

Code of Conduct & Ethics

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CEO Message	3
Vision, Mission, & Values	4
Introduction	5
Compliance with Laws & Regulations	6
Coding & Billing Integrity	7
Conflicts of Interest	8
Health & Safety	9
Fostering a Positive Work Environment	10
Protection & Use of Information, Property, & Equipment	11
Duty to Report & Non-Retaliation	12
Management & Workforce Member Compliance Responsibilities	13

Dear Colleague,

Getting People Healthier Faster. These words are more than just a slogan: they represent the common fiber of who we are and what we do at HealthTrackRx. They speak to an unrelenting drive to reduce the time patients wait for answers and the clinical information to get them healthier faster. The bedrock of our pursuit of these lofty goals rests on an unwavering commitment to our Code of Conduct and Ethics by every HealthTrackRx colleague.

It is often said that integrity is measured by the decisions we make when no one is watching. In healthcare that expression takes on heightened significance because someone is always watching. Colleagues. Clients. Patients. Payors. It is our ethical behavior in the marketplace that creates confidence in HealthTrackRx and affords us the bare opportunity to change healthcare with our transformational services. It is also the collective commitment we make to each other every day; not only when the choice between right and wrong is easy, but more critically in those moments when those decisions are harder. There are hundreds of labs out there, and we operate in an environment where our customers can switch providers anytime. This is a reputation and relationship business and achieving our important vision is dependent on maintaining the brand of a highly ethical company.

While we are all accountable for doing the right thing, it's not always clear what behaviors to model, which is why we created the Code of Conduct and Ethics as a resource to guide our decisions and actions. The Code is not meant to be inclusive of every requirement that governs our work, but rather provides overarching principles to help our decision-making match our commitment to our common purpose and the reputation of our company. I urge you to refer to the Code often and use it as a guide when faced with uncertainty about how to proceed. It will also tell you where to seek answers for situations that require deeper expertise.

When it comes to our company's reputation, there can be no compromises if we intend to achieve our vision. Thank you for your commitment to **Getting People Healthier Faster** and doing so in a manner that reflects our company's ethical culture.

Sincerely,

Martin Price, Executive Chairman & CEO

VISION

Getting People Healthier Faster

MISSION

Transforming the laboratory experience by delivering custom solutions to clients, accelerating answers to patients, and creating value for payors.

VALUES

In pursuit of our mission, we will be guided by these four principles:

We will be **RELIABLE**

We will do what we say we are going to do.

We will be **EXTRAORDINARY**

We will go above and beyond whenever we can.

We will be **ACCOUNTABLE**

We will be responsible for our actions and results.

We will be **LOYAL**

We will be committed to each other and our mission.

HealthTrackRx (HTRx) is committed to conducting business in an ethical, legal, and responsible manner, consistent with our organization's mission and values. We strive to provide high-quality services in compliance with all applicable laws, regulations, and guidelines, as well as HTRx's policies and procedures. The Code of Conduct and Ethics (Code) is designed to provide general guidance and supplement other policies and procedures adopted by HTRx.

Decision-Making Using the Code

While this Code covers a wide range of business activities and expectations, it is not intended to cover every situation or replace good judgment. Instead, the Code sets out basic principles to help each of us feel more confident in making the right decision. Put in more simplistic terms, the Code helps guide our decision-making when we may not be certain what to do. The following questions can also help when the answer is uncertain:

- ▶ Is my decision aligned with HealthTrackRx's mission and values?
- ▶ Could my decision create even the perception of unethical or inappropriate behavior?
- ▶ How would I feel if my decision was made public in tomorrow's news?
- ▶ Could my decision cause any type of harm to the company, my colleagues, the patients our company serves, or other individuals?

If uncertainty still exists after referring to the Code and asking yourself these questions, you should ask your supervisor, the Compliance Team, or Human Resources for guidance.

