



## TruBridge Policy for Reporting Violations and Complaints

### ***Policy Statement***

TruBridge, Inc. (the “Company”) 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 the Company’s or any subsidiary’s behalf) to report (a) 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; international trade rules and sanctions; violations of the medical billing and coding compliance policies; discrimination; harassment; workplace health and safety; corporate record keeping; or improper disclosure of confidential information; and (b) any concerns or complaints regarding questionable accounting or auditing matters, violations of internal accounting controls, or any other accounting, internal accounting controls, auditing or financial matters, or the reporting of fraudulent financial information, which we refer to collectively in this Policy as “Questionable Accounting Matters.” Violations and complaints involving medical billing and coding are also subject to our Medical Billing and Coding Compliance Policy, which is available on our website.

### ***Obligation to Report Suspected or Actual Violations; Anonymous Reporting***

#### **a) Reporting Generally**

It is the responsibility of every Company employee and agent to report suspected and actual violations of laws, government rules and regulations, the Company’s Code of Business Conduct and Ethics, and other Company policies. If an employee has reason to believe that questionable or illicit conduct exists, including without limitation Questionable Accounting Matters, 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 Corporate Compliance Officer any time they receive a report of suspected wrongdoing under this Policy by any Company employee, officer, director or third party acting on the Company’s behalf. You may use the Violation Complaint Form contained on the Company’s intranet within the Human Resources tab (all fields on the form are optional). The Company expects that any employee, officer, director or third party acting on the Company’s behalf will notify the Company of a report of suspected wrongdoing within two (2) business days of receiving it. Failure to fulfill this obligation may result in employment consequences up to and including termination.

Nothing in this Policy prohibits, restricts or impedes, or shall be construed to prohibit, restrict or impede, any person subject to this Policy from reporting possible violations of law or regulation to any federal or state regulatory authority or governmental entity, including without limitation the United States Securities and Exchange Commission (a “Governmental Entity”), or any self-regulatory organization, including without limitation the Financial Industry Regulatory Authority and The Nasdaq Stock Market (an “SRO”), or from initiating communications directly with, responding to an inquiry from, providing documents

and other information to, providing testimony before, or participating in any investigation or proceeding that may be conducted by, a Governmental Entity or an SRO, in each case in connection with or relating to any possible violation of law or regulation. Likewise, all persons subject to this Policy have the right to engage in the foregoing activities without notifying or seeking approval from the Company. All persons subject to this Policy are also permitted under all circumstances to file a charge or complaint with or recover an award from a Governmental Entity or an SRO without risk of being held liable by the Company for any penalty.

The Company 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, the Corporate Compliance Officer, a 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, including channels involving reporting to any self-regulatory organization or federal or state regulatory authority or governmental entity:

- 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 the [Privacy and Security Organizational Chart](#) to identify the appropriate divisional representative
- Medical Billing and Coding Violations – email either [BillingCompliance@trubridge.com](mailto:BillingCompliance@trubridge.com) or [CodingCompliance@trubridge.com](mailto:CodingCompliance@trubridge.com) or submit a concern electronically by accessing the Legal/Compliance page of [TruPortal](#).

If you do not feel comfortable speaking with a supervisor, someone in senior management, someone in Human Resources, or the Corporate Compliance Officer, or if you're not comfortable with their response, the Compliance and Ethics Hotline 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:  
TruBridge, Inc.  
Corporate Compliance Officer  
54 St. Emanuel Street  
Mobile, Alabama 36602

- Submit a secure Internet-based message through our compliance website:
  1. Go to MyComplianceReport.com
  2. At the “Begin a new report” prompt, enter TBRG for the Company Access ID, then select the button for New Report, and follow the prompts, thereafter.
- Submit a secure message through our compliance website by following the prompts on the intranet.
  1. Go to TruPortal > Functional Areas > Legal/Compliance > Reporting Complaints )
  2. Select mycompliancereport.com in option B.
  3. At the “Begin a new report” prompt, enter TBRG for the Company Access ID, then select the button for New Report, and follow the prompts, thereafter.
- Call our Hotline and speak to a live person: (800) 385-4387

### ***Treatment and Retention of Complaints and Reports***

The Company'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 the Company 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. The Company 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 Corporate Compliance Officer 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 Corporate Compliance Officer and in no event later than two (2) business days. The Corporate Compliance Officer will work with management and outside legal counsel if necessary to consider the information received under this Policy and determine the appropriate action, including investigation if necessary.

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

All reports or complaints relating to Questionable Accounting Matters will be reviewed by the Audit Committee and such other persons as the Audit Committee determines to be appropriate. The Audit Committee will determine in its judgment when to pursue an investigation related to a report or complaint. The Audit Committee may enlist employees of the Company and/or outside legal, accounting or other advisors, as appropriate, to conduct any investigation relating to any report or complaint. Confidentiality will be maintained to the fullest extent possible, consistent with the need to conduct an adequate review and investigation. Prompt and appropriate

corrective action will be taken when and as warranted in the judgment of the Audit Committee.

### ***Statement of Non-Retaliation***

The Company will not discharge, demote, suspend, threaten, harass or in any manner discriminate against any employee based upon any lawful actions of such employee with respect to good faith reporting of complaints regarding violations of the Company's Code of Business Conduct and Ethics, or other questionable or illicit conduct, including without limitation Questionable Accounting Matters, or otherwise as specified in Section 806 of the Sarbanes-Oxley Act of 2002.

The Company 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 Company rule.

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

If you have been subject to any conduct that you believe constitutes retaliation for having made a report in compliance with this Policy or for having participated in any investigation relating to an alleged violation of law or regulation or a Questionable Accounting Matter, please immediately report the alleged retaliation to the Corporate Compliance Officer or Human Resources, ideally within ten (10) days of the offending conduct. If, for any reason, you do not feel comfortable discussing the alleged retaliation with these people, please report the alleged retaliation through the [MyComplianceReport.com](http://MyComplianceReport.com) as described above under Anonymous Reporting. These individuals will ensure that an investigation is conducted in a timely fashion. Additionally, any manager or supervisor who observes retaliatory conduct must report the conduct to the Corporate Compliance Officer or Human Resources so that an investigation can be made and corrective action taken, if appropriate.

### ***Statement of Confidentiality***

The Company will keep confidential both the information and concerns reported under this Policy, and its discussions and actions in response to these reports and concerns, except as may be reasonably necessary under the circumstances to facilitate the investigation, take remedial action, or comply with applicable law.

### Revision History

Version	Effective 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	10/3/2022	Provided a link to the Code of Bus Conduct & Ethics; Added ability to contact other compliance resources for Privacy, Security, Medical Billing/Coding. Situation 9524131
1.3	05/01/2023	Updated contact address to new headquarters and link to committee organizational chart.
1.3	10/25/2024	Reformatted for TruBridge; combined with Sarbanes- Oxley accounting complaints policy; general updates
2.0	03/14/2025	Updated internal reporting path to reflect change in intranet location; minor formatting.