

VA Claims Insider



Code of Conduct



Table of Contents

BOTTOM LINE UP FRONT

SOCIAL COVENANT

MESSAGE FROM OUR CEO

OUR CORE VALUES

Our MISSION

YOUR RESPONSIBILITIES

WHAT WE EXPECT FROM ALL TEAMMATES

WE RESPECT PEOPLE

HOW WE TREAT EACH OTHER

HOW WE TREAT VETERANS

DIVERSITY, INCLUSION, AND NON-DISCRIMINATION

HEALTH AND SAFETY

WE CONDUCT BUSINESS WITH INTEGRITY

COMPLIANCE WITH LAWS AND REGULATIONS

SALES PRACTICES AND ADVERTISING

COMBATTING POTENTIAL FRAUD

CONFLICTS OF INTEREST

BEING A GOOD CORPORATE CITIZEN

SAFEGUARDING VACI ASSETS

PROTECTING OUR ASSETS

BYOD

PROTECTING OUR CONTENT AND CONFIDENTIAL

INFORMATION

PROTECTION OF CUSTOMER DATA

WORKING WITH HEALTH INFORMATION

ACCURATE BOOKS AND RECORDS

RESPONSIBLE COMMUNICATION

SPEAK UP!

ANTI RETALIATION

RESOURCES AT A GLANCE

B.L.U.F.

BOTTOM LINE UP FRONT

This code isn't just our organizational rules, it's an expression of our values and the voice of our character - both of which are fundamental to sustainable growth as a business.

Also, we have faith in our team. We realize that it's impossible to spell out every possible ethical scenario we might face. Instead, we rely on YOUR good judgment to uphold a high standard of integrity for ourselves and our company.

Therefore, we expect all VA Claims Insider ("VACI") employees, independent contractors, and our business partners to be guided by both the letter and the spirit of this Code.

However, we understand that identifying the right thing to do isn't always an easy call. If you aren't sure if something is an issue, we encourage you to raise questions or concerns to your manager, People & Culture, or Compliance.

We also understand that raising concerns can be uncomfortable, with that in mind, here is the link to our Compliance Helpline where you can raise issues anonymously should you choose.

SOCIAL COVENANT

As members of VACI we establish this Social Covenant and agree that we will behave in accordance with the VACI Code of Conduct, Employee Handbook, and Elite Service Guide.

The steps below outline what VACI staff should do if one of us does not model our ELITE Core Values. If for any reason you are uncomfortable with executing the steps below, you can always contact HR or submit a report anonymously to Legal and Compliance.

Keep in mind, it is best to approach these steps with:

- **Kindness:** “I care more about you than what you think of me.” No personal attacks allowed.
- **Humility:** “I could be wrong.”
- **An Open Mind:** Be open to understanding and forgiveness.
- **With 100% Truth:** The truth and the facts on the situation. The truth and the facts might be different.

Special note on gossip: If we talk to another member (who is not part of the problem or the solution) about something concerning a third-party team member, we have 48 hours to bring that conversation to the attention of the third-party team member and perform a six-step apology.

Step One: Go to the person one-on-one to discuss the situation.

Guidance for the first meeting.

- **Start with WADEL:** Welcome. Ask Questions. Discuss. Empower. Launch. Share something good and do an affirmation!

- Appropriate environment: Create an environment that is conducive to successful conflict resolution. A Private Zoom meeting is recommended.
- Agree to the purpose: Agree prior to sitting down together that the purpose of the meeting is to resolve conflict. This way all parties arrive prepared and no one is caught off guard.
- Determine your goal: What outcome are you seeking? A better working relationship? A better solution to the problem? Increased alternatives for successful projects? A broadened understanding of each person's needs and wants?
- Listen and ask questions: Allow each party to express their point of view. The purpose of the exchange is to make sure both parties clearly understand the viewpoint of the other. This is not the time to discuss; it is the time to ask questions, clarify points for better understanding, and truly hear the other's viewpoint.
- Agree on the difference in points of view: Often problems are simply misunderstandings. Clarification can end the need for conflict resolution. Try to focus on the issues, not the personalities of the participants.
- Explore solutions and alternatives: Try to focus on both your individual needs and wants and those of the other party.
- Agree on a solution: Agree on a plan that meets the needs of all parties and the organization. Agree on follow-up steps, as necessary, to make the plan work. Agree on what each person will do to solve the conflict.
- Write it down: It's possible that you won't need it, but should the conflict escalate, you'll want to be able to show how you've handled the situation proactively and professionally.
- ***Do what you agreed to do!***

Step Two: If the situation is not resolved, then you will bring in one or two peers who act as facilitators.

Guidance for the second meeting.

- Impartiality: The facilitators should let the parties know that they have not chosen sides.
- Listen: The facilitators should let the parties briefly summarize their point of view, without comment or interruption by the other party.
- Explore potential resolutions: Ask each participant to describe specific actions they'd like to see the other party take that would resolve the differences.
- Agree on a solution: Agree on a plan that meets the needs of all parties and the organization.
- Write it down: It's possible that you won't need it, but should the conflict escalate, you'll want to be able to show how you've handled the situation proactively and professionally.
- Without Judgment: Facilitators are not in the meeting to judge the parties, they are there to witness the facts and facilitate productive conversation.
- 100% Truth: Ensure all grievances and concerns are included in the first and second meeting. If there is a need for a third meeting, no new grievances or concerns should arise.

