

USING THE COMPLIANCE PROGRAM

Our Code of Conduct

Hoag has established a Compliance Program, led by the Compliance Officer, as appointed by the Hoag Executive Leadership Team and Board of Directors. The Compliance Program contains this Code of Conduct which outlines the appropriate behavior for all employees. This Code is the heart of our Program and will assist employees in carrying out their daily activities within appropriate moral, ethical, and legal standards. It is not intended to cover every situation, but is intended to help employees make the right decisions and/or ask the right questions. This Code and associated policies also apply to Hoag's relationships with our subcontractors, independent contractors, vendors, and consultants.

Duty to Know and Understand

It is the duty of all employees and relevant third parties to know and understand the ethical standards, legal standards, and company policies applicable in performing their daily tasks. Hoag's Compliance Program is designed to assist all employees to know and understand these ethical and legal standards through training and communication.

Duty to Comply

It is the duty of all employees to comply with applicable laws, rules, regulations, and the Code. Failure to do so may subject employees to disciplinary action.

Duty to Report Actual or Suspected Violations

Employees must report to their immediate supervisor, a member of management or the Compliance Officer, actual or suspected violations by employees of applicable law, rules, regulations, or the Code. Employees have the same reporting obligations for actual or suspected violations committed by a subcontractor or vendor of Hoag. Hoag provides multiple reporting lines to ensure that employees are comfortable with whom they communicate compliance issues.

Duty to Respond to Government Investigations, Inquiries, or Subpoenas

Employees shall notify the Compliance Office immediately upon the receipt (at work or at home) of any inquiry, search warrant, subpoena, or other agency or government request for information regarding Hoag or a Hoag employee. Employees have the right to request that any government inquiry or interview be postponed until the employee has the opportunity to consult with the Compliance Officer or legal counsel.

Employees shall not destroy or alter Hoag information or documents in anticipation of, or in response to, a request for documents by any applicable governmental agency or from a court of competent jurisdiction.

Resources for Guidance and Reporting Concerns

To obtain guidance on a compliance issue or to report a concern, individuals may choose from several options. Hoag encourages the resolution of issues, including human resources related issues (e.g., payroll, fair treatment and disciplinary issues), through the proper channels.

Hoag makes every effort to maintain, within the limits of the law, the confidentiality of the identity of any individual who reports concerns or possible misconduct. Consistent with our Core Values there is a non-retaliation policy protecting anyone who reports a concern in good faith.

When you believe there may be a problem or have a problem:

- You may contact the Compliance Office at 949/764-4427 or email at CorporateCompliance@hoag.org.
- Call the Hoag ComplianceLine at **800/441-1727** (confidential and available 24 hours a day, 7 days a week)