



Code of Conduct

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Code of Conduct Overview

Our Code of Conduct provides guidance to all BioTek reMEDys employees and assists us in carrying out our daily activities within appropriate ethical and legal standards. These obligations apply to our relationships with patients, physicians, third party payers, subcontractors, independent contractors, vendors, consultants, and one another. The Code of Conduct is a critical component of our overall Ethics and Compliance Program. We have developed the Code of Conduct to ensure we meet our ethical standards and comply with applicable laws and regulations.

The Code of Conduct is intended to be comprehensive and easily understood. In some instances, the Code of Conduct deals with the subject covered.

Though we promote the concept of management autonomy the standards set forth in this Code of Conduct are mandatory and they must be followed.

The Code of Conduct provides ethical direction for our actions as we perform our work, including how we behave with each other, with our clients and with the patients we serve. It furnishes a moral compass that ensures we always, in every situation, act with fairness and integrity.

Our Mission

We at BioTek reMEDys, offer Superior therapy specific service by one of our Specialty trained team members. Our Pharmacy services are not just limited to local patients, but also to our extended community with Compassion, Excellence, and Knowledge. We strive to provide a safer, better, more cost-effective way to deliver your Specialty drug with Quality, Integrity, and Honesty.

Our Core Values - Who We Are

- **Quality, Integrity, Honesty:** We at BioTek reMEDys, offer Superior therapy specific service by one of our Specialty trained team members. Our Pharmacy services are not just limited to local patients, but also to our extended community with Compassion, Excellence, and Knowledge. We strive to provide a safer, better, more cost-effective way to deliver your Specialty drug with quality, integrity and honesty.
- **Our Team is Our Core Strength:** Our Company, BioTek reMEDys is strong because our employees are diverse, skillful and collaborative. We pursue our fullest potential as individual contributors, team members and team leaders.
- **Our Commitment to Those We Serve:** We measure our success by how well we enable people to achieve and thrive. Patients, caregivers and employees deserve our very best.
- **Growth, Transformation and Renewal:** Consistent with our core values, we as individuals and as a company are dedicated to creative and constructive growth, transformation, and renewal as a source of inspiration and validity.

OUR FUNDAMENTAL COMMITMENT TO STAKEHOLDERS

We affirm the following commitments to BioTek reMEDys stakeholders:

To our patients: We are committed to providing quality care that is sensitive, compassionate, promptly delivered, and cost-effective.

To our BioTek reMEDys employees: We are committed to a work setting which treats all employees with fairness, dignity, and respect, and affords them an opportunity to grow, to develop professionally, and to work in a team environment in which all ideas are considered.

To our Physicians: We are committed to providing comprehensive adherence support services and specialized clinical management with commitment to excellence in the coordination of care.

To our third-party payers: We are committed to dealing with our third-party payers in a way that demonstrates our commitment to contractual obligations and reflects our shared concern for quality healthcare and bringing efficiency and cost effectiveness to healthcare. We encourage our private third-party payers to adopt their own set of comparable ethical principles to explicitly recognize their obligations to patients as well as the need for fairness in dealing with providers.

To our regulators: We are committed to an environment in which compliance with rules, regulations, and sound business is woven into the corporate culture. We accept the responsibility to aggressively self-govern and monitor adherence to the requirements of law and to our Code of Conduct.

Quality of Care and Patient Safety

Our mission is to provide high-quality, cost-effective healthcare to all our patients. We treat all patients with warmth, respect, and dignity and provide care that is both necessary and appropriate.

BioTek reMEDys is a specialty pharmacy that through supply chain management, cutting edge technology and specialty trained pharmacists, delivers superior service at a lower cost. By servicing very specific disease states our expert team can focus on patient care making sure that dosages and treatments are appropriate. We provide therapy-specific patient education materials and our National Customer Support Center is available 24 hours a day, 7 days a week to help patients manage critical aspects of their care.

BioTek reMEDys provides programs with comprehensive adherence support and specialized clinical management for specific treatment protocols and related disease state through an efficient care delivery model. Through these programs, our patient care specialists work in

conjunction with our clinical team to provide compliance management, patient education, proactive side effect management and other clinical interventions. Our programs are supportive of and provided in conjunction with the physician's plan of care. We monitor patient progress on therapy and document specific outcomes indicators.

