

Code of Conduct

Our Code of Conduct provides the framework that guides our actions in every aspect of our business. All of our stakeholders, whether they're internal or external to MedAvail, deserve our promise of compliance.

Our company operates within the context of federal, state and provincial laws, rules and regulations in the United States (US) and Canada. That's why our Code of Conduct requires us to comply with all applicable laws, rules and regulations, as well as all company policies and procedures.

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

The Code applies to everyone in the company, including the Board of Directors, when acting in their role as directors, and all full-time and part-time employees of MedAvail. In certain circumstances the Code also applies to contractors and temporary employees.

Code of Ethics

In addition to our Code of Conduct, we also have a Code of Ethics. Like our Code of Conduct, our Code of Ethics applies to everyone at MedAvail, including all employees, directors and officers of the company. The Code of Ethics provides that everyone at MedAvail will comply with all applicable laws, rules and regulations; engage in and proactively promote honest and ethical conduct; promote full, fair, accurate and understandable disclosures to the government; and promptly report violations of the Code of Ethics. You can find the Code of Ethics on page 8 of this publication.

Support

Help is always available if you have questions, need information or assistance with forms, or if you believe you should report a potential compliance issue. **Contact the Compliance and Ethics Hotline at 888-554-7650.**

Your Responsibilities

As a MedAvail employee, you're expected to be honest, act ethically and demonstrate integrity in all situations. You have a duty to follow policies and procedures found in this Code of Conduct and the Employee Handbook, as well as those that are specific to your job. 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're unsure about the right thing to do, ask someone on the management team or the Compliance Officer.

Before you act, ask yourself:

- Am I following approved company practices?
- Am I causing harm to someone?
- Can I defend my actions to my leader, coworkers, associates and the public?
- Am I protecting the information of our customers, patients, clients, associates and shareholders?
- Am I living up to my personal code of behavior?
- Will my actions give the appearance of being illegal or unethical?
- Will my actions bring discredit to any co-workers, associate or the company if disclosed to the public?



If your answer to any of these questions raises doubts, talk with your supervisor, anyone in management, Human Resources, or the Compliance Officer.

Are you a supervisor or a manager? You're responsible for knowing the rules and reviewing the Code of Conduct with your direct reports to make sure they're familiar with its contents. You're also responsible for preventing violations of the Code, as well as detecting violations that may occur and reporting them appropriately. You're expected to:

- Lead with integrity.
- Encourage employees to ask questions and expand their knowledge of the rules.
- Demonstrate integrity by acting promptly and effectively when necessary.
- Educate employees on compliance policies specific to their job responsibilities.

Complying with Laws and Regulations

Our industry is highly regulated, and many laws apply to our work. You're responsible for knowing and complying with laws that relate to the performance of your job, whether or not they're specifically addressed in this Code of Conduct. Here are some examples of laws or regulations that affect MedAvail.

Fraud, Waste, and Abuse (FWA)

The detection, correction and prevention of FWA are essential to maintaining a health care system that is affordable for everyone. US state and federal law enforcement agencies are increasingly focused on investigating health care FWA.

Examples of FWA include but are not limited to:

- Defrauding or attempting to defraud the health care system
- Lying, using false pretenses or making false statements or promises to get money from the health care system
- Using the identifying information of another person to defraud the health care system
- Misusing resources or services, which results in unnecessary costs to the health care system
- Taking any action that leads to a payment from the health care system that is improper, for substandard care or for medically unnecessary services

Even if you don't intentionally lie or misrepresent facts, you could still be committing fraud, waste and abuse if you are paid by the health care system but are not actually entitled to the money.

Requirement to report FWA:

Everyone who performs a function that in some way supports MedAvail business is required to report suspected FWA to the designated contact in the "Support" section on the previous page.

For more information on FWA, including additional examples, use the Web link below to access US CMS' Medicare Parts C and D Fraud, Waste, and Abuse Training and Medicare Parts C and D General Compliance Training: <http://www.cms.gov/Outreach-and-Education/Medicare-Learning-Network-MLN/MLNProducts/ProviderCompliance.html>.

Disclosure of Exclusion or Criminal Behavior

Acting ethically, maintaining high standards of integrity and respecting the law are fundamental to our identity as a company. If excluded from participation in a US federal healthcare program, or have been found guilty or pleaded guilty or no contest to a criminal violation, you must notify your supervisor or Human



Resources immediately. The same holds true if your name appears in the exclusions databases of the US General Services Administration or the US Office of Inspector General at the Department of Health and Human Services.

Annual Conflicts of Interest Attestation

During our annual Code of Conduct training, you're required to acknowledge that you comply with the "Conflicts of Interest" policy, located on Policies\\(P). You're also required to acknowledge that you've reported any conflicts of interest to your supervisor and the Human Resources department.

Anti-kickback Laws

Kickbacks are payments of value to individuals or other companies with the goal of persuading or influencing a decision or performance in a certain situation. An example of an illegal kickback is providing a direct, indirect or disguised payment in return for referring patients.