Our Responsibilities Under the Code

As a condition of employment or affiliation with HTRx, all "Workforce Members" and independent contractors of HTRx are required to read, understand, and agree to comply with the ethical standards described in this Code. The term "Workforce Members" includes Board members, executives, managers, employees, trainees, and other persons whose conduct is under the direct control of HTRx, regardless of whether and by whom they are paid. The Code of Conduct and Ethics also applies to all individuals that are either acting or providing services on behalf of HTRx. Failure to comply with the Code of Conduct and Ethics, or applicable laws, regulations, and policies can result in serious damage to our standing with customers and patients, legal or regulatory action against the organization and/or individual employees, and HTRx disciplinary action (including termination of employment).

HTRx's management team and supervisors have special responsibilities for exemplifying the principles of the Code and creating an ethical culture. These responsibilities include helping their teams to understand the Code and how to apply it, identifying and correcting situations in which their employees are not acting in accordance with the Code, and reporting any instances of suspected or known behavior that is inconsistent with the Code and organizational values.

If you have questions about the Code or its application in any situation, or if you become aware of an actual or potential violation of this Code, applicable laws, or HTRx policies, you should report the concern to your supervisor, the Compliance Team, Human Resources or utilize the RightTrack Hotline at **833-255-7337** or at www.healthtrackrx.ethicspoint.com.

- ▶ HealthTrackRx provides services and conducts business operations in an ethical manner in accordance with all applicable laws, regulations, and policies.
- ▶ All employees and contractors are expected to be familiar with applicable laws, regulations, and policies governing their areas of work and responsibilities.
- ▶ We are committed to taking prompt action with respect to any possible violations of law, regulation, or policy. All reported compliance issues or concerns will be reviewed, investigated, and addressed in a prompt and reasonable manner.
- ▶ There is zero tolerance for any retaliation or other negative action against an individual who, in good faith, reports a concern or suspected violation.
- ▶ We will not offer, provide, solicit, or accept kickbacks, bribes, rebates, or anything of value tied to influencing the referral of patients or services covered and payable by a Federal health care program.
- ▶ We ensure that all agreements with an individual or organization that may be a referral source are in writing and approved by management and legal counsel prior to effectuation.
- ▶ We bill patients and third-party payers in accordance with applicable laws, regulations, policies, and procedures.
- ▶ We ensure that complete and accurate patient medical records are prepared and maintained in accordance with federal and state privacy and security laws, regulations, and policies.
- ▶ We respect the privacy, confidentiality, and rights of all individuals related to their personal information.
- ▶ We ensure that confidential patient information is accessible only to healthcare personnel involved with a patient's care, third-party payers, and others authorized to review such patient information.
- ▶ We do not hire, or do business with individuals or entities that have been sanctioned by the Office of Inspector General (OIG) in the U.S. Department of Health and Human Services or barred from a state health care program (e.g. Medicaid).

HealthTrackRx Workforce Members bill for testing performed as requested by the ordering healthcare provider, and in a manner consistent with all laws, regulations, and third-party payer requirements.

- ▶ We are committed to accurate, complete, and truthful billing to patients, Federal health care programs, and other third-party payers.
- ▶ We will employ best efforts to submit claims to both federally funded and commercial health care programs for services that HTRx has reason to believe are medically necessary.
- ▶ We correctly code and bill for services consistent with applicable laws, regulations, and payer policies.
- ▶ We will not “knowingly” submit, or cause to be submitted, for payment a claim that is false, fraudulent, or fictitious.
- ▶ We periodically review bills, reimbursement, and medical records to ensure compliance with applicable billing, coding, and documentation requirements.
- ▶ We prepare and maintain medical and billing records in a manner consistent with applicable laws, regulations, and policies.
- ▶ We promote the disclosure to third-party payers (and patients) of any errors in billing and refund any funds to which it is not entitled, including any identified overpayments by a Federal health care program within 60 days of identification and verification.
- ▶ We do not promote the routine waiver of patient cost-sharing (e.g., deductibles and co-payments).
- ▶ We respond to and address all questions, concerns, and complaints related to a customer’s or patient’s bill in a timely and responsive manner.