BioTek reMEDys is focused on attentiveness and dedication to service of patients to ensure quality and patient safety and to create an overall culture that makes patient safety paramount. BioTek reMEDys aspires to a standard of excellence which is committed to the delivery of patient centered care and services.

There are increasingly numerous measures that relate in some way to the quality of patient care. These include, for example, the standards and surveys of The Joint Commission (TJC), the Conditions of Participation of the Centers for Medicare and Medicaid Services (CMS), the Utilization Review Accreditation Commission (URAC). BioTek reMEDys is attentive to all of these standards and seeks to establish systems and processes that reflect the best practices required or implied by the various standard setting efforts.

This commitment to the quality of care and patient safety is an obligation of every BioTek reMEDys employee. Accordingly, it is a fundamental principle of being a part of BioTek reMEDys and that each person dedicates himself or herself to achieving the goals described here. In addition, in any circumstance where a BioTek reMEDys employee has a question about whether the quality or safety commitments set forth herein are not being fully met, that individual is obligated to raise this concern through appropriate channels until it is satisfactorily addressed and resolved.

Leadership Responsibilities

While all BioTek reMEDys employees are obligated to follow our Code of Conduct, we expect our leaders to set the example, to be in every respect a model. We expect everyone in the organization with supervisory responsibility to exercise that responsibility in a manner that is kind, sensitive, thoughtful, and respectful. We expect each supervisor to create an environment where all employees feel free to raise concerns and propose ideas. We also expect that they will ensure those on their team have sufficient information to comply with laws, regulations, and policies, as well as the resources to resolve ethics and compliance. This culture must encourage everyone in the organization to share concerns when they arise. We must never sacrifice ethical and compliant behavior in the pursuit of business objectives.

Our Clinical Responsibility

BioTek reMEDys is a healthcare company dedicated to creating comprehensive "Total Patient Care" in the healthcare industry. As a result, our clinical products, programs, and services must

meet the highest standards of clinical integrity. If you are involved in our clinical work, your work must be reliable, balanced and clinically sound.

We make no distinction in the availability of services; the admission, transfer or discharge of patients; or in the care we provide based upon age, gender, disability, race, color, religion, or national origin. We recognize and respect the diverse backgrounds and cultures of patients and make every effort to equip our employees with the knowledge and resources to respect each patient's cultural heritage and needs. BioTek reMEDys respects the patient's right to and need for effective communication.

Each patient is provided with a written statement of patient rights and responsibilities and notice of privacy practices. These statements include the rights of a patient to make decisions regarding medical care, the right to refuse or accept treatment, the right to informed decision making, and a patient's rights related to his or her health information maintained by our organization. Such statements conform to all applicable state laws and Federal laws, including but not limited to the Health Insurance Portability and Accountability Act of 1996 (HIPAA). BioTek reMEDys maintains processes for prompt resolution of patient grievances which include informing patients who to contact regarding grievances and informing patients regarding grievance resolution. BioTek reMEDys addresses the resolution of complaints from patients and their families. Patients have a right to refuse care, treatment, and services in accordance with law and regulation. BioTek reMEDys maintains an ongoing, proactive patient safety effort for the identification of risk to patient safety and the prevention, reporting, and reduction of healthcare errors. BioTek reMEDys employees receive training about patient rights in order to clearly understand their role in supporting them.

We collect information about the patient's medical condition, history, medications, to provide quality care. We realize the sensitive nature of this information and are committed to maintaining its confidentiality. Consistent with HIPAA, we do not use, disclose or discuss patient-specific information with others unless it is necessary to serve the patient or required by law.

BioTek reMEDys employees must never use or disclose confidential information that violates the privacy rights of our patients. In accordance with our appropriate access and privacy policies and procedures, which reflect HIPAA requirements, no BioTek reMEDys employee has a right to any patient information other than that necessary to perform his or her job.

Subject to only emergency exceptions, patients can expect their privacy will be protected and patient specific information will be released only to a person's authorized by law or by the patient's written authorization.

YOUR RESPONSIBILITIES AS AN EMPLOYEE:

As an employee of BioTek reMEDys, you're expected to be honest, act ethically and demonstrate integrity in all situations. You need to know the policies and procedures found in the Code of Conduct as well as those that are specific to your job title. You must also comply with all laws that apply to our business.

