



2026

Code of Conduct

June 2026



Lyric Code of Conduct Policy

A MESSAGE FROM OUR CEO

Our values only matter if we live them, enforce them, and celebrate them. Integrity is a prerequisite and is foundational here at Lyric. Strong morals and ethics are how we earn trust with each other, with our customers, and with the people and communities our work ultimately serves.

Lyric's continued success depends on every one of us embracing our values and following our Code of Conduct.

This Code of Conduct is a guide for everyday decisions, and it applies to all of us, regardless of our role or level. Please read it carefully, understand it, and make it a part of your daily life. When you have questions or something does not feel right, ask early. To learn more, you can talk with your manager, Human Resources, or the Compliance Office. You can also use the reporting resources listed in this Code. For additional policies and procedures related to specific topics, please visit CenterStage.

We are all ambassadors for Lyric, and we all have an obligation to protect our company's values and reputation. If you see or suspect misconduct, raise your hand. Lyric does not tolerate retaliation against anyone who reports a concern in good faith or participates in an investigation.

Thank you for doing the right thing, even when it is not the easy thing. We value our community of trust and protect the trust that our teammates, our customers, and partners expect and celebrate.

R. Halsey Wise
Chief Executive Officer



Contents

A MESSAGE FROM OUR CEO	2
REPORTING CHANNELS	4
ZERO TOLERANCE FOR RETALIATION POLICY	5
CODE OF CONDUCT OVERVIEW	5
REPORTING OBLIGATIONS	6
RESPECT IN THE WORKPLACE.....	8
COMPANY INFORMATION.....	9
TEAMWORK.....	11
VALUE OUR CUSTOMERS	11
CONFLICTS OF INTEREST	11
GIFTS AND ENTERTAINMENT.....	12
USE OF COMPANY ASSETS	12
BUSINESS RECORDS.....	14
RESPONSIBLE USE OF AI AND CYBERSECURITY RESPONSIBILITIES	15
FOLLOWING THE LAW	16
DOING BUSINESS WITH THE GOVERNMENT.....	18
POLITICAL CONTRIBUTIONS AND ACTIVITIES	19
INSIDER TRADING	19
ANNUAL CODE OF CONDUCT TRAINING.....	19
DEFINITIONS	20

Policy Contact: For more information, or if you have any questions or concerns about this Policy, please contact the Compliance Office at compliance-ethics-privacy@lyric.ai.

REPORTING CHANNELS

Lyric is committed to upholding the highest standards of business conduct. We ask that you review the Code of Conduct and report any concerns about potential violations of the Code of Conduct, Lyric policies, or other legal requirements to the resources identified below.

Reporting known or suspected violations, unethical behavior, or other misconduct is everyone's responsibility.

Whether you:

- want to know about a compliance issue, Lyric's policies, or whether an activity is legal,
- see inappropriate behavior, a Code of Conduct or policy violation, or illegal activity, or
- suspect inappropriate behavior, a Code of Conduct or policy violation, or illegal activity,

you should reach out through the **Reporting Channels**. Don't wait for someone else to report. Looking the other way when it comes to unethical or unlawful conduct puts us all at risk.

WHERE TO REPORT WITHIN LYRIC: To report a concern, violation, or suspected violation, or to obtain more information about the Code of Conduct, Lyric's policies, or legal requirements, you can use any of the methods below:

Compliance Hotline:

Website: lyric.ethicspoint.com

Phone:

United States/Canada: 1-844-539-2320

Philippines: 1-800-1-322-0418

India- 000 800 050 3774

Compliance Office Email

The Compliance Office is available to answer questions, provide guidance or address your compliance, ethics, and business conduct concerns. You can contact the Compliance Office via email at compliance-ethics-privacy@lyric.ai. Note that Compliance Office members read all emails sent to this account, so it is not an anonymous way to communicate concerns.

Permitted Communication with Government Entities. To facilitate appropriate investigation and resolution of compliance concerns, Lyric requests that employees report compliance concerns first to Lyric through the Reporting Channels identified above and allow Lyric to fully investigate the concern. Lyric's investigation will include an assessment of whether it is necessary to report the concern to governmental entities, in which case Lyric will cooperate with government entities as described in this Code of Conduct. However, nothing in this Code of Conduct shall (i) impede or prohibit an employee from communicating, cooperating or complaining to any federal, state, or local governmental or law enforcement branch, agency or entity with respect to possible violations of regulations that are protected under the whistleblower provisions of any such law or regulation, or (ii) prevent an employee from making any truthful statements or disclosures required by law, regulation or legal process, or from requesting or receiving confidential legal advice. Notwithstanding the foregoing, under no circumstance are employees authorized to disclose any information covered by Lyric's attorney-client privilege or attorney work product without prior written consent. Any agreement inconsistent with the above language between Lyric and an employee is deemed invalid and will not be enforced by Lyric.

ZERO TOLERANCE FOR RETALIATION POLICY

Lyric has a zero-tolerance policy for retaliation against anyone who in good faith raises a question, reports a concern regarding potential violation of the Code of Conduct or other misconduct, or provides information or participates in an investigation regarding the same. Anyone who engages in retaliation is subject to disciplinary action, which may include termination of employment.

We define retaliation as taking adverse action against a team member in response to that team member's good faith report of an actual or suspected violation of the Code of Conduct, the Company policies, or legal requirements.

If someone has retaliated against you, report it immediately using any of the resources listed in the Reporting Channels section of this Code of Conduct. If you see someone engaging in retaliation, you should also report it immediately.

