

TRUBRIDGE, INC.
VENDOR CODE OF CONDUCT

(Last amended by the Board of Directors on October 25, 2024)

Introduction

TruBridge, Inc. (together with its subsidiaries, “TBRG” “we,” “us” or “our”) is committed to conducting our business with integrity, accountability and transparency. We value our customers, employees and vendors, and we strive to build strong relationships and cultivate an environment of trust, respect and ethical conduct.

TBRG expects that any firm or individual that provides a product or service to TBRG, a TBRG affiliate or a customer on TBRG’s behalf (a “Vendor”) will share and embrace our commitment to ethical business practices and regulatory compliance. Therefore, we have developed this Vendor Code of Conduct (this “Code”), which sets forth our expectations for the business practices of our Vendors. This Code has been developed in accordance with the frameworks and standards of the International Labor Organization (ILO) Declaration on Fundamental Principles and Rights at Work. We require all of our Vendors to comply with this Code while they are conducting business with or on behalf of TBRG. TBRG expects our Vendors to hold their employees, agents and subcontractors (their “Representatives”) to the same standards contained in this Code.

No Code can address every issue that may arise; therefore, if you have questions about any of the information in this Code, or what is expected of you, please contact TBRG’s Corporate Compliance Officer. The provisions of this Code are in addition to and should not be construed as amending, replacing or superseding the provisions of any applicable written agreement between a Vendor and TBRG or a TBRG affiliate.

Legal and Regulatory Compliance

We conduct our business with the highest standards of integrity, and we expect our Vendors to adhere to the same high standards. All Vendors shall conduct their business activities in full compliance with the applicable laws and regulations of their respective jurisdictions. Specifically (and without limiting the generality of the preceding sentence), all Vendors shall:

- Comply with anti-corruption laws of the countries in which they do business, and not make any direct or indirect payments or promises of payments to foreign government officials for the purpose of inducing the individual to misuse his or her position in order for the Vendor to obtain or retain business.
- Comply with applicable laws and regulations that are in effect in the jurisdictions in which they conduct business, including without limitation the Health Insurance Portability and Accountability Act of 1996 (“HIPAA”) security and privacy standards, United States Food and Drug Administration oversight of medical devices, and regulations that govern the electronic transmission of certain prescriptions and prescription requirements.
- Comply with antitrust and unfair competition laws that govern the jurisdictions in which they conduct business.

- Comply with applicable import and export laws and regulations to the extent the Vendor is responsible for the import or export of goods, software or technology.

Ethical Business Practices

TBRG has established a Code of Business Conduct and Ethics that reflects our commitment to ethical business practices and regulatory compliance. Vendors are expected to adhere to all applicable provisions of the Code of Business Conduct and Ethics.

TBRG expects that in all business activities with or on behalf of TBRG, Vendors shall:

- Honestly and accurately record and report all business information and comply with all applicable laws regarding its completion and accuracy.
- Create, retain, and dispose of business records in full compliance with all applicable legal and regulatory requirements.
- Use TBRG-provided information technology and systems (including email) only for authorized TBRG business-related purposes where applicable.
- Not use any TBRG-provided technology and systems to create, access, store, print, solicit, or send any material that is intimidating, harassing, threatening, abusive, sexually explicit or otherwise offensive or inappropriate, or send any false, derogatory or malicious communications.
- Comply with requirements and policies applicable to any TBRG network, systems and buildings.
- Report any incidents or suspected incidents involving data security and disclosure of customer information immediately to TBRG's Corporate Compliance Officer.
- Comply with the intellectual property rights of TBRG and any third party whose technology or other product the Vendor uses to provide service to TBRG or a customer on TBRG's behalf.
- Speak to the press on TBRG's behalf only if expressly authorized in writing to do so by an authorized representative of TBRG.
- Only give or receive gifts that are reasonable, appropriate for business purposes and strictly comply with TBRG's Gifts, Meals, Entertainment, and Travel Policy.
- Avoid the appearance of or actual improprieties or conflicts of interest: bribes, kickbacks, and similar forms of compensation are prohibited.
- Not knowingly cause any employee, agent or representative of TBRG to violate TBRG's Code of Business Conduct and Ethics.

Privacy and Confidentiality

If TBRG shares confidential information with Vendors, we require that Vendors protect that information and not access, share or disclose that information except as contemplated by our agreement. TBRG expects Vendors to share our respect for the privacy of our customers' and employees' sensitive financial and personal information. Vendors should comply with all laws pertaining to the proper collection, handling, storage and transmission of such information. Vendors must have in place and utilize appropriate security, including cybersecurity, physical security and internal controls, to protect confidential information shared by or on behalf of TBRG.

