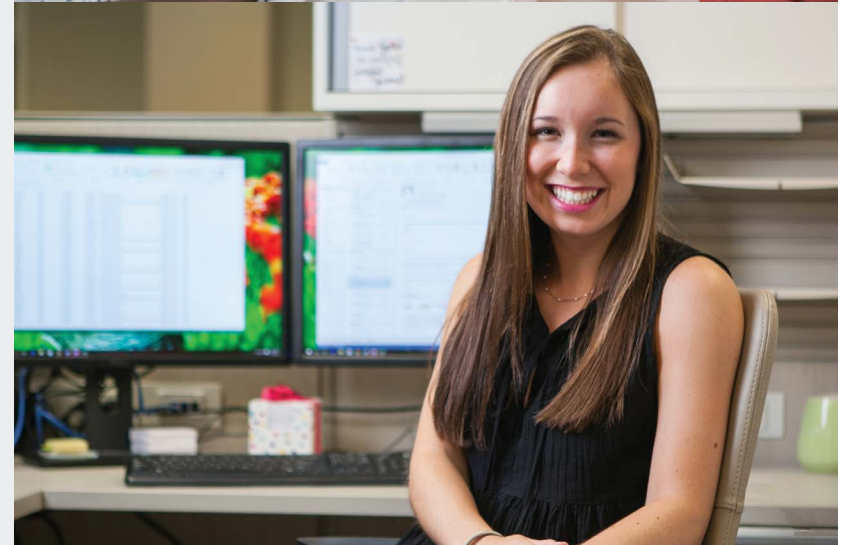




Leading With Quality

AIS Healthcare Code of Conduct



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Advancing quality. Improving lives.

A leading healthcare organization focused on innovation, AIS Healthcare is driven to improve the everyday lives of patients and providers, doing what's right—not just what's expected—every time. Adherence to higher standards; attention to process, procedure and regulation; investment in innovative sterilization processes; and financial/billing expertise all contribute to the consistent delivery of trusted healthcare solutions.

“Our reputation is one of our most valuable assets...”

This AIS Healthcare Code of Conduct is a critical extension to our mission, vision and values because it is all about ensuring the highest integrity in all that we do.

Our reputation is one of our most valuable assets and depends on our combined individual decisions. You know the feeling of doing the right thing, the right way. It builds your confidence. It builds your reputation. So, imagine what happens when all of us do the

right thing, the right way. It builds the AIS Healthcare reputation and helps make us the recognized leader in specialty medications. Please remember that leadership is earned and we must earn it together—it goes with trust. This code places trust in you and lets you be at your best.

Do all you can to make AIS Healthcare the best it can be! Remember our mission, our vision and our values. Always ask yourself the six questions, and follow the ten principles outlined in this code.



Simon Castellanos
Chief Executive Officer



John Finley
Chief Legal Officer and
Chief Compliance Officer
Legal, Government Affairs
and Compliance



AIS Healthcare

AIS Healthcare is more than just a pharmacy or a nursing services provider. We are a healthcare company committed to doing more of what matters.

We have two divisions focused on providing highly effective treatments and support services to patients with complex conditions, such as chronic pain and immune deficiencies, to improve their quality of life and management of their health.

Our Advanced Infusion Care (AIC) division specializes in providing in-home immunoglobulin (Ig) and Alpha-1 therapy and care for patients with rare diseases. We take a center of excellence approach to patient care with a team-based model that prioritizes patient outcomes.

Our Targeted Drug Delivery (TDD) division provides patient-specific compounded medications and services for individuals with surgically implanted intrathecal infusion pumps. With two fully redundant state-of-the-art 503A compounding pharmacies, we meet or exceed industry standards to produce medications of the highest quality.

We are proud to do more for patients and providers, exceeding expectations in everything we do. Because when we do more to advance care quality, providers are empowered, and patients are supported. Days get easier. Lives get better.



Mission, vision and values

Mission

We are driven to improve the everyday lives of patients and providers, in ways big and small. By doing what's right, not just what's expected—every time—we set higher quality standards for targeted drug delivery and infusion care, and enable a higher quality of life for all.

Vision

To be the leader in targeted drug delivery and infusion care, empowering transformative impact across the care continuum.

Values

Innovation: Go above and beyond

We strive to do more for patients and providers, continually creating and improving processes that lead to higher quality and safety.

Stewardship: Do what's right

We are committed to making life easier for patients, providers and employees, treating everyone fairly, truthfully and respectfully.

Unity: Advance everything together

When we recognize and incorporate all the diverse skills and perspectives found throughout our organization, we can do more. By valuing differences—in race, gender, ethnicity, sexual orientation, disability status and more—we are better able to support patients, empower providers and transform lives.

