

This Code of Conduct is rooted in our core value to **Do the Right Thing**. It reflects our commitment to integrity and compliance, and is designed to complement existing policies and procedures—whether set forth in the BrightStar Care Employee Handbook or in a franchisee’s employee handbook. While handbooks may vary, all are expected to align with the principles of this Code.

About This Code of Conduct

At BrightStar Care, we're committed to **delivering quality services and upholding compliance with all applicable laws and regulations**. This Code of Conduct outlines the principles and standards that guide everyone affiliated with our brand—including BrightStar Care officers, directors, employees, contractors, vendors, franchise owners, and the teams they employ—across our entire network in fulfilling that mission.

Conducting ourselves ethically and legally is essential to who we are and the work we do.

Updates to This Code

This Code of Conduct will be updated as needed. Updates will be shared by posting revised versions on our website and BrightConnect, our internal communications platform, as well as by email. BrightStar Care reserves the right to modify this Code at any time without prior notice.

Understanding Our Franchise Model

BrightStar Care operates through a network of independently owned and operated franchise locations. While we provide support and resources to our franchisees, each location operates independently and is responsible for adopting and upholding this Code of Conduct, along with its own healthcare compliance program. Each franchisee is ultimately accountable for maintaining compliance within its organization.

We support franchisees by:

- Providing compliance tools and resources
- Facilitating compliance reporting through our hotline
- Performing risk analyses to identify areas for improvement
- Sharing best practices across the network

Franchisees adopt and uphold by this Code of Conduct as a reflection of their commitment to the BrightStar Care standard of excellence and compliance.

Making Ethical Decisions

We all play a role in creating a culture that promotes the **highest standards of ethics and compliance**—one that encourages everyone to share concerns when they arise. When making ethical decisions, ask yourself:

- *Does this comply with our Code of Conduct and policies?*
- *Does this comply with relevant laws and regulations?*
- *Does this reflect our Core Values?*
- *Is this consistent with my BrightStar Care training?*
- *Would I feel comfortable if my actions became public?*

If you can answer “Yes” to all these questions, you’re likely on the right track. If you’re unsure about anything, ask for help.

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Reporting Concerns



When and How to Report

Immediately report any concerns about ethical issues, violations of law, policy, regulatory standards, or contractual agreements—whether observed or suspected.

You can:

- Contact your immediate supervisor or manager
- Contact our Compliance Officer directly:
 - healthcarecomplianceofficer@brightstarcare.com
- Call our confidential compliance hotline:
 - **866-903-0186, extension 186** (available 24/7, anonymous reporting option available)

The hotline serves both corporate operations and our franchise network. All information is documented and forwarded to the appropriate department for review.

- Franchise-related concerns are typically shared with the franchisee's leadership, unless the nature of the concern requires review or investigation by BrightStar Care's franchise support center.
- Corporate concerns are investigated by BrightStar Care directly.
- All data collected helps us strengthen compliance tools across the network.

Frequently Asked Questions

What types of issues can I report to the hotline?

You can report any concerns to the hotline, especially if you're not comfortable speaking directly with your manager or leader. Examples include abuse or mistreatment of clients, discrimination or harassment, conflicts of interest, accounting or financial issues, violations of our compliance program or policies, theft, waste, fraud, bribery, or environmental or safety issues.

Is the hotline really anonymous?

Yes. If you don't provide your contact information, name, or phone number, your identity cannot be confirmed.

Can I be retaliated against if I report something that turns out to be incorrect?

No. If you make a report in good faith, you will not face retaliation—even if the investigation finds the report was unfounded. We encourage everyone to speak up about any perceived violations.

If I don't report anonymously, will my report be kept confidential?

We treat all compliance reports made in good faith as confidential and share the information only with those who need to know in order to review and address the concern. In some cases, this may include internal teams, legal counsel, or regulatory authorities as required by law.

A photograph of two men in a wheelchair outdoors. The man in the foreground is bald with a grey beard, wearing a grey t-shirt, and is smiling while looking to the right. The man in the background is also bald with a beard, wearing a teal shirt, and is looking towards the right. The image has a yellow and blue color overlay.

Legal Compliance

We're committed to operating in compliance with all applicable federal and state laws and regulations, including requirements for Medicare, Medicaid, and other government-funded healthcare programs. All members of the BrightStar Care network—including franchise center support staff, franchise owners, their employees, contractors, and partners—are expected to support this commitment. The following standards provide guidance on key legal compliance areas. These standards are not exhaustive—you must comply with all applicable laws, whether or not specifically addressed here. If you have questions about any law or regulation, contact our Compliance Officer, who will refer legal issues to appropriate counsel when necessary.

Licensure and Certification

All individuals affiliated with BrightStar Care must comply with the licensure and certification requirements relevant to their roles and job duties.



