



CONNECTING PEOPLE
WITH CARE

Coordinated Transportation Solutions, Inc.

**Code of Conduct
2019**

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Coordinated Transportation Solutions (CTS) adheres to the highest standard of ethics, integrity and professionalism in conducting its business affairs. Each CTS employee is a custodian of those standards. The Code of Conduct (Code) outlines standards of behaviors as they relate to conducting business, quality service, reporting integrity and adherence to all applicable laws and regulations. The Code has been approved by the CTS' Compliance Committee and demonstrates our commitment to compliance and quality of services.

As you know, we conduct our work according to our values behavioral attributes. These are:

Customer Focus

- We remember that the customers are the reason we are here.
- We treat all customers with respect and integrity.
- We always keep our customers informed (as agreed to with the customer).
- We acknowledge requests promptly (as agreed to with the customer).
- We give customer options to solve problems.
- We are a resource to help resolve their issues.
- We use the information we gather from customers for continuous improvement.
- We continuously improve our processes to best respond to customer needs.

Integrity

- We communicate openly, honestly, and responsibly (own up to it). We say what we mean and we mean what we say (say it in a respectful tone)
- We only make agreements we intend to keep. If we are unable to keep our agreements we notify all parties involved immediately and reset expectations.
- We work within existing policies and guidelines which are designed to benefit all employees and customer. If we disagree we use our company change control process to consider changes that will benefit all.
- We create a safe learning environment:
 - When we make a mistake we admit it, take action to correct it and work together to prevent it from occurring in the future.
 - When we see a mistake from others we communicate it respectfully and work with others to correct it and prevent it from occurring in the future.

Respect

- We treat others as we want to be treated:
 - With dignity and professionalism
 - Set the example by modeling the behavior
 - We are aware of the volume of our voice, personal space of others, and our attire.
 - We treat company property as if it were our own
- We communicate effectively. We listen and focus attentively without interruption and we paraphrase to confirm understanding (stop, look, listen, and confirm).
- We are non-judgmental, provide feedback and avoid criticism.
- We are aware of our words, tone of voice, and body language.
- We are a good neighbor:
 - We take advantage of opportunities to help teammates.
 - We empathize with other people's feelings.
 - We praise in public, coach in private, and refrain from gossip.

The Code of Conduct:

- (1) Communicates the commitment of CTS to comply with all relevant laws, rules, regulations, and policies;
- (2) Explains the responsibility of CTS' governing body and its workforce, including employees, temporary employees, volunteers, management, executive management, and other persons under the direct supervision and control of CTS as well as contractors, their subcontractors and related entities to report violations or suspected violations, as well as the avenues for reporting concerns; and
- (3) Outlines general compliance guidelines.

The Code does not, nor was it intended to, cover every situation you may encounter. It serves as a guideline, which is reinforced in greater detail by our specific CTS policies and procedures.

As employees of CTS, we are all required to become familiar with the Code of Conduct and apply the standards set forth in our daily work. Please read this carefully and use it as a guide in carrying out your responsibilities.

If you have any questions as to the meaning or interpretation of any provision of the Code or encounter any situation which you believe may violate the provisions of the Code, please contact the Vice President of Compliance: Donna Strigler

I. INTRODUCTION TO THE CODE OF CONDUCT

CTS is committed to conducting business in a legal, ethical and socially responsible manner. It is our policy that all members of CTS's workforce and governing body comply with, and conduct business in a manner that is consistent with those standards and all relevant state and federal laws, rules, regulations and Plan policies and procedures. CTS's workforce consists of employees, temporary employees, trainees, management including the President, and any first tier, downstream and related entities (FDRs) as defined under state and federal law. CTS's governing body is also subject to this Code and applicable Plan policies and procedures and state and federal laws and regulations.

While the need for members of CTS's workforce and governing body members to fulfill ethical responsibilities is beyond question, the definition of the specifics of those responsibilities may not always be clear.