Step Three: If the situation is still not resolved, the parties mutually agree to bring it to Executive Leadership or People & Culture for mediation.

- The Executive Leadership Team or People & Culture will listen to both parties' points of view and confirm the final attempt at a solution that meets the needs of all parties.
- If the issue involves members of the Executive Leadership Team or People & Culture, they should bring in peers from another group.
- As appropriate, this step may include the establishment of an Employee Success Plan (ESP).
- At the conclusion of this meeting, one party will:
 - (1) Perform a six-step apology and (2) agree to change their behavior.

Step Four: If no resolution takes place, then the parties in consultation with Executive Leadership mutually agree to some sort of resolution.

Six Step Apology:

We recognize we are imperfect. If we fail to live up to our ELITE Core Values, we will take the initiative and perform a Six-Step Apology:

1. Acknowledge what we did by stating the offense. (“I did ‘it’”)
2. Admit that we are wrong. (“I was wrong”)
3. Say that we are sorry. (“I am sorry”)
4. Ask: “Will you forgive me or if and when you can, will you forgive me?” Wait for the answer.
5. Ask the person or group: “Will you hold me accountable? I give you permission to hold me accountable from now on.”
6. Ask: “Is there anything else?”

Important: VACI reserves the right to combine or skip steps depending on the facts of each situation and the nature of the offense. Some of the factors that will be considered are whether the offense is repeated despite coaching, counseling or training, the employee's work record, and the impact the conduct and performance issues have on the organization. Nothing in this policy provides any contractual rights regarding employee discipline or counseling, nor should anything in this policy be read or construed as modifying or altering the employment-at-will relationship between VACI and its employees.

MESSAGE FROM OUR CEO

Our Core Values matter. They matter to our veteran clients, our teammates, our mission partners, and the communities in which we live and work. And they matter greatly to me.

From the very beginning, we have been a movement of passionate and innovative world-changers, who serve veteran clients and each other with Heart and Hustle (H²) while pushing the boundaries of what's possible. Our ability to adapt and overcome is one of the biggest reasons why we've been so successful in a rapidly changing environment.

But another reason is because we are equally passionate about “HOW” we do our work. We act in accordance with our Core Values of **E**mpathy, **L**earning, **I**ntegrity, **T**eamwork, and **E**nthusiasm (**ELITE**) and continuously uphold the letter and spirit of the law.

We strive to do the right things and to do those things right each day. We will make sound and ethical choices with the utmost integrity that serve our veteran clients, our teammates, our mission partners, and the communities in which we live and work at an ELITE-level.

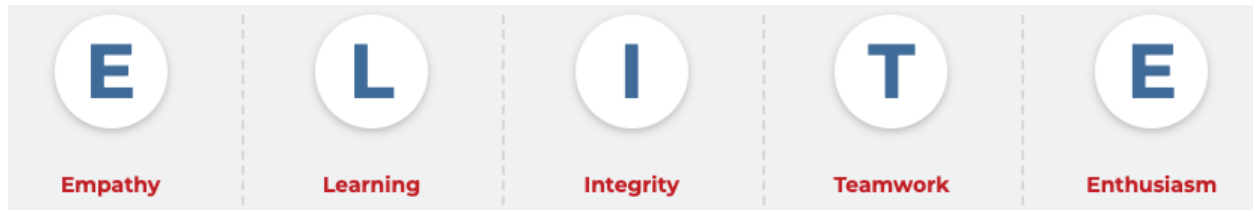
Our Code of Conduct is our “HOW-TO” guide for doing business at VA Claims Insider, and it is incumbent on all of us — all roles, all levels and everywhere we operate — to know it and live it every day. Our leaders have a special responsibility to lead with integrity and in ways that protect and enhance the reputation of our team and our company.

At VA Claims Insider, integrity is not optional. It's who we are. Thank you for following our Code, living our Core Values, and fulfilling our purpose and calling to help veterans celebrate life change.



Brian T. Reese
Founder & CEO

OUR CORE VALUES




Empathy - Empathy is at the heart of who we are. It is key to providing ELITE-Level Customer Service. We will listen, respect, relate, and seek understanding with each other and the Veterans we serve.

Learning - Learning is both a mindset and a philosophy. We must always grow and adapt, learn and apply knowledge, be resourceful, do and be more, and constantly challenge the status quo. Nobody knows it all and there is no such thing as “good enough”

Integrity - Integrity means doing the right thing, all the time, even if nobody’s looking. We will make mistakes, but we will never sacrifice our integrity. Without integrity, the rest of our core values don’t matter.

Teamwork - If we want to go far, we must go together. WE will build-up, support, and be accountable to each other in all things. We will collaborate as a team, and the best idea will win. The team is more important than our individual wants and needs.

Enthusiasm - Enthusiasm is the driving force behind our culture. It is the energy and passion that fuels everything we do. It is a contagious positive attitude. It is what makes our craft fun and exciting.



We Believe Many Veterans Are

Stuck, Frustrated, & Underrated

According to our data, 8/10 (80%) of you reading this message right now are stuck, frustrated, and underrated by the VA...which means you could be missing out on thousands of dollars of tax-free compensation and benefits each month for you and your family...

Our VISION:

Be the world's most trusted educational resource for veterans navigating the VA disability claim process.

Our PURPOSE:

Help veterans celebrate life change by securing the VA disability benefits they legally, morally, ethically, and medically deserve.