Antitrust

All individuals affiliated with BrightStar Care must comply with **antitrust and similar laws that regulate competition.**

Examples of prohibited conduct include:

- Agreements to fix prices, bid rigging, or collusion with competitors (including price sharing)
- Boycotts, certain exclusive dealing arrangements, and price discrimination agreements
- Unfair trade practices including bribery, misappropriation of trade secrets, deception, and intimidation

Individuals in managerial or administrative positions should seek advice from our Compliance Officer when confronted with business decisions that might involve fraud and abuse risk.

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Fraud and Abuse

All individuals affiliated with BrightStar Care must refrain from conduct that violates **fraud and abuse laws**.

These laws prohibit:

- Direct, indirect, or disguised payments in exchange for referrals
- Submitting false, fictitious, or fraudulent claims to any government entity, including claims for services not rendered, claims that mischaracterize services, or claims that don't comply with program requirements
- Making false representations to gain or retain program participation or obtain payment for services

Individuals in managerial or administrative positions should seek advice from our Compliance Officer when confronted with business decisions that might involve antitrust risk.

The False Claims Act

The Civil False Claims Act (FCA) is a federal law covering fraud in government-funded programs, including Medicare and Medicaid. The FCA establishes liability for anyone who **knowingly presents false or fraudulent claims** to the U.S. government for payment. Examples of false claims include billing twice for the same service, billing a higher level of service than provided, unbundling charges when bundling is required, and billing for equipment or supplies that were never provided or medically necessary.

One unique aspect of the FCA is the qui tam provision, commonly called the “whistleblower” provision. This allows a private person with knowledge of a false claim to bring a civil action on behalf of the U.S. Government to recover funds paid as a result of false claims. **The FCA protects whistleblowers from retaliation** by their employers for filing claims. Many states have similar false claims laws.

If you encounter any billing situation that you believe is improper—whether intentional or unintentional—you have a duty to **immediately report** your concerns to your supervisor or our Compliance Officer.

Federal Healthcare Laws

The following federal laws apply to specific types of payors, though many states have broader laws covering more payor types. Regardless of payor type, we strive to follow the practices outlined below.

Stark Law, 42 U.S.C. § 1395nn(a)

The Stark Law prohibits physicians from referring patients to an entity for designated health services reimbursable by Medicare and/or Medicaid if the physician—or their immediate family member—has a financial relationship with that entity, unless a specific exception applies. Financial relationships include **both compensation arrangements and ownership or investment interests**. Personnel in managerial or administrative positions should seek advice from our Compliance Officer when confronted with business decisions that might involve self-referral or compensation law risks.

Anti-Kickback Statute, 42 U.S.C. § 1320a-7b(b)

The federal Anti-Kickback Statute (AKS) makes it a criminal offense to knowingly and **willfully offer, pay, solicit, or receive anything of value** in return for or to induce:

- Patient referrals, or
- Purchasing, leasing, ordering, or recommending items or services paid for by federal or state healthcare programs (e.g., Medicare, Medicaid, TRICARE)

Safe harbors are available to shield certain conduct. Violations can result in civil and/or criminal liability.

Discrimination

We believe fair and equitable treatment of everyone in the BrightStar Care network is essential to fulfilling our vision and goals. Our policy is to recruit, hire, train, promote, assign, transfer, lay off, recall, and separate individuals based on **ability, achievement, experience, and conduct**—without regard to race, color, religion, sex, national origin, age, disability, or any other classification protected by law. We are committed to a culture where harassment and discrimination have no place. Every concern raised will be taken seriously and reviewed in accordance with applicable laws. For our franchise support center employees, additional details are available in the BrightStar Care Employee Handbook.

For those affiliated with a franchise location, please refer to your employee handbook for additional details.

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OSHA

Workplace safety and health are top priorities at BrightStar Care. Everyone in our network is expected to follow safety requirements and practices that help keep our workplaces safe.



ADA/ADAAA

We comply with **all applicable anti-discrimination and disability accommodation laws**. We provide reasonable accommodation to support individuals with disabilities in performing essential job functions, provided the accommodation does not create an undue hardship. We also comply with laws governing accessibility for individuals with disabilities in places of public accommodation. **Every report of alleged discrimination will be taken seriously and investigated** in accordance with applicable laws. For corporate employees, additional details are available in the BrightStar Care Employee Handbook. For those affiliated with a franchise location, please refer to your location's employee handbook for more information.

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Taxes

We accurately report payments to appropriate taxing authorities and file tax returns and other information in accordance with applicable laws





Business Ethics

We are committed to the highest standards of business ethics and integrity. Everyone affiliated with BrightStar Care—whether franchise support center employees, franchise owners, their teams, contractors, or partners—must accurately and honestly represent the brand and must not engage in any activity or scheme intended to defraud anyone of money, property, or honest services. Anyone who becomes aware of a potential violation has an obligation to report it.

The standards below provide guidance to ensure our business activities consistently reflect these principles.

