



**National Corporate Compliance & Ethics Week: November 7-13, 2021**  
***Awareness, Recognition, Reinforcement***

Nuvance Health is committed to establishing and maintaining an effective Compliance and Ethics Program (the “Program”). The Program’s primary focus is to cultivate a culture of integrity at Nuvance Health that is rooted in ethical and legally compliant conduct. Accordingly, we ask all Nuvance Health workforce members, business affiliates, and agents (“Covered Individuals”) to please join us in celebrating this commitment by recognizing **National Corporate Compliance and Ethics Week, November 7-13, 2021**. Our compliance theme continues to focus on ***Awareness, Recognition, and Reinforcement***.

- ***Awareness***: As a Covered Individual, it is crucial that you review, become familiar with, and adhere to our organization’s ethical and compliance principles, which are embodied in the following Nuvance Health standards of conduct:
  - ***Attachment “A”*** – legacy *Health Quest Code of Conduct and Vendor Code of Conduct* (for Covered Individuals at Nuvance Health West); and
  - ***Attachment “B”*** – legacy *Western Connecticut Health Network Code of Conduct and Business Ethics* (for Covered Individuals at Nuvance Health East).

As you are aware, the Nuvance Health’s confidential and anonymous Compliance and Ethics Helpline is available to you to report any compliance issues, concerns or incidents that you may become aware of at:

- **1-844-YES-WECOMPLY (1-844-937-9326)** at Nuvance Health-West; and
- **1-844-395-9331** at Nuvance Health-East

Always remember to: ***Ask Questions. Voice Your Concerns. Report Improper Conduct.***

- ***Recognition***: Supervisors, managers, directors and leadership are encouraged to continue to acknowledge and recognize the activities and efforts of their direct reports that contribute to the solidification of the Program.

- **Reinforcement:** Through training and educational programs and, where necessary, corrective measures, the Corporate Compliance Office will continue to reinforce Nuvance Health's dedication to an organizational culture that promotes Nuvance Health's: (i) *Reason for Being and Values* (see **Attachment "C"**); and (ii) steadfast focus on detecting, deterring, and preventing illegal, unethical, and unprofessional conduct. Additionally, Nuvance Health reinforces its compliance efforts by fairly and consistently enforcing its non-retaliation and whistleblower protection policies. Under these policies, Covered Individuals who engage in retaliatory conduct will face progressive disciplinary action up to and including, where appropriate, termination of employment, contract or other affiliation with Nuvance Health.

Join us in commemorating *National Corporate Compliance and Ethics Week* by visiting the sites listed below. There you will find: (i) the numerous Compliance Week activities that are scheduled to occur virtually throughout the organization next week (see **Attachment "D"**); and (ii) various policies and procedures promulgated by Nuvance Health to implement the Program including, for example, the *Compliance and Ethics Program Charter* and *Whistleblower Protection Policy*.

- Nuvance Health-West intranet and internet links:

<https://dimensions.health-quest.org/sites/Auditing/SitePages/Corporate%20Compliance%20%26%20Ethics%20Week.aspx>

<https://www.nuvancehealth.org/compliance/additional-compliance-resources>

- Nuvance Health-East intranet and internet links:

<http://thepulse.wchn.priv/Departments/compliance/Compliance%20Week/Forms/AllItems.aspx>

<https://www.nuvancehealth.org/compliance/additional-compliance-resources>

Thank you for joining us in our celebration of *National Corporate Compliance and Ethics Week*. We greatly appreciate your commitment to the Program.