Our MISSION:

Make the VA claim process easy through the power of community, personal coaching, and best in class education because WE CARE.

CODE BOOT CAMP

BLUF: This section serves as an *introduction to the core concepts* contained in the Code of Conduct.

Our Code of Conduct (“Code”) defines the ethical behaviors that we all need to demonstrate when working for VACI. *They are mandatory.* While these are for internal use, we also publish them externally in support of transparency. The following are core concepts of the Code:

- **What is The Code:** This Code is an *expression of VACI’s values, the voice of our character, and a core element of our Compliance program.* Each section includes an explanation of each subject addressed by the Code, key considerations, and links to applicable policies. Policies at the enterprise, business, and department levels provide more specific direction and are linked where applicable.
- **Complying With the Code:** Since the Code cannot address every situation you might encounter, VACI relies on your good judgment and values to uphold the *letter, spirit, and intent* of the Code. If you are ever unsure about what to do in a particular situation, we encourage you to ask questions! We have many resources available to help you.
- **Note for Managers:** Managers play a key role in promoting *Teamwork* and culture. Therefore, managers have an additional responsibility to understand and live this Code so that you may serve as a role model and a resource to provide guidance to your team.
- **Violations of the Code:** Unethical or illegal acts can never be justified. *Period.* No employee, regardless of his or her position, is ever authorized to commit, or direct another employee or third party to commit, an unethical or illegal act. All violations of this Code of

Conduct, VACI policies, contractual obligations, or laws will be taken seriously and may result in discipline, up to and including termination of employment and possible legal action, including referral to law enforcement.

- **Reporting Potential Code or Policy Violations:** If you encounter what you believe to be a potential violation of law, regulation, this Code, or Company policy, you have the responsibility to [speak up!](#) By speaking up, you **help VACI** address issues quickly and help us identify opportunities to provide guidance on how the Code and our policies apply in specific circumstances. We're human and understand raising concerns at work can be uncomfortable. So everyone has the option of reporting concerns anonymously through the Compliance Hotline, and regardless of how you report, you are protected from retaliation whenever you speak up in good faith.

Now that you know the basics, we will delve into some specific responsibilities you have and outline how we work to our mission responsibly.

YOUR RESPONSIBILITIES

We encourage you to *review the code regularly, commit to complying* with it, and *reach out* if you have any questions or concerns.

WHAT WE EXPECT FROM ALL TEAMMATES

BLUF: We expect everyone to do their part to protect our *reputation, our company, and our customers.*

As members of the VACI team, we count on each other to build a reputation of excellence and live the *ELITE* values that drive our company. To that end, *we expect that you do the following:*

- Review this Code
- Act Ethically
- Share questions, concerns, and ideas
- Cooperate fully
- Understand laws and rules that affect you

For *all supervisors*, you have a special obligation to demonstrate high performance with high integrity. It's not enough for you to act with integrity yourself; you have a responsibility to inspire others to follow your lead.

Therefore, *we expect managers to:*

- Be a role model and build an ethical culture
- Listen and offer guidance
- Never permit retaliation
- Get advice if uncertain

Any personnel found to have violated any of VACI's policies will, subject to local laws, be disciplined, up to and including termination of employment.

WE RESPECT PEOPLE

VACI commits to maintaining an environment with an emphasis on **respect for each individual** at all levels of the organization as well as our customers.

HOW WE TREAT EACH OTHER

BLUF: At VACI we value **Teamwork** and treat each other with **respect and Empathy**.

Every VACI employee, including YOU, is entitled to work in an environment that is free of harassment, bullying, and discrimination.

Although we primarily work virtually; harassment, bullying, and discrimination can take many forms, including:

- Unwelcome remarks or gestures
- The display or circulation of offensive, derogatory, or sexually explicit materials
- Offensive or derogatory jokes or comments (explicit or by innuendo)
- Verbal or physical abuse or threats
- Inappropriate intrusions into someone's personal life
- Spreading lies or gossip
- Ostracizing behaviors

VACI values **Teamwork** and everyone at VACI should do their utmost to create a supportive work environment, where everyone has the opportunity to reach their fullest potential.

If you believe you have been bullied, harassed, discriminated against, or in any way mistreated by anyone at VACI, or by a VACI partner or vendor, we strongly encourage you to report the incident to your manager, [People & Culture](#), or anonymously with Compliance.

HOW WE TREAT VETERANS

BLUF: *ELITE level customer service* for veterans is the backbone of how we get underrated veterans what they legally, morally, ethically, and medically deserve.

To be the most trusted name in education-based resources for Veterans, we treat veterans with the same sense of *Enthusiasm* and *Teamwork* that we provide another.

Keeping in mind the following principles will help us to deliver *ELITE level service*:

- **Human Interaction:** Technology can help us deliver a better customer experience, but it can't replace the deeply human aspect of our business. At VACI we strive to build deep, life changing interactions with our clients - this means we pick up the phone to *touch base with our Veterans often!*
- **Responsiveness:** Part of being useful and honest is being responsive. We recognize relevant user feedback when we see it, and we do something about it. We take pride in responding to communications from our users, whether questions, problems, or compliments. If something is broken, *we fix it.*
- **Taking Action:** Any time you feel our users aren't being well-served, don't be bashful - let someone at VACI know about it. Continually improving our products and services takes all of us, and we're proud

that everyone at VACI champions our users and takes the initiative to step forward when the interests of our users are at stake.

