

TRUBRIDGE, INC.
POLICY STATEMENT
GUIDELINES FOR CORPORATE DISCLOSURE

(as last amended on May 10, 2024)

Policy Statement

TruBridge, Inc. and its subsidiaries (collectively, “TruBridge”) are committed to fair and timely disclosure of information about TruBridge without advantage to any particular analyst, securities market professional or investor, consistent with the Securities and Exchange Commission’s Fair Disclosure Regulation (“Regulation FD”). The regulation is intended to eliminate situations where a company may selectively disclose important nonpublic information, such as earnings warnings, to analysts, securities market professionals or investors, before disclosing the information to the general public.

It is TruBridge’s policy to comply with all applicable periodic reporting and disclosure requirements established by the Securities and Exchange Commission (the “SEC”), including Regulation FD. TruBridge will continue to provide current and potential investors with information reasonably required to make an informed decision on whether to invest in TruBridge securities in its periodic filings, its current reports and as required by law or as determined appropriate by management.

Scope

Persons Covered. This policy covers members of TruBridge’s Board of Directors and all employees of TruBridge and its subsidiaries, and complements TruBridge’s Insider Trading Policy.

Communications Covered. This policy covers all communications made on behalf of TruBridge. The following is a non-exclusive list of some examples of communications covered by this policy:

- speeches, interviews, industry and investor conferences, meetings and conventions;
- news and earnings releases and related conference calls;
- letters to shareholders;
- providing “guidance” as to our operating performance (i.e., systems sales contracts signed) or financial performance;
- oral statements made or presentations provided, in group and individual meetings, with investors, financial analysts or securities market professionals;
- phone calls with investors, financial analysts or securities market professionals;
- reviewing or referring to analyst reports on us;
- analyst and investor visits;
- responding to market rumors;
- social media communications, including through chat boards, Twitter, Facebook, LinkedIn, YouTube and corporate blogs; and

- postings on our website.

Regulation FD Overview

Regulation FD requires that whenever:

- TruBridge or a person acting on behalf of TruBridge;
- intentionally discloses material nonpublic information;
- to certain specified persons (including securities market professionals, such as investment advisers and broker-dealers, and investment companies, hedge funds, analysts and shareholders); **then**
- TruBridge must **simultaneously** disseminate the information to the public.

If TruBridge learns that it or anyone acting on its behalf has unintentionally disclosed material nonpublic information, it must make public disclosure of the information “promptly,” meaning no later than twenty-four (24) hours after discovering the unintentional disclosure or the opening of trading on the Nasdaq Stock Market, whichever is later.

I. Policy Overview

TruBridge’s policies on the communication of material nonpublic information, which are set forth below, are designed to comply with Regulation FD and to provide, where determined appropriate by management or where required by applicable law, for the broad, non-exclusionary dissemination of material nonpublic information.

Intentional Disclosure. A selective disclosure of material nonpublic information is “intentional” when the person making the disclosure either knows, or is reckless in not knowing, that the information he or she is communicating is both material and nonpublic.

Material Information. Information is “material” if there is a substantial likelihood that a reasonable investor would consider it important in making an investment decision. Materiality with respect to contingent or speculative events depends upon a balancing of the probability that the event will occur and the magnitude of the anticipated impact of the event on TruBridge’s business, operations or financial condition. Possible material information or events include, but are not limited to:

- earnings information, quarterly results and guidance on earnings estimates;
- financial condition, including material impairment charges;
- mergers, acquisitions, tender offers, joint ventures or changes in assets;
- institution of, or developments in, significant litigation, investigations, regulatory actions or proceedings;
- new material customers, new material contracts or developments (including material changes in previously announced schedules) regarding such customers or contracts;

- new products and discoveries;
- cybersecurity incidents;
- major management or organizational changes;
- bank borrowings or other financing transactions, other than in the ordinary course of TruBridge’s business;
- changes in auditors;
- notification by TruBridge’s independent auditor that TruBridge may no longer rely on the auditor’s report;
- events regarding TruBridge’s securities (e.g., defaults on any outstanding debt, stock repurchase plans or stock splits; changes in dividends; or public or private sales of additional securities); and
- bankruptcies or receiverships.

Nonpublic Information. Information about TruBridge is “nonpublic” if it has not been disseminated in a manner that makes it available to investors generally on a broad-based, non-exclusionary basis.