The Code of Conduct outlines our standards of behaviors as they relate to conducting business, medical quality service standards, financial control and adherence to all applicable laws and regulations. In essence, the Code of Conduct provides guidance for ethical behavior in conducting business and explains CTS's position with respect to breaches of ethical conduct. Specifically, the Code of Conduct addresses the following areas:

- Prohibition on Acceptance of Gifts and Gratuities
- Reporting Violations and Suspected Violations
- Ethical Business Practices
 - Prohibition on Acceptance of Gifts and Gratuities
 - Fraud, Waste & Abuse and Anti-Kickbacks / Stark Laws
 - Marketing Practices
 - Conflicts of Interests
- Compliance with Laws and Regulations
- Accurate and Timely Reporting
- Confidentiality
- Quality of Service and Member Access

Members of CTS's workforce and governing body are required to report any violation or suspected violation of the Code, our policies and procedures, federal or state laws, guidance, rules and regulations. CTS has created an infrastructure, including a confidential, anonymous Ethics Hotline (855) 262-0865 and a Non-Retaliation Policy, which protects those Workforce members who come forth in good faith to raise concerns about possible violations of the Code from non-intimidation and non-retaliation. Anyone who raises concerns or allegations of possible violations of the Code, policies/procedures, laws, or regulations will be received openly and courteously. The infrastructure provides the framework for workforce members to identify and report potential problems, non-compliance or fraud, waste and abuse to management so that these matters may be properly assessed, investigated and resolved.

For the Compliance Program to be effective, it must have the cooperation of all individuals. All supervisors and managers are charged with ensuring that all employees reporting directly to them receive compliance training. Failure to observe the Code or CTS's policies and procedures can result in serious consequences to the employee, such as dismissal and criminal charges. There are also serious consequences to CTS for the failure of employees to adhere to the Code of Conduct.

No Code of Conduct can foresee all possible situations that may arise. CTS ultimately relies upon the integrity and judgment of its employees “to do the right thing.” Please use this Code of Conduct to guide your conduct in business situations.

II. HOW TO REPORT VIOLATIONS OR SUSPECTED VIOLATIONS AND RESPONSE TO REPORTED ISSUES

CTS requires all members of CTS’s workforce and governing body to report actual or suspected violations of the Code that occur in the workplace or are related to the business of CTS. We depend upon our workforce to be alert and to report any questionable ethical action or suspected violation or non-compliance to enforce the Code.

Non-Intimidation and Non-Retaliation:

As stated numerous times in this Code, CTS does not permit retaliation against, or intimidation of, any workforce member who makes a good faith report of a compliance-related concern internally or to an outside government entity. Retaliation is prohibited by both state and federal laws and will not be tolerated at CTS.

We seek to have an open and supportive environment where workforce members feel comfortable raising issues and everyone works to resolve them as quickly as possible. Members of CTS’s workforce are protected against retaliation and intimidation regardless of whether the situation giving rise to the report is ultimately determined to not have any factual basis, as long as the reporting is made in good faith.

Our Duty to Comply, Report and Cooperate - When and to Whom to Report:

All members of CTS’s workforce and governing body have a duty to comply with this Code, CTS’s policies and procedures, and all applicable state and federal laws, guidance, rules and regulations. Whenever a member of CTS’s workforce or governing body knows of or suspects a violation of the Code, Plan policies and procedures or federal or state law, or questions a particular practice or behavior that could violate the Code or CTS’s policies and procedures, he or she must report the issue to the appropriate Plan personnel. Reports of concerns should be made to any of the following:

- To a supervisor or next level manager
- To the HR Department (203) 736-8810 extension 140
- Through CTS’s toll-free Ethics Hotline (855) 262-0865

Workforce members are encouraged to report any concerns or ask questions of your supervisor or the Compliance Department directly. However, CTS’s Ethics Hotline is another avenue to report questions or concerns about compliance with the Code, our policies and procedures and applicable state and federal laws and regulations governing CTS and you do not need to raise an issue with your supervisor first before calling the Ethics Hotline. The Hotline is for voicemail, which is managed by the Compliance department and is available 24 hours a day, seven days a week and is a toll-free number. Callers may choose to identify themselves or remain anonymous to the company when reporting. If the caller chooses to identify him or herself, CTS will protect the anonymity of the caller to the full extent

of the law.

The Ethics Hotline is available 24 hours a day, 7 days a week. The number to call is (855) 262-0865.

For more information, please review CTS's Compliance Policy.

CTS will not retaliate against workforce members who bring a compliance matter to the attention of our organization. All reports, if not made directly to the Ethics Hotline, must be forwarded to the Compliance Department and will be investigated and appropriately resolved under the direction of the Compliance Officer.

