



CPSI Policy for Reporting Violations and Complaints

Policy Statement

CPSI is committed to fostering and maintaining the highest level of integrity. Protecting our integrity is the job of everyone in the Company. To that end, we have established a [Code of Business Conduct and Ethics](#) to assist our employees in maintaining compliance with applicable law and regulations and to maintain our high standards of ethical conduct. This Policy for Reporting Violations and Complaints is intended to supplement our Code of Business Conduct and Ethics by encouraging all employees and third parties (including all agents, representatives, consultants who are acting on CPSI's or any subsidiary's behalf) to report any suspected violations or concerns as to compliance with laws, regulations, our Code of Business Conduct and Ethics and other Company policies, including but not limited to conduct related to violations of law; conflicts of interest; insider trading; corruption; bribery; violations of the Code of Conduct and Business Ethics; Gifts, Meals and Entertainment (GMET) policy; international trade rules and sanctions; medical billing and coding; discrimination; harassment; workplace health and safety; corporate record keeping; disclosure of confidential information and other CPSI policies.

Obligation to Report Suspected or Actual Violations; Anonymous Reporting

a) Reporting Generally

It is every CPSI employee and agent's obligation to report suspected and actual violations of laws, government rules and regulations, the Company's Code of Business Conduct and Ethics and other CPSI policies. If an employee has reason to believe that questionable or illicit conduct exists, the employee should immediately report the suspected wrongdoing to his/her supervisor or manager or by using the procedures set forth below. As noted below, supervisors and managers are required to report to the Compliance Point of Contact (CPOC) any time they receive a report of suspected wrongdoing under this policy by any CPSI employee, officer, director or third party acting on CPSI's behalf. You may use the Violation Complaint Form contained on CPSI's intranet within the Human Resources tab (all fields on the form are optional). CPSI has made a concerted effort in the past to provide our employees with an avenue to report safety, ethical, and compliance concerns, and have done so by asking our employees to report these types of concerns to their supervisor, CPOC, Human Resource representative, or anonymously via our web portal. This procedure has worked very well in the past; however, in an effort to provide employees with an additional means of reporting workplace issues and concerns, we have implemented a Compliance and Ethics Hotline.

Typically, the order in which to report concerns is the following, but any channel may be used:

- 1) Contact your direct supervisor
- 2) Contact someone else in senior management
- 3) Contact Human Resources
- 4) Contact the Corporate Compliance Officer



5) Contact the Hotline (via phone or web portal)

You may also report the following specific types of violations to the following:

Privacy and Security Violations – refer to [Privacy and Security Organizational Chart](#) to identify the appropriate divisional representative

Medical Billing and Coding Violations – Director of Medical Billing Compliance,
Amy.Judice@trubridge.com

If you do not feel comfortable speaking with a supervisor, someone in senior management, someone in Human Resources, or the CPOC, the Compliance and Ethics Help Line is another avenue for you to speak with someone. You may remain anonymous or you may choose to identify yourself. Regardless of your decision, your information will be documented and investigated.

b) *Anonymous Reporting*

If you wish to report suspected wrongdoing anonymously, you may do so using any one of the following:

- mail a description of the suspected violation or other complaint or concern to:

Computer Programs and Systems, Inc.
Compliance Point of Contact
Attn: Kevin Plessner
6600 Wall Street
Mobile, Alabama 36695
United States

- Submit a secure Internet-based message through our compliance website:

1. Go to MyComplianceReport.com
2. Once you have entered the site you will see "Begin new report". Enter the Company Access ID of CPSI. Then "NEW REPORT" and follow the prompts.

- Submit a secure message through our Wiki using the CPSI Confidential Corporate Complaint Form:

1. The Home page of the CPSI Wiki (Wiki Home > Reporting Complaints)
2. At the "Begin a new report" prompt, enter CPSI for the Company Access ID, then select the button for New Report, and follow the prompts, thereafter.

- Call our compliance hotline and speak to a live person: (800) 385-4387



Treatment and Retention of Complaints and Reports

CPSI's compliance application and phone support is provided and maintained by ComplianceLine. ComplianceLine is a third-party help line provider that has been contracted by CPSI to address workplace issues and concerns. ComplianceLine does not trace or record calls and does not have caller identification. ComplianceLine is available 365 days a year, twenty-four (24) hours a day for your convenience. CPSI understands the importance of providing a safe and ethical workplace for all employees and we are constantly trying to improve our processes.

Each supervisor and manager must report any suspected violation, concern or complaint reported to such person by employees or other sources to the Compliance Point of Contact to assure proper treatment and retention. In addition, employees should take note that persons outside the Company may report complaints or concerns about suspected wrongdoing. These concerns and complaints should also be reported immediately upon receipt to the Compliance Point of Contact. Supervisors and managers as well as the legal department and management will promptly consider the information received by them under this policy or otherwise. Each person will take appropriate action, including investigation as appropriate, in accordance with applicable laws, governmental rules and regulations, the Company's Code of Business Conduct and Ethics and other applicable CPSI policies, and otherwise consistent with good business practice.

Upon receipt by the Compliance Point of Contact, all reports of suspected wrongdoing received pursuant to this policy will be recorded in a log maintained by the Compliance Point of Contact, indicating the description of the matter reported, the date of the report and the disposition thereof. The log must be retained in accordance with CPSI document retention policies applicable to legal correspondence.

Statement of Non-Retaliation

CPSI will not permit any form of intimidation, discrimination, retaliation or harassment by any officer, employee, contractor, subcontractor or agent of the Company against any employee because of any lawful act done by that employee to:

- provide information or assist in an investigation regarding any suspected wrongdoing reported in good faith by the employee in accordance with this policy. For purposes of this policy, "good faith" means the person reporting suspected wrongdoing reasonably believed that the report was true, regardless of the outcome of the investigation; or
- file, testify, participate in, or otherwise assist in a proceeding relating to a violation of any law, regulation or CPSI rule.

Any such action is a violation of CPSI policy and should be reported immediately. Persons who discriminate, retaliate or harass may be subject to civil, criminal and administrative penalties, as well as disciplinary action, up to and including termination of employment.



Statement of Confidentiality

CPSI will, to the extent reasonably possible, keep confidential both the information and concerns reported under this policy, and its discussions and actions in response to these reports and concerns. In the course of its investigation, however, the CPSI may find it necessary to share information with others on a “need to know” basis.

Revision History

Version Number	Version Date	Details
08/25/2021	08/25/2021	Documentation processes applied with August 25, 2021 amendments.
1.1	07/15/2022	Reformatted to documentation standards, to include version number and revision history table. Updates to sections 2.B and 3, to reflect process amendments. Situation: 9467057
1.2	10/3/2021	Provided a link to the Code of Bus Conduct & Ethics; Added ability to contact other compliance resources for Privacy, Security, Medical Billing/Coding. Sit 9524131