There are also some basic ethical principles that VACI always abides by when working with clients:

- **VACI employees shall:**
 - Execute their duties to the best of their abilities.
 - Be truthful in their dealings with all clients.
 - Be responsive, and act with reasonable diligence and promptness.

- **VACI employees shall not:**
 - Engage in fraud, deceit, misrepresentation, or dishonesty - this includes holding oneself out as providing accredited services.
 - Mislead, threaten, coerce, or deceive any client.
 - Encourage clients to engage in acts or behavior prejudicial to the fair and orderly conduct of any proceeding.
 - Inappropriately disclose any client information.
 - Engage in any unlawful conduct, including the preparation, presentation, and prosecution of claims.

Simply put, we always treat veterans with **Empathy, Enthusiasm**, and the dignity they have well earned. For more on this, please see the **ELITE Service Guide**.

A NOTE ON VETERAN SUICIDE RECOGNITION AND ASSISTANCE

VACI is committed to protecting our veterans and has set forth a policy to recognize and direct to appropriate resources as is appropriate. If any staff member feels any veteran has indicated they intend to harm themselves or

someone else, or they detect suicidal ideation, they are to immediately notify the CEO and Executive staff.

If possible, the staff member will refer the veteran to the following national resource <https://www.veteranscrisisline.net/> which provides immediate free support for veterans. If the staff member feels the threat is imminent, the staff member should contact the appropriate emergency personnel.

Confidential Support Is a Call Away

If you're a Veteran in crisis or concerned about one, there are caring, qualified VA responders standing by to help 24 hours a day, 7 days a week.

→ Call 988 and then Press 1 ←

or

→ Text 838255 ←

The Veterans Crisis Line is a free, anonymous, confidential resource that's available to anyone, even if you're not registered with VA or enrolled in VA health care.

DIVERSITY, INCLUSION, AND NON-DISCRIMINATION

BLUF: Not only does VACI not discriminate, *we embrace diversity as an integral part of Teamwork.*

VACI actively creates and promotes a *culture that is inclusive* of all people and their unique abilities, strengths and differences, and promotes diversity as a strategic and competitive business advantage.

As such, employment at VACI is based solely upon individual merit and qualifications directly related to professional competence. We strictly prohibit unlawful discrimination or harassment on the basis of race, color, religion, veteran status, national origin, ancestry, pregnancy status, sex, gender identity or expression, age, marital status, mental or physical disability, medical condition, sexual orientation, or any other characteristics protected by law. We also make all reasonable accommodations to meet our obligations under laws protecting the rights of the disabled

HEALTH AND SAFETY

BLUF: We are committed to a *safe and healthy* work environment.

Behavior that poses risk to the health, safety, or security of VACI employees or our clients is prohibited. As such, employees are expected to *maintain their workspace in a safe manner*, free from safety hazards.

We know that the *Learning* is difficult if you don't feel safe and secure. So if you become aware of a risk to the safety, health, or security of our workplace, you should report it to your manager or People & Culture. Additionally, if you require assistance with ergonomic office equipment, please contact People & Culture. In the event of an emergency, call the

relevant emergency responder and alert your manager when it is safe to do so.

A NOTE ON DISTRACTED DRIVING

Ensuring that our staff return home safely to their families has and will always be a top priority for VACI. For that reason, VACI staff members are expected to refrain from using their phones, including hands free or bluetooth capable devices, for performing work duties while driving. Research demonstrates that hands-free devices only provide a false sense of security. All they do is allow the driver to put one more hand on the wheel, however, the cognitive distraction still exists.

Regardless of the circumstances, including slow or stopped traffic, employees are required to pull off to the side of the road and safely stop the vehicle before placing or accepting a work call. Reading or sending text messages while driving is strictly prohibited.

For your safety, and the safety of those around you while driving, please do not use your cell phone while driving.

WE CONDUCT BUSINESS WITH INTEGRITY

VACI is committed to competing *fair and square*, so please contact Compliance if you have any questions about how anything in this section applies to you.

COMPLIANCE WITH LAWS AND REGULATIONS

BLUF: We operate within the *letter and spirit* of the law. Period.

VACI is committed to full compliance with the laws, rules, and regulations of the locations in which it operates. You must comply with all applicable laws, rules and regulations when performing your duties.

Fundamental business regulations that all companies must comply with are highlighted below:

- **Anti Bribery Laws:** Like all businesses, VACI is subject to numerous laws, both U.S. and non-U.S., that prohibits bribery in virtually every kind of commercial setting. VACI's rule is very simple – ***don't bribe or accept bribes*** from anybody, anytime, for any reason.
- **Anti Money Laundering:** It is important not to become associated – however innocently – with the criminal activities of others. In particular, VACI and its employees must ensure VACI ***does not receive*** the proceeds of criminal activities, as this can amount to the criminal offense of money laundering.
- **Unfair Competition:** Competition and antitrust laws ***prohibit any form of collusion with competitors*** whether direct or through third parties. It also prohibits abuses of a dominant market position. Sharing of commercially sensitive info with a competitor should always be approved by Legal.

When you think a conflict exists between the VACI policies and an applicable law, rule or regulation, or if you have a question concerning the legality of anyone's conduct, you should consult with your manager or contact Legal & Compliance.

SALES PRACTICES AND ADVERTISING

BLUF: At VACI we have the ***best interest of Veterans at heart***, and our sales and advertising reflect that.