Responses to Reported Compliance Issues or Violations

All reports received by CTS's Compliance Department which suggest the presence or threat of substantial violations of the Code, our policies or procedures, state or federal laws or regulations will be investigated promptly to determine whether the concern reported can be substantiated. Reports will be investigated in the order of their seriousness, as determined by the Vice president of Compliance.

All reports will normally be investigated within 48 hours of receiving the report. Investigations of reports will be conducted by, or at the direction of, the VP of Compliance. The VP of Compliance, or his/her designee, may enlist the assistance of persons with expertise or experience in the issue reported in the conduct of the investigation, including other departments or third parties.

Once an investigation is complete, the VP of Compliance may, when appropriate, inform the reporting individual as to the status of and, to the extent appropriate, the corrective actions being taken to remedy the problem. All workforce members have the duty to cooperate with investigations conducted by the Compliance Department (or designated investigator) and with the implementation of any remedial actions, including corrective action plans.

III. GENERAL COMPLIANCE GUIDELINES

A. Prohibition on Acceptance of Gifts and Gratuities

No employee of CTS shall solicit or accept, or offer or provide, any gift, or other favor, from any individual, company or agency that does or is seeking to do business with, or is a competitor of, CTS under circumstances from which it could be reasonably inferred that such action was intended to influence, or might influence, the individual in the performance of his or her duties or the business decisions of that company or agency. This does not include items of nominal or token value (under \$50), which are not related to a particular transaction or activity of CTS.

Accepting entertainment only event gift tickets, such as for concerts, sporting events or other non-charitable events, **when a vendor will not accompany you, is prohibited**, even if the amount of the ticket is less than \$50.

If the vendor will be present during the event, you may occasionally accept tickets to an event, as the presumption is that business will be discussed during the event. An occasional dinner invitation

extended by a vendor or other third party is also not considered a gift if the vendor will be present because there is the presumption that business will be discussed. However, the cost of the meal should be reasonable and the employee must realize that he or she is representing CTS, even after working hours.

Under no circumstance may a workforce member provide any gift or gratuity, of any value, to a federal or state government employee.

B. Anti-Kickback Law, Stark Law and Fraud, Waste and Abuse

CTS is committed to carefully observing federal and state anti-kickback, self-referral, and fraud, waste and abuse laws and regulations. These laws and regulations are designed to ensure the appropriate use of funds from federal and state programs. Members of CTS's workforce are expected to, and must abide by, federal and state laws and regulations.

CTS is committed to compliance with the Federal Anti-Kickback law which makes it illegal to:

- Offer, provide, solicit or accept any remuneration (anything of value), directly or indirectly, in exchange for referrals of patients/client/members covered by Medicaid, Medicare or any other federal or state funded program.
- Offer, provide, solicit or accept any remuneration, directly or indirectly, for the purchase, lease, ordering or recommending the purchase, lease or ordering of any goods, facilities, services or items covered under the benefits of Medicaid, Medicare or any other federal or state funded program.
- Provide false or misleading statements relative to Medicaid, Medicare, or any other federal or state reimbursement.

CTS is committed to compliance with the federal self-referral law known as the Stark Law, which generally prohibits a physician from referring a patient/client for designated health services to an entity in which the physician (or his/her immediate family) has a financial interest. If you know of any member referral that could violate this law, contact the Compliance Department immediately.

Fraud, Waste and Abuse: CTS is also committed to detecting, preventing and reporting instances of actual or suspected provider or member fraud, waste and abuse, as well as employee fraud. CTS is committed to ensuring that providers and suppliers are only reimbursed for products and services supplied, billed correctly, and, where required, provided by a qualified individual. In addition, CTS maintains an internal Fraud, Waste and Abuse Program to detect, prevent and report potential and actual provider and member fraud, waste and abuse. If you become aware of an actual or suspected provider or member committing fraud, waste or abuse, you are required to report the incident. Incidents may be reported to the Ethics Hotline (855) 262-0865 or directly to the Compliance Department

It is the responsibility of CTS employees to avoid situations or conduct that involves actual or potential fraud, waste and abuse. CTS employees who become aware of actual or suspected violations of laws and regulations pertaining to fraud, abuse and kickbacks are required to report the incident.

