

DOING WHAT'S RIGHT



Our Code of Conduct and Ethics

DOING WHAT'S RIGHT



Dear Employees and Caregivers,

Caring. It's at the core of who we are and what we do. As caregivers to the most frail in our society, the Curo focus is on quality care, effective use of resources and compliance with all applicable laws and ethical standards – the Curo Code of Conduct and Ethics (“the Code”) is here to support our efforts as we build and maintain the Curo culture of caring.

I rely on you and every member of Curo to act with integrity in both words and deeds. Please take the time to read our Code and use it to guide your everyday conduct on the job. Ask questions when you are unsure of the right thing to do, and speak up about any activity by anyone that compromises our company's commitment to the highest professional and ethical standards.

Remember, you are Curo. In everything you do and everywhere you operate, make sure you are *“Doing What's Right.”*

Sincerely,

A handwritten signature in blue ink that reads 'Larry Graham'.

Larry Graham, CEO

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Our Mission

The mission of Curo Health Services is to honor life and offer compassion to individuals and their families when facing a life-limiting illness.

Our Core Values

- © Choose the right attitude, message and priority.
- © Be accountable for all thoughts, words and actions.
- © Embrace and drive change. Pursue growth and learning.
- © Demonstrate humility and servant leadership.
- © Select great people, treat them with respect, help them and communicate effectively.
- © Celebrate small successes on our journey to greater success.
- © We are here for our patients and each other. Be passionate, about what we do. Be innovative and efficient in everything we do.

DOING WHAT'S RIGHT



Our Commitment to Ethical and Legal Conduct

The Curo Compliance Program

Our *Doing What's Right* program represents an organization-wide effort to prevent fraud, waste and abuse, promote ethical conduct and ensure quality patient care everywhere we operate. The program is designed to provide you with the information you need to make good decisions and maintain the trust of those we serve through a network of compliance initiatives.

Written Policies

Our Code, our Employee Handbook and other policies and procedures provide detailed guidance on how to conduct business with integrity.

Compliance and Legal Professionals

Curo has dedicated personnel available to assist you with any challenges you may face on the job. We are your resource when you need us.

Training

We provide annual Code training and position-based training to give you the tools for ethical decision-making.

Messaging

Posters, brochures and other communications reinforce the commitment we make to an ethical Curo and outline each employee's responsibilities.

Enforcement of Standards

The way we do business is as important as the business we do – we take action to preserve and protect our mission, our values and our commitment to caring.

Communication

Our Open Door Policy and the Curo Integrity Helpline give you the channels you need to speak up about unethical or illegal conduct.

The Curo Code of Conduct and Ethics

Our Code is the embodiment of our values and our dedication to integrity in the delivery of our services. It lays out the principles under which we operate and helps us put policy into practice on the job every day. It also sets forth the guidelines needed to support compliance with all federal healthcare program requirements and the provision of high-quality patient care.

The Code applies to all employees, caretakers, officers and directors of Curo and its subsidiaries and is administered by the Curo General Counsel and Chief Compliance Officer who report directly to the Board of Directors. Each of us has a responsibility to read, understand and comply with the Code and to ask questions about anything in the Code that is unclear.

Unfortunately, the Code can't address every possible situation you may face on the job. If you are ever unsure of how to handle a particular situation, Curo offers many resources to help you. We want you to have all the information you need to do your work fairly, honestly and ethically.

Violations of Our Code or Company Policies

Our Code represents our commitment to *Doing What's Right*. By working for Curo, you are agreeing to uphold this commitment. Do your part to understand the requirements of the Code and the policies and practices that apply to your job and comply with them at all times. You also have a responsibility for taking action when you see or suspect unlawful, unethical or fraudulent activity, questionable accounting or auditing matters or any other violation of our Code.

Violating our Code breaks the trust that we have built within our company and the communities in which we operate. Anyone who violates our Code will be subject to disciplinary action which may include termination and, in some cases, legal action.