VACI competes on the basis of our ELITE products and services in all sales and advertising. Our communications with our customers or potential customers must have **Integrity**, or in other words, be **truthful, fair, and evidence based**. When we say something about our products and services, we must be able to **substantiate** it.

Question: *An otherwise great potential client asks whether we can submit claims, can I tell him yes?*

Answer: *No. VACI should never engage in the preparation, presentation or prosecution of VA disability claims. We should be 100% honest with our current and prospective clients – this means letting them know we do not prepare or submit claims because we are not accredited.*

COMBATTING POTENTIAL FRAUD

BLUF: We are **honest** about who we are and what we do - and what we **DO NOT** do.

We believe it is important to tell the truth about our services and capabilities and not make promises we cannot keep. We work hard to understand and meet the needs of our Veterans, while always remaining true to our values.

While it is impossible to list every potential circumstance of fraud, there are three potential scenarios that every VACI employee should be aware of:

1. The unaccredited Preparation, Presentation, or Prosecution of claims for benefits:

VACI is not an accredited organization by the Department of Veterans Affairs. As such, we never represent ourselves to be accredited or engage in accredited activities.

There is *ZERO TOLERANCE* for team members, contractors, or any other service providers who engage in any activity that has even the appearance of the preparation, presentation, or prosecution of claims. This includes, among other things, logging into a veteran's eBenefits or VA.gov account, contacting anyone on behalf of a veteran, or submitting a VA disability claim on behalf of a veteran.

If you have any doubt, however small, that a potential act may be interpreted as the preparation, presentation, or prosecution of a claim **DO. NOT. DO. IT.** Doing so will result in *immediate termination*. You should cease the activity and contact Legal & Compliance for guidance on the matter.

Question: *A client asks if I can tell them exactly what to say in his/her C&P exam(s), can I do that?*

Answer: *No. While VACI encourages clients to be vulnerable and honest throughout their VA claim journey, VACI only provides information and educational materials on the VA claim process. The facts communicated to a C&P examiner for a particular claim must always come from the client alone.*

2. The potential submission of false claims:

Not every potential customer should be our customer and we NEVER facilitate or encourage the submission of false claims. If you do not believe a customer or potential customer has a legitimate disability claim or sense other *“red flags”*, please contact your manager or Legal & Compliance for guidance.

Question: *My client's paperwork looks slightly off, what do I do?*

Answer: *Forward all questionable paperwork to Legal for review. VACI never facilitates the submission of false claims and even the smallest perception of falsity should be reviewed by Legal.*

3. Customers who do not require everything we offer:

While VACI maintains a relationship with an independent network of medical providers, VACI employees or contractors **will never pressure clients** to use a specific provider or to use all or any particular medical service. Guidance will be provided based on a client's individual circumstances and the experience of the Coach, but **decisions regarding medical evaluations and service shall always remain with the client**, and the choice on whether or who to use for a particular service will not impact VACI's commitment to providing **ELITE** service to every client. Once the client has selected their medical provider, the coach shall respect the independence of the medical evaluation and never contact or attempt to contact the medical provider of the client.

Question: *My client wants me to contact an independent medical provider to discuss his/her claim, what do I do?*

Answer: *Forward the issue to your SVC and Legal. An AA, VC, or SVC should never contact an independent medical provider for any reason. VACI understands and respects the importance of the Nexus Letter (Independent Medical Opinion) process from its network of independent providers and never influences or attempts to influence any particular*

outcome. All decisions regarding medical evidence for VACI veteran clients rests solely with the independent medical providers.

If you have any questions on the above, employees must seek advice from Legal & Compliance.

CONFLICTS OF INTEREST

BLUF: Conflicts of interest can *harm our reputation, expose us to legal actions, and affect our ability to retain or seek new business*. Conflicts must be disclosed on the VACI Conflict of Interest Disclosure Form. Most conflicts can be managed, but only if disclosed!

A conflict of interest arises when your personal interests interfere with your VACI job duties or ability to make objective decisions on behalf of our company. This is often described as *“competing loyalties”*.

We also work to avoid even the *appearance* of a conflict. A conflict of interest may unconsciously influence even the most ethical person and the mere appearance of a conflict may cause someone’s actions or integrity to be questioned

Below, we provide guidance in some of the most frequent areas in which conflicts arise:

- **Business opportunities:** Business opportunities discovered through your work here belong first to VACI, except as otherwise agreed to by VACI. Additionally, VACI employees and agents should not compete with any activity of VACI, directly or indirectly, or use the knowledge gained here to help anyone else compete with VACI.

- **Friends and relatives; co-worker relationships:** Certain relationships within VACI may compromise or be seen to compromise your ability to perform your job responsibilities, may create uncomfortable or conflicted positions, and may raise issues of fairness, favoritism, or harassment. Therefore, be mindful of how your relationships within VACI could impact or be perceived by others. Romantic or familial relationships are not permitted between VACI employees where one individual is in a position to exercise authority or supervision over the other.
- **Procurement Conflicts:** You must not participate in any decisions or related activities for buying and selling goods or services for VACI that may directly or indirectly benefit yourself, a friend, or anyone with whom you share a significant relationship. Any VACI employees and agents who find themselves in such situations should remove / recuse themselves from the proceedings.
- **Outside Employment:** VACI does not prohibit employees from engaging in certain types of outside employment—such as part time work—but to make sure that potential conflicts are addressed, always disclose and discuss employment with your manager and P&C. VACI employees must ensure that their outside work does not hinder their ability to perform their duties with VACI. However, VACI employees are **not permitted** to be employed by a competitor or business partner in any capacity.
- **Gifts and Hospitality:** Accepting gifts, entertainment, and other business courtesies from a VACI competitor or business partner can create the appearance of a conflict of interest, especially if the value of the item is significant. Generally, acceptance of inexpensive “token” non-cash gifts is permissible. In addition, infrequent and moderate business meals and entertainment with clients can be appropriate. Contact Legal & Compliance before accepting any gift or courtesy beyond a nominal or token amount.

