

Mission Statement:
To maximize stakeholder value in an increasingly competitive healthcare profession

Statement of Our Core Values

Concordant Healthcare Solutions, Inc

Principles

We embrace the principles of satisfying the needs of our internal and external stakeholders in the most ethical manner possible while upholding the highest professional standards of performance.

Values

We seek and value honest feedback from stakeholders on our performance and we use this data to support our goals of maximizing Continuous Quality Improvements and Stakeholder Value in an ethical and sustainable manner.

Build Trust and Credibility

Because the skills we offer our clients extend across healthcare, business and government agencies, we depend on the trust and confidence of stakeholders in each of these organizational segments for our success. We endeavor to earn this trust by demonstrating honesty and integrity in all interactions and in the products and services we provide. We will not engage in activities or support decisions that create an “I win, you lose” outcome; instead, we will at all times seek solutions that equally contribute to the success of our clients and our Concordant Healthcare Solutions, Inc.

Respect for the Individual

We respect and embrace individualism and diversity throughout Concordant Healthcare Solutions, Inc., and we expect the same from our suppliers and strategic partners. Our employees will be trained in cultural competency and teamwork so that they can use and respect their divergent cultures and skills to contribute to delivering products and services of the highest quality to our customers.

Freedom of expression is encouraged throughout Concordant Healthcare Solutions, Inc. as long as it is done in a respectful and professional manner. Likewise, we embrace the kind of professional discourse that supports creative and critical thinking. It is through this process that we expect all employees and stakeholders to respect individual thoughts and expressions.

Concordant Healthcare Solutions, Inc. is an equal employment/affirmative action employer and is committed to providing a workplace that is free of discrimination of all types from abusive, offensive or harassing behavior. As part of our open door policy, any employee who feels harassed or discriminated against should report the incident to his or her manager, human resources or any executive of the company including the Chief Executive Officer.

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Create a Culture of Open and Honest Communication

At Concordant Healthcare Solutions, Inc., everyone should feel comfortable to speak his or her mind, particularly with respect to ethics concerns. Our leaders have a responsibility to create an open and supportive environment where employees feel comfortable raising ethical questions or concerns.

We recognize that all of our stakeholders benefit when our employees exercise their power to prevent mistakes or wrongdoing by asking the right questions at the right times. Concordant Healthcare Solutions, Inc. will quickly investigate all reported instances of questionable or unethical behavior. In every instance where improper behavior is found to have occurred, the company will take appropriate action. We will not tolerate retaliation against employees who raise genuine ethical concerns in good faith.

Employees are encouraged, in the first instance, to address such issues with their leader, as most problems can be resolved swiftly. If for any reason that is not possible or if an employee is not comfortable raising the issue with his or her leader the Chief Executive Officer has an open-door policy. In addition, concerns may be submitted through a secure electronic system to if anonymity is required.

Set Tone at the Top

To make our Code work, all of our leaders must be responsible for promptly addressing ethical questions or concerns raised by employees and for taking the appropriate steps to deal with such issues. Leaders should not consider employees' ethics concerns as threats or challenges to their authority, but rather as another encouraged form of business communication. We want the ethics dialogue to become a natural part of daily work at Concordant Healthcare Solutions, Inc.

Uphold the Law

We are committed to complying with laws, rules and regulations where we conduct business. Further, each of us must have an understanding of the company policies, laws, rules and regulations that apply to our specific roles. If any member of our team is unsure of whether a contemplated action is ethical, permitted by law or in compliance with our policy, they should seek the advice from their leader or a member of the leadership team. All team members are responsible for preventing violations of law and for speaking up if they see possible violations.

Whistle Blower Policy

The following policy is intended to encourage all internal and external stakeholders of Concordant Healthcare Solution, Inc. and others to report suspected or actual occurrence(s) of illegal, unethical or inappropriate events (behaviors or practices) without retribution:

1. The Whistleblower should promptly report the suspected or actual event to his/her supervisor.
2. If the Whistleblower would be uncomfortable or otherwise reluctant to report to his/her supervisor, then the Whistleblower should report the event to the next highest or another level of management, including to an appropriate Board committee or member.