DOING WHAT'S RIGHT



We Preserve a Welcoming Workplace

We want to provide a workplace that promotes innovation and achievement and ensure that every employee is treated with respect and dignity.

Equal Opportunity

We provide equal employment opportunity to all qualified persons according to the law, regardless of their race, color, creed, religion, national origin, citizenship, age, gender, genetic information, disability or veteran status. Our commitment to fairness extends to all aspects of employment including (but not limited to): recruitment, hiring and firing; opportunities for growth, development and promotions; selection of employees for training programs; and determination of compensation, benefits, hours of work, and other conditions of employment.

"I believe I was passed up for a promotion because of my age. What should I do?"

We require that employment decisions be made without regard to age of the candidate. If you feel you were treated unfairly, contact the Human Resources Department, the Chief Compliance Officer or the Curo Integrity Helpline.

Discrimination

Diversity is valued at Curo. We expect every employee to respect the people and the cultures with which we work, to act responsibly and to treat co-workers with dignity.

Harassment

Harassment can take many forms, all of which are unacceptable at Curo. Prohibited conduct includes jokes, threats or other unwelcome actions about a person's race, color, creed, national origin, age, gender, disability or veteran status. Unwelcome sexual advances, requests for sexual favors or other unwelcome verbal, nonverbal or physical contact or the display of sexually suggestive material are also unacceptable and will not be tolerated at Curo.

Retaliation

We encourage open and honest communication. Any employee who, in good faith, raises a concern or reports misconduct is complying with our Code. Taking action (whether a formal adverse employment action or engaging in intimidation, harassment or other tactics) against someone who brings an issue forward is strictly forbidden. As a company, we take reports of retaliation seriously – anyone found to have retaliated against another individual will face disciplinary action and possible dismissal.

“My supervisor told me to do something that violates a company policy. What should I do?”

Don't do it. No one, including your supervisor, is authorized to make you do something that would violate our Code or company policies. Share your concern with a vice president, the Human Resources Department, the Chief Compliance Officer or contact the Curo Integrity Helpline. You'll have the assurance of knowing that we are looking into the situation and that retaliation by your supervisor or others will not be tolerated.

Accommodation for Individuals with Disabilities

We are committed to working with and providing reasonable accommodations for employees and applicants with disabilities. Employees with disabilities should let the Human Resources Department know as soon as possible if they need reasonable accommodation.

Keeping Our Workplace and Our Patients Safe

We are committed to providing a safe and healthy working environment. Remember, safety and security are a team effort – we require every employee to comply with applicable laws and Curo's policies as they relate to ensuring the health, safety and security of our workforce. You should only undertake work for which you are trained, work in accordance with good safety practices and report any unsafe conditions or injuries promptly.

We are also committed to a non-violent working environment, free of threats, intimidation and physical harm. Any acts or threats of violence towards another person or Curo's property should be reported immediately. The unauthorized possession and/or use of weapons by any employee while at work, on property belonging to Curo or while on business for our company is also strictly prohibited.

Keeping Our Workplace and Our Patients Safe continued

"I overheard an employee threaten a co-worker. I'm not sure if the person who was threatened reported the incident. What should I do?"

You have a responsibility to act if you see, hear or suspect a threat of violence. Report the incident immediately.

We recognize that the use of alcohol, illegal drugs, and/or other unauthorized substances can create serious health and safety risks and have implemented a drug-free workplace policy. You are not permitted to use, possess or be under the influence of alcoholic beverages, illegal drugs or other unauthorized substances while conducting business on behalf of Curo.

We Preserve a Welcoming Workplace

You're *Doing What's Right* if you:

- *Do your part to make Curo a great place to work.*
- *Always treat others with respect and dignity.*
- *Speak up if you know or suspect that others are being harassed or discriminated against.*
- *Know and abide with our organization's policies regarding safe working practices.*
- *Promptly report any unsafe conditions, violations of the drug-free workplace policy or violent acts or threats.*



We Follow the Law and Industry Regulations

We are committed to conducting business in full compliance with all applicable laws and regulations and in accordance with the highest ethical principles. We rely on our employees to do their part to ensure we meet our legal and ethical obligations.

