



Human Rights Policy

HMS is committed to treating each employee, and individuals with whom we work, with dignity and respect.

Scope

This Human Rights Policy applies to all HMS operations and to all locations and situations where HMS business is conducted. The rules and principles outlined in this Policy apply to all HMS personnel, including employees and contractors, as well as all vendors, subcontractors, consultants and any others acting on HMS' behalf. Violations of this Policy may result in disciplinary action up to and including termination.

Purpose

HMS Holdings Corp. and its subsidiaries (collectively "HMS") support the protection of human rights around the world. While our employees perform healthcare information technology and related services in the United States, our commitment to human rights is much broader. It extends to circumstances where we may interact with vendors, suppliers and customers spanning a variety of industries and geographic locations. These commitments are woven into the fabric of our core values and are further described in our Code of Conduct and other applicable policies and procedures.

This Policy is intended to provide guidance to help ensure that HMS's employees and others acting on HMS' behalf understand their responsibility to uphold human rights, including but not limited to the anti-trafficking provisions of the Federal Acquisition Regulations (FAR) "Combating Trafficking in Persons."

Policy

1. Respect for Human Right

Respect for human rights is a fundamental value of HMS. We strive to respect and promote human rights in our relationships with our employees, suppliers and subcontractors.

HMS is committed to treating each employee, and individuals with whom we work, with dignity and respect. Recognizing that the engagement of our workforce is critical to our success, we hold ourselves accountable through our Open Door Communication policy as outlined in our Employee handbook and formal Employee Engagement Surveys to track our success in meeting this commitment and identifying opportunities to improve.

Employees who are aware of a potential violation of this policy are required to report the matter in the manner described below. The HMS Chief Human Resources and Chief Compliance Officer is responsible for investigating alleged policy violations, and for overseeing the proactive monitoring of HMS worksites, subcontractors and vendors, to ensure we meet our commitment to respecting the human rights of all people in our business.

2. Human Trafficking, Forced Labor, Child Labor

HMS opposes all forms of slavery, servitude, forced labor, and human trafficking. HMS prohibits modern slavery in its operations, in its supply chain, and by its business partners around the globe.

As a contractor to the U.S. Government, HMS is required by law to notify all employees who work with our federal customers of the Government's zero tolerance policy regarding human trafficking. Some examples of trafficking-related activities include: (i) engaging in severe forms of trafficking in persons, such as sex trafficking or the use of forced labor, (ii) procurement of commercial sex acts during the period of performance of a contract, (iii) using forced labor in performance of a contract, (iv) the use of misleading or fraudulent recruitment practices, (v) using recruiters that do not comply with labor laws, (vi) charging employees recruitment fees, and (vii) if required by law or contract, failing to provide an employment contract, recruitment agreement or other required work document in writing. Additional information about Trafficking in Persons and examples of awareness programs can be found at the Web site for the Department of State's Office to Monitor and Combat Trafficking in Persons at <http://www.state.gov/j/tip/>.

HMS strictly prohibits all HMS employees from engaging in any form of human trafficking. Failure to respect anti-trafficking FAR provisions and this Policy may result in HMS being barred from work on government contracts and a disciplinary action up to and including termination.

HMS also complies with all applicable laws regarding the employment of minors. HMS does not tolerate any form of exploitative child labor.

3. Non-Discrimination

HMS is committed to providing equal employment opportunities and complies with all applicable laws that prohibit employment discrimination on the basis of age, sex, gender (including pregnancy), race, color, disability, genetic information, national origin, sexual orientation, gender identity, religion, military or veteran status, or any other legally protected characteristic. All of our employment decisions are covered by this commitment, including recruiting, hiring, training, promotions, pay practices, benefits, disciplinary actions, and terminations. For additional information about HMS' Anti-Discrimination and Anti-Harassment policies, consult the HMS Employee Handbook.

4. Health and Safety

HMS provides a safe and healthy workplace and complies with applicable safety and health laws, regulations, and policies. We are dedicated to minimizing the risk of accidents, injury and exposure to health risks. While accidents and injuries are rare (inasmuch as HMS employees typically work in office-based healthcare information services roles), we are nevertheless committed to engaging with our employees to continually improve the health and safety in our workplace, including the identification of hazards and remediation of health and safety issues.

We ensure our workplaces are free from violence, harassment, intimidation, and other unsafe or disruptive conditions due to internal or external threats.

For additional policies addressing workplace safety and security, consult the HMS Employee Handbook.

5. Freedom of Association

HMS respects the rights of the members of our workforce to join organizations or bargaining groups for representation and to engage in collective bargaining, as permitted by applicable laws in the countries where HMS does business.

6. Labor Standards

HMS maintains labor standards including hours, conditions, wages, and overtime pay practices that comply with the laws of the jurisdictions in which we operate. HMS provides compensation packages that are competitive for the locations in which our workforce members work.

Conclusion and Reporting Concerns

HMS employees should immediately report any conduct that could potentially constitute a violation of the law or this Policy by following the steps listed in the HMS Holdings Corp. Code of Conduct. Employees can report suspected violations by calling 1-877-640-3416 or by visiting the hotline website at HMS.com/hotline. Employees may also report human trafficking concerns to the National Human Trafficking Hotline at 1-888-373-7888. No retaliatory action will be taken against any HMS employee for raising concerns or claims made in good faith under this Policy.

HMS is committed to investigating, addressing and responding to the issues and concerns of its employees and to taking appropriate corrective action in response to any violation.