Most of the time common sense and good judgment provide excellent guideposts. If you are unsure about the right thing to do, ask someone on the management team or the compliance staff.

Before you act, ask yourself:

- Is this the right thing to do?
- Is it legal?
- Do I have the authority to act?
- Does this action comply with the Code of Conduct?
- If this action became public, how would it be depicted in the news media?
- Would I be upset or embarrassed if other people found out about this action?

If your answer to any of these questions raises doubts, talk to your department manager, the Compliance Officer, or you can call the Compliance Hotline at (844) 760-5839.

Audits and Investigations

When BioTek reMEDys conducts audits and investigations, you must fully cooperate with all requests made by company auditors and lawyers. If you obstruct an audit or fail to cooperate with our auditors or lawyers, you may be subject to disciplinary action.

If You Violate the Code of Conduct

What happens if you violate the Code of Conduct or related policies? You may be subject to disciplinary action by the seriousness of the violation. You may receive one or more of the following: a verbal warning, written warning, written reprimand, suspension, termination, repayment, referral for criminal prosecution.

MAINTAINING INTEGRITY IN BUSINESS RELATIONSHIPS: AVOIDING CONFLICT OF INTEREST

We do not pay for referrals. We accept patient referrals based solely on the patient's medical needs and our ability to render the services needed. We do not pay or offer to pay anyone for referral of patients.

We do not accept payments for referrals we make. No BioTek reMEDys employee or any other person acting on behalf of the organization is permitted to solicit or receive anything of value,

directly or indirectly, in exchange for the referral of patients. Similarly, when making patient referrals to another Pharmacy, we do not take into account the volume or value of referrals that the provider has made (or may make) to us.

Conflict of Interest

A conflict of interest may occur if a BioTek reMEDys employee's outside activities, personal financial interests, or other personal interests influence or appear to influence his or her ability to make objective decisions in the course of the employee's job responsibilities. A conflict of interest may also exist if the demands of any outside activities hinder or distract an employee from the performance of his or her job or cause the individual to use BioTek reMEDys resources for other than BioTek reMEDys purposes. BioTek reMEDys employees are obligated to ensure they remain free of conflicts of interest in the performance of their responsibilities at BioTek reMEDys. If employees have any question about whether an outside activity or personal interest might constitute a conflict of interest, they must obtain the written approval of their supervisor before pursuing or obtaining or retaining the interest.

- **Gifts.** It is critical to avoid the appearance of impropriety when giving gifts to individuals who do business or are seeking to do business with BioTek reMEDys. We will never use gifts or other incentives to improperly influence relationships or business outcomes. Never accept a gift, favor, service, or entertainment if your acceptance could be viewed as influencing a business-related decision or action. In addition, employees and directors of BioTek reMEDys may not attempt to influence the decisions of others by offering them money, services or other things of value. This prohibition applies to, among others, purchasers, suppliers, customers and government officials.
- **Gifts from patients.** Never ask for or accept tips or presents from patients or clients. If a patient, client or outside party wants to give you a monetary gift, refer the matter to your department manager or the Compliance Officer.
- **Gifts from Existing Vendors.** Do not accept gifts, meals, or other incentives given for the purpose of influencing a purchasing or contracting decision, or that otherwise could appear to improperly influence decisions you make involving BioTek.
- **Vendor Sponsored Entertainment.** You should politely decline gifts offered by suppliers or other business partners that involve entertainment or social activities such as free or discounted tickets to sporting events, theatre or concert events, golf outings, travel and lodging, etc. You may attend an entertainment or social event with a supplier or other business partner provided you, not the supplier, pay your own cost (e.g., the face value of a sporting event ticket) to attend such events. Any exceptions to this policy require the advance approval of your Manager and Compliance Officer.

- **Soliciting Donations or Gifts From Outside Parties.** Soliciting donations or gifts in return for placement of business or other considerations is not allowed. This applies to purchasers, suppliers, customers, government officials or others doing business with BioTek reMEDys.
- **No Gifts From Pharma.** We have a zero gifts policy with regard to pharmaceutical manufacturers. In other words, you can't offer or receive a gift or meal or entertainment of any value from a pharmaceutical company.