A. Authorized Spokespersons

No one except (1) the Chief Executive Officer, (2) the Chief Financial Officer, (3) the Chairman of the Board, (4) the Chief Operating Officer, and (5) the General Counsel (“Authorized Spokespersons”) shall communicate with a member of the Investment Community (as defined below) on matters concerning TruBridge. Other TruBridge employees may communicate with members of the Investment Community only after an Authorized Spokesperson (i) has authorized such employee to communicate with such member of the Investment Community and (ii) has reviewed and authorized the scope and content of such communication for disclosure to such member of the Investment Community subject to any condition such Authorized Spokesperson deems necessary to comply with this policy. If you receive a request from someone for material nonpublic information, you should not respond. Instead, ask for the person’s name and number and contact an Authorized Spokesperson. Each Authorized Spokesperson is required to receive “Regulation FD training.”

B. Investment Community

Regulation FD prohibits selective disclosure to certain enumerated persons, including (i) brokers or dealers, or persons associated with a broker or dealer (which includes buy-side or sell-side analysts); (ii) investment advisers, investment managers or persons associated with an investment adviser or investment manager; (iii) investment companies (including mutual funds) and certain entities that would be investment companies but for certain exceptions (e.g., hedge funds), or an affiliated person of any such entity; and (iv) holders of any of TruBridge’s securities (collectively, the “Investment Community”).

Communications in the ordinary course of business with customers, suppliers or strategic partners, as well as communications with the press or news organizations or the government, are not covered by the regulation. However, as it is difficult to know whether a customer, supplier or strategic partner may also be a holder of TruBridge’s

securities, this policy requires that all material nonpublic information be communicated in accordance with this policy.

C. Authorized Disclosure to the Investment Community

Authorized Spokespersons, or their designees, may disclose material nonpublic information about TruBridge (i) for legitimate business purposes to persons who owe a duty of trust or confidence to TruBridge (e.g., attorneys, investment bankers or accountants) and (ii) for legitimate business purposes to persons, such as potential customers, other developers, joint venture partners and vendors, who have expressly agreed with TruBridge in writing to keep TruBridge's information confidential and not to transact in TruBridge's securities on the basis of such information. Prior to disclosing such material nonpublic information, an Authorized Spokesperson or his or her designee must confirm with the General Counsel that the person to whom disclosure is being made is a permitted recipient as set forth above.

D. Methods of Public Disclosure of Information

Once TruBridge determines to disclose certain material nonpublic information, TruBridge may disclose such information through any of the following alternatives:

- “filing” the information under Item 8.01 of Form 8-K (which will result in such information being incorporated by reference into certain securities filings by TruBridge);
- “furnishing” the information under Item 7.01 of Form 8-K (which will not result in such information being incorporated by reference into securities filings by TruBridge unless the information is later expressly incorporated into a securities filing);
- distributing a press release through a widely disseminated news or wire service;
- making an announcement on a conference call or at a webcast event (such as an analyst or investor conference or conference call) to which the public has been provided adequate advance notice and access; and
- disclosing through any other method (or combination of methods) of disclosure that is reasonably designed to provide broad, non-exclusionary distribution of the information to the public.

All such press releases should, at a minimum, be provided to the major wire services (e.g., Dow Jones, Bloomberg, Reuters, AP, UPI and Business Wire). An Authorized Spokesperson must approve the content of all press releases of TruBridge relating to financial matters or material developments involving TruBridge. At this time, posting information on TruBridge's web site would not by itself constitute adequate disclosure. In addition, merely posting information on a social media platform, such as Twitter, Facebook, YouTube or a corporate blog, would not by itself constitute adequate disclosure. Any questions as to whether a procedure will constitute public disclosure should be directed to TruBridge's General Counsel.

II. Communication Policies

A. Quarterly Earnings Releases

TruBridge will issue a press release disclosing its quarterly results for each quarter of its fiscal year. These press releases will be distributed through widely circulated news and wire services and also furnished to the SEC on Form 8-K as required. The form and substance of each earnings release will be approved prior to release in accordance with procedures separately developed for that purpose, including TruBridge's disclosure controls and procedures.

TruBridge may conduct an earnings conference call following each such earnings release. TruBridge will provide reasonable advance public notice, through a press release and posting on TruBridge's website, of each scheduled conference call to discuss the announced results. Such notice will provide the time and the date of the conference call, and instructions on how to access the call and any replay. Any conference call held will be held in an open manner, permitting interested persons to listen in by telephone and/or through Internet webcasting. Senior management may allow a limited group to ask questions of management on the conference call, provided that all listeners can hear the questions and answers.

The introduction to the conference call shall include a disclaimer relating to forward-looking statements, reference a writing (e.g., TruBridge's Form 10-K) containing the factors that could materially affect the validity of such forward-looking statements, and include a disclaimer of any duty to update. Any replay of the conference call shall be accompanied by similar caveats, preferably in writing.