Is it in the patient's
best interest?

1

Is it legal?

2

Is it honest?

3

Is it fair?

4

Does it fit our values
and culture?

5

Will it reflect well upon
me and AIS Healthcare?

6

Principles of AIS Healthcare

1. Ethical cultures
2. Ethical business practices
3. Avoid conflicts of interest
4. Don't accept or give gifts
5. Protecting company assets
6. Respect others and the workplace
7. Protect all confidential information
8. Leave politics at home
9. Keep healthy and stay safe
10. Report potential misconduct



Ethical cultures

At AIS Healthcare, we put the needs of our patients, our partners and our communities first. We always act with integrity and compassion.

We do the right thing, for the right reason, every time.

EMPLOYEE RESPONSIBILITY

All AIS Healthcare employees are leaders. Accordingly, they are accountable for maintaining the highest professional and ethical standards when conducting AIS Healthcare business or patient care. Employees must:

- Seek assistance from the Chief Compliance Officer, your manager or another employee when you have questions or concerns
- Create an environment that supports the highest ethics and standards
- Take prompt, appropriate action when a potential violation occurs
- Never retaliate against persons who report a suspected violation
- Ask questions and report concerns as soon as they arise
- Exemplify ethical behavior at all times
- Understand the Code of Ethics
- Complete annual training

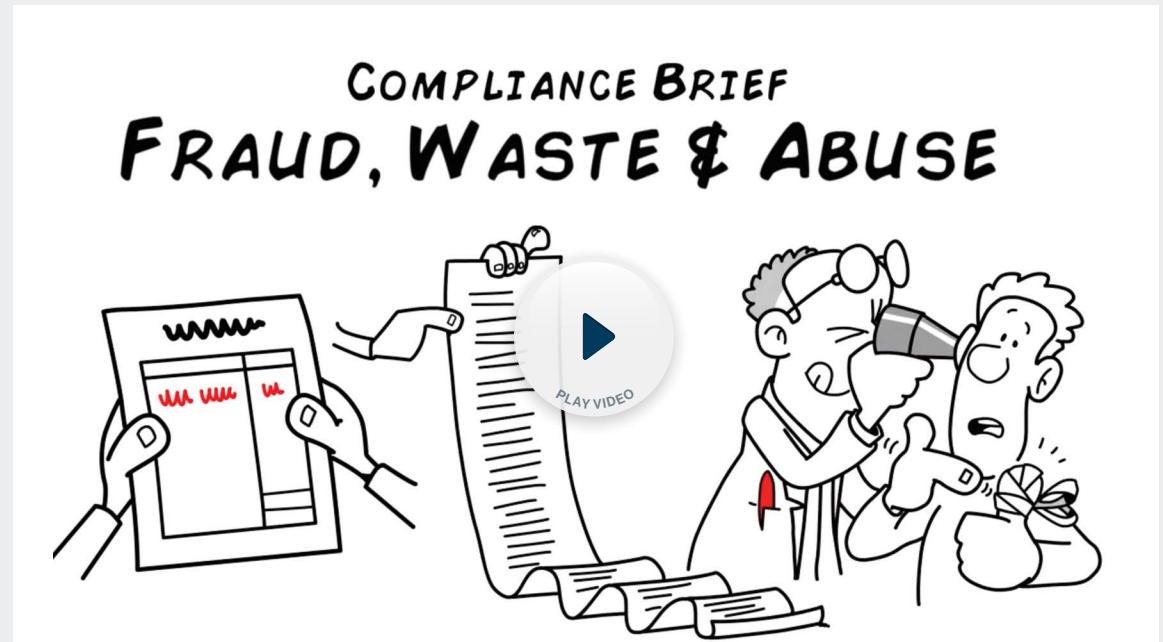


1

Ethical business practices

AIS Healthcare complies with all U.S. federal and state healthcare laws. This means that, as an employee, you must never:

- Offer, make or authorize payments or gifts in order to obtain business or secure an improper advantage
- Make agreements that limit patient choice or fix prices
- Provide anything of value to anyone who is in a position to influence decision-making



2

Avoid conflicts of interest

COMPLIANCE BRIEF CONFLICTS OF INTEREST



A conflict of interest is any situation that has the potential to cause a clash between our self-interest and what is best for AIS Healthcare.

EXAMPLES

- Employment at, ownership of or a substantial interest in a company that does business with AIS Healthcare
- A personal financial interest in AIS Healthcare customers, suppliers and competitors
- Board positions at AIS Healthcare competitors, suppliers and customers
- Demands of outside activities that interfere with your job
- Selection of consultants, suppliers or vendors because they provide gifts or entertainment, or because of family or strong personal relationships

3

Don't accept or give gifts

AIS Healthcare employees may not accept gifts of cash or equivalents from anyone that is doing business with, or hopes to do business with, AIS Healthcare. Perishable items should be shared with other AIS Healthcare staff and non-perishable items should be returned with a note explaining the AIS Healthcare gift policy. What to do?