Incidents related to employee fraud must be reported to the Ethics Hotline (855) 262- 0865 or a member of the compliance Department

C. Federal or State Excluded Individuals

CTS may not employ, credential or contract with any “ineligible person.” An “ineligible person” is any individual or entity that is currently excluded from participation in state and/or federally-funded health care programs such as Medicare or Medicaid or that has been convicted of a criminal offense related to the provision of health care items or services and has not yet been reinstated after a period of exclusion or ineligibility.

Prior to hire and on a monthly basis thereafter, CTS screens all members of CTS’s workforce and governing body against the OIG List of Excluded Individuals and Entities and the GSA Excluded Parties List published by the federal government. If you are excluded from participation in the federal or state health care programs, you must notify the VP of Compliance immediately. You must also notify the VP of Compliance if you become aware that an individual has been excluded.

D. Marketing Practices

CTS recognizes that marketing activities in government sponsored insurance programs such as Medicaid and Medicare are highly regulated. We only engage in marketing activities consistent with the requirements of applicable law, and our state and federal contracts.

Marketing means the activity for creating, communicating, and delivering product-specific information and other information that has value for customers, clients and society. CTS will maintain a file of all marketing practices in accordance with federal and state regulations, and ensure that all marketing materials are accurate and do not mislead, confuse, or defraud.

If you become aware of violations or suspected violations with CTS marketing practices, you are required to report the incident.

E. Compliance with Laws and Regulations

CTS is bound to comply with all applicable state and federal laws and regulations. Therefore, CTS expects that all members of CTS's workforce and governing body will conduct themselves in accordance with the highest legal, moral and ethical standards and will at a minimum:

- Comply with state and federal regulations related to and referenced in our contracts with state and federal agencies.
- Ensure that all reports or other information required to be provided to any federal, state or local government agency shall be filed timely, accurately and in conformance with the applicable laws and regulations governing such report or information.
- Not tolerate false statements made by workforce members to a government agency. Deliberate misstatements to government agencies or other regulators will expose workforce members involved to criminal penalties and termination of employment. Deliberate misstatements made by contractors or their sub-contractors subject them to contract termination and referral to governmental or law enforcement agencies, as appropriate.

Members of CTS's workforce and governing body who become aware of violations or suspected violations with CTS's compliance with laws and regulations are required to report the incident.

F. Accurate and Timely Reporting

CTS is required to submit many financial and encounter reports to government and auditing entities. CTS is committed to ensuring that all reports are timely, accurate, and complete and certified as necessary.

Many workforce members are required to document activities and submit information as part of their roles and responsibilities. This information contributes in part or in whole to the accuracy of reports submitted to governmental agencies and auditors.

Time reports, expense reports, financial reports and data reports are some examples of the information submitted by workforce members. All records, reports and documents are expected to be complete and accurate and required to follow CTS financial control procedures, including obtaining of appropriate authorization.

If you become aware of suspected or actual violations, you are required to report the incident.

G. Confidentiality

CTS is committed to ensuring the confidentiality of all employee and proprietary business information. It is expected that all employees will use and disclose confidential information only for its intended purposes.

Members of CTS's workforce and governing body:

1. Must agree, as a condition of employment or service, that they will not disclose to any person, firm, corporation, association or other entity, any business information or documents that are confidential or proprietary, as well as any member information except as needed to perform specific responsibilities.
2. Are responsible for holding in strict confidence any and all confidential and proprietary information pertaining to CTS and its members, employees, providers, and other affiliates. Any workforce member who is not sure if something is considered confidential and proprietary should treat the material as confidential and should seek guidance.
3. Who gain access to confidential information, regardless of the method or source, have an obligation to maintain the confidentiality of the information, take reasonable action to stop the further dissemination of the confidential information, and report any breach of confidentiality to their supervisor, manager, the VP of compliance or to CTS's Ethics Hotline (855) 262-0865.
4. Who do not require access to confidential member, employee, or business information to perform specific job responsibilities, but intentionally gain access to this information are subject to disciplinary action up to and including termination (or termination of contract for contractors).
5. Must abide by the Federal Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the Health Information Technology for Economic and Clinical Health Act (HITECH) that establish guidelines to protect members' health information. The obligation to maintain the confidentiality of members' health information extends beyond one's tenure or relationship with CTS.
6. Must abide by the Data Breach Laws of Connecticut that establish guidelines to protect Personal Information (PI). The obligation to maintain the confidentiality of PI extends beyond one's tenure of employment with CTS or applicable business relationship with CTS.
7. Must take all reasonable precautions to protect confidential and proprietary documents and information with strict control by using the following procedures as applicable:
 - Retain all confidential material in a secure location;
 - Store all confidential material in securable file cabinets or offices;
 - Use and disclose confidential material only to the minimal extent necessary to perform job-related activities and handle properly when in use;