Relationships with Patients, Customers and Vendors

Trust – it lies at the core of all our relationships. Our patients trust us to provide quality care and treat them with compassion and respect. Our customers trust us to deliver on our promises, to do what we say we're going to do. And our vendors trust us to be good business partners, to conduct business honestly, fairly and with integrity. Compliance with laws and industry regulations helps us maintain the trust we've built with all of our stakeholders.

Fraud, Waste and Abuse

Acts of fraud, waste and abuse conflict with our commitment to quality service and could be illegal. Government program integrity efforts target various causes of improper payments ranging from mistakes and errors to inefficiencies to intentional rule-bending and deception.

Curo takes a zero-tolerance approach to all acts of fraud, waste and abuse and complies with the highest standards of business conduct no matter who we are working with or where we do business. We comply fully with all applicable laws and industry regulations, including the following:

- **The False Claims Act (FCA)** and related state laws make it illegal to submit or cause the submission of false or fraudulent claims, records or statements to obtain payment from the government. Violations of the FCA include acts such as: billing for services that weren't actually provided or for services that weren't medically necessary, falsifying cost reports, assigning an improper code in order to get reimbursement (or a higher reimbursement) or giving (or receiving) anything of value in exchange for improper referrals or generation of federal healthcare program business. Production of complete and accurate documentation is critical for regulatory compliance and patient care. We expect employees to operate with honesty and transparency at all times. For more information, see Curo's policy on the FCA.
- **The Anti-Kickback Statute (AKS)** prohibits us from knowingly and willfully asking, receiving or paying something of value in exchange for a referral or in return for buying a particular service or supply. A violation of the AKS can result in both civil and criminal penalties. It includes conduct such as making payments to or from referral sources that are greater than fair market value or giving to or accepting from referral sources free or discounted supplies. It can also include situations where payment to vendors, suppliers or referral sources are based on the volume of business rather than the value of the service provided. Referrals for healthcare services and plans of care must be based on medical need of the patient and not financial or other incentives to individuals or groups. Employees are expected to use good judgment in conducting business – if an action feels dishonest, it probably is. For more information, see Curo's policy on the AKS.

Fraud, Waste and Abuse continued

- **The Stark Law** prohibits doctors from making referrals of Medicare patients to a particular person or facility if the doctor or a member of his/her family has a financial connection to that person or facility, unless the arrangement fits into a specified exception to the law. "Referral," under the Stark Law, can relate to a product or service, a consultation with another doctor, a test or procedure or a plan of care. There is an exception that covers hospice services, but not for home health services, certain therapies, medical equipment and outpatient drugs. To ensure compliance with the Stark Law, it's critical that our employees understand and comply with Curo's policies and procedures regarding physician interactions and ask questions if they are ever unsure of the proper course of action. For more information, see Curo's policy on the Stark Law.
- **The Civil Monetary Penalties Law (CMP)** prohibits any person from offering or transferring anything of value to any individual eligible for benefits under Medicare or Medicaid that the person knows or should know will influence that individual to order or receive service from a particular provider. Accordingly, Curo does not give free or discounted items or services to a patient in order to encourage the patient to choose us as a service provider.

- **Screen of Excluded Individuals**, as defined by the U.S. Health and Human Services Office of the Inspector General, requires that Curo screen current and prospective employees against the HHS-OIG list of excluded parties and General Service Administration (GSA) list of parties who have been debarred from participation in federal contracts. We will not employ and will not pay for any items or services, furnished, ordered or prescribed by, excluded individuals or entities. For more information, see Curo's policy on Screen of Excluded Individuals.