- **Personal investments:** Personal investments in companies that compete with VACI, directly or indirectly, are not allowed unless they consist of small amounts of stock (less than 1% of outstanding shares) in publicly traded companies or incidental as part of a diversified mutual or similar fund.
- **Veteran Organization Affiliations:** Affiliation in an employment or volunteer capacity with any accredited Veteran Organizations, including VSO's, accredited agents, or accredited attorneys.

In each of these situations, the rule is the same – if you are considering entering into a business situation that creates a conflict of interest, don't. If you are in a business situation that may create a conflict of interest, or the appearance of a conflict of interest, disclose the situation for Compliance review. It's also important to understand that as circumstances change, a situation that previously didn't present a conflict of interest may present one.

Finally, please know there is no harm in disclosing a potential conflict, and most conflicts can be managed, but serious professional harm could result from concealing one.

FAIR LABOR

Every worker has a right to compensation for a regular work week that is sufficient to meet the workers' basic needs and provide some discretionary income. VACI will always pay at least the minimum wage or contracted rate, whichever is higher, comply with all legal requirements on wages, and provide any fringe benefits required by law or contract.

Additionally, VACI is committed to ensuring that all work performed for VACI is compensated correctly. If you are a non-exempt (hourly) employee, you must accurately record your time worked as required by law or policy – whether scheduled or unscheduled, regular or over

time, authorized or unauthorized. All overtime must be consensual; meaning pre-approved by management and agreed to by the non-exempt employee.

Managers will never ask an hourly employee to work “off-the clock” or ask an associate not to record their hours of work accurately.

When recording your time, you should never:

- Work without pay, including not recording hours for work done.
- Fail to report overtime, whether approved or unapproved.
- Record time for a fellow employee.
- Inaccurately record time worked, including attestations for meal and rest breaks.
- Remove correctly recorded hours from a time record.

Any questions or concerns regarding this section should be directed to People & Culture.

BEING A GOOD CORPORATE CITIZEN

BLUF: There is both a ***business and a moral case*** for ensuring that good corporate citizenship is upheld across VACI’s operations and value chain.

Being a good corporate citizen refers to our responsibility toward our ***veteran population and the world at large***. Our company’s existence is not lonely. It’s part of a bigger system of people, values, other organizations and nature. The social responsibility of a business is to give back and support the community that enables our existence through the following methods:

- **Volunteerism:** Many of the biggest issues facing veterans cannot be tackled by VACI alone. For this reason, we encourage and support involvement in the veteran community that supports us! This includes supporting volunteering for veterans organizations across the country. We encourage all VACI employees to take four days of PTO each year to volunteer at an organization that supports veterans.
- **Charitable Giving:** VACI also aims to create a positive impact in our veteran community through charitable giving. We encourage charitable giving but at the same time we need to protect the business from unscrupulous appeals and possible misappropriation of funds. As such, all charitable donations by VACI require Compliance approval.
- **Our Business Impact:** We understand that corporate social responsibility extends to our entire supply chain. This encompasses not just the services we supply, but also the human rights, ethics, and social practices of our suppliers and business partners. We build partnerships with like minded organizations and avoid businesses who utilize forced labor, child labor, or engage in irresponsible environmental practices.

If you have any ideas of how we can support our veteran community or have concerns about our supply chain, please contact Compliance.

SAFEGUARDING VACI ASSETS

BLUF: VACI's ability to succeed as an organization is dependent on how we work together to **conserve company resources and protect company assets** and information.

PROTECTING OUR ASSETS

BLUF: VACI expects its employees to *help it safeguard* all computer equipment and data against intentional malicious acts by individuals inside or outside the company.

We all have a responsibility to *protect company property whether it be physical or intellectual*. Employees must take care that their use of VACI electronic systems and resources does not expose the company to the risk of security or confidentiality breaches, legal claims, sabotage, viruses, or similar problems. The following are some best practices:

- **Only use software that has been properly licensed.** The copying or use of unlicensed or “pirated” software on VACI’s computers or other equipment is strictly prohibited.
- **Respect and acknowledge the copyright and intellectual property of others**, obtaining the appropriate consent or permission to use the intellectual property in our products, services, and activities.
- **Exercise good judgment** regarding appropriate use of information and network resources.

If you have any questions or concerns on this section, please contact Technology or Compliance.

BYOD

BLUF: All company *policies apply to your device* during work related activities and when using VACI systems.

VACI is a Bring Your Own Device (BYOD) company where use of personal electronic devices (laptops, phones, tablets, etc.) is allowed. However, all VACI policies in effect pertaining to harassment, discrimination, retaliation, proprietary information, trade secrets, confidential information and ethics apply to the use of personal devices for and during work-related activities.