CODE OF CONDUCT OVERVIEW

What does the Code of Conduct mean? While we work in the complex and ever-changing healthcare industry, our commitment to conducting business honestly, ethically, and in compliance with legal requirements remains constant. Our success depends upon the decisions we make every day. All Lyric employees are responsible for understanding the standards of business conduct embodied in the Code of Conduct. We are committed to incorporating integrity, honesty, and trust in all we do to ensure we build confidence and respect among our colleagues and customers.

We align our actions to the Code of Conduct. The Code of Conduct guides us to perform our daily work consistent with our values. We should all strive to make sound decisions and build and maintain trust with our colleagues and customers. We understand this trust is essential for the continued success of our business.

How does the Code of Conduct work? The Code of Conduct outlines the conduct we expect all employees to adhere to in their daily work. It establishes the standards of business conduct and provides information, tools, and other resources to help all employees make ethical decisions which align to Lyric's values. When making decisions, seeking guidance, or if you are unsure about what to do in a particular situation, you should refer to the Code of Conduct as a resource and guide.

The Code of Conduct applies to all of us. The Code of Conduct applies to everyone at every level of Lyric. It applies to our employees, Board of Managers, and any third parties who provide services at the direction of Lyric, like business partners, consultants, contractors, suppliers, or vendors. Third-party personnel can impact Lyric's reputation through their behavior. For this reason, we seek business partners, consultants, contractors, suppliers, and vendors who share our commitment to integrity, ethics, and compliance. If you are responsible for hiring or managing third-party personnel, it is your responsibility to ensure that they understand and comply with the Code of Conduct, Lyric's policies, and legal requirements. It is also your responsibility to hold third-party personnel accountable and monitor their activities. If you suspect that third-party personnel are in violation of the Code of Conduct, Lyric's policies, or legal requirements, you must report the conduct.

We have shared responsibilities. Each of us is responsible for understanding and following the Code of Conduct, Lyric's policies, and legal requirements. We also share a responsibility to report any known or suspected violation of the Code of Conduct, Lyric's policies, and legal requirements. If we fail to do so, Lyric may be required to take disciplinary action, which may include termination of employment.

Managers have special responsibilities. Managers must set a good example for their team members, leading with integrity to model and inspire ethical conduct. Through everyday words and actions, managers should show they do business honestly by complying with the Code of Conduct, Lyric's policies, and legal requirements. Managers need to hold their team members accountable when they violate the Code of Conduct, Lyric's policies, and legal requirements. Managers must:

- foster an inclusive environment;
- ensure team members have read and understand the Code of Conduct and Lyric's policies and have taken all mandatory training courses;
- exercise appropriate supervision and oversight to ensure compliance with the Code of Conduct and Lyric's policies;
- encourage team members to report known or suspected violations of the Code of Conduct, Lyric's policies, or legal requirements, and ensure team members know where and how to report concerns;
- listen and respond to team members' concerns;
- immediately report and address suspected misconduct; and
- ensure team members are not retaliated against when they report.

Performance of these duties will be considered in all manager evaluations.

Handling questions and concerns. We treat all concerns and complaints seriously, and will promptly, thoroughly, and fairly investigate all reports, taking appropriate action when necessary. We confidentially handle all reports, sharing information only on a "need to know" basis. We also protect our employees' identities to the extent possible when investigating reports of potential violations of the Code of Conduct, Lyric's policies, or legal requirements.

Waivers. Waivers for any part of the Code of Conduct must be approved by the Chief Legal Officer and VP, Human Resources. Waivers granted to executive officers must also be approved by Lyric's Board of or one of its committees. In the extremely rare situation that a waiver is approved, its scope will be limited as needed to protect Lyric to the greatest extent possible. The company will promptly disclose any such waivers for executive officers as required by law.

REPORTING OBLIGATIONS

Employees must report in good faith. It is our responsibility to ask questions and voice concerns when we encounter something that does not seem right. Acting in "good faith" means making a genuine effort to provide honest, complete, and accurate information. When we report concerns, unethical behavior, or potential or suspected violations of the Code of Conduct, we demonstrate our ability to incorporate integrity, honesty, and trust in all we do, in line with Lyric's values.

How do I ask for guidance, voice a concern, or report an incident? In many cases, your

manager is in the best position to help you. However, if you are not comfortable talking about an issue with your manager, you may contact the Compliance Office, Human Resources, or the phone numbers and email addresses in the Reporting Channels section of this Code of Conduct. No matter whom you contact or what resources you choose, your concern will be promptly addressed and handled with the appropriate level of confidentiality. Lyric has a zero-tolerance policy for retaliation against anyone who raises a question or reports potential misconduct in good faith. Anyone who engages in retaliation is subject to disciplinary action, which may include termination of employment.

You Must Report:

- discrimination or harassment;
- privacy concerns;
- conflicts of interest;
- theft, fraud, or bribery;
- environmental or safety concerns;
- workplace violence, threats, or bullying;
- accounting or other financial issues;
- inappropriate gifts or entertainment;
- intimidation or retaliation;
- other threatening, concerning, or illegal behavior;
- code of conduct violations;
- policy violations; or
- legal requirement violations; or
- potential compliance issues

This is not a complete list of issues you should report. Anytime you see or suspect something is not right, you must report your concern.

Lyric investigates compliance concerns. We promptly investigate all reports of conduct that may violate the Code of Conduct, Lyric's policies, or legal and regulatory requirements. All employees are expected to be truthful and fully cooperate with any investigation into an alleged violation of the Code of Conduct, Lyric's policies, or legal requirements. Employees who fail to do so may be disciplined, possibly having their jobs terminated.