HealthTrackRx Workforce Members strive to avoid any conflicts of interest between an individual's private interests and those of the company or their job responsibilities.

- ▶ We refrain from and avoid conflicts, or the appearance of impropriety, between the performance of our duties and private interests.
- ▶ We do not solicit, receive, or accept cash, cash equivalents, gifts or favors, such as meals, transportation, or entertainment, which might be interpreted as improperly influencing the performance of our HTRx job responsibilities.
- ▶ We exercise good faith and judgment, and fair dealing in all transactions involving responsibilities to HTRx.
- ▶ We do not misuse our position with HTRx for personal gain.
- ▶ We do not accept outside employment that conflicts with their position at HTRx without prior approval.
- ▶ We avoid any situation that would create an actual, or suggest the appearance of, a conflict of interest. Approval by Senior Leadership is required prior to hiring or establishing a business relationship on behalf of HTRx with a relative.
- ▶ We will disclose potential conflicts of interest to our supervisor, Human Resources, or the Compliance Team.

HealthTrackRx is committed to protecting the health and safety of patients and Workforce Members and maintaining a professional work environment.

- ▶ We comply with all safety and health requirements established by law or regulation and all applicable environmental laws.
- ▶ We take reasonable precautions and follow safety rules and regulations to maintain a safe environment for Workforce Members and patients.
- ▶ We comply with all laws and regulations regarding the disposal of medical waste and hazardous materials.
- ▶ We promptly report to the appropriate Governmental authorities as required any accidents involving injury to a Workforce Member or patient.
- ▶ We educate staff on healthy and safe work practices to reduce hazards.
- ▶ We conduct regular inspections of the work areas to identify and remedy health and safety risks.
- ▶ We do not permit the manufacture, sale, possession, distribution, or use of illegal drugs or alcohol.
- ▶ We do not permit any employee or contractor to provide services when under the influence of illegal drugs or alcohol.

HealthTrackRx establishes and maintains a work environment where employees are treated with respect and fairness.

- ▶ HTRx provides a work environment that is free from harassment and intimidation. Verbal, physical, or sexual harassment will not be tolerated.
- ▶ Employment and promotion decisions are made without regard to race, color, sex, national origin, religion, age, disability, or any other classification or status protected by law.
- ▶ We maintain open lines of communication so that the views of every employee can be considered, and opinions given proper respect and consideration.
- ▶ We strive to ensure that employees show respect and consideration for one another regardless of status or position.
- ▶ The Code of Conduct and Ethics, the Employee Handbook, and other personnel policies will apply to all Workforce Members regardless of position in the workplace.
- ▶ HTRx provides training opportunities to assist employees in developing and maintaining professional skills.
- ▶ HTRx has a zero-tolerance workplace violence policy that includes threats, harassment, or bullying of any kind.

Protection & Use of Information, Property, & Equipment

HealthTrackRx Workforce Members protect patient and company information and property from improper disclosure, misuse, loss, theft, or destruction, and use company property and equipment only as authorized.

- ▶ We correctly use and care for all property and equipment entrusted to and used by them.
- ▶ We safeguard confidential and proprietary information, and do not use or disclose such information unless authorized and permitted by law.
- ▶ We do not make unauthorized copies of computer software or use unauthorized personal software on company computer equipment.
- ▶ We do not communicate or transfer any HTRx information or documents to any unauthorized person.
- ▶ We practice responsible stewardship of HTRx funds and the proper use of property.
- ▶ We properly maintain and use supplies.
- ▶ We follow established internal control procedures in handling HTRx funds and property.
- ▶ We disclose company information only as required in the performance of their duties and/or expressly authorized by a responsible manager.
- ▶ We report any identified or observed misuse of property or funds to management or to the Compliance Team. Alternatively, such reports can be made anonymously through the RightTrack Hotline at **833-255-7337** or at www.healthtrackrx.ethicspoint.com.

