



TruBridge[®]

Code of Conduct

Dear Partner,

Our purpose is simple at TruBridge: Create thriving communities across the world. It's a commitment to make a difference and contribute to a greater cause, not just for our customers, employees and shareholders, but all of the communities where we work and live. There are a lot of people counting on us out there, and we cannot serve them without having our actions—both personal and professional—rooted in our Mission and Values.

I'm proud of the work that we do and the way that we do it. Acting ethically and responsibly is not just the right thing to do, but the right way to do business. Every day, we're all entrusted with decisions that may impact our reputation and relationships with each other and the people we serve. By conducting ourselves with integrity and transparency, acting from a place of empathy and humanity, we're able to build trust, understanding and stronger relationships.

Think of the TruBridge Code of Conduct as a compass. It may show the way to make ethical decisions around the workplace, but it's up to each and every one of us to take the steps. Though the journey may sometimes be difficult, it's ultimately an empowering experience. So never be afraid to ask for help if you have a question or concern. And if you're unable to do so, please speak up.

If you're reading this right now, take pride. You're the inheritor of a reputation built on forty years of ethics and integrity. You're a vital part of TruBridge's essential role in healthcare today and the foundation of our success in the years to come. We're entrusting our legacy to you with this Code of Conduct. Take your time to study it, understand it and apply it every day.

Thank you for your dedication to these principles and for everything you do to help TruBridge create an environment for healthcare workers to focus on using their time to do what they do best—provide quality care.



Chris Fowler
President and CEO



Our Mission and Values

For more than 40 years, we've been known as a company that places integrity and trust above all else. We act with courage, challenge the status quo, celebrate our successes while learning from our failures, find new ways to innovate, to grow as a company and as people. With our partners and customers, we live these values:



Embrace the Fun

TruBridgе believes in bringing a sense of joy and levity to the jobs that we do. We celebrate the successes of our personnel and partners, encourage vulnerability and authenticity, and appreciate the unique insights that arise from our differences. Grin, don't grind.



Dare to Explore

We value progress over perfection and see failure as a necessary step on the path to achievement. In order to challenge the status quo, we must be comfortable with being uncomfortable, ask the questions that we don't know the answers to, express a dissenting point of view, and own our mistakes as well as our achievements. Fail fast and learn.



Go After Greatness

We cannot lead our industry without inspiring our team to dream big and achieve bigger. All ideas are encouraged. Make big bets, execute and enhance. Be bold. Take chances. Triumph together.



Do the Right Thing

Our reputation as an ethical company is one of our most valuable assets and crucial to our continued success. It's our responsibility to act with openness and transparency, have the difficult conversations and keep our commitments while delivering a wow experience for our customers. It's what you do and how you do it.



Put People First

Here at TruBridgе, we not only take care of ourselves, but our friends and neighbors along the way. We practice self-care and find ways to be kind, empathetic and to always pay it forward. We value the person above the project because our humanity and compassion are the core of who are. Good work comes from great people.



Introduction

This Code of Business Conduct and Ethics (this “Code”) sets forth the guiding principles by which we operate TruBridge (“TruBridge”) and conduct our daily business with our stockholders, customers, suppliers and with each other. We want all directors, officers and employees of TruBridge and any subsidiary of TruBridge, and all agents and representatives, including consultants, acting on behalf of TruBridge or any subsidiary’s behalf, to read this Code, understand it, and commit to acting in accordance with it.

While this Code covers a wide range of business practices and procedures, it does not include all of the policies and procedures of TruBridge. It does not cover every issue that may arise, but sets out basic principles to guide us in making sound judgments regarding compliance with the law and ethical business conduct.

We must seek to avoid even the appearance of improper behavior. TruBridge takes this commitment seriously. Those who violate the standards in this Code will be subject to disciplinary action, up to and including termination of employment or contract. If you have questions about adherence to this Code or concerns about actual or potential violations, you should follow the procedures in this Code for raising questions and reporting concerns.