- Respectfully decline lavish gifts and favors
- Discuss the gift or favor with your supervisor
- Offer to pay your own way for meals, trips and entertainment
- Share the gift with the workplace
- Do not give a government employee or official anything of value — including meals, gifts, entertainment or travel — unless the government employee pays the fair market value for it

COMPLIANCE BRIEF GIFTS & ENTERTAINMENT



4

Protecting company assets

COMPLIANCE BRIEF *MISUSE OF RESOURCES*



The proper use of company time and property is the responsibility of every AIS Healthcare employee.

- Give an honest day's work every day
- Think before you send an email
- Only use company property for business purposes
- Do not use company computers for personal interests

5

Respect others and the workplace

The safety of our patients, employees and visitors is of the utmost importance. As a member of the AIS Healthcare family, you should:

- Preserve and enhance the quality and safety of the workplace
- Support a substance-free environment
- Promote and protect health and safety
- Never discriminate against or harass others—it will not be tolerated

Violence, threats, harassment and insubordination lead to immediate termination.

COMPLIANCE BRIEF ***RESPECTING OTHERS***



6

Protect all confidential information

COMPLIANCE BRIEF *PRIVACY AND CONFIDENTIAL INFORMATION*



AIS Healthcare is committed to protecting patient information by following federal and state privacy laws. Patient information must be protected at all times and should not be shared with anyone who does not have a legitimate business need to know. This includes family members, friends and law enforcement:

EXAMPLES

- Do not accept confidential information from an outside business
- Do not provide confidential information to anyone outside AIS Healthcare
- Keep private and employee data confidential
- Protect the privacy of employees
- Protect patient information

7

Leave politics at home

AIS Healthcare encourages employees to participate in the political process on their own time; however, employees may not do so at work or on AIS Healthcare property.

EXAMPLES

- Do not engage in any activity intended to influence legislation or rulemaking, or engage lobbyists or others to do so on behalf of the company, without written authorization
- Do not make campaign contributions using corporate funds and other resources without our express approval
- Do not use federal money to bribe government employees or officials
- Participate in local and political activities only on personal time

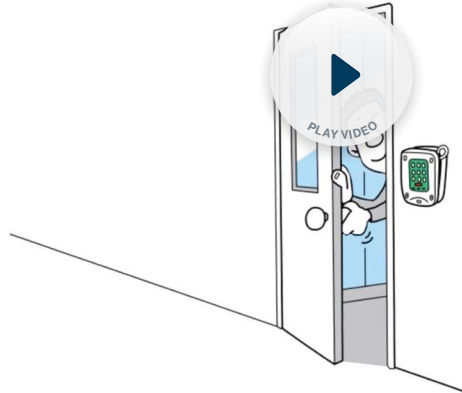
COMPLIANCE BRIEF *POLITICAL ACTIVITIES*



8

Keep healthy and stay safe

COMPLIANCE BRIEF MAINTAINING A SAFE AND SECURE WORKPLACE



EXAMPLES

- Keep your workplace clean, organized and free from physical risk
- Respect your life and the health of others
- Report unsafe working conditions or accidents to your supervisor
- Remedy any unsafe situation as soon as possible
- Do not retaliate against anyone who makes a concern known

9

Report potential misconduct

If you have doubts about a behavior or have an issue or concern, simply ask. If the answer to any of the questions below is no, you have a responsibility to share your concerns. Whenever possible, go to your supervisor or manager. You can always reach out to the Compliance Office or the hotline:

Local: 769.300.0775
Toll-Free: 877.443.4006
Email: compliance@aiscargroup.com

AIS Healthcare is committed to ensuring that all reports are promptly reviewed. AIS Healthcare strictly prohibits retaliation against persons who report in good faith.

EXAMPLES

- Is the action legal?
- Is it fair?
- Is it honest?
- Is it consistent with AIS Healthcare values, policies and procedures?
- Is it the right thing to do?
- Does it protect AIS Healthcare from legal or financial risks?

COMPLIANCE BRIEF REPORTING



10

Contact information

AIS Healthcare is committed to full compliance with all federal and state healthcare program requirements. Please report to the Chief Compliance Officer, or other appropriate individual, suspected violations of any federal or state healthcare program requirements or of AIS Healthcare policies and procedures. AIS Healthcare prohibits retaliation and strives to maintain, as appropriate, confidentiality and anonymity with respect to such reports.

John Finley, Esq., MPH. CHC
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Approved by the board of directors on June 10, 2025