Ethical Leadership

Managers and supervisors at every level are expected to take responsibility for their team's actions. This means ensuring your team understands and applies the ethical standards in this Code of Conduct, listening to their questions, and acting on their concerns. Leadership requires setting a personal example of high ethical performance. Managers and supervisors set the tone for their teams and for BrightStar Care.



Business Relationship

Everyone affiliated with BrightStar Care is expected to act with **honesty and integrity**. No one may engage in business practices that unlawfully seek favorable treatment or business from government entities, physicians, vendors, or other partners.



Disclosure of Financial Interest

Personnel must disclose to our Compliance Officer any **financial interest, ownership interest, or other relationship** they (or their immediate family) have with BrightStar Care's vendors or competitors.

All employees and leaders of the franchise support center must also disclose to the Compliance Officer any **financial interest, ownership interest, or other relationship** they (or their immediate family members) have with BrightStar Care vendors or competitors.

For those affiliated with franchise locations, disclosure of potential conflicts of interest is strongly recommended as a best practice and should be made to the appropriate franchise leadership.

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Business Inducements

No one affiliated with BrightStar Care may seek to gain advantages through the **improper use of payments, business courtesies, or other inducements.**



Conflicts of Interest

Personnel are prohibited from engaging in **any business activity that conflicts with BrightStar Care's interests or those of the franchisees we support**. No personnel may perform work or render services for any competitor or for any organization with which BrightStar Care does business or seeks to do business without required pre-approval.

For BrightStar Care franchise support center team members, engaging in **any business activity that conflicts with the interests of BrightStar Care or the franchisees we support is prohibited**. Franchise support center employees may not perform work or provide services for a competitor, or for any organization with which BrightStar Care does business or seeks to do business, without the required pre-approval. For more information, please refer to the BrightStar Care Employee Handbook.

For those affiliated with franchise locations, such as clinical team members and caregivers, there may be situations where individuals hold multiple jobs. While this Code does not prohibit outside employment, individuals are expected to avoid situations that create a direct conflict of interest and must follow the policies outlined in their franchise location's employee handbook.

Financial Practices

Purchases, payments, and other transactions must be **authorized by the appropriate person, supported by adequate documentation, and accurately recorded in our books and records.** We follow legal requirements and generally accepted accounting practices in preparing financial books, records, and reports. All financial reports, cost reports, accounting records, research reports, expense reports, timesheets, and other documents must accurately and clearly represent the facts and true nature of transactions.



Agreements with Outside Parties

Our commitment to integrity and quality extends to situations where services are provided by contractors or other outside parties. Contractors must comply with **all applicable laws, regulations, and guidelines**, and, when appropriate, follow BrightStar Care policies and procedures.

For franchise support center office and BrightStar Care-owned offices, all contractor arrangements must be **documented in a written contract** approved by the Legal Department.

For franchise owners, contractor arrangements should be documented in accordance with their own location's policies and procedures and applicable laws, and it is strongly recommended they adopt a similar process to maintain consistency and compliance across the network.

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Honest Communication

We require candor and honesty from everyone affiliated with BrightStar Care in performing their responsibilities and in any compliance-related communications.

For **franchise support center team members and leaders**, this includes full transparency and accuracy when communicating with our Compliance Officer. Employees in our franchise support center must not make false or misleading statements to anyone doing business with BrightStar Care—whether about other persons or entities doing business with us, our competitors, or our products and services.

For **franchise owners and their teams**, the same expectation applies: honesty and accuracy in all business interactions. Franchisees should follow their own location's policies and procedures, while ensuring their teams uphold the same high standards of integrity.

Your Responsibilities



We expect each person to whom this Code of Conduct applies to abide by these principles and standards and to conduct business in a manner consistent with them.

All individuals are expected to:

- Read and understand this Code of Conduct
- Complete required compliance training
- Ask questions when you're unsure about the right course of action
- Report suspected violations promptly
- Cooperate fully with any investigations
- Hold yourself and others accountable to these standards

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Consequences of Non-Compliance

Failure to abide by this Code of Conduct or the guidelines it represents may lead to disciplinary action. For alleged violations, relevant facts and circumstances will be considered, including the extent to which the behavior violated the Code's language or intent, the seriousness of the behavior, the individual's history, and other relevant factors. Discipline may range from verbal correction to dismissal.

For **franchise support center team members**, discipline will be handled in accordance with BrightStar Care policies and procedures. For **franchise owners and their teams**, discipline will be handled in accordance with the policies and procedures of their individual franchise location.

Nothing in this Code is intended to, or should be construed as, providing additional employment or contract rights to corporate employees, franchisees, caregivers, contractors, or any other persons affiliated with BrightStar Care.



Questions

If you have questions about this Code, please contact your direct supervisor or manager.

- **Franchise support center team members** may also contact the BrightStar Care Compliance Officer directly.
- **Franchise owners and their teams** may raise questions through their local leadership or by contacting the BrightStar Care Compliance Officer.

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