01 **Compliance with Laws, Rules and Regulations**

Obeying the law, both in letter and in spirit, is the foundation on which the TruBridge ethical standards are built. We must all respect and obey the laws of the countries, states and cities in which we operate. Although not all employees are expected to know all the details of these laws, it is important to know enough to determine when to seek advice from supervisors, managers or other appropriate personnel.

As appropriate, TruBridge will hold information and training sessions to educate us on applicable laws, rules and regulations and how to comply. If a law conflicts with a policy in this Code, we must comply with the law.

02 **Conflicts of Interest**

We should be scrupulous in avoiding any action or interest that conflicts with, or gives the appearance of a conflict with, the interests of TruBridge. A “conflict of interest” exists whenever an individual’s private interests interfere or conflict in any way (or even appear to interfere or conflict) with the interests of TruBridge. A conflict situation can arise when we take actions or have interests that may make it difficult to perform our work for TruBridge objectively and effectively. Conflicts of interest may also arise when we, or a member of our family, receive improper personal benefits as a result of our position with TruBridge, whether from a third party or from TruBridge.

Loans to, or guarantees of obligations of, employees and their family members may create conflicts of interest. It is almost always a conflict of interest for a TruBridge employee to work simultaneously for a competitor, customer or service provider. You are not allowed to work for a competitor as a consultant or board member. It is best to avoid any direct or indirect business connection with our customers, suppliers, service providers or competitors except on behalf of TruBridge.

Conflicts of interest are prohibited as a matter of TruBridge policy, except under guidelines approved by the TruBridge Board of Directors (the “Board”). Conflicts of interest may not always be clear, so if you have a question, you should follow the procedures in this Code for raising questions.



03 Insider Trading

Those of us who have access to confidential information are not permitted to use or share that information for stock trading purposes or for any other purpose except the conduct of our business. All non-public information about TruBridge should be considered confidential information. To use non-public information for personal financial benefit or to “tip” others who might make an investment decision on the basis of this information is not only unethical but illegal.

In order to assist with compliance with laws against insider trading, TruBridge has adopted a separate Insider Trading Policy governing trading in securities of TruBridge. If you have any questions, please consult the TruBridge Chief Financial Officer, who serves as the Insider Trading Compliance Officer of TruBridge.

04 Corporate Opportunities

We are prohibited from taking for ourselves personal opportunities that are discovered through the use of corporate property, information or position without the consent of the Board. No one may use corporate property, information or position for improper personal gain or compete with TruBridge directly or indirectly. We owe a duty to TruBridge to advance its legitimate interests when the opportunity to do so arises.

05 Competition and Fair Dealing

We seek to outperform our competition fairly and honestly. TruBridge seeks competitive advantages through superior performance, never through unethical or illegal business practices. Stealing proprietary information, possessing trade secret information that was obtained without the owner’s consent or inducing such disclosures by past or present employees of other companies is prohibited. Likewise, we may not agree with any competitor, explicitly or implicitly, to set prices or otherwise restrict vigorous competition, whether that be competition for customers or employees. All of us should endeavor to respect the rights of and deal fairly with TruBridge customers, suppliers, competitors and employees. No one should take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts or any other intentional unfair-dealing practice, including bribery or corruption.



06 Prohibition Against Corruption and Bribery

TruBridge strictly prohibits all forms of bribery in connection with TruBridge business. TruBridge policy is to comply with all anti-corruption laws in the jurisdictions in which it operates and to accurately reflect all transactions in books and records of TruBridge. We must never offer or accept bribes or kickbacks in connection with TruBridge business and must not participate in or facilitate corrupt activity of any kind.

The Company's prohibition against offering, promising or paying bribes also applies to third parties who provide services or act on behalf of TruBridge, such as suppliers, agents, contractors, consultants and distributors. We must never engage a third party whom we believe may attempt to offer a bribe in connection with TruBridge business.

Anti-corruption laws can be difficult to interpret and apply. TruBridge has adopted an Anti-Corruption Policy to provide you with additional guidance. You should contact the TruBridge Corporate Compliance Officer if you have any questions regarding this Policy or its application.