Lyric cooperates with Government Investigations. Governmental agencies are empowered to conduct audits and investigations related to the administration of various laws. These may involve routine inspections of Lyric's records, interviews with employees, or a more thorough audit or investigation based on a complaint made by an employee, customer or other aggrieved party. It is Lyric's policy to cooperate fully with all government agencies during government audits and investigations. It is important that all employees treat government officials with the utmost respect and maintain a professional standard of conduct. It is equally important that Lyric's interests are maintained during all government audits and investigations. As such, Lyric has designated the Legal and Compliance Department to address and respond to government audits, investigations or other inquiries. Accordingly, please notify the Legal and Compliance department at lyric-legal@lyric.ai immediately upon receipt or notice of any government audit, investigation, or other inquiry, and do not respond to requests for information, provide any written documents, or answer any questions without first receiving authorization from Lyric's Legal and Compliance Department.

RESPECT IN THE WORKPLACE

Lyric strives to create a supportive work environment where all employees can achieve their full potential and contribute to our values. Lyric encourages collaboration and inclusion. Sharing, valuing, and supporting a wide range of ideas and viewpoints broadens our perspectives, inspires innovation, and empowers us to achieve our goals.

We maintain a harassment-free work environment. Lyric expects that all employees will treat each other with dignity and respect and promote a work environment where all employees can feel safe and comfortable. We do not tolerate verbal or physical conduct based upon a protected category that disrupts another's work performance or creates a hostile work environment. Sometimes, a person's conduct may be considered harassment even if it was not intended to be offensive.

We respect human rights. Lyric complies with all laws prohibiting human trafficking and maintains a zero-tolerance policy against human trafficking that applies to all employees. Human trafficking includes, without limitation, recruiting, harboring, transporting, providing, or obtaining a person for labor or services through the use of force, coercion, fraud, or deception, the abuse of power or of a position of vulnerability, or the giving or receiving of payments or benefits to achieve the consent of a person having control over another person for the purpose of exploitation.

Individuals with disabilities. We are committed to providing reasonable accommodations to qualified individuals with disabilities. Accommodation requests are evaluated on a case-by-case basis, taking into account applicable laws, job requirements, and business needs, to enable employees to perform the essential functions of their roles and participate in our employment opportunities.

If you believe you need an accommodation because of a disability, or if you have questions or concerns about discrimination or harassment, you should contact your manager, Human Resources, the Compliance Office, or any other resource identified in the Reporting Channels section of this Code of Conduct.

Remote Work and Distributed Workforce Expectations

Because Lyric operates with a distributed and remote workforce, employees are expected to maintain the same standards of professionalism, confidentiality, security, and compliance regardless of work location.

Employees working remotely must:

- Protect confidential conversations from being overheard by unauthorized individuals.
- Use only approved devices, networks, and collaboration platforms for company business.
- Secure company devices when not in use.
- Prevent unauthorized individuals, including family members and friends, from accessing company systems or information.
- Follow clean desk and secure document practices.
- Report lost, stolen, or compromised devices immediately.
- Comply with all customer, regulatory, privacy, and security obligations while working remotely.

Remote work does not reduce any employee's responsibility to safeguard company information,

customer information, Personal Information, or Protected Health Information.

COMPANY INFORMATION

We protect Company Information. All employees have an obligation to protect the Company Information that drives our business. Company Information includes information or data collected, accessed, stored, transmitted, used, disclosed or disposed of in connection with Lyric business or otherwise related to the company, customers, employees, business partners, and any entity or third-party providing services at the direction of Lyric. Company Information may include but is not limited to Restricted, Confidential, and Internal Use Only Information as well as Personal Information and Protected Health Information. Company Information does not include Public Information.

We earn the trust of our employees and the companies with which we do business by following the Code of Conduct, Lyric's policies and legal requirements. Company Information may only be used for business purposes, not for personal use or gain.

We must respect and protect the sensitive nature of all Company Information and carefully maintain its confidentiality. In limited circumstances certain Company Information may be shared with parties outside Lyric for a legitimate business reason but only upon the approval of the Compliance Office and/or Legal Counsel and only with the appropriate contractual agreement such as a non-disclosure agreement or business associate agreement.

Non-Public Information is information about a business organization that is not generally available to or known by the public (sometimes called "inside information").

Restricted Information is intended for a limited group of individuals specified by name. Inappropriate disclosure of such information could result in serious detriment to Lyric. Examples include Protected Health Information (PHI), merger and acquisition information, financial forecasts or results not yet public, and strategic planning information not yet public

Confidential Information is intended for limited business use that is exempt from public disclosure because, among other reasons, such disclosure could jeopardize the privacy or security of team members, clients, or partners, and possibly violate federal or state laws. Disclosure of Confidential Information could cause significant harm to Lyric and is limited to authorized individuals.

Internal Use Only Information may be shared among employees, but not with outside parties unless an authorized nondisclosure agreement has been signed. Examples include weekly status reports, employee contact information, and software documentation.

Please also review **the Records and Information Policy** for more details on handling and safeguarding Company Information.

We respect the privacy and security of Personal Information. Our customers, business partners, and employees trust us to respect and protect Personal Information and other sensitive information. **Personal Information** includes any information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular individual, such as name, address, photo, birth date, phone number, social security number, health, credit, or financial information. Personal Information is protected under various federal, state, and international privacy, security, healthcare, credit, and financial laws. We collect, store, access, use, share, transfer, and dispose of Personal Information responsibly.