To ensure the security of proprietary company information and technology, employees are required to:

- Comply with VACI requirements regarding the installation of antivirus software, additional encryption software and “remote-wipe” software by the IT department.
- All VACI-related information and applications must be stored in a way that is password-protected and secure.
- Cloud-based applications or backup software programs may not be used unless authorized specifically by management, as these programs may allow company-related information to be transferred to unsecured parties.
- Employees may not use unsecured internet connections to upload or download company information.

Privacy

When personal devices are being used for work purposes, employees should not expect any privacy except that which is required by law. VACI has the right, at any time, to monitor any communications that utilize the VACI networks in any way, including data, voicemail, telephone logs, Internet use, network traffic, etc., to determine proper use. VACI reserves the right to review, retain, monitor, or release personal or company-related data on personal devices to government agencies or third parties during an investigation or litigation. Finally, no employee may knowingly disable, tamper with, alter, or destroy any network software or system identified as a monitoring application.

Security

Employees are expected to reasonably protect personal devices used for work-related purposes from loss, damage and theft. If a personal device is lost or stolen, you should notify your manager immediately. VACI may choose to remotely wipe company-related data. VACI is not responsible for the loss or damage of other data and applications on the device when it is remotely wiped. VACI bears no responsibility for replacing or repairing personal devices that are damaged even if that damage occurs during working hours.

The employee may be asked to produce any personal device used for work purposes at any time for inspection or review of compliance with policy. When an employee resigns or is terminated, the employee must cooperate in allowing access to the personal device so that the Technology Department can remove all company data.

PROTECTING OUR CONTENT AND CONFIDENTIAL INFORMATION

BLUF: The release of *confidential information* can cause us to lose a competitive advantage, cause reputational harm, and damage our relationships with customers and others.

Confidential information can include, but is not limited to, intellectual property, financial information, content, internal emails, business decisions and so on. Each of us must be **vigilant and safeguard our confidential information** as well as confidential information that is entrusted to us by others.

We all have a responsibility to **protect company content**, to make sure it is stored and distributed in a manner that doesn't unnecessarily expose us to unauthorized access and distribution. Our content includes our website,

products, services, courses, portals, books, eBooks, digital assets, videos, manuals, assessments, images, and any other electronic files.

Unauthorized use of VACI's content (often referred to as “piracy”) is illegal, hurts us by replacing sales of genuine products, and erodes the trust our customers place in us.

Question: *I was contacted by a former client asking for some of their paperwork and our internal information, what should I do?*

Answer: *This request has the potential to cause a breach of PHI, a violation of HIPAA, and a loss of VACI intellectual property. Therefore, it should be forwarded to Technology for review to ensure the request is from a legitimate source.*

Question: *I was contacted by a vendor asking to route payment to a different account than was originally agreed to, what should I do?*

Answer: *Even if you are familiar with the vendor, this could be a phishing attempt to reroute payment to an illegitimate source. You should forward the email to Technology for review.*

If you have any questions on this section contact Technology.

PROTECTION OF CUSTOMER DATA

BLUF: Always remember that ***we are asking users to trust us*** with their personal information. Preserving that trust requires that each of us respect and protect the privacy and security of that information.

At VACI we respect and protect the rights, freedoms, and dignity of all individuals who entrust us with their **Personal Information (“PI”)**. This

includes our customers, website users, and third parties. Protecting this information is more than a legal requirement—***it is a matter of trust.***

As a company in a digitally connected environment, we respect all applicable laws relating to data privacy, including the GDPR and the CCPA. Personal information is any data that, by itself, or in combination with other information, identifies or links to an individual. Some PI is particularly sensitive and requires an ***extra degree of care.*** This includes but is not limited to:

- Health, medical and biometric information
- National identity numbers
- Credit card or bank account numbers
- Age, race, ethnicity, sexual orientation, and certain non-professional affiliations, memberships and preferences
- Information which may lead to or cause damage to a person's reputation

Our security governance ***strictly limits access*** to and use of users' personal information, and requires that each of us take measures to protect user data from unauthorized access. To that end, when collecting, using, or storing PI, employees must:

- Only collect data that is adequate and relevant
- Use data solely for the purpose for which it is collected
- Be transparent with individuals in relation to how their PI is used
- Obtain consent from individuals in accordance with local law
- Keep PI up to date and correct inaccurate data when requested
- Keep PI confidential and secure
- Act responsibly and ethically, upholding VACI's core values, always considering the risk to individuals in using their PI and take steps to mitigate such risk

If in doubt, employees must seek advice from Legal & Compliance.

WORKING WITH HEALTH INFORMATION

BLUF: We all must use health information only for its *intended purpose* and *safeguard that info* from misuse. All employees with access to sensitive health information will undergo regularly scheduled HIPAA training.

At VACI we recognize that part of our day-to-day responsibilities may include access to and use of health information and that the use or disclosure of such information is governed by laws, regulations, customer contracts, and VACI policies.

We also recognize that *maintaining the privacy and security* of the health information that we collect, use, or that is entrusted to our care is an essential component of VACI's mission and its commitment to *Integrity* and ethical behavior.

When accessing or using health information in your job, *take care of it!* Only access information that is required for your job, only use the minimum amount necessary, and do so in a secure manner appropriate to the sensitivity of the information and applicable laws or policies.

If you are unsure how to handle health information appropriately, or suspect the inappropriate access, use, or disclosure of health information, *please contact Compliance*.