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3. The Whistleblower can report the event with his/her identity or anonymously.
4. The Whistle blower shall receive no retaliate on or retribution for a report that was provided in good faith – that was not done primarily with malice to damage another or the organization.
5. A Whistleblower who makes a report that is not done in good faith is subject to discipline, including termination of the Board or employee relationship, or other legal means to protect the reputation of the organization and members of its Board and staff.
6. Anyone who retaliates against the Whistleblower (who reported an event in good faith) will be subject to discipline, including termination of Board or employee status.
7. Crimes against person or property, such as assault, rape, burglary, etc., should immediately be reported to local law enforcement personnel.
8. Supervisors, managers and/or Board members who receive the reports must promptly act to investigate and/or resolve the issue.
9. The Whistleblower shall receive a report within five business days of the initial report, regarding the investigation, disposition or resolution of the issue.
10. If the investigation of a report, that was done in good faith and investigated by internal personnel, is not to the Whistleblower's satisfaction, then he/she has the right to report the event to the appropriate legal or investigative agency.
11. The identity of the Whistleblower, if known, shall remain confidential to those persons directly involved in applying this policy, unless the issue requires investigation by law enforcement, in which case members of the organization are subject to subpoena.

Competition

We are dedicated to ethical, fair and vigorous competition. We will sell our products and services based on their merit, superior quality, functionality and competitive pricing. We will make independent pricing and marketing decisions and will not improperly cooperate or coordinate our activities with our competitors. We will not offer or solicit improper payments or gratuities in connection with the purchase of goods or services or the sales of our products or services, nor will we engage or assist in unlawful boycotts of particular customers, unless required by federal sanctions.

Proprietary Information

It is important that we respect the property rights of others. We will not acquire or seek to acquire improper means of a competitor's trade secrets or other proprietary or confidential information. We will not engage in unauthorized use, copying, distribution or alteration of software or other intellectual property.

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Health and Safety

We are dedicated to maintaining a healthy environment for our employees, visitors and strategic partners.

Conflicts of Interest

We must avoid any relationship or activity that might impair, or even appear to impair, our ability to make objective and fair decisions when performing our jobs. At times, we may be faced with situations where the business actions we take on behalf of Concordant Healthcare Solutions, Inc. may conflict with our own personal or family interests.

We owe a duty to our company to advance its legitimate interests when the opportunity to do so arises. We must never use the company's property or information for personal gain or personally take for ourselves any opportunity that is discovered through our position with Concordant Healthcare Solutions, Inc.

Gifts, Gratuities and Business Courtesies

We are committed to competing solely on a merit of our products and services. We will avoid any actions that create a perception that favorable treatment of outside entities by our company was sought, received or given in exchange for personal business courtesies.

Business courtesies include gifts, gratuities, meals, refreshments, entertainment or other benefits from persons or companies with whom Concordant Healthcare Solutions, Inc. does or may do business. We will neither give nor accept business courtesies that constitute, or could reasonably be perceived as constituting, unfair business inducements that would violate law, regulation or policies of our company or customers, or would cause embarrassment or reflect negatively on Concordant Healthcare Solutions Inc.'s reputation.

Accepting Business Courtesies

No member of our organization should feel any entitlement to accept and keep a business courtesy. Although no one may not use their position at to obtain business courtesies, and should never ask for them, some members may accept unsolicited business courtesies that promote successful working relationships and good will with the firms that Concordant Healthcare Solutions, Inc. maintains or may establish a business relationship with.

Members of the organization who award contracts or who can influence the allocation of business, who create specifications that result in the placement of business or who participate in negotiation of contracts must be particularly careful to avoid actions that create the appearance of favoritism or that may adversely affect the company's reputation for impartiality and fair dealing. The prudent course is to refuse a courtesy from a supplier when Concordant Healthcare Solutions, Inc. is involved in choosing or reconfirming a supplier or under circumstances that would create an impression that offering courtesies is the way to obtain business from our firm.

Meals, Refreshments and Entertainment

We may accept occasional meals, refreshments, entertainment and similar business courtesies that are shared with the person who has offered to pay for the meal or entertainment, provided that:

- They are not inappropriately lavish or excessive.
- The courtesies are not frequent and do not reflect a pattern of frequent acceptance of courtesies from the same person or entity.
- The courtesy does not create the appearance of an attempt to influence business decisions, such as accepting courtesies or entertainment from a supplier whose contract is expiring in the near future.
- The employee accepting the business courtesy would not feel uncomfortable discussing the courtesy with his or her manager or co-worker or having the courtesies known by the public.

Gifts

Employees may accept unsolicited gifts, other than money, that conform to the reasonable ethical practices of the marketplace, including:

- Flowers, fruit baskets and other modest presents that commemorate a special occasion.
- Gifts of nominal value, such as calendars, pens, mugs, cap and t-shirts (or other novelty, advertising or promotional items).