Given our role in the healthcare industry, we also receive, collect, maintain, use, or create a particular type of Personal Information, known as **Protected Health Information**. Protected Health Information (PHI) is any individually identifiable health information, that (1) is created or received by a healthcare provider health plan, or healthcare clearinghouse; and (2) relates to the past, present, or future physical or mental health or condition of an individual; the provision of healthcare to an individual; or the past, present or future payment for the provision of healthcare to an individual; and (3) directly or indirectly identifies the individual.

See the **HIPAA Privacy Policies** for detailed guidance on handling and safeguarding PHI. All employees must follow the company's privacy policies, which among other things require you to collect, access, use, share, transfer, and dispose of Personal Information and PHI only as necessary to do your job, to do so transparently, and to retain the information only so long as necessary for legitimate purposes, consistent with our records retention policies.

Help respect the privacy, security, confidentiality, and integrity of all Company Information:

- adhere to all Lyric's policies, procedures, rules, and guidelines addressed to privacy, confidentiality, record and information management, and information security;
- comply with applicable legal requirements;
- collect and use the minimum amount of information necessary to achieve legitimate business purposes;
- share information only with individuals who have a legitimate need for it and will protect it properly;
- follow Lyric's policies and guidelines for storing, handling, and destroying such information;
- immediately report any inappropriate disclosure or use of such information to the Ethics Hotline; or any of the other Reporting Channels listed;
- new employees must protect the Non-Public Information of any former employers; and
- if an employee leaves the company, the employee should return all Non-Public Information and may not share it with a new employer.

Maintaining Secure Information. Access to secure information is limited and depends upon an employee's job function. Lyric regularly monitors its systems to be sure that information is accessed and used for appropriate, authorized activities, to discover any new threats, and to look for ways to improve the security of its systems. We monitor and control all electronic and computing devices used to conduct Lyric's business or to interact with our internal networks and systems. As allowed by applicable legal requirements, Lyric may inspect or monitor all messages, files, data, software, or other information stored on these devices or transmitted over our internal networks and systems to ensure compliance with Lyric's policies.

Incident Reporting. An incident is any situation where sensitive information may be lost, stolen, accessed, hacked, compromised, or improperly handled. An incident may involve Personal Information, PHI, or other Non-Public Company Information, or an attempt to gain unauthorized access to our systems or data. All employees must report any known or suspected incident involving Lyric's or any of its employees' Non-Public Company Information or Non-Public Information belonging to a customer, business partner, contractor, consultant, supplier, or vendor through the Reporting Channels section of this Code of Conduct. You may report by contacting the Compliance Office, Human Resources, Cybersecurity, or the phone numbers and email addresses in the Reporting Channels section of this Code of Conduct.

TEAMWORK

We believe that teamwork is critical to our success. We are committed to enabling a collaborative environment where all team members' contributions are valued. We encourage open communication, mutual respect, and shared accountability. By working together, we can achieve our common goals and provide the highest quality of service to our clients. We celebrate each other's achievements and support one another in our professional growth.

VALUE OUR CUSTOMERS

We are committed to placing our customers first. We treat our customers with respect and understanding, ensuring their needs are met with the highest level of service and care. We strive for excellence in every interaction, delivering high-quality products and services. Transparency and honesty guide our communications, and we continuously seek to improve our offerings based on customer feedback. By valuing our customers, we build lasting relationships and trust.

CONFLICTS OF INTEREST

A conflict of interest exists when you have a personal, family, business, or other interest that could impair or appear to impair your ability to act in the best interest of Lyric when making business decisions on behalf of Lyric. Use your best judgment and avoid even the appearance of a conflict. See the Lyric Conflict of Interest Policy for additional information.

Disclose potential conflicts of interest. If a personal activity, investment, interest, or association could compromise – or even appear to compromise – your judgment, you must promptly disclose the conflict by contacting the Compliance Office. A conflict of interest often can be resolved in a simple and mutually acceptable way when discussed promptly and openly.

Is it a conflict? Ask yourself:

If I take this course of action:

- Will I feel obligated to someone else?
- Am I acting inconsistently with Lyric's values?
- Is there a chance that my independent judgment could be compromised?
- Could it give the appearance of impropriety or divided loyalty?

If you answer "yes" to any of these questions, a real or perceived conflict of interest may exist. Disclose the potential conflict of interest by contacting the Compliance Office.

Common situations where conflicts of interest may arise:

Family and friends. Family and friends can create a conflict of interest if they work for Lyric or one of our customers, business partners, contractors, consultants, suppliers, vendors, or competitors. You should consider the term "family and friends" broadly to include spouse, significant other, children, siblings, parents, grandparents, grandchildren, aunts, uncles, nieces, nephews, cousins, step relationships, and in-laws or other devoted family member or friend.

Financial interests. A conflict of interest can arise if you have a financial interest in a current or potential Lyric customer, business partner, contractor, consultant, supplier, vendor, or competitor.

Outside business activities. An outside business activity, such as a second job or working on a consulting basis, can create a conflict of interest if it competes with Lyric or interferes with the work you do for Lyric.

Hiring former government employees. Recruiting or hiring current or former government officials, whether appointed or elected, may raise conflict of interest concerns. You must not recruit or hire a current or former government official, whether appointed or elected, or government employee without obtaining prior approval from Human Resources and the Compliance Office. Refer to the Code of Conduct section on Doing Business with the Government for further guidance.