- Protect confidential information from improper disclosure when copying, faxing, mailing, emailing, or even speaking about them;
- Maintain and dispose of all confidential material, hard copy or electronic, in accordance with Plan policy and procedures;
- Execute all HIPAA related business associate agreements in a timely manner in accordance with HIPAA policies and procedures; and
- Label confidential and proprietary documents as “Confidential”.

Employees of CTS who become aware of violations or suspected violations regarding confidentiality are required to report the incident through the Ethics Hotline. For contracted vendors, processes are established to report privacy incidents either through the compliance department or Ethics Hotline.

H. Quality of Service

CTS is committed to the principle of ensuring access to high quality and cost effective transportation in a manner that responds to members’ needs. Therefore CTS, its employees, and applicable contractors and their subcontractors will help ensure that:

- There is adequate provider network to covered services.
- Members have the right to receive appropriate and high quality services without discrimination due to their race, creed, gender, national origin, sexual orientation, disability, age.

I. Be Respectful of Others and Provide a Safe and Secure Workplace

All employees of CTS must treat each other, and our members and providers with respect and fairness. This means that you must act professionally in all job-related activities and follow all applicable policies regarding employee conduct.

Never verbally or physically mistreat others or engage in offensive behavior. This includes harassing, abusive, or intimidating treatment, inappropriate language or gestures, disorderly conduct, and any other conduct that interferes with a co-worker’s ability to his or her job. Employees of CTS who become aware of inappropriate conduct are required to report the incident.

Threats or acts of violence in the workplace are prohibited. Violent acts include physical violence, stalking, threats or other similar acts. Workplace violence is any conduct that is offensive or intimidating enough to make an individual reasonably fear for his/her personal safety or the safety of family, friends or property. No firearms, weapons, explosive devices or other dangerous materials are permitted in Plan facilities.

Any workforce member, regardless of position, who threatens to commit or commits an act of workplace violence will be subject to disciplinary action up to and including termination of employment.

All threats of or actual violence should be reported as soon as possible to your supervisor or another member of management of CTS, and/or immediately to 911 for police services.

J. Our Compliance Program

CTS's Compliance Program is designed to detect and prevent non-compliance and fraud, waste and abuse to ensure our adherence to the many state and federal laws and regulations that govern CTS. The Compliance Program is a vehicle for monitoring and auditing compliance, preventing violations of the law and enabling CTS to rectify any situation before it becomes a problem or legal violation. Since the Compliance Program benefits both CTS and our workforce members, CTS expects good faith cooperation from all members of CTS's workforce and governing body in making the Compliance Program effective and reporting suspected or actual ethical or compliance related violations to the appropriate officials as set forth in this Code and CTS's policies and procedures.

All members of CTS's workforce must participate in general compliance training, including the Code of Conduct, and fraud, waste and abuse training within 90 days of initial hire and annually thereafter.

K. Our Privacy and Security Programs

CTS's Privacy and Security Programs are designed to implement the requirements of HIPAA and other federal and state laws that govern the use, disclosure and safeguarding of member protected health information (PHI), electronic-PHI, personal information (PI) and company proprietary information. These programs help ensure the security of our electronic systems and communications and provide education and training on privacy and security issues. These programs also receive reports of potential and actual privacy and security violations and investigate and resolve them appropriately. If you have any questions regarding privacy and security, please consult CTS's Compliance Department or the Director of IT.

L. Disciplinary Guidelines and Enforcement

Any member of CTS's workforce who violates the provisions of this Code of Conduct, Plan policies and procedures, state or federal law, will be subject to disciplinary action. The appropriate disciplinary action will be determined on a case-by-case basis. CTS policy provides for a range of disciplinary action, from retraining and/or verbal warning to termination of employment or business relationship with CTS.

Regardless of the violation, CTS reserves the right to impose any level of discipline, including immediate termination from employment or CTS business relationship, based on our assessment of all the circumstances of the violation, including, but not limited to, the seriousness of the violation, the frequency of the violation, the actual or potential consequences of it and the workforce member's prior disciplinary and performance record.