Outside Financial Interests

The following examples might cause conflict of interest problems:

- Owning a business or being employed by a company that does business with BioTek reMEDys.
- Conducting any business on the side with any BioTek reMEDys vendor, supplier, client, contractor or agency that is not conducted on BioTek reMEDys behalf.
- Working on any BioTek reMEDys transaction with another company in which you have a substantial personal interest.
- Disclosing or using BioTek reMEDys confidential proprietary, special inside information.
- Competing, directly or indirectly with BioTek reMEDys.
- Working with BioTek reMEDys Competitors or Vendors.

COMPLYING WITH LAWS AND REGULATIONS

Antitrust Laws

Antitrust laws are designed to create a level playing field in the marketplace and to promote fair competition. These laws could be violated by discussing BioTek reMEDys business with a competitor, such as how prices are set, disclosing the terms of supplier relationships, allocating markets among competitors, or agreeing with a competitor to refuse to deal with a supplier. Our competitors are other health systems and organizations in markets where we operate.

At trade association meetings, employees must be alert to potential situations where it may not be appropriate to participate in discussions regarding prohibited subjects with competitors. Prohibited subjects include any aspect of pricing, our services in the market, key costs such as labor costs, and marketing plans. If a competitor raises a prohibited subject, employees must end the conversation immediately. Employees must document their refusal to participate in the conversation by requesting their objection be reflected in the meeting minutes and notify the Compliance Officer of the incident.

In general, employees must avoid discussing sensitive topics with competitors or suppliers, unless they are proceeding with the advice of the Compliance Officer. Employees must not provide any

information in response to an oral written inquiry concerning an antitrust matter without first consulting the Compliance Officer.

Diversity and Equal Employment Opportunity

BioTek reMEDys actively promotes diversity in its workforce at all levels of the organization. We are committed to providing an inclusive work environment where everyone is treated with fairness, dignity and respect. We will make ourselves accountable to one another for the manner in which we treat one another and for the manner in which people around us are treated. We are committed to recruit and retain a diverse staff reflective of the patients and communities we serve. We regard laws, regulations and policies relating to diversity as a minimum standard. We strive to create and maintain a setting in which we celebrate cultural and other differences and consider them strengths of the organization. BioTek reMEDys is an equal opportunity employer and no one shall discriminate against any individual with regard to race, color, religion, sex, national origin, age, and disability, sexual orientation with respect to any offer, or term or condition, of employment.

Harassment and Workplace Violence

Each BioTek reMEDys employee has the right to work in an environment free from harassment and disruptive behavior. We do not tolerate harassment by anyone based on the diverse characteristics or cultural backgrounds of those who work with us. Degrading or humiliating jokes, slurs, intimidation, or other harassing conduct is not acceptable in our workplace. Sexual harassment is prohibited. This prohibition includes unwelcome sexual advances or requests for sexual favors in conjunction with employment decisions. Moreover, verbal or physical conduct of sexual nature that interferes with an individual's work performance or creates an intimidating, hostile, or offensive work environment has no place at BioTek reMEDys. Harassment also includes incidents in the workplace violence. Workplace violence includes robbery and other commercial crimes, stalking, violence directed at the employer, terrorism, and hate crimes committed by current or former employees. Employees who observe or experience any form of harassment or violence should report the incident to their supervisor, the Human Resources Department, a member of management, or the Compliance Officer or Compliance Hotline.

Health and Safety

BioTek reMEDys complies with all government regulations and rules, BioTek reMEDys policies and required practices that promote the protection of workplace health and safety. Our policies have been developed to protect employees from potential workplace hazards. Employees must become familiar with and understand how these policies apply to their specific job responsibilities and seek advice from their Manager whenever they have a question or concern. It is important that each employee immediately advise his or her supervisor of any serious

workplace injury or any situation presenting a danger of injury so timely corrective action may be taken to resolve the matter.

Hiring of Former and Current Government and Fiscal Intermediary Employees

The recruitment and employment of former or current US government employees may be impacted by regulations concerning conflict of interest. Hiring employees directly from a fiscal intermediary requires certain regulatory notifications. Employees should consult with the Human Resources Department or Compliance Officer regarding such recruitment or hiring.