GIFTS AND ENTERTAINMENT

We recognize that the exchange of gifts or entertainment may help develop and strengthen our business relationships – but we do not give or receive gifts or entertainment that influence, or even appear to influence, business decisions. We give and receive gifts or entertainment in an ethical way that does not violate the Code of Conduct, Lyric's policies, legal requirements, or third-party policies. All employees should study the Accepting and Providing **Meals, Gifts and Entertainment Policies** to learn the right way to give or receive appropriate business courtesy. Whether giving or receiving a gift or entertainment, the Accepting and **Providing Meals, Gifts and Entertainment Policy** requires an employee to determine whether the courtesy is appropriate and lawful. This section describes the first steps you should take when considering giving or receiving a business courtesy, but you should always consult the Accepting and Providing **All gifts and entertainment**, whether given or received, must meet the Criteria for Acceptable Business Courtesies. All gifts and entertainment, whether given or received, must meet the Criteria for Acceptable Business Courtesies.

Criteria for Acceptable Business Courtesies

- not solicited or requested;
- not perceived to improperly influence a business decision;
- not offered or received while a sales or procurement decision is pending;
- not conditioned on obtaining a sales or procurement decision;
- no personal benefit;
- infrequent;
- nominal value (not excessive or lavish);
- not cash or cash equivalent (no gift cards or gift certificates);
- occurs in an appropriate setting for business discussion;
- would not embarrass Lyric; and
- is lawful under applicable laws.

USE OF COMPANY ASSETS

We protect our Company Assets. Company Assets are the tools and information Lyric uses to conduct business, including equipment, supplies, vehicles, furnishings, computer systems, software, phones, other wired and wireless devices, information, trade secrets, personnel, our brand, and our reputation. We use these assets for legitimate business purposes and safeguard them from loss, theft, fraud, and misuse. Lyric's assets are valuable and essential to operating the company profitably and successfully.

Appropriate use of Company Assets and Information Systems. All employees are required

to use Lyric's information systems in accordance with the **Records and Information Management Policy**. Your Lyric computer, network, and internet access must be used primarily for business. Occasional and reasonable personal use of Company Assets is allowed so long as it is minimal, does not interfere with your work performance or the work of others, and does not result in a significant cost or impact to our network. However, group collaboration software, such as Microsoft Teams, Zoom, and WebEx may only be used for business purposes. You should never use Lyric's assets including its electronic systems for commercial or for-profit activity, or to:

- send chain letters or email spam;
- engage in illegal conduct;
- access or send sexually explicit, obscene, or offensive material;
- play games or gamble;
- create unapproved websites; or
- make personal video/conference calls.

Employees should have no expectation of privacy when using Lyric's information systems. All activity conducted using these systems is and remains the property of Lyric. Lyric reserves the right at any time and for any reason to review and monitor the use of its information systems as permitted by legal requirements.

We safeguard our intellectual property. Lyric's intellectual property is a valuable asset, and we invest heavily in its development. Lyric's software code, knowledge, ideas, discoveries, formulas, inventions and other tangible and intangible assets that have commercial value and are protected under copyright, patent, service mark, trade secret, and trademark laws. We protect our intellectual property by taking steps to prevent inappropriate disclosure, use, or loss of such information and will vigorously enforce our rights to these assets. We also respect the intellectual property rights of others.

Electronic communications. When you send emails, voicemails, or access the internet at work, it is important to remember that your words and actions represent Lyric. Employees should strive to use clear, accurate, respectful, and professional communication in all of our business interactions, both within and outside the company. Ambiguous and unprofessional communications, whether oral or written, can harm Lyric.

Communicating with the public. We are committed to providing the public with relevant and appropriate information about Lyric and communicating the information in a way reasonably designed to provide broad distribution of the information to the public. To maintain our reputation and ensure the public is consistently and accurately informed, only authorized individuals may communicate on behalf of Lyric with the media. Press releases and all media contacts are to be made only through a designated Lyric spokesperson. Unless you receive prior approval, you must decline the opportunity to respond to any inquiries for news or information about Lyric. You must avoid creating any impression that you are speaking on behalf of Lyric in any personal communications.

Social media. We encourage communication and collaboration among employees, customers, business partners, contractors, consultants, suppliers, and vendors. However, the broad, instantaneous reach of social media significantly increases the importance of communicating responsibly, and managing private, sensitive, and confidential information in accordance with our policies and legal requirements. Ensure that you appropriately represent Lyric's interests when making authorized company communications and distinguish your personal opinions from those of Lyric's.

You also are expected to protect Lyric's Non-Public Company Information and respect the privacy of employees, customers, business partners, contractors, consultants, suppliers, and vendors when using social media. If you have been entrusted with Restricted, Confidential, or Internal Use Only Information, you must not disclose it unless specifically authorized to do so. Do not publish maliciously false information that might embarrass or damage the reputation of another employee, customer, business partner, contractor, consultant, supplier, or vendor.

BUSINESS RECORDS

The Company maintains accurate business records. We are accurate, complete, and timely in all aspects of our recordkeeping. Maintaining accurate, complete, and timely records demonstrates integrity and builds trust in our stakeholders. Each of us has an obligation to follow all internal controls in recording and maintaining Lyric's books and records. Accurate information is required to make good business decisions. The accuracy of our books, records, and accounts also contributes to the quality of the financial and other information we provide to government agencies and make available to the public. We are committed to making full, fair, accurate, timely, and understandable disclosures.

We watch for unusual activity. We stay alert for irregularities or inaccuracies in our books, records, and accounts, and never give in to pressure from anyone to falsify a record or ignore something unethical. You must never knowingly engage in activities or conduct business with individuals involved in money laundering – a process in which funds generated through criminal activity (such as terrorism, drug dealing and fraud) are moved through legitimate businesses to hide their criminal origin. Suspicious accounting practices could be a sign of fraud, bribery, or some other illegal act. Report such conduct to an appropriate Reporting Channel immediately.

