

EMPLOYEE CONDUCT AND CODE OF ETHICS

Policy on Employee Conduct

The ALLHC Group of Companies promotes an environment that fosters and maintains a high level of self-discipline among all employees. It recognizes that the ultimate responsibility for meeting prescribed standards of conduct and performance rests on each employee.

The Company expects each employee to observe reasonable and proper conduct in the performance of work, in the handling of Company assets, in relationships with fellow employees and in dealings with the public. For this purpose, the Company establishes certain standards of conduct which are consistent with the corporate philosophy and objectives, government policies and regulations and which are necessary to promote harmonious and productive relationships among employees and with business partners.

Implementation and Monitoring of Compliance with the Code of Ethical Behavior

ALLHC has established a compliance structure which assigns oversight responsibility for the Company's Code of Ethical Behavior program to Human Resources Head or his/her designate. Strategic Business Units and Group Heads are responsible for establishing, implementing and maintaining an effective program, including a system of internal controls, to ensure compliance by everyone with all laws and regulations and the provisions of this Code. As coaches and leaders, supervisors and managers must:

- Maintain an environment of open communication in which the ALLHC values and the provisions of this code and related policies and instructions are shared, discussed and even debated.
- Ensure that their people understand the ALLHC values and the provisions of this code and provide additional training, when appropriate.
- Take reasonable steps to ensure that unethical conduct within their areas of responsibility is detected and addressed.
- Consider whether a person lives the ALLHC values before placing him or her in a position of responsibility.

If any one suspects, observes or learns of any unethical business conduct or the commission of any dishonest, destructive, or illegal act, he/she is responsible for notifying the Human Resources Head or Compliance Officer immediately.

The appropriate group will investigate all reports and provide feedback when appropriate. There will be no reprisals against those who report suspected violations in good faith, and their identity will be protected to the extent consistent with law and ALLHC policy.

Because ALLHC strongly believes in ethical behavior, employees who do not comply with the provisions of this Code and other Company policies and procedures may be subject to a range of disciplinary actions, up to and including dismissal. Additionally, violations of these standards could result in criminal penalties and/or civil liabilities.

To view ALLHC's Code of Ethical Behavior, click on the link below:

[ALLHC Code of Ethical Behavior](#)