Following any conference call, an audio recording or transcript, including the questions and answers, of the conference call will be posted on TruBridge's website and made available through TruBridge's website or an outside service for a period of up to thirty (30) days following the call. After this time, the call will be taken down so that the information does not become stale.

B. Participation in Speeches, Interviews and Conferences

TruBridge from time to time may participate in securities firm-sponsored and other investor conferences. TruBridge will not provide material nonpublic information at such conferences or events. If participation in such events and conferences will include either question-and-answer sessions after the presentation or any "break out" sessions with members of the Investment Community, TruBridge will not provide material nonpublic information during such sessions. If it is determined that material nonpublic information may have been disclosed unintentionally during the event, conference or session, outside securities counsel to TruBridge should be notified immediately.

All scripts and/or presentations to be used in any presentation or speech where members of the Investment Community may be in attendance must be previously reviewed and approved by the General Counsel. If the script, as approved, contains material nonpublic information about TruBridge, TruBridge will file a Form 8-K with such information prior to the presentation or speech. Authorized Spokespersons shall adhere to the script and

not disclose any material nonpublic information about TruBridge during any “break out” or question-and-answer sessions.

C. Responding to Calls or Questions from the Investment Community; Quiet Period

Inquiries from the Investment Community received by anyone other than an Authorized Person must be forwarded to an Authorized Spokesperson. Authorized Spokespersons will not disclose material nonpublic information in meetings, telephone calls or other communications with members of the Investment Community. Participants in such meetings or telephone calls will be limited to Authorized Spokespersons. During these meetings, calls or other communications, Authorized Spokespersons may present historical public information and immaterial background information to help members of the Investment Community understand our business, but they should never provide material nonpublic information, particularly financial projections, during any such meeting or other communication. While this policy does not prohibit exchanges of e-mail correspondence with members of the Investment Community, Authorized Spokespersons should exercise particular caution in interacting with members of the Investment Community through e-mail.

In general, TruBridge’s “quiet period” will begin on the close of trading on the fifteenth (15th) day of the last month of each fiscal quarter (March 15, June 15, September 15 and December 15) and end on the close of trading on the second full trading day following the day of the public release of TruBridge’s quarterly or year-end earnings information. TruBridge will not discuss with members of the Investment Community, or otherwise comment on, TruBridge’s financial or business performance or prospects for the current or just-concluded quarter during the quiet period. Access to Authorized Spokespersons will be restricted during the quiet period. Additionally, TruBridge should not participate in any investor conference during a quiet period without prior consultation with outside securities counsel to TruBridge.

D. Site Visits and Non-Deal Roadshow Presentations

We permit members of the Investment Community to visit our offices and other facilities on a non-discriminatory, appointments-only basis. Additionally, while Authorized Spokespersons may from time-to-time make “road show”-style presentations to members of the Investment Community, it is our policy, in the absence of a confidentiality agreement between TruBridge and such member of the Investment Community, to never disclose material nonpublic information during these meetings. Authorized Spokespersons may elect to include certain other officers or representatives in these meetings, provided that such officers or representatives are briefed on their responsibilities under this disclosure policy prior to meetings and an Authorized Spokesperson accompanies them during the meetings. Site visits by and presentations to the Investment Community should not occur during any quiet period without prior consultation with outside securities counsel to TruBridge.

E. Roadshows for Offerings

Regulation FD does not apply to statements made in connection with some registered public offerings, but it does apply to oral and written information provided in connection with private placements and other non-registered offerings. Further, the exemption is not available for registered secondary offerings, DRIP plans, employee benefit plan offerings and exercises of outstanding options, warrants or convertible securities. Accordingly, prior to any conference or roadshow associated with a non-exempt offering, TruBridge will publicly disclose through the filing of a Form 8-K or a press release or method approved by this policy, any material information that may be discussed or presented.

F. Providing “Guidance” as to Performance or Results

TruBridge will not provide guidance regarding unreported performance or results, whether direct, indirect, explicit or implied, to members of the Investment Community, except pursuant to a press release or other SEC filing. TruBridge will not provide implicit or “indirect” confirmation that TruBridge is, or remains, comfortable with analysts’ consensus on earnings, guidance or other components of TruBridge’s expected performance or results, unless simultaneous public disclosure is made. Authorized Spokespersons will not reaffirm, clarify or update any earnings guidance or other information given in TruBridge’s publicly disclosed documents. If any member of the Investment Community inquires as to the reliability of a previously, publicly disseminated projection, Authorized Spokespersons should follow the “no comment” policy.