Ineligible Persons

We do not contract with, employ, or bill services rendered by an individual or entity that is excluded or ineligible to participate in Federal healthcare programs; suspended or debarred from Federal government contracts; or has been convicted of a criminal offense related to the provision of healthcare items or services and has not be reinstated in a Federal healthcare program after a period of exclusion, suspension, debarment, or ineligibility, provided that we are aware of such criminal offense. We check all employees prior to hire and then monthly with the Department of Health and Human Services OIG Services Administration's lists of excluded and ineligible persons, as well as the Exclusion List on SAM.gov. Employees are required to report to us if they become excluded, debarred, or ineligible to participate in Federal healthcare programs; or have been convicted of a criminal offense related to the provision of healthcare items or services.

Marketing Practices - Marketing Materials

BioTek reMEDys accurately represents the organization and address the care, treatment and services that we provide either directly or by contractual arrangements. Whenever an employee of BioTek is referring to its organization inside, or outside of the company, they are to represent BioTek with integrity.

Anti-Kickback, Fraud and Abuse

Healthcare anti-kickback, fraud waste and abuse laws provide important safeguards for the government and clients, and it's our responsibility to understand and uphold these laws, which prohibit the following:

- Direct or indirect or disguised payment in return for referring patients.
- Submission of false, fraudulent or misleading claims to any government agency or third-party payer (including claims for services not rendered, claims that mischaracterized the service provided, and claims that do not comply with applicable program or contractual requirements).
- False representations or statements in order to gain or retain participation in a program, or obtain payment for a service.

- Concealing or improperly avoiding an obligation to repay a health care program.
- Offering or paying money, goods, or anything of value to encourage or reward the referral of patients to a health care provider.

The False Claims Act

The False Claims Act is a federal law that makes it a crime for any person or organization to knowingly make a false record or file a false claim to a federal health care program. “Knowingly” includes having actual knowledge that a claim or record is false or acting with “reckless disregard” as to whether a claim is false. In addition to the federal law, most states in which BioTek reMEDys operates have adopted similar state false claims laws.

The False Claims Act and similar state laws allow individuals with original information concerning fraudulent activities involving government programs to file a lawsuit on behalf of the government and, if successful, to receive a portion of the recoveries received by the government.

Penalties for violating the False Claims Act are significant. Financial penalties can be as much as three times the amount of the claims plus fines of \$11,000 - \$22,000 per claim. Courts can also impose criminal penalties against individuals and organizations for willful violations of the False Claims Act. The False Claims Act and similar state laws protect employees, contractors and agents from being fired, demoted, threatened or harassed by an employer for filing a False Claims Act lawsuit.

BioTek reMEDys prohibits any employee, agent or contractor from knowingly presenting or causing to be presented claims for payment which are false, fictitious or fraudulent. Please contact your organization’s Integrity & Compliance Officer if you have any questions regarding the False Claims Act.

In addition to protection for those who file a lawsuit under the False Claims Act, federal and many state laws also protect employees who report suspected fraud internally or to government agencies. Employees who participate in investigations or refuse to engage in unlawful conduct are also protected.

Environmental Compliance

It is our policy to comply with all environmental laws and regulations as they relate to our organization’s operations. We act to preserve our natural resources to the full extent reasonably possible. We comply with all environmental laws and operate with the necessary permits, approvals, and controls. We diligently employ the proper procedures to provide a good environment of care and to prevent pollution. In helping BioTek reMEDys comply with these laws and regulations, all BioTek reMEDys employees must understand how job duties may impact the

environment, adhere to all requirements for the proper handling of hazardous materials, and immediately alert supervisors to any situation regarding the discharge of a hazardous substance, improper disposal of hazardous waste, or any situation which may be potentially damaging to the environment.

Accuracy, Retention, and Disposal of Documents and Records

Each BioTek reMEDys employee is responsible for the integrity and accuracy of our organization's documents and records, not only to comply with regulatory and legal requirements but also to ensure records are available to support our business practices and actions. No one may alter or falsify information on any record or document. Records must never be destroyed in an effort to deny governmental authorities that which may be relevant to a governmental investigation.