US federal and state healthcare anti-kickback laws provide important safeguards for the government, clients and patients by making sure that decisions by healthcare providers and payers are made for legitimate health-related reasons rather than because of inducements. It's our responsibility to understand and uphold these anti-kickback laws in order to ensure a safe, effective and efficient healthcare system.

Receiving and Offering Gifts and Gratuities

The rules for gifts and gratuities prevent any impropriety or damage to MedAvail's reputation. It's simple: Never accept a gift, favor, service or entertainment if it could be perceived as influencing a business decision. Employees and directors of MedAvail may not attempt to influence decisions by offering money, services or other things of value. This rule applies when you're dealing with purchasers, suppliers, clients, healthcare professionals, patients, government officials and others. If you see improper conduct regarding a gift or gratuity, report it immediately to the Human Resources department.

Environmental Laws and Regulations

MedAvail manages and operates its business in a manner that respects our environment and conserves natural resources. To uphold this commitment, you're expected to use resources appropriately and efficiently, recycle when possible, and dispose of waste in ways that follow the law and company policies.

Medicare and Medicaid Program Requirements

As a provider of pharmacy services in the US, MedAvail participates in Medicare programs and state Medicaid programs. If you work with these programs, you're responsible for knowing and complying with the applicable laws. Those laws include the previously discussed fraud and abuse laws, as well as state and federal controlled substances laws, the Stark Law and Medicare and Medicaid rules. If you have questions about US legal requirements for these programs, contact your supervisor or the Compliance Officer.

Health Insurance Portability and Accountability Act (HIPAA)

Many MedAvail employees routinely come in contact with patients' personal information and/or that of company employees. US federal regulations, known collectively as HIPAA, are designed to protect the privacy of "protected health information" (PHI). Personal information may be considered PHI if it relates to a patient's physical or mental condition, or the provision of or payment for healthcare.

It's important for everyone at MedAvail to be thoroughly familiar with HIPAA regulations and our company's related privacy policies and procedures which are located on the shared drive- Policies \\(P). If you have access to PHI, you're responsible for protecting that information from improper use and disclosure. You must



not access, use or disclose any PHI unless you have a legitimate business or patient-care purpose, as defined by HIPAA and company policy, and you may not use PHI for your personal benefit.

US federal and state law in this area is complex; that's why training on these topics is especially important. You're encouraged to contact your supervisor or the Compliance Officer if you have any HIPAA or privacy-related issues.

Licensure or Certifications Related to Your Job Responsibilities and Disclosure of Discipline

Certain employees are required to obtain and keep current a license or certification, such as a pharmacist license or registration. It's your responsibility to obtain and maintain these requirements to continue performing your job. If you're disciplined, censured, suspended or disbarred from any licensed profession, you must notify your supervisor or Human Resources immediately.

Information Security

Because you're responsible for using MedAvail computer resources properly, especially regarding information security, you need to be thoroughly familiar with our information security policies and procedures located on the shared drive- Policies\\(P).

These steps can go a long way in preventing unauthorized access:

1. Never share your logon information.
2. Lock your workstation when you step away.
3. Log off your workstation when you leave for the day.
4. Clear your workstation, waste can, printers and fax machines of sensitive information, such as PHI or company-sensitive information.

Accuracy, Retention and Disposal of Documents and Records

When you work with documents and records, accuracy is essential for compliance with legal and regulatory requirements. In addition to your responsibility for the accuracy of materials, you're also responsible for their proper identification and timely retrieval, which ensures that records are available, as needed, to defend our business practices and actions for the remainder of the retention and record-keep requirements. No one may alter or falsify information on any record or document.

MedAvail retains patients' personal, medical and health information, as well as our business documents, in compliance with legal, contractual and program requirements. Information and documentation may be in various formats – paper (letters and memos, for example), electronic (emails or computer files on disk or tape, for example) and other media.

Information about patients, the company or its business activities must be retained or destroyed in accordance with MedAvail records and information retention policies. Never tamper with, remove or destroy MedAvail information and documents except in accordance with company policy and applicable law.

If you have questions regarding records retention or management, contact the Compliance Officer.



Workplace Culture

Maintaining a workplace that's safe, secure, fair and welcoming to all employees is essential to attract and retain an excellent workforce. We want a work environment that generates excitement and stimulates employees to do their best work. We want to create a climate that fosters innovation and offers opportunities for personal and professional growth.

Discrimination

MedAvail believes that fair, equitable treatment of employees, patients and all persons is critical to fulfilling our mission. For that reason, our policy is to:

- Serve patients without regard to race, color, religion, sex, ethnic origin, age, disability, gender identity or any other classification protected under law.
- Recruit, train, promote, assign, transfer, lay off, recall or terminate employees based on the ability of the individual, as well as on achievement, experience and conduct, without regard to race, creed, color, religion, sex, national origin, nationality, ancestry, age, disability or status as a disabled veteran or veteran of the Vietnam era, pregnancy, affectional or sexual orientation, gender identity or expression, marital status, status with regard to public assistance, veteran status, citizenship or membership in any other legally protected class.