All of these laws emphasize the fact that we operate in a highly regulated industry with a set of federal and state standards that are far reaching and complex. Violations of laws and regulations are serious for Curo and for our employees and can result in civil, criminal, administrative and monetary penalties, exclusion from participation in Medicare and Medicaid, loss of license – even imprisonment. In order to remain compliant with the law and preserve our high ethical standards, you have an obligation to speak up about any known or suspected violations. Regulatory compliance is a highly complex area and any questions or concerns should be directed to the General Counsel or the Curo Integrity Helpline.

HIPAA/HITECH Acts

The Health Insurance Portability and Accountability Act (HIPAA) and the Health Information Technology for Economic and Clinical Health (HITECH) Act are designed to protect the confidentiality of protected health information (PHI) and prevent misuse of health information technology.

PHI is identifiable health information about a patient, resident or employee. It can include information such as a name, telephone number, birth date, medical record number, social security number – any data that could be used to identify a person. PHI may be information listed on paper documents, stored in electronic devices or communicated verbally on the phone.

We have measures in place to comply with HIPAA/HITECH and protect PHI that is entrusted to us (see Protecting Patient Information). We take HIPAA violations seriously and are committed to moving swiftly and deliberately in the event of any improper disclosure of PHI. Anyone who sees or suspects a breach at Curo is required to share his or her concern as promptly as possible. For more information, see Curo's policy on HIPAA/HITECH.

“I was making some copies and noticed some patient information in the trash. What should I do?”

Remove the information from the trash and report the incident to your supervisor. HIPAA requires that PHI – unless it's unreadable and indecipherable – must be disposed of in a secure manner, such as by shredding or disposing it in a secure area.

Conditions of Participation

In order to participate in Medicare, home health agencies and hospices must meet specific federal requirements called Conditions of Participation. These conditions cover required certifications, patient rights issues, treatment protocols, nursing, physician and drug-dispensing services, personnel requirements, the organization and administration of services and the management of records. We have a duty and an obligation to know and meet these conditions. For more information, see Curo's policy on Conditions of Participation.

Responding to Government Inquiries

Curo cooperates fully with requests for information by federal, state and local government officials, as required by the law, taking care to never disclose any information protected by privacy laws. If you receive an inquiry from a government official contact our General Counsel for assistance in addressing the inquiry promptly, accurately and completely.

We Follow the Law and Industry Regulations

You're *Doing What's Right* if you:

- *Nurture positive relationships with our patients, customers and vendors.*
- *Honor Curo's commitment to prevent fraud, waste and abuse.*
- *Comply with all laws and regulations that apply to our industry and our company.*
- *Are sensitive to – and protect – PHI.*
- *Follow requirements related to Medicare's Conditions of Participation.*
- *Work with our General Counsel to cooperate with government requests for information, as required by law.*

DOING WHAT'S RIGHT



We Safeguard Our Resources

Each of us has a responsibility to protect our company and our reputation. We expect employees to use company resources wisely, apply sound judgment in their decision making and be good stewards of all Curo assets.

Confidentiality

Confidential information is verbal, written or electronic information about Curo, fellow employees, patients, customers, suppliers or other third parties that employees may be exposed to as part of their job. Each of us has a responsibility to use confidential information only as needed to do our job (never for personal benefit) and never share it with people or entities that do not have a need for it in doing their job.

Examples of confidential information include PHI, pricing formulas, business strategies, marketing plans, customer lists and nonpublic financial information about Curo. Employees should never discuss confidential information with anyone outside of Curo (including family and friends) or in public places such as planes, trains, elevators and restaurants.

Your responsibility to protect confidential information even applies to work you may have done **before** coming to Curo and to any work you do if you leave. You may not share any confidential information from former, current or future employers. Disclosing confidential information can seriously damage Curo's reputation and put current – and future – business opportunities at risk. It can also expose you and the company to legal penalties.

"I have a friend who is starting a new business and has asked me for a list of patients who might be interested in her services. What should I do?"