07 Gifts, Meals, Entertainment and Travel

The exchange or provision of gifts, meals, entertainment and travel ("GMET") can create goodwill and sound working relationships; however, it can also create real or perceived conflicts of interest. GMET can also be perceived as a bribe under applicable laws and international standards. To avoid such perceptions, TruBridge expects us and the third parties with whom we work to only provide reasonable, appropriate GMET for business purposes and strictly comply with the TruBridge GMET Policy, especially when providing any GMET to employees or agents of government agencies, public institutions and state-owned enterprises.

08 International Trade and Sanctions Compliance

Laws and regulations govern the import and export of certain products, including software and technology, outside of the country or to foreign nationals. TruBridge seeks to understand and comply with these laws.

TruBridge prohibits funding, facilitating or engaging in any activities, business or transaction of or with any sanctioned person, in any sanctioned country/territory or otherwise in any manner that would result in the violation of economic sanctions imposed by the U.S. or other applicable authority.

International trade and sanctions laws can be difficult to interpret and apply. Contact the TruBridge Corporate Compliance Officer if you have any questions regarding these laws.

09 Billing and Coding Compliance

With respect to any person or entity that engages in billing practices on behalf of TruBridge, it is TruBridge policy for these parties to know and comply with the billing and coding requirements for Medicare, Medicaid and other federal health programs, as well as all other third-party payers responsible for reimbursement of claims to TruBridge customers. Billing and coding policies are addressed in more detail in the TruBridge Medical Billing and Medical Coding Compliance Policies and Procedures.

10 Discrimination and Harassment

The diversity of TruBridge employees is a tremendous asset. We are firmly committed to providing equal opportunity in all aspects of employment and will not tolerate any illegal discrimination or harassment of any kind. Examples of prohibited conduct include derogatory comments based on racial or ethnic characteristics and unwelcome sexual advances. Additional information on TruBridge employment policies and procedures can be obtained on the Company's Intranet.



11 **Health and Safety**

TruBridge strives to provide each employee with a safe and healthy work environment. Each employee has responsibility for maintaining a safe and healthy workplace for all employees by following safety and health rules and practices, and reporting accidents, injuries and unsafe equipment, practices and conditions.

Violence and threatening behavior are not permitted. Employees should report to work in condition to perform their duties, free from the influence of illegal drugs, legal drugs that may impair job performance or alcohol. The use of illegal drugs, legal drugs that may impair job performance or alcohol in the workplace will not be tolerated.

12 **Record-Keeping**

TruBridge requires honest and accurate recording and reporting of all information in order to make responsible business decisions. For example, only the true and actual number of hours worked should be reported for compensation purposes.

Many employees regularly use business expense accounts, which must be documented and recorded accurately. If you are not sure whether a certain expense is legitimate, ask your supervisor or the Company's Corporate Compliance Officer or his or her designee or follow the procedures in this Code for raising questions or reporting concerns.

All TruBridge books, records, accounts and financial statements must be maintained in reasonable detail, must appropriately reflect TruBridge transactions and must conform both to applicable legal requirements and to the TruBridge system of internal controls. Unrecorded or "off the books" funds or assets should not be maintained unless expressly permitted by applicable law or regulation.

Business records and communications often become public, and you should avoid exaggeration, derogatory remarks, guesswork or inappropriate characterizations of people and companies that can be misunderstood. This applies equally to email, internal memos and formal reports. Records should always be retained or destroyed according to TruBridge record retention policies.



13 Confidential and Proprietary Information

We must protect the confidential and proprietary information entrusted to us by TruBridge or its customers or suppliers. To avoid violating TruBridge policy or the law, we may only use or distribute Confidential and Proprietary Information when it is authorized by an executive officer of TruBridge, required by laws or regulations, or permitted by a whistleblower or reporting statute.

Confidential information includes all non-public information that might be of use to competitors or harmful to TruBridge or its customers, suppliers or employees, if disclosed.