Harassment and Workplace Violence

MedAvail is committed to providing you with a safe, secure work environment, free from unlawful harassment.

- Incidents of workplace violence are strictly prohibited.
- Sexual harassment by employees or others, including vendors, salespeople, clients and visitors, is strictly prohibited.
- MedAvail won't tolerate any other type of unlawful harassment, including harassment on the basis of diverse characteristics or cultural background.

Drug-free Work Environment

Part of a healthy, safe and productive work environment is freedom from substance and alcohol abuse. Accordingly, you may not possess, manufacture, distribute, sell or be under the influence of alcohol or illegal drugs while you're at a MedAvail facility or conducting MedAvail business off-site. MedAvail may conduct random and reasonable-suspicion drug testing of employees and management. A positive drug test may result in termination of employment.

Health and Safety

MedAvail depends on your personal commitment and alertness to help provide a safe and healthy work environment. Please be familiar with and follow all MedAvail safety and security rules and policies.

Labor Practices

MedAvail is committed to compliance with all applicable laws and regulations, including those concerning labor and employment.

Workplace Culture Questions or Concerns

For questions or concerns about discrimination, harassment, workplace violence, drug policies, or health and safety, contact the Human Resources department.



Your Obligation to Report Suspected Violations

If you suspect or know that someone has violated the Code of Conduct, our policies, or any applicable laws or regulations, you must act.

Report the violation to any of the following:

- Your supervisor or anyone in management in your department
- Human Resources
- The Compliance Officer

See the Contact List, accessible on our intranet for additional contact information.

If You Report a Violation

You can report a violation without worry. Our policy forbids supervisors and other employees from retaliating, intimidating, harassing, threatening or taking adverse action against anyone who in good faith reports a known or suspected violation of the Code of Conduct, cooperates in an investigation of a potential violation, or reports suspected fraud, waste or abuse. This policy applies not only to employees but also to directors, vendors and agents of the company. As long as you believe that the information you provide is true, you are protected. If you think you're a victim of retaliation, intimidation or harassment, contact Human Resources, your supervisor or the Compliance Officer.

Violation of the Code

If you violate the Code of Conduct or related policies, you may be subject to disciplinary action, which will be determined by the seriousness and frequency of the violation. You may receive one or more of the following:

- Verbal warning
- Written warning
- Written reprimand
- Suspension
- Termination
- Repayment or restitution
- Referral for criminal prosecution

Changes to the Code

From time to time, changes may be made to the Code or compliance policies without advance notice. You'll be informed when changes are made, and then it's your responsibility to understand and uphold those changes.

Your Annual Acknowledgment of the Code of Conduct

Each year, as a condition of your employment, you're required to acknowledge that you've received the Code of Conduct and understand its rules. New employees will complete the acknowledgment when they start with the company and complete their Code of Conduct training.

Your annual acknowledgment confirms that:

- You have access to the Code of Conduct and Code of Ethics and understand that you're required to comply with both of them and have not acted contrary to either to the best of your knowledge, including compliance policies and procedures, as well as policies and procedures related to your job responsibilities.

- You comply with the Conflicts of Interest policy and have reported any potential conflicts of interest to the Human Resources department.
- You will report any questions or concerns about suspected or actual violations of the Code to your supervisor, the Human Resources department, or the Compliance Officer.
- You understand that the Code of Conduct and Code of Ethics represent mandatory policies, and that you may be disciplined, up to and including termination, for any violations of the principles, standards or policies therein.



MedAvail Code of Ethics

MedAvail is committed to conducting business in compliance with the law and the highest ethical standards. As part of this commitment, MedAvail requires compliance with this Code of Ethics (the “Code”) by all of its officers, directors and employees. This Code is in addition to other MedAvail corporate policies and procedures, including the Code of Conduct, compliance policies, IT and Human Resources policies and procedures.

Each individual covered by this Code will:

- Comply with applicable laws, rules, standards and regulations of federal, state, provincial and local governments, and other appropriate public or private regulatory, listing and standard-setting agencies.
- Engage in honest and ethical conduct, including avoiding any actual or apparent conflicts of interest between his or her personal affairs and relationships and his or her professional responsibilities to MedAvail, and promptly report to Human Resources or the Compliance Officer any material transaction or relationship that could be expected to give rise to an actual or apparent conflict of interest.
- Proactively promote ethical and honest behavior within MedAvail.
- Promptly report any possible violation of this Code to Human Resources or any of the other parties listed in the Code of Conduct.

Any individual violating this Code will be subject to discipline, up to and including termination of employment. There shall be no retaliation against any director, executive officer or employee for reporting questionable behavior under this Code.

Effective April 15, 2020