Medical and business documents and records are retained in accordance with the law and our record retention policy, which includes comprehensive retention schedules. Medical and business documents include paper documents such as letters and memos, computer-based information such as e-mail or computer files on disk or tape, and any other medium that contains information about the organization or its business activities. It is important to retain and destroy records only according to our policy. BioTek reMEDys employees must not tamper with records. No one may remove or destroy records prior to the specified date without first obtaining permission as outlined in the Record Retention Policy. Finally, under no circumstances may an BioTek reMEDys employee use patient, employee or any other individual's or entity's information to personally benefit (e.g., perpetrate identity theft).

BioTek reMEDys retains records in accordance with state and federal requirements, including CMS record retention rules and HIPAA mandates. Most compliance documentation is maintained for a minimum of six (6) years unless longer retention is required by specific contracts or laws.

Coding and Billing for Services

We have implemented policies, procedures and systems to facilitate accurate billing to governmental payers, commercial payers, and patients. These policies, procedures and systems conform to pertinent Federal and state laws and regulations. We prohibit any employee or agent of BioTek reMEDys from knowingly presenting or causing to be presented claims for payment or approval which are false, fictitious, or fraudulent.

In support of accurate billing, medical records must provide reliable documentation of the services we render. It is important that all individuals who contribute to medical records provide accurate information and do not destroy any information considered part of the medical record.

Confidential Information

The term “confidential information” refers to proprietary information about our organization’s strategies and operations as well as patient information and third-party information. Improper use or disclosure of confidential information could violate legal and ethical obligations. BioTek reMEDys employees may use confidential information only to perform their job responsibilities and shall not share such information with others unless the individuals and/or entities have a legitimate need to know the information in order to perform their specific job duties or carry out a contractual business relationship, provided disclosure is not prohibited by law or regulation. Confidential information covers virtually anything related to BioTek reMEDys’s operations that is not publicly known, such as personnel data maintained by the organization; patient lists and clinical information; patient financial information; passwords; pricing and cost data; information pertaining to acquisitions, divestitures, affiliations and mergers; financial data; details regarding Federal, state, and local tax examinations of the organization or its joint venture partners; research data; strategic plans; marketing strategies and techniques; supplier and subcontractor information; and proprietary computer software. In order to maintain the confidentiality and integrity of patient and confidential information, such information should be sent through the Internet only in accordance with information security policies and standards, which require, among other things, that the individual and/or entity be validated, and information be encrypted.

Use of due care and due diligence is required to maintain confidentiality, availability and integrity of information assets the Company owns or of which it is the custodian. Because so much of our clinical and business information is generated and contained within our computer systems, it is essential that each BioTek reMEDys employee protect our computer systems and the information contained in them by not sharing passwords and by reviewing and adhering to our information security policies and guidance.

If an individual’s employment or contractual relationship with BioTek reMEDys ends for any reason, the individual is still bound to maintain confidentiality of information viewed, received or used during the employment or contractual business relationship with BioTek reMEDys. This provision does not restrict the right of an employee to disclose, if he or she wishes, information about his or her own compensation, benefits, or terms and conditions of employment. Copies of confidential information in an employee’s or contractor’s possession shall be left with BioTek reMEDys at the end of the employment or contractual relationship.

Electronic Media and Security Requirements

All communication systems, including but not limited to computers, electronic mail, Intranet, Internet access, telephones, and voice mail, are the property of BioTek reMEDys and are to be used primarily for business purposes in accordance with electronic communications policies and standards. Limited reasonable personal use of BioTek reMEDys communication systems is

permitted; however, users should assume these communications are not private. Users of computer and telephonic systems should presume no expectation of privacy in anything they create, store, send, or receive on the computer or telephonic systems, and the Company reserves the right to monitor and/or access communications usage and content consistent with Company policies and procedures.