Don't provide the list. Patient lists and names are confidential and should never be shared with anyone outside of Curo (or with anyone inside of Curo who does not need them to perform their job).

Protecting Patient Information

Due to the nature of our business, we have access to the personal and private information of many people, information that is protected by laws and regulations and that, if shared, could result in serious consequences for both Curo and our employees.

We are good stewards of patient information and understand the importance of protecting PHI. As part of our commitment to protecting patient information we comply with the Privacy and Security Rules of HIPAA/HITECH and undertake best-practice security measures that include:

- Administrative safeguards (including processes for preventing, detecting, containing and correcting security violations)
- Physical safeguards (including restrictions on access to facilities and work stations and processes for the proper disposal of data and hardware)
- Technical safeguards (including password protection and data encryption)
- Organizational requirements (including agreements with business associates about their obligation to maintain safeguards)

- Documentation requirements (including written policies and procedures and supporting documentation for all of our security measures)

A conscientious employee is Curo's best defense against breaches of data privacy. You are required to know, understand and comply with policies designed to protect patient information and to report violations.

Protecting Our Physical, Electronic and Information Assets

All employees have a responsibility to use Curo's physical, technology and information assets with care. Our assets include things like office supplies and equipment, phones, copiers and fax machines as well as hardware, software and information systems (including computer files, e-mail and Internet access).

Much of our business is conducted through electronic means. To safeguard our assets, you have a responsibility to:

- Use extreme caution when opening e-mail attachments from unknown or suspicious senders.
- Never install unauthorized software, applications, hardware or storage devices on your company-issued computer – use only software that is legally licensed to Curo.
- Protect your passwords, never sharing them with others in or outside of the company.

You should be aware that any information you create, send, receive, download or store on our systems belongs to Curo, and we reserve the right to review and monitor its use at any time without notifying you, to the extent permitted by law.

Occasional, personal use of Curo physical and electronic assets is permitted, but we count on you to do so in moderation, mindful of the fact that these assets are intended to support Curo's business objectives.

"I'm going on vacation next week, and my co-worker asked if I would leave her my computer password before I go so she can respond to any e-mails that come in. What should I do?"

Don't share your password – it is private and should remain so. Make arrangements to forward your e-mail and any documents your co-worker may need to access, in advance of your trip.

Communicating about Curo

Curo's reputation relies on compliance with all the laws and regulations related to release of information and on communicating consistently and accurately to the public. We trust you never to speak on behalf of the company unless specifically authorized to do so. If contacted by the media for information, copies of company documents or even your opinion, you should refer the inquiry to the General Counsel.

We also have an obligation to be responsible in our use of social media such as Facebook and Twitter. In posting online, make it clear that you are speaking on your own behalf and that your views don't reflect Curo's views. Regardless of whether you access the Internet via Curo's system or your own, be sure to comply with your responsibility to protect confidential information.

Conflicts of Interest

We count on our employees to dedicate their best efforts to our success and make fair, objective decisions that are in the best interest of our company and our patients. A conflict of interest occurs whenever personal interests or activities – or those of a family member – interfere with your job responsibilities or the decisions you make on the job.

It's impossible to list all of the circumstances that might signal a potential conflict of interest but there are certain kinds of situations that lend themselves to potential conflicts – and being familiar with these situations may help you avoid them.

Personal Relationships. Conflicts of interest can happen when employees mix personal relationships with work relationships. Conducting business with family or close friends, whether they work for Curo or companies with which we do business can affect your ability to exercise good judgment and create a conflict – or the perception of one – between the interests of Curo and your personal interests. You should avoid situations where personal relationships create an actual or potential conflict of interest.

Conflicts of Interest continued

“My father-in-law owns a company that sells medical equipment to Curo. What should I do?”

Discuss the situation with your supervisor. A conflict of interest could exist if you have a decision-making role that relates to purchase of this equipment or if you are involved in making or approving payments to the company.