Furthermore, the Regulation FD adopting release cautions: “[w]hen an issuer official engages in a private discussion with an analyst who is seeking guidance about earnings estimates, he or she takes on a high degree of risk under Regulation FD. If the issuer official communicates selectively to the analyst nonpublic information that TruBridge’s anticipated earnings will be higher than, lower than, or even the same as what analysts have been forecasting, the issuer likely will have violated Regulation FD. This is true whether the information about earnings is communicated expressly or through indirect ‘guidance,’ the meaning of which is apparent though implied. Similarly, an issuer cannot render material information immaterial simply by breaking it into ostensibly non-material pieces.”

G. No Responding to Market Rumors

TruBridge will not confirm or deny or otherwise discuss or comment on rumors in the marketplace (including those that appear in “chat rooms” on the Internet) regarding TruBridge or on similar matters. TruBridge’s response to inquiries regarding such matters is “no comment” or “we do not comment on rumors.”

H. Reviewing Analyst Reports and Similar Materials

TruBridge does not review or comment upon any analyst reports, financial models and similar materials published by members of the Investment Community other than for the limited purpose of ensuring the accuracy of historical data that has been publicly disclosed.

I. Forward-Looking Statements

Subject to compliance with this policy, TruBridge may, from time to time, release earnings estimates and make other forward-looking statements regarding its outlook or expectations for revenues, expenses or other future financial or business performance, strategies or expectations, or the impact of legal, regulatory or other matters on its business operations or performance. In connection with these statements, TruBridge may rely upon the safe harbor as prescribed in the Private Securities Reform Act of 1995.

TruBridge generally seeks to identify forward-looking statements and to accompany such statements with meaningful cautionary language that warns investors regarding risks that such statements could change materially. In the case of oral forward-looking statements, if the cautionary language is not included in a previously released, readily available written document, TruBridge will generally seek to include appropriate language along with such statement. In addition, such statements shall also be deemed qualified by applicable cautionary language contained in previous TruBridge SEC filings and other readily available written documents, such as a news release.

J. Monitoring Postings on TruBridge's Website

Even if information is accurate, complete and without omission, at this time, we do not consider website posting alone to constitute "public disclosure" for purposes of Regulation FD. Therefore, all financial and business information about TruBridge that is proposed to be posted on TruBridge's website must be reviewed by the General Counsel prior to posting or distribution. The General Counsel will review this information for accuracy and completeness and will also determine whether "public disclosure" of the information is required. The Chief Financial Officer/General Counsel has primary responsibility to ensure that all of TruBridge's information placed on its website is accurate, complete and up-to-date.

K. Use of Social Media

Use of social networks, including corporate blogs, employee blogs, chat boards, Facebook, LinkedIn, Twitter, YouTube and any other non-traditional means of communication, to disclose material nonpublic information is considered selective disclosure and would violate this policy unless such social media channel is considered a recognized channel of distribution. Any communication of TruBridge-related information through social media channels should be approved by the General Counsel prior to posting or distribution.

III. Policy Implementation

A. Training

The General Counsel will be responsible for providing all employees, including Authorized Spokespersons, periodic training on Regulation FD and this policy. Prior to participating in any approved speech, interview or conference, any Authorized

Spokesperson participating in such event must have received Regulation FD training. This training is designed to assist in the identification and prevention of the disclosure of material nonpublic information, as well as the procedures to follow if it is believed that a nonpublic disclosure of material information may have occurred.

B. Unintentional Selective Disclosures

If any Authorized Spokesperson becomes aware of a possible unintentional disclosure of material nonpublic information about TruBridge to a member of the Investment Community, he or she shall immediately inform outside securities counsel to TruBridge to permit public disclosure of such material nonpublic information, in accordance with Regulation FD and other applicable law.

If any other employee of TruBridge becomes aware of a possible unintentional disclosure of material nonpublic information about TruBridge to a member of the Investment Community, he or she shall immediately inform the General Counsel to permit public disclosure of such material nonpublic information, in accordance with Regulation FD and other applicable law.

C. Posting of this Policy

This policy shall be regularly disseminated and posted on TruBridge's intranet and its external website and must be strictly complied with.

D. Violation of this Policy

TruBridge's General Counsel is responsible for administering this policy and for monitoring compliance with it by TruBridge's directors and employees.

Violations of the policy may constitute grounds for disciplinary action, including dismissal. Violations of Regulation FD are subject to SEC enforcement action, which may include an administrative action seeking a cease-and-desist order, or a civil action against TruBridge or an individual seeking an injunction and/or civil money penalties. If an employee or director of TruBridge believes that a disclosure of material nonpublic information about TruBridge may have occurred, he or she must immediately notify TruBridge's General Counsel so that TruBridge can determine whether it is required to make public disclosure of the information in accordance with applicable law.

E. Further Information about Regulation FD

All inquiries regarding the provisions or procedures of this policy or Regulation FD generally should be addressed to TruBridge's General Counsel.