Employees may not use internal communication channels or access to the Internet at work to post, store, transmit, download, or distribute any threatening materials; knowingly, recklessly, or maliciously false materials; obscene materials; or anything constituting or encouraging a criminal offense, giving rise to civil liability, or otherwise violating any laws. Also, these channels of communication may not be used to send chain letters, personal broadcast messages, or copyrighted documents that are not authorized for reproduction. Employees who abuse our communication systems or use them excessively for non-business purposes may lose those privileges and be subject to disciplinary action. Employees shall comply with BioTek reMEDys policies and governing use of information systems. Only assigned user ID and "Secure" user IDs shall be used. Passwords, tokens and user IDs shall never be shared or disclosed. Employees shall never use tools or techniques to break or exploit BioTek reMEDys information security measures, or those used by other companies or individuals. BioTek reMEDys information systems shall not be used to access inappropriate or prohibited websites.

Intellectual Property Rights and Obligations

Any work of authorship, invention, or other creation ("Development") created by an employee during the scope of the employee's employment with BioTek reMEDys shall be considered the property of BioTek reMEDys. Whether something is developed during the scope of an employee's employment depends on a number of factors, including: the nature of an employee's work, whether the Development is related to BioTek reMEDys business, whether the employee was directed to produce the Development as part of the employee's work, whether the Development is related to BioTek reMEDys business, whether the employee utilized BioTek reMEDys intellectual property or resources at least in part to make the Development, and whether the employee created the Development while being paid by BioTek reMEDys. When creating Developments for BioTek reMEDys, employees shall respect the intellectual rights of others.

Government Relations and Political Activities

The organization and its representatives comply with all Federal, state, and local laws governing participation in government relations and political activities. Further, BioTek reMEDys funds or resources are not contributed directly to individual political campaigns, political parties, or other organizations which intend to use the funds primarily for political campaign objectives. Organization resources include financial and non-financial donations such as using work time and

telephones to solicit for political cause or candidate or the loaning of BioTek reMEDys property for use in the political campaign. It is important to separate personal and corporate political activities in order to comply with the appropriate resources, including email, is appropriate for personally engaging in political activity. A employee may, of course, participate in the political process on his or her own time and at his or her own expense. While doing so, it is important that BioTek reMEDys employees not give the impression that they are speaking on behalf of or representing BioTek reMEDys in these activities. Employees cannot seek to be reimbursed by BioTek reMEDys for any personal contributions for such purposes.

The Company Ethics and Compliance Program

Program Structure

The Ethics and Compliance Program is intended to demonstrate in the clearest possible terms the absolute commitment of the organization to the highest standards of ethics and compliance. The elements of the program include setting standards (the Code of Conduct and Policies and Procedures), communicating the standards, providing a mechanism for reporting potential excepting, monitoring and auditing, and maintaining an organizational structure that supports the furtherance of the program. These elements are supported at all levels of the organization. Providing direction, guidance and oversight are the Ethics, Compliance and Quality of Care Committee consisting of senior management and managers and directors. Another important resource who may be able to address issues arising out of this Code of Conduct is the Human Resources Manager. Human Resources Managers are highly knowledgeable about many of the compliance risk areas described in this Code of Conduct that pertain to employment and workplace and are responsible for ensuring compliance with various employment laws. All of these individuals or groups are prepared to support BioTek reMEDys employees in meeting the standards set forth in this Code of Conduct.

The Compliance Officer has direct access to the Chief Executive Officer and the Board of Directors. The Compliance Officer operates independently of operational or financial departments and has authority to investigate compliance concerns, recommend corrective actions, and escalate issues without management interference.

Training and Communication

Comprehensive training and education has been developed to ensure that employees throughout the organization are aware of the standards that apply to them. Code of Conduct training is conducted at the time an individual joins the organization and annually for all employees. Compliance training in areas of compliance risk (e.g., billing, coding, cost reports) is required with certain individuals. Company policies outline the training requirements. All ethics

and compliance training is mandatory and required for all employees. Additional targeted compliance training is provided to employees in high-risk areas such as billing, coding, sales/marketing, pharmacy services, clinical review, and anyone interacting with payors or government programs. Training content is reviewed annually and updated to reflect changes in regulations and organizational risk assessments.

Obligation to Speak-Up

BioTek reMEDys promotes an environment that encourages all to seek answers to questions and to report issues and concerns. Each employee has a right and a duty to report any activity he or she believes may violate applicable laws, regulations, professional standards of practice, or this Code of Conduct using one or more of the resources listed herein. If the matter has previously been reported and the employee believes it has not been given sufficient attention, he or she should report the matter to a higher level of management, the Compliance Officer or the Compliance Hotline. While internal reporting is encouraged, employees have the right to report concerns directly to regulatory bodies such as the U.S. Department of Health and Human Services (HHS), Office for Civil Rights (OCR), Office of Inspector General (OIG), or applicable state agencies. BioTek reMEDys will not retaliate against anyone for such good-faith reports.