We manage and retain our records appropriately. The responsible creation, storage, maintenance, and disposal of records is important in helping us maintain financial integrity and meet our legal, tax, and regulatory requirements. You must retain Lyric's records as described in the **Records and Information Management Policy**. Records that have met their retention requirements should be properly destroyed.

Do not dispose of any information that is subject to a legal hold as directed by the Compliance Office. A legal hold suspends all document destruction procedures to preserve appropriate records under special circumstances, such as anticipated or actual litigation or government investigations. The records cannot be destroyed, altered, or deleted until you have been notified by the Compliance Office that the legal hold has been removed.

Adherence to Accounting and Financial Processes. Employees involved in any aspect of our accounting or other financial processes must:

- follow all internal processes, controls, and accounting or other financial principles, ensuring that our records accurately and timely reflect all transactions;
- be accurate, timely, and complete in all aspects of recordkeeping (including accounting records, financial statements, expense reports, time sheets, purchase orders, invoices, etc.);
- not establish any undisclosed or unrecorded funds, liabilities, or assets for any purpose;
- never falsify or mischaracterize any book, record, account, or transaction;
- not make any payment – regardless of form – on Lyric's behalf without adequate supporting documentation and required approval; and
- apply payments received from customers properly.

Cooperation with audits. Lyric and all employees are expected to cooperate with any audit. Such cooperation requires accuracy, candor, and responsiveness. You must never try to alter or destroy data, make any false, misleading, or inaccurate oral or written statement or influence, pressure, mislead, or manipulate any auditor in connection with any review of the company's financial or other records.

Global Privacy

Employees must comply with all applicable privacy, data protection, healthcare, and security laws in the countries where Lyric operates or conducts business.

Employees must collect, access, use, disclose, transfer, retain, and dispose of personal information only for legitimate business purposes and only to the extent necessary to perform their job responsibilities.

Employees must immediately report suspected privacy incidents, unauthorized disclosures, and data losses.

RESPONSIBLE USE OF AI AND CYBERSECURITY RESPONSIBILITIES

Responsible Use of Artificial Intelligence (AI)

Lyric uses data analytics, automation technologies, machine learning, artificial intelligence, and decision support tools to improve operational efficiency, support business processes, enhance customer outcomes, and drive innovation. While these technologies can provide significant benefits, they must be used responsibly, ethically, securely, and in compliance with applicable laws, regulations, contractual obligations, and company policies.

Employees are responsible for ensuring that data analytics and automation tools are used in a manner that protects the privacy, security, confidentiality, integrity, and appropriate use of information entrusted to Lyric.

AI and Generative AI Governance

Lyric recognizes the potential benefits of artificial intelligence, machine learning, and generative AI technologies when used responsibly and in compliance with applicable laws, regulations, customer obligations, and company policies.

Employees may use only AI tools that have been reviewed and approved by Lyric. Employees must not enter Protected Health Information, Personal Information, source code, proprietary algorithms, pricing information, strategic plans, or other Restricted or Confidential Information into public or unapproved AI systems.

Employees remain responsible for all work products generated or assisted by AI. AI-generated content must be reviewed for accuracy, completeness, bias, intellectual property concerns, security risks, and compliance with legal and contractual obligations before use.

AI will not be used without the appropriate human oversight.

Cybersecurity Responsibilities

Cybersecurity is a shared responsibility. Every employee, contractor, consultant, and temporary worker plays an important role in protecting Lyric, its customers, and the individuals whose information we maintain.

Employees must:

- Follow all information security policies, standards, and procedures.
- Use strong passwords and multifactor authentication where required.
- Protect company-issued devices from theft, loss, or unauthorized access.
- Install only authorized software and applications.
- Immediately report suspected phishing attempts, malware, ransomware, unauthorized access, or other security incidents.
- Secure physical and electronic access to systems and information.
- Complete all required security awareness training.

Employees must never bypass security controls, share passwords, use unauthorized cloud storage services, or transmit sensitive information through unapproved channels.

Failure to follow cybersecurity requirements may result in disciplinary action up to and including termination of employment.

FOLLOWING THE LAW

Our customers and business partners look to us for operational excellence. Because of this, we strive to perform our work in a transparent and ethical manner, and in compliance with legal requirements wherever we operate.

Anti-Kickback Statute (and similar state laws). In the United States, federal and state anti-kickback legal requirements prohibit the offering of, paying for, or requesting or receiving anything of value that is intended to influence the purchase of a healthcare product or service that may be reimbursed by any federal healthcare benefit program. Such programs include Medicare, Medicaid, and Tricare, any state healthcare benefit programs, and in some cases, a payer of healthcare products or services. Such offers or “kickbacks” may include any item of value, or compensation of any kind, such as money, commissions, credits, discounts, prebates, rebates, free products or services, or gifts or entertainment. These legal requirements are drafted broadly and affect a variety of our business arrangements. Please review the **Anti-Kickback Policy** for more information.

False Claims Act (and similar state laws). The United States False Claims Act (and similar state laws) makes it a crime for any person or organization to knowingly make a false record or file a false or fictitious claim with the government for payment.

Stark Law (Physician Self-Referral Prohibition Statute). The Stark Law prohibits a physician in the United States from referring Medicare and Medicaid patients for certain designated health services to an entity with which the physician or a member of the physician’s immediate family has a financial relationship. Providers of designated health services may not bill for services that result from a prohibited referral.

