 Compliance & Ethics Department	Policy No. Compliance 2.0	Page 1 of 2
Subject: Reporting Compliance Issues/ Compliance Action Line	Effective Date: January 1, 2018	
	Reviewed Date: December 1, 2019	
Approval: Chief Compliance Officer		

1.0 Purpose

To provide employees the means of reporting compliance concerns and compliance violations without fear of retaliation or retribution.

2.0 Scope

Anyone, including employees, clients, vendors, etc., aware of any suspected, actual or potential violation of laws, policies, Code of Conduct, etc.

3.0 Policy

BrightSpring employees are required to report in good faith¹ any suspected, actual or potential violation of law, regulations, BrightSpring Policy and Procedure or BrightSpring Code of Conduct.

3.1 Practice


3.1.1 Employees must immediately report knowledge of suspected, actual or potential violations of law, regulations, policy and procedure or violations of the BrightSpring Code of 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. By calling 502.630.7023 or writing the Compliance Department at the BrightSpring Support Center 805 N. Whittington Parkway, Louisville, KY 40222.
- b. By contacting the Compliance Department through BrightSpring's website: www.brightspringhealth.com/contact-us/
- c. By calling the toll-free Compliance Action Line: 1.866.293.3863

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 the Compliance Department.
- b. No Caller is required to disclose his or her 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 the Company is legally required to report certain types of crimes or potential crimes and infractions to external agencies.

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- 3.1.1.3 All reports of compliance concerns/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 Officer 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 Business Line/Support Center Management/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/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 will be 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 and/or Federal agencies will be notified as appropriate.
- 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.