Non-Retaliation Policy

BioTek reMEDys has a policy of “zero tolerance” for any form of retaliation against those who report issues and concerns in good faith, including potential violations of our Code of Conduct. Retaliation includes direct as well as indirect actions, or the threat of actions, supervisors, co-workers, or others.

Retaliation is subject to discipline, up to and including dismissal from employment or termination of business relationships with BioTek reMEDys.

Compliance Hotline

(844) 760-5839 or www.mycompliancereport.com/MCR and enter code “BIOTK”

The Compliance Hotline is staffed 24 hours a day, 7 days a week by an outside organization on behalf of BioTek reMEDys. When you call the Compliance Hotline, you will speak with an individual trained to listen to your questions and concerns and to gather as much information from you as possible. If you prefer, you may submit your issue online at the website address listed above. Using either method, your report will not be traced or recorded, and the Compliance Hotline does not use caller ID.

When submitting a report through either the Compliance Hotline phone or online system you may choose to remain anonymous. BioTek reMEDys uses every effort to maintain, within the limits of the law, the confidentiality and identity of any individual who reports issues and

concerns. Your report will be provided to BioTek reMEDys for review and investigation. When using the phone system to file a report, you will be provided a report identification number for you to check back later on the status and ultimate resolution of your report.

Corrective Action

Where an internal investigation substantiates a reported violation, it is the policy of the organization to initiate corrective action, including, as appropriate, making prompt restitution for any overpayment amounts, notifying the appropriate governmental agency, instituting whatever disciplinary action is necessary, and implementing systematic changes to prevent a similar violation from recurring in the future.

Discipline

All violators of the Code of Conduct will be subject to disciplinary action. The precise discipline utilized will depend on the nature, severity, and frequency of the violation and may result in any or all of the following disciplinary actions:

- Oral warning;
- Written warning;
- Written reprimand;
- Suspension;
- Termination; and/or
- Restitution.

Measuring Program Effectiveness

We are committed to assessing the effectiveness of our Ethics and Compliance Program through various efforts. Much of this effort is provided by the internal audit, which routinely conducts internal audits, and issues that have regulatory or compliance implications that are reported to our Compliance Officer. Responsible Managers routinely undertake monitoring efforts in support of policies and compliance in general. Most of these methods of assessment result in reports of findings by the reviewers and corrective action plans by BioTek reMEDys that are reviewed. Through these reviews, we are continuously assessing the effectiveness of the Ethics and Compliance Program and finding ways to improve it.

Acknowledgement Process

All BioTek reMEDys employees are required to acknowledge their receipt and review of this Code of Conduct, confirm they understand it represents the mandatory policies of BioTek reMEDys and agree to abide by it. New employees are required to do so as a condition of employment and all employees are required to participate in annual Code of Conduct training designed to reinforce awareness and understanding of its requirements.

Acknowledgment and Certification

I acknowledge that I have received a copy of the BioTek reMEDys Code of Conduct and I agree to read it completely. I also agree to discuss any questions or concerns with the Code of Conduct with my supervisor. I certify that I will comply with the Code of Conduct and any other policies established by my organization that apply to my role at BioTek reMEDys. I understand it is my responsibility and obligation to report any issues or concerns regarding possible violation of the Code of Conduct. I also understand I may be asked to cooperate in an investigation and agree to do so if asked. I understand that BioTek reMEDys will not retaliate against me for making a report of issues and concerns in good faith.

I understand the Code of Conduct contains standards of behavior I am expected to follow as a condition of my employment at BioTek reMEDys and is not an employment contract. I also understand the standards may be amended, modified or clarified at any time and I will receive periodic updates as they may occur.

Please Print

Name: _____

Department or Unit: _____

Organization: _____

Signature: _____

Please complete and submit to your department manager or Compliance Officer. This acknowledgment may also be obtained electronically. Contact Human Resources or your Compliance Officer if you have any questions about this process.