“Confidential information” specifically includes Protected Health Information (“PHI”), such as patient diagnosis, treatment and financial information and patient lists. Under the Health Insurance Portability and Accountability Act of 1996 (“HIPAA”) and the regulations pertaining to it, TruBridge is expected to maintain the privacy of and security of PHI. For additional information, consult TruBridge HIPAA policies and related procedures.

Proprietary information includes intellectual property such as trade secrets, patents, trademarks and copyrights, as well as business and marketing information and unpublished financial data and reports. For more information regarding Confidential and Proprietary Information, consult the Protection of Confidential and Proprietary Information Policy.

The obligation to protect Confidential and Proprietary Information continues even after employment ends. You should contact the TruBridge Compliance Officer if you have any questions regarding TruBridge Confidential and Proprietary Information policies and procedures.

14 Protection and Proper Use of Company Assets

We should endeavor to protect TruBridge assets and ensure their efficient use. Theft, carelessness and waste have a direct impact on the profitability of TruBridge. Any suspected incident of fraud or theft should be immediately reported for investigation pursuant to the procedures in this Code for reporting concerns. TruBridge equipment should not be used for non-TruBridge business, though incidental personal use may be permitted.



15 Questions Regarding Compliance with this Code or Your Behavior

We must all work to ensure compliance with the law and this Code and ensure prompt and consistent action against violations of this Code. However, in some situations, it is difficult to know what is and is not appropriate. When in doubt, you should:

Consult TruBridge policies and procedures.

This Code references a number of stand-alone policies and procedures. They are available to all employees on the Company's Intranet. These policies will provide you with additional details.

Make sure you have all the facts. In order to reach the right solution, you and TruBridge must be as fully informed as possible.

Ask yourself: What specifically do I want to do or am I being asked to do? Does it seem unethical or improper? This will enable you to focus on the specific question you are faced with and the alternatives you have. Use your judgment and common sense; if something seems unethical or improper, it probably is and should not be done.

Clarify your responsibility and role. In most situations, there is shared responsibility. Are your colleagues informed? It may help to get others involved and discuss the problem.

Discuss the problem with your supervisor or TruBridge contact in the case of third parties.

This is the basic guidance for all situations. In many cases, your supervisor or TruBridge contact, as applicable, will be more knowledgeable about the question and will appreciate being brought into the decision-making process. Your supervisor or TruBridge contact will also be able to seek advice from others in TruBridge or outside counsel if necessary. Remember that it is your supervisor's or TruBridge contact's responsibility to help solve problems.

Seek help from TruBridge resources.

In the rare case where it may not be appropriate to discuss an issue with your supervisor or TruBridge contact, or where you do not feel comfortable approaching your supervisor or TruBridge contact with your question, discuss it with the TruBridge Corporate Compliance Officer.

Always ask first. Act later. If you are unsure of what to do in any situation, seek guidance before you act.



16 **Reporting any Illegal or Unethical Behavior**

Any of us who suspect or know of violations of this Code or other illegal or unethical business conduct relating to TruBridge business have an obligation to report. Everyone is encouraged to first report matters to their supervisor or TruBridge contact in the case of third parties. Typically, the order in which to report concerns is the following:

- 1. Contact your direct supervisor**
- 2. Contact someone else in senior management**
- 3. Contact Human Resources**
- 4. Contact the Corporate Compliance Officer**
- 5. Contact the Hotline (via phone or web portal)**

If you do not feel comfortable reporting possible misconduct directly to your supervisor or TruBridge contact, you may report to someone else in senior management, Human Resources, the Corporate Compliance Officer or report the issue anonymously by going to MyComplianceReport.com and using access ID "CPSI" or by calling our third-party compliance hotline at (800) 385-4387. Regardless of how you report, your complaint will be investigated and addressed. We are all expected to assist TruBridge in any investigation conducted to address a potential violation of this Code or other illegal or unethical business conduct.

TruBridge is prohibited from retaliating against employees who provide information, assist in an investigation or participate in a proceeding concerning alleged violations of this Code or illegal or unethical business or workplace conduct. Therefore, any employee may submit a good faith concern regarding potential violations of this Code or illegal or unethical business conduct without fear of dismissal or retaliation of any kind. TruBridge will also seek to protect any reporter's identity if possible.