M. Response to Government Inquiries

We fully cooperate with all appropriate government requests for information, site visits, audits and investigations. These interactions with government authorities may have significant legal and financial impacts on CTS and you.

It is vitally important that you notify your supervisor and the VP of Compliance immediately if you are contacted by a government agent for information and/or if any government agency initiates a non-routine site visit. In this situation, you should ask for the government representative's business card, the reason for the visit and whether he/she has a subpoena or warrant.

You should then notify your supervisor and the VP of Compliance and ask the government agent to wait while you do so.

If you are approached by a government agent regarding your relationship with CTS, you have the right to:

- Contact CTS's Vice President of compliance before speaking with the agent;
- Schedule an interview at a time and place that is convenient for you
- Have counsel present
- End the discussion at any time for any reason; and
- Decline to talk with the agent.

N. Anti-Trust and Protecting the Marketplace

CTS strives to win business by providing the high quality and cost effective services to our customers. We comply with the anti-trust laws, which prohibit agreements between competitors that undermine the principles of fair competition. We do not tolerate behavior that fixes prices, divides markets, manipulates competitive bidding processes, boycotts competitors or places unreasonable restraints on competition.

O. Protecting CTS's Not-For-Profit Status

We do not use any CTS resources, including email, to engage in political elections, campaigns or candidates either personally or on behalf of CTS. CTS is a 403(b), (3) tax-exempt, not-for-profit corporation. CTS also does not make contributions or expenditures, directly or indirectly (or through the use of intermediaries, consultants or otherwise), on behalf of any candidate for political office, political party or political committee. This prohibition includes monetary contributions and non-monetary contributions, such as employees' work time or CTS's telephones, or premises.

We can participate as individuals in political activities during our non-working time. However, we must be sure that we keep our personal political activities separate from our job duties and responsibilities and we can never suggest or imply that we are representing CTS when we participate in these activities.

P. Use of CTS Equipment and Resources

Use of Plan resources, such as materials, supplies and equipment should not be used for personal business purposes. Generally, you should not conduct personal business during working time and you should not use CTS assets for personal financial gain. Occasional use of certain assets is permissible if the cost to CTS is negligible, such as making a personal telephone call. However, you should not expect that any such activities are private, as CTS reserves the right to monitor and access your communication usage and content, including telephone records and email communications. **You should have no expectation of privacy when using CTS resources for personal communications.** CTS may impose discipline when your usage violates CTS policies or procedures.

Q. Conflicts of Interest

CTS only makes business decisions based solely on the best interest of our customers and best business practices. Your outside financial or other personal interests must not influence – or appear to influence – your professional decision-making on behalf of CTS. You also may not personally benefit from any actions that you take on behalf of CTS.

In order to identify and manage potential or actual conflicts of interest, you must disclose any potential or actual conflict of interest to CTS's VP of Compliance. Certain employees are required to file annual disclosure forms that describe any potential or actual conflicts of interest the individual may have. The VP of Compliance reviews the disclosures and determines how to resolve any conflicts of interest. In the case of Board of Director members, the VP of Compliance will review the initial Conflict of Interest disclosures and subsequent disclosures.

Most conflicts can be resolved easily; however, in some instances, you may be required to refrain from participating in certain decision-making activities.

R. Substance Abuse or Impairment in the Workplace

CTS prohibits the unsafe use of alcohol, drugs or medications in the workplace. Abusing substances or working while impaired can lessen your ability to perform your responsibilities and

compromise the safety of your co-workers. On-the-job use, possession, theft or sale of drugs and alcohol is strictly prohibited. CTS reserves the right to test employees for drugs and/or alcohol when there is a reasonable suspicion that an employee is under the influence of them in the workplace.

S. Media Relations

All news and other information that is released to the media by CTS must be approved by and coordinated by CTS management. If you believe that non-public information from or about CTS is about to be released inappropriately without the consent of management, please notify the Vice President of Compliance immediately.

T. Records Retention

Federal and state laws require that we retain records for specified periods of time. We carefully follow the rules for each type of record. You and our contractors are responsible for ensuring that our records are accurate, up-to-date and maintained in compliance with the law and CTS record retention policies and procedures. CTS may suffer serious consequences up to and including sanction and fines if we fail to comply with the legal requirements.