ACCURATE BOOKS AND RECORDS

BLUF: Each person at VACI– *not just those in Finance* – has a role in making sure that money is appropriately spent, our records are complete and accurate, and internal controls are honored.

Financial integrity and fiscal responsibility are core aspects of corporate professionalism. Employees with a role in the preparation of our financial

and regulatory disclosures have a special responsibility in this area, but **all of us contribute** to the process of recording business results and maintaining documents.

To make sure that we get this right, VACI maintains a system of internal controls to reinforce our compliance with legal, accounting, tax, and other regulatory requirements. What follows are some **core concepts** that lie at the foundation of financial integrity and fiscal responsibility.

- **Spending Company Money:** When you submit an expense for reimbursement or spend money on VACI's behalf, make sure that the cost is reasonable, directly related to company business, and supported by appropriate documentation.
- **Signing a Contract:** Signing a contract on behalf of VACI is a very big deal. Never sign any contract on behalf of VACI unless you are specifically authorized to do so.
- **Recording Transactions:** Record all transactions accurately, completely, and promptly.
- **Reporting Financial or Accounting Irregularities:** VACI strictly forbids any falsification of any record or account, including time reports, expense accounts, and any other VACI records. If you suspect any financial irregularities, no matter how small, please report them to Finance or Legal & Compliance.
- **Hiring Third Parties:** We should always strive for the best possible deal for VACI. This almost always requires that you solicit competing bids to make sure that VACI is getting the best offer. In general, soliciting at least three bids is a best practice.
- **Retaining Records:** It's critical that we keep records for an appropriate length of time and there are varying requirements for

different types of records. If you have a question regarding the correct length of time to retain a record, contact Legal & Compliance.

Our records provide valuable information for the business and evidence of our actions, decisions and obligations. Any failure to record transactions accurately, or falsifying or creating misleading information, or influencing others to do so could constitute fraud and result in penalties for employees or VACI. If you have any questions, do not hesitate to contact Finance or Legal.

RESPONSIBLE COMMUNICATION

BLUF: Only *authorized persons* should speak on behalf of VACI.

It's essential that our communications are clear, consistent, and accurate. Only individuals with specific authorisation and training may communicate about VACI with the media, investment communities, or respond to legal inquiries. **If you receive inquiries from the media, investment communities, or government regulators please contact Compliance for guidance and do not respond.**

The following is guidance on circumstances in which employees may inadvertently appear to have authority to represent VACI:

- **Social Media:** When using social media, *never give the impression that you are speaking on behalf of VACI* unless you are authorized to do so. This means that the workplace communications and the VACI logo should never appear in your social media without prior approval. Additionally, you should disclose that you are an employee and make it clear that your views are personal and yours alone.
- **Political Activities:** VACI does not support or contribute to political parties or candidates. Personal political activities must be conducted

on your own time and using your own resources. You must not promote any political or personal views or beliefs (including by posting or distributing notices or other materials), and you may not indicate or suggest that you speak for VACI or that the company supports your views.

- **Personal Activities:** VACI understands the need for balance between work, personal and family life. However, always keep in mind that you are a representative of VACI and your conduct can affect perceptions of the VACI brand.

If you have any questions on this section, please contact People & Culture.

SPEAK UP!

BLUF: If you see something, say something!

VACI core values require compliance with the law, as well ***ELITE*** and ethical conduct. If you feel these standards have not been met, have questions about policies, or have any other questions, please ask for guidance or voice your concerns by contacting any of the following:

- Your manager
- [Legal & Compliance](#)
- [People & Culture](#)

The [Compliance Confidential Report Intake Form](#) is an online form that allows you to anonymously raise concerns about an actual or potential breach of the Code of Conduct or to ask questions. The form is available on the VACI Hub under the L&C dropdown menu.

Your concerns will be taken seriously and all information provided will be treated in a confidential manner.

ANTI RETALIATION

VACI does not tolerate unlawful retaliation in any kind, for any reason. Retaliation of any sort in response to a report is completely unacceptable and undermines the purpose of our core values and Code of Conduct. Moreover, it is illegal and exposes VACI to liability.

If you think that you or someone you know has experienced retaliation as a result of reporting a breach of the Code or for participating in an investigation, contact Legal & Compliance.

RESOURCES AT A GLANCE

<p>Your Manager</p>	<p>Often your first contact for workplace issues. If you are not comfortable contacting your manager for any reason, please use one of the other resources listed.</p>
<p>People & Culture Email: hr@vaclaimsinsider.com</p>	<p>Your contact for:</p> <ul style="list-style-type: none"> • Employee relations issues, • Compensation, • Employee Benefit Concerns.
<p>Compliance Email: Compliance@vaclaimsinsider.com <i>or</i> Confidential Compliance Intake Form</p>	<p>Your contact for questions about or advice on interpreting and reporting violations of:</p> <ul style="list-style-type: none"> • The Code of Conduct, • Company policies, • Laws or regulations.
<p>Legal Email: legal@vaclaimsinsider.com</p>	<p>Your contact for advice on legal issues associated with:</p> <ul style="list-style-type: none"> • Interactions with government officials or entities, • Guidance on laws and regulations, • Employee or third party contracts.

Policy Name	Code of Conduct
Published	8/19/2022
Revised	8/12/2022
Executive Owner	Brian Reese, CEO
Experience Owner	Steven Dansky, Director of Compliance sdansky@vaclaimsinsider.com