Likewise, nothing in the Code of Business Conduct and Ethics or TruBridge policy is designed to limit an employee's ability to communicate with any government agency (including the SEC and any other federal, state or local government regulatory or law enforcement agency). You have the right to participate in and fully cooperate with any investigation or proceeding that may be conducted by any of these government agencies, including providing documents or other information, without notice to or approval from TruBridge. You are also permitted under all circumstances to file a charge or complaint with or recover an award from the government agencies, and to provide confidential information to government agencies without risk of being held liable by TruBridge for any penalty.

Additional details regarding the procedures for reporting a suspected violation or complaint are available in the TruBridge Policy for Reporting Violations and Complaints.

17 Amendments and Waivers of this Code

Any amendments to or waivers of this Code applicable to executive officers or directors may be made only by the Board or a Board committee to which this responsibility has been delegated and will be promptly disclosed as required by law or stock exchange requirements.



Certification and Acknowledgment

I, _____, hereby certify that I have reviewed, understand and will comply with the TruBridge Code of Business Conduct and Ethics. I understand and agree that any violation of the Code or the policies contained therein may result in disciplinary action, up to and including termination of my employment and/or any other association with TruBridge.

Name (Signature) _____

Name (Print) _____

Date _____




TruBridge, Inc. Code of Ethics for CEO and Senior Financial Officers

TruBridge has a Code of Business Conduct and Ethics (the “Code”) applicable to all directors, officers and employees of TruBridge. The CEO and all senior financial officers, including the CFO and principal accounting officer and controller, are bound by the provisions set forth therein relating to ethical conduct, conflicts of interest and compliance with law. In addition to the Code, the CEO and senior financial officers are subject to the following additional specific policies:

1. The CEO and all senior financial officers are responsible for full, fair, accurate, timely and understandable disclosure in the periodic reports required to be filed by TruBridge with the Securities and Exchange Commission (the “SEC”). Accordingly, it is the responsibility of the CEO and each senior financial officer promptly to bring to the attention of the Audit Committee of the Board of Directors (the “Board”) any material information of which he or she may become aware that affects the disclosures made by TruBridge in its public filings.
2. The CEO and each senior financial officer shall promptly bring to the attention of the Audit Committee of the Board any information he or she may have concerning (a) significant deficiencies in the design or operation of internal controls which could adversely affect the Company’s ability to record, process, summarize and report financial data or (b) any fraud, whether or not material, that involves management or other employees who have a significant role in TruBridge financial reporting, disclosures or internal controls.
3. The CEO and each senior financial officer shall promptly bring to the attention of the CEO and the Audit Committee of the Board any information he or she may have concerning any violation of the Code, including any actual or apparent conflicts of interest between personal and professional relationships involving any officers or other employees who have a significant role in TruBridge financial reporting, disclosures or internal controls.





4. The CEO and each senior financial officer shall promptly bring to the attention of the CEO and the Audit Committee of the Board any information he or she may have concerning evidence of a material violation of the securities or other laws, rules or regulations applicable to TruBridge and the operation of its business, by TruBridge or any agent thereof, or of a violation of the Code or of these additional policies.

5. The Board shall determine, or designate appropriate persons to determine, appropriate actions to be taken in the event of violations of the Code or these additional policies by the CEO or any senior financial officers of TruBridge. Such actions shall be reasonably designed to deter wrongdoing and to promote accountability for adherence to the Code and these additional policies. These actions shall include written notices to the officer involved that the Board has determined that there has been a violation, censure by the Board, demotion or re-assignment of the officer involved, suspension with or without pay or benefits, or termination of the individual's employment (as determined by the Board). In determining what action is appropriate in a particular case, the Board or a designee shall take into account all relevant information, including the nature and severity of the violation, whether the violation was a single occurrence or a repeated occurrence, whether the violation appears to have been intentional or inadvertent, whether the officer in question had been advised prior to the violation as to the proper course of action, and whether the officer in question had committed other violations in the past.





TruBridge[®]

Clear the way for care.