Exclusions and debarment. Under federal and state law, certain individuals and entities may be excluded, suspended, or debarred from participating in government healthcare and procurement programs. Companies may face fines and penalties for allowing such excluded individuals or entities to participate in these programs. Because Lyric engages with many health insurance companies that administer government health insurance plans (such as Medicare and Medicaid managed care plans), Lyric does not knowingly employ or do business with any individual or

entity that: (1) is excluded, suspended, debarred, or declared ineligible from doing business with the government; (2) has been convicted of an offense related to government contracting or a government healthcare or procurement program; or (3) is identified on any government Exclusion List. In the event you become disqualified, suspended, debarred, or declared ineligible from doing business with the government at any time during your employment or assignment with the company, you must immediately notify your manager. Lyric conducts checks of the following Exclusion Lists prior to hiring or assigning any individual or entity to perform work on behalf of Lyric and on a periodic basis thereafter:

1. The General Services Administration's "Excluded Parties List System" and System for Award System (SAM)— a list of parties excluded from receiving federal contracts, certain subcontracts, and certain types of federal financial and non-financial assistance and benefits;
2. The Office of Foreign Asset Control's "Specially Designated Nationals and Blocked Persons List" – a list of people and organizations with whom United States citizens and permanent residents are prohibited from doing business;
3. The Office of the Inspector General's "List of Excluded Individuals and Entities" – a list of people and entities who are not eligible to participate in federally funded healthcare programs; and
4. All available state Medicaid exclusion lists

If any employee or contractor is added to an Exclusion List, HR and the Compliance Office will coordinate on an appropriate response, which may include termination of the employment or contract of the affected individual or entity.

Antitrust and competition laws. Lyric is committed to operational excellence and standing out in our industry through legal and ethical means. Therefore, you should:

- never make false, misleading, or disrespectful comments about our competitors or their products or services;
- only use legitimate means of obtaining competitive intelligence;
- respect the confidential information and intellectual property of our competitors and other third parties; and
- always comply with antitrust and competition laws.

Antitrust and competition laws encourage free and fair competition in the marketplace and protect the public from unfair business practices. Examples of prohibited anti-competitive business practices include:

- agreeing with a competitor to raise, fix, or hold a price at which goods or services will be offered (price fixing);
- agreeing with a competitor as to when, if, or at what price, each will submit a bid in a bidding process (bid rigging);
- agreeing with a competitor to divide markets or sell only to customers in certain geographic areas (market division); and
- exchanging price or other competitively sensitive information with competitors.

As a general rule, you always should limit your contact with competitors and avoid conversations

about prices, customers, and suppliers. Antitrust laws are very complex, and the risks of noncompliance can be severe. If you have any questions or need further information, please contact the Compliance Office.

Communications laws. In the United States, various federal and state laws regulate when, how, and if Lyric may contact others, including our customers. These legal requirements include:

- complying with “do not call” and “no texting” lists;
- restrictions on faxing;
- restrictions on “robo” calls; and
- restrictions on sending emails.

Before implementing any marketing or other product or services communications campaign, you must obtain advance approval of such a campaign. Consult the **Telephone and Electronic Communications Policy**.

If you become aware of a potential violation of any legal requirements, whether discussed in the Code of Conduct or not, you must report it.

DOING BUSINESS WITH THE GOVERNMENT

There may be additional requirements or obligations to consider when doing business with the government. Doing business with the government requires us to follow rules beyond those applicable to our commercial customers or suppliers. Activities that may be appropriate in the commercial business environment may be improper when interacting with government customers. We never want to appear as if we are trying to bribe or to exercise improper influence on government customers. If your work involves a government customer, you are responsible for knowing and complying with the applicable legal requirements, including meeting all contractual obligations. A violation of such requirements can lead to serious financial and reputational harm and result in Lyric being prohibited from doing business with government customers.

Government Officials are employees or agents of any government anywhere in the world, even low-ranking employees or employees of government-owned, affiliated or controlled entities. The term also includes political parties and party officials, candidates for political office, and employees of public international organizations, such as the United Nations.

Government procurement integrity. Lyric employees must not attempt to obtain the following information from any source:

- procurement-sensitive government information;
- confidential internal government information, such as pre-award, source selection information; and
- a competitor’s bid or proposal information.

If such information is inadvertently communicated to you by a consultant, contractor, supplier, vendor, or a government employee, you should promptly contact the Compliance Office.

Organizational conflict of interest. You must ensure that when competing for or performing a government contract there is no actual or potential organizational conflict of interest that would provide Lyric unequal access to Non-Public Information, provide an unfair advantage in a competitive procurement, or impair our objectivity in providing assistance or advice to or performing work for a government customer. You must promptly report all actual or potential organizational conflicts of interest to the Compliance Office.

Restrictions on employing current and former government personnel. Many governments regulate the employment activities of current and former government officials, whether elected or appointed, to restrict Lyric from gaining an unfair competitive advantage by hiring a current or former government official or employee. You must obtain advance approval from the Compliance Office before discussing employment opportunities with any former or current government employee.

Anti-corruption laws. We do not tolerate bribery or any form of corruption. You must not offer anything of value to obtain favorable treatment from a respective customer. This is true even in countries where bribery is common and local legal and cultural standards allow it. Lyric complies with all anti-bribery and corruption laws in the locations where it does business. Lyric prohibits anyone from offering, soliciting, or accepting a bribe, whether dealing with government officials, political parties or representatives from commercial organizations. We expect this same standard of integrity from all our third parties, agents, and anyone else with whom we work on Lyric's behalf. Please review the Global **Anti-Corruption Policy** for more information.