Employment Outside of Curo. Conflicts of interest can also happen when an employee accepts a second job. Owning, working for or providing services to a business that is a competitor or a company with which Curo does business can present a conflict. A conflict can also arise when employees work for a company that has no association with ours but interferes with the time, talent and energy they bring to their job at Curo. Before accepting employment or consulting work, it's always best to discuss it with your supervisor to make sure there is no potential for a conflict.

Doing Work that Competes with our Business. Using Curo property, information, relationships or position for personal gain can also create a potential conflict. Employees should make sure that their personal activities and relationships don't conflict, or appear to conflict, with the interests of the company. Board memberships, volunteer opportunities, political activities – we encourage employees' involvement in outside activities, but caution against using company time, resources or the company name to advance any personal interests. Ensure that your participation in any outside activities doesn't jeopardize Curo's reputation or distract you from doing your job.

Giving or Receiving Gifts. Gifts and entertainment can promote goodwill, but when lavish or offered frequently, can compromise an employee's objectivity and suggest the appearance of a conflict of interest or something improper. Furthermore, any gifts must comply with all applicable laws, including the Stark Law and the Anti-Kickback Statute. Make sure you know and comply with our company policy and ask for help if you're not sure about the appropriateness of a particular gift or offer of entertainment.

Conflicts of Interest continued

At Curo, we want our success to be based on the quality of the services we provide, not on gifts, gratuities or business courtesies we give or receive. Providing someone with something of value can compromise his or her objectivity in making good business decisions and give the appearance of something improper. That's why we prohibit our employees from accepting any gift, gratuity or business courtesy from Curo vendors or others with which we do – or might do – business, unless:

- It is nominal in value.
- It is not cash or a cash equivalent.
- It is not intended to influence a business decision.

Appearances matter. Even if someone indicates that the intent behind a gift was perfectly innocent, you must consider how that act would look to someone from the outside. In general, if the act of giving or receiving a gift appears improper, it probably is.

“One of our suppliers gave me a \$20 gift card during the holidays because she knew that, according to company policy, I could only accept ‘nominal gifts.’ What should I do?”

You must return it. Gifts of cash or cash equivalents, such as gift cards, gift certificates or discounts are never acceptable.

Our sales and service representatives have a greater level of responsibility when it comes to offers of gifts, gratuities and business courtesies. They must be aware of applicable industry regulations regarding kickbacks and inducements and particularly sensitive to any circumstances that could incentivize the referral of patients or business, either directly or indirectly. Curo officers, directors and employees may not accept or offer anything of value in exchange for the direct or indirect referral of patients or business or in return for buying services or supplies. For more information see Curo's policy on the AKS.

Conflicts of Interest continued

Regardless of the situation, if you are ever in doubt about a certain activity you should ask yourself:

- Is it legal?
- Does the activity compete against Curo's interests?
- Am I using company property, information, relationships or my position to advance a personal interest?
- Does it interfere with the work I do at Curo?
- Does it put me in a position of divided loyalty?
- Will I or members of my family receive some sort of personal benefit from it?

An answer of "yes" to any of these questions can signal a potential conflict and should be discussed with your supervisor. Remember, even the appearance of a conflict of interest should be avoided.

We Safeguard Our Resources

You're *Doing What's Right* if you:

- *Safeguard confidential information, including PHI.*
- *Use Curo's physical, technology and information assets with care.*
- *Don't speak to the media on behalf of Curo unless authorized to do so.*
- *Are responsible in your use of the Internet and social media.*
- *Become familiar with – and avoid – the types of situations that may present a conflict between your personal interests and the interests of Curo.*
- *Know and follow the rules for giving and receiving gifts, gratuities and business courtesies.*

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We Ensure Financial Integrity

Our future success is based on maintaining accountability and transparency in all of our operations. We count on every employee to be fully accountable for his or her actions and to be honest, accurate and complete in recordkeeping, especially the documentation of patient care.