Duty to Report & Non-Retaliation

Workforce Members are expected to report concerns of potential wrongdoing and shall not be subject to any retaliation.

If a Workforce Member has a question or concern about potentially wrongful, unethical, or illegal activity, the following options are available:

- ▶ The individual can discuss the issue or concern with a supervisor. A direct supervisor is most familiar with a Workforce Member's responsibilities and applicable laws, regulations, and policies. Confidentiality will be maintained, and efforts will be made to resolve an issue in a fair and unbiased manner.
- ▶ If a Workforce Member is not comfortable talking with a direct supervisor or does not receive an adequate response, an issue may be raised with a supervisor's manager or another member of the management team.
- ▶ A Workforce Member may also contact the HTRx Chief Compliance Officer, Compliance Team, or Human Resources Department.
 - ▶ Compliance Department email: compliance@healthtrackrx.com
 - ▶ Human Resources Department: human.resources@healthtrackrx.com
- ▶ Alternatively, a Workforce Member may contact the RightTrack Hotline. Contact may be made on a confidential and anonymous basis.
 - ▶ Website Reporting: www.healthtrackrx.ethicspoint.com
 - ▶ Telephone Reporting: **833-255-7337**
 - ▶ Mobile: www.healthtrackrxmobile.ethicspoint.com

OR



Scan the QR code to be taken directly to the compliance page

Every report will be reviewed by the Chief Compliance Officer and will be responded to appropriately. All allegations of wrongdoing will be carefully investigated before any action is taken. The rights of all staff, including anyone who is the subject of a HTRx report, will be respected and protected.

HTRx has a non-retaliation policy to protect employees who report concerns or compliance issues. No disciplinary action or retaliation will be taken when a Workforce Member reports a perceived issue, problem, concern, or violation to management, the HTRx Chief Compliance Officer, or The RightTrack in "good faith." "Good faith means that the individual actually believes or perceives the reported information to be true and accurate, even if they are later found to be mistaken.

We value and respect the dignity of the individual. Workforce Members have the right to be treated fairly and with respect, and HTRx will make sure that you are treated that way. If a Workforce Member believes that he/she has been unlawfully harassed and or retaliated against, a written complaint should be submitted to the Human Resources Department and/or the Chief Compliance Officer as soon as possible after the incident. Concerns will immediately be reviewed and investigated.

Management & Workforce Member Compliance Responsibilities

Workforce Members are expected to follow all laws, regulations, and policies. Anyone who knows about a violation or a suspected violation must report this information. If you do not report a violation, you may be subject to disciplinary action even if you were not directly involved. Reporting does not protect you from disciplinary action regarding your own performance or conduct but telling the truth about your own actions will be taken into consideration.

Management must demonstrate and promote a commitment to ethical and legal behavior that is consistent with these values. Managers have the obligation to ensure that employees:

- ▶ Know and follow all laws, regulations, and policies related to their duties;
- ▶ Know the procedure for reporting suspected or actual violations; and
- ▶ Encourage others to ask questions and to report actual or suspected violations.

If a Workforce Member has a question regarding compliance with a law, regulation, or policy, a manager is responsible for:

- ▶ Taking steps to ensure the employee does not fear or experience retaliation;
- ▶ Maintaining the employee's confidentiality;
- ▶ Obtaining and providing responsive and accurate information regarding the employee's report;
- ▶ Pursuing the right process, including notification of the Compliance Department, so that credible reports of violations or suspected violations can be further investigated; and
- ▶ Informing the employee that a report has been followed up on.

It is the responsibility of both Workforce Members and managers to report any violations or suspected violations of law, regulations, or policy, including the Code of Conduct and Ethics. HTRx will not condone any retaliation or reprisal against a Workforce Member who reports a violation of law, regulation, organization policy, or the Code.