If an applicable law conflicts with the Code of Conduct, we follow the law; however, if a local business practice conflicts with the Code of Conduct, we follow the Code of Conduct. When in doubt, reach out to an appropriate resource for guidance.

POLITICAL CONTRIBUTIONS AND ACTIVITIES

Engagement in political activities must comply with and be consistent with legal requirements. In the United States, federal, state, and local laws regulate our ability to make political contributions and to engage in political activities, including lobbying. Many countries outside the United States have similar laws. Accordingly, all political contributions to be made with Lyric's funds, and all lobbying activities on Lyric's behalf, must be approved in advance by the Chief Legal Officer and Chief Executive Officer. Employees may, in their individual capacities, make contributions directly to candidates and political parties of their choice. However, any individual contributions should not be attributed to Lyric, and contributing employees are responsible for ensuring that their contributions comply with applicable legal requirements. Please review the **Political Contributions and Governmental Activities Policy** for more information.

INSIDER TRADING

Do not trade on insider information. United States securities laws prohibit buying and selling shares of stock or other securities on the basis of non-public material information. This is called "insider trading." If you have access to non-public material information about Lyric or another company, regardless of the source, you are not permitted to use or share that information for your personal benefit. All Non-Public material information about us, our owners, our customers, business partners, contractors, consultants, suppliers or vendors should be considered confidential information. If an employee trades securities of these entities while having non-public material information, or if an employee shares non-public material information with others who trade, this may constitute insider trading. We are all responsible for reviewing, understanding, and complying with applicable securities laws and regulations. Material Information is any information that an investor likely would consider important in deciding whether to buy, hold, or sell securities of a company.

ANNUAL CODE OF CONDUCT TRAINING

Each year Lyric and all employees engage in a Code of Conduct training. This training discusses

the goals and objectives of the Code of Conduct, Lyric's policies and legal requirements. Specific topics include, but are not limited to, the following:

- Lyric's values and commitment to incorporating integrity, honesty, and trust in all we do, including acting in an ethical manner and in compliance with applicable laws;
- overview of pertinent laws applicable to Lyric's business, including the federal anti-kickback statute, the False Claims Act, the Foreign Corrupt Practices Act, securities laws, antitrust laws, and privacy and security laws;
- the requirement that employees report potential noncompliance or violations of the Code of Conduct or Lyric's policies;
- process and lines of communication for asking compliance questions or reporting potential noncompliance (including anonymous);
- prohibition against intimidation or retaliation for good faith reporting of potential noncompliance;
- privacy and security awareness;
- fraud, waste, and abuse (FWA) training as published Medicare Compliance Program Requirements; and
- attestation that the employee is aware of, and will abide by, the Code of Conduct.

Completion requirements. Employees receive compliance training both as part of their initial orientation (within 14 days of initial hire or engagement) and annually thereafter.

Successful completion of compliance training both during initial orientation and annually is a condition of continued employment or engagement. Failure to complete the training within the required timeframe could result in disciplinary action.

DEFINITIONS

Anything of Value. Anything of value is broadly defined and may include cash, cash equivalents, gifts, meals, entertainment, recreation, charitable donations, loans, travel expenses (airfare, hosting, etc.), job placements, consulting contracts, operational support, educational support or other payments, or free or discounted items.

Bribery. Offering, promising, or giving anything of value to gain an improper advantage or favorable business decision.

Cash Equivalents. Loans, stock, stock options, bank checks, travelers' checks, check or cash cards, gift certificates, money orders, investments securities, or negotiable instruments.

Close relative. Includes spouse, significant other, child, parent, in-law, or other devoted family member.

Employee: For purposes of the Code of Conduct, Employee means all full-time, part-time, and temporary employees; Company officers and directors; as well as contingent workers (including those not receiving a Company W-2 or participating in benefits) such as contractors and consultants, who perform professional services on the Company's behalf.

Good Faith. Acting in "good faith" means making a genuine effort to provide honest, complete, and accurate information.

Harassment. Unwelcome words, actions or behaviors that denigrate, disrespect, or belittle an individual or create a hostile, offensive or intimidating work environment because of a protected category. Sometimes, a person's conduct may be considered harassment even if it was not intended to be offensive.

Intellectual Property. Knowledge, ideas, discoveries, formulas, inventions and other intangible assets that have commercial value and are protected under copyright, patent, service mark, and trademark laws. Additional examples of intellectual property include technical inventories, brands and logos, software code, presentations, databases, customer lists, process documents, product designs, and roadmaps.

Kickback. A form of corruption that involves two parties agreeing that a portion of the money paid, or due to be paid, will be given back to the purchasing party in exchange for making the deal.

Legal Hold. A legal hold suspends all document destruction procedures to preserve appropriate records under special circumstances, such as anticipated or actual litigation or government investigations. The Compliance Office identifies what types of records or documents are required to be placed under a legal hold.

Need to Know. Team members who have a “need to know” information require access to that information (often confidential in nature) to do their jobs. If you are in doubt about whether a particular individual within the Company has a “need to know,” please contact HR or the Compliance Office.

Non-Public Company Information. Information about a business organization that is not generally available to or known by the public (also called “inside information”).

Social Media. Online communication channels that provide an opportunity for content sharing, individual input of information, and interaction. Includes websites, chat rooms, blogs, news feeds, social networking sites, and special applications dedicated to posting and sharing comments, articles, opinions, ideas, information, and images