Generally, employees may not accept compensation, honoraria or money of any amount from entities with whom Concordant Healthcare Solutions, Inc. does or may do business. Tangible gifts (including tickets to a sporting or entertainment event) that have a market value greater than \$100 may not be accepted unless approval is obtained from management.

Employees with questions about accepting business courtesies should talk to their leader or a member of the leadership team.

Offering Business Courtesies

Any employee who offers a business courtesy must assure that it cannot reasonably be interpreted as an attempt to gain an unfair business advantage or otherwise reflect negatively upon Concordant Healthcare Solutions Inc. An employee may never use personal funds or resources to do something that cannot be done with company resources. Accounting for business courtesies must be done in accordance with approved company procedures.

Other than to our government customers, for whom special rules apply, we may provide nonmonetary gifts (i.e., company logo apparel or similar promotional items) to our customers. Further, management may approve other courtesies, including meals, refreshments or entertainment of reasonable value, provided that:

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- The practice does not violate any law or regulation or the standards of conduct of the recipient's organization.
- The business courtesy is consistent with industry practice, is infrequent in nature and is not lavish.
- The business courtesy is properly reflected on the books and records of Concordant Healthcare Solutions, Inc.

Accurate Public Disclosures

We will make certain that all disclosures made in financial reports and public documents are full, fair, accurate, timely and understandable. This obligation applies to all employees, including all financial executives, with any responsibility for the preparation for such reports, including drafting, reviewing and signing or certifying the information contained therein. No business goal of any kind is ever an excuse for misrepresenting facts or falsifying records. Employees should inform Executive Management if they learn that information in any filing or public communication was untrue or misleading at the time it was made or if subsequent information would affect a similar future filing or public communication.

Corporate Recordkeeping

We create, retain and dispose of our company records as part of our normal course of business in compliance with all company policies and guidelines, as well as all regulatory and legal requirements. All corporate records must be true, accurate and complete, and company data must be promptly and accurately entered in our books in accordance with Concordant Healthcare Solutions Inc.'s and other applicable accounting principles. We must not improperly influence, manipulate or mislead any unauthorized audit, nor interfere with any auditor engaged to perform an internal independent audit of company's books, records, processes or internal controls.

Promote Substance Over Form

We must have the courage to tackle the tough decisions and make difficult choices; secure in the knowledge that Concordant Healthcare Solutions, Inc. is committed to doing the right thing. At times this will mean doing more than simply what the law requires. Merely because we can pursue a course of action does not mean we *should* do so. Although our guiding principles cannot address every behavioral issue or provide answers to every ethical dilemma, they can define the spirit in which we intend to do business and should guide us in our daily conduct.

Accountability

Each of us is responsible for knowing and adhering to the values and standards set forth in this Code and for raising questions if we are uncertain about company policy. If we are concerned whether the standards are being met or are aware of violations of the Code, we must contact a member of the leadership team. We takes seriously the standards set forth in this Code of Conduct, and violations will result in disciplinary action up to and including termination of employment.

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Confidential and Proprietary Information

Integral to our business success is our protection of confidential company information, as well as nonpublic information entrusted to us by employees, customers and other business partners. Confidential and proprietary information includes such things as pricing and financial data, customer names/addresses or nonpublic information about other companies, including current or potential supplier and vendors. We will not disclose confidential and nonpublic information without a valid business purpose and proper authorization.

Use of Company Resources

Company resources, including time, material, equipment and information, are provided for company business use. Nonetheless, occasional personal use is permissible as long as it does not affect job performance or cause a disruption to the workplace.

Employees and those who represent the company are trusted to behave responsibly and use good judgment to conserve company resources. Managers are responsible for the resources assigned to their departments and are empowered to resolve issues concerning their proper use.

Generally, we will not use company equipment such as computers, copiers and fax machines in the conduct of an outside business or in support of any religious, political or other outside daily activity, except for company-requested support to nonprofit organizations. We will not solicit contributions nor distribute non-work related materials during work hours.

In order to protect the interests of the Concordant Healthcare Solutions, Inc. network and our fellow employees, leadership reserves the right to monitor or review all data and information contained on an employee's company-issued computer or electronic device, the use of the Internet or company's intranet.

We will not tolerate the use of company resources to create, access, store, print, solicit or send any materials that are harassing, threatening, abusive, sexually explicit or otherwise offensive or inappropriate. Questions about the proper use of company resources should be directed to your manager.

Signed By:

James P. Young, Jr., PhD,

Date: January 1, 2015

James P. Young Jr., PhD
Title: Chief Executive Officer

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CONCORDANT HEALTHCARE SOLUTIONS, INC.

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