Respect for Human Rights

TBRG expects Vendors to share our commitment to human rights, dignity and equal opportunity in the workplace. TBRG's commitment to the protection of internationally recognized human rights and respect for all workers is set forth in our Human Rights Policy and we expect our Vendors to follow the same standards. Vendors shall respect internationally recognized human rights and conduct their business operations free from human rights abuses, including any form of modern slavery, such as forced labor or human trafficking, or child labor. TBRG will not tolerate Vendors engaging in any practices which constitute child labor, forced labor or trafficking, including charging illegal or excessive recruitment fees, underpayment of wages, delayed or withheld wages, forced or involuntary overtime exceeding legal limits, and the withholding of identity documents.

Employment Practices

Vendors shall conduct their employment practices in full compliance with all applicable laws and regulations, including anti-discrimination laws and laws prohibiting harassment and retaliation. Vendors shall have in place a mechanism that addresses discrimination or inappropriate behavior that could be construed as harassment, sexual harassment or abuse of one's authority. Harassment or discrimination of any form, whether based on an individual's race, ethnicity, religion, color, national origin, gender, sexual orientation, pregnancy, age, disability, socioeconomic and family status, political affiliation or protected veteran status, is unacceptable and inconsistent with TBRG's values.

TBRG values a workforce that fosters diversity and equal opportunity, and we expect our Vendors to demonstrate a similar respect for and commitment to diversity and inclusion. We expect our Vendors to provide fair and comparable wages, hours and benefits to all employees for comparable work and to maintain policies for the calculation of basic wages, overtime, bonuses and payroll deductions which are the same for all employees.

Vendors should provide wages and benefits that meet or exceed the requirements of local law, and grant and correctly compensate for any types of paid leave or time off to which they are legally entitled under applicable local laws. Workers should not be required to work in excess of the relevant legal limits on working hours, overtime hours and number of working days per week and all overtime work must be voluntary. Vendors are expected to respect rights of workers to associate freely with others, form, and join or not join labor unions or organizations of their choice, and bargain collectively, without interference, discrimination, retaliation or harassment. Vendors are expected to comply with applicable local and national laws regarding workers' rights to freedom of association and collective bargaining.

Health & Safety

Vendors should provide workers with a safe and healthy environment in compliance with all applicable occupational health, safety and environmental laws and regulations. They should implement reasonable and effective occupational health and safety measures, provide training and

education to solve health and safety issues, and procedures and systems should be in place to prevent, manage, track, and report occupational injury and illness. Vendors are expected to make safety a priority and continuously improve safety performance.

Inclusion

TBRG promotes economic inclusion and diversity, including within our supply chain. We value and will seek partnerships with a diverse group of suppliers, including vulnerable, marginalized or underrepresented groups, as well as small and medium-sized third-parties. Similarly, we expect Vendors to promote economic inclusion and diversity in their own businesses.

Environmental Sustainability

TBRG expects Vendors to share our commitment to conducting business in an environmentally responsible way that creates long-term sustainable value for our respective stakeholders. TBRG's commitment to environmental sustainability is set forth in our Human Rights Policy. Vendors shall conduct their business in full compliance with all applicable environmental, health and safety laws and should strive to minimize any negative impact their operations have on the environment.

No Creation of Third-Party Rights

This Code does not confer, nor shall it be deemed to confer, any rights on the part of third parties, including any third-party beneficiary rights. For example, no employees of any Vendor shall have any rights against TBRG by virtue of this Code, nor shall such employees have any rights to cause TBRG to enforce any provisions of this Code, the decision with respect to any such actions being reserved by TBRG in our sole discretion.

Compliance with This Code

Each Vendor is expected to self-monitor its compliance, to ensure that its Representatives understand and comply with this Code and to inform its TBRG contact (or TBRG's Corporate Compliance Officer) of any possible violation of this Code. Vendors or their Representatives may direct questions about this Code to their TBRG contact (or TBRG's Corporate Compliance Officer).

A Vendor's failure to comply with this Code may be sufficient cause for TBRG to (a) exercise our contractual right to terminate our business relationship with that Vendor or (b) require the Vendor to implement a corrective action plan to bring such Vendor into compliance with this Code.

We thank you for your compliance with this important Code and look forward to a mutually beneficial relationship with all of our Vendors based on the highest levels of ethical behavior.