Accurate and Complete Coding

Proper reimbursement starts with accurate and complete coding. The care our employees take to accurately code services results in cleaner claims, fewer delays and greater business efficiency. Greater efficiency, in turn, fuels the financial strength our company needs to support and promote our quality care goals and initiatives. We count on you to follow best-practice methods and ask for help whenever questions arise to ensure correct diagnosis codes are assigned.

Clear, Accurate and Reliable Documentation

Exceptional documentation drives exceptional patient care. Clear, accurate, complete and reliable documentation not only ensures we are reimbursed for the services we provide, but that we're delivering the information needed to identify the best medical solutions, the most appropriate tests and the most accurate diagnoses. We must never create or change documents in an effort to mislead someone, nor should we leave out, falsify or cover up any relevant information.

Our employees have a responsibility to produce quality medical records and supporting documentation taking care to ensure they are not only clear, accurate and reliable, but also complete, timely and compliant with industry standards.

“My supervisor directed me to change information on an invoice, but he didn't provide the documentation to support this change. What should I do?”

You are required to be honest and accurate and to record entries in a way that fully and accurately reflects the transaction. Ask your supervisor for the supporting documentation. If he doesn't provide it, contact a vice president, the Curo Human Resources Department, the Curo Chief Compliance Officer or contact the Curo Integrity Helpline.

Ethical Billing and Collection Practices

We bill only for services delivered, and we observe company policies and all applicable laws and regulations as they relate to the collection of medical claims and consumer debts. Consistent with all aspects of our service delivery, we operate with integrity and treat individuals with respect and dignity throughout the billing and collection processes. Fraudulent practices can harm our reputation and result in severe penalties for the individual committing the act and for Curo.

We Ensure Financial Integrity

You're *Doing What's Right* if you:

- *Make a commitment to produce records and documentation that are consistently clear, accurate, complete and reliable.*
- *Employ billing and collection practices that are ethical.*



Resources for Doing What's Right

Violations of our Code break the trust that we have built within the communities we serve. We each have a responsibility to take action when we see or suspect unlawful, unethical or fraudulent activity, questionable accounting or auditing matters or any other violation of our Code or applicable law.

Our Open Door Policy

We are dedicated to caring for our patients in the way we would want our families and ourselves to be cared for. Accordingly, we all have an obligation to report possible violations of our Code, our policies or the law. Employees who seek advice, raise a concern or report suspected acts of misconduct in good faith are complying with our Code and furthering our mission. Curo does not tolerate retaliation or retribution against anyone who raises an issue or concern in good faith.

Reporting “in good faith” means that you are sincere in your attempt to provide honest and accurate information, even if the concern you raised is later found to be inaccurate. Our company has several resources available for speaking up about misconduct.

Your Resources

If you see or suspect a violation, there are internal resources you can turn to for help.

Start by speaking with:

- Your supervisor
- A vice president

You may also contact:

- The Curo Human Resources Department
- The Curo Chief Compliance Officer

The Curo Integrity Helpline

Employees who don't feel comfortable addressing their concern internally or feel that the Open Door Policy has not been effective, may contact **The Curo Integrity Helpline**:

Call: **800-273-8452**

Report online: www.integrity-helpline.com/curohs.jsp

24 hours a day, 7 days a week

The Integrity Helpline offers an anonymous option for reporting possible unethical or illegal behavior and is operated by an independent, third-party reporting service called Global Compliance. When you contact the helpline:

- You speak to a professional interview specialist or access an online Web reporting form where your concern is documented in detail and forwarded to Curo for investigation and follow-up.
- You may check back to find out the status of the investigation or report any additional information you may have.
- You have the assurance of knowing that your concern will be handled promptly, discreetly and anonymously.

"I think I saw someone violate a law, but I'm not sure. What should I do?"

Speak up about it. We're counting on you to do the right thing by sharing your concerns with someone at Curo through our Open Door Policy or, if doing so makes you feel uncomfortable, through the Curo Integrity Helpline.