

CODE_{OF} ETHICS AND CONDUCT

2020

IWP

The Patient Advocate Pharmacy®

Applicable Party(s): All IWP Employees
Subject: Code of Ethics and Conduct and Disciplinary Action
Department: Compliance
Line(s) of Business: All business entities of Injured Workers Pharmacy, LLC including, but not limited to: Injured Workers Pharmacy, LLC, Andover, MA

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Injured Workers Pharmacy, LLC Mission Statement

IWP is “The Patient Advocate” for those who are injured on the job. “Do well by doing good- be advocates for patients in a complicated system.”

Our Values

Advocate - We advocate for the rights to quality care for our patients.

Dependable - We deliver on our promise to be a reliable source for our patients.

Commitment - We dedicate ourselves to guiding our patients through the complex claim process.

Trust - We build and foster relationships by continuously exceeding expectations.

Compassion - We empathize and strive to alleviate hardships endured by our patients.

Introduction

Injured Workers Pharmacy, LLC (referred to as “IWP” or “the Company”) is committed to providing quality care and service to its patients, and therefore established legal and ethical conduct standards set forth in this Code of Ethics and Conduct (the “Code”) to be reviewed on an annual basis.

In order to ensure alignment with the Core Values of the Company, all who are subject to the Code are required to comply with the principles of the Code. The Company holds its employees accountable for compliance with the Code and any noncompliant conduct is subject to remedial action, up to and including, termination.

If you have managerial or supervisory responsibilities, you have additional responsibility to take these actions:

- Educate your employees on this Code of Ethics and Conduct and the requirements applicable to your employees' work activities
- Promote compliance with this Code of Ethics and Conduct and other relevant policies, standards, and procedures
- Report suspicions or allegations of employee misconduct in accordance with company procedures.

Definitions:

“Annual” means a calendar year.

“Associates” means all full or part-time employees, contingent workforce members and interns within all of the business entities of Injured Workers Pharmacy, LLC.

“Company” means all business entities under Injured Workers Pharmacy, LLC, including all existing and future LOBs, as they may be amended periodically.

“Contractor” for the purposes of this Policy means any individual or entity retained by the Company to perform and/or provide professional or technical advice or service to the Company on a contracted basis. Contractors are not employed by the Company. Contractor includes, but is not limited to, consultants and vendors.

“Core Values” means Advocacy, Commitment, Compassion, Dependability and Trust.

Compliance Obligations and Adherence to the Code of Conduct

Apply IWP's values to all work decisions. Deal fairly with IWP's customers, suppliers, competitors, and employees. Don't take unlawful advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other practice involving unfair dealing.

Never knowingly violate laws, regulations, policies, standards, or procedures, even if you think doing so would increase earnings or satisfy a customer. Make yourself aware of the requirements associated with your job. Your supervisor cannot order you to take an action that intentionally violates this Code, a law, a regulation, or a company policy, standard, or procedure.

If you're unsure, ask! We do not expect all of the policies and procedures to be memorized but we ask if there is a situation that you are involved in or witness that may violate this Code to report it immediately utilizing the proper communication channels.

Use this decision-making checklist:

- Is it legal and ethical, and does it meet our internal requirements?
- Have I made a decision that feels right and is fair and just?
- How would it look in a newspaper or on the Internet?
- How would my decision or actions be judged by others?
- Will I feel comfortable with my decision?
- If I'm not sure of something, have I asked for advice?

IWP strives to demonstrate the highest standards of ethical conduct. The company does not grant waivers to its conduct, conflict of interest and compliance standards.

Discipline

All employees are required to comply with the Company's Code and failure to do so may result in disciplinary action, up to and including termination. Discipline decisions can vary depending on the severity of the misconduct and the employee's disciplinary record, years of service, and job duties.

All Contractors will be required to comply with the Company's Code and failure to do so may result in an action for breach and lead to potential termination of the contract.

All Managers are required to ensure the Employees they supervise follow the Company's Code. If the noncompliant conduct was foreseeable, the Manager will be held responsible.

How to Report Compliance Issues and Voicing Concerns

IWP strongly encourages employees to report compliance issues or concerns to their supervisor or manager initially. We also understand that in some circumstances, the employee would rather report this information anonymously, therefore, we offer the Compliance Hotline through Lighthouse Services.

The Compliance Hotline is available 24 hours a day, 7 days a week so employees may report off company property and time if they so choose. Below are the various ways one may report:

- Toll-Free Telephone:
 - English speaking USA and Canada: 844-990-0002
 - Spanish speaking USA and Canada: 800-216-1288
 - Spanish speaking Mexico: 01-800-681-5340
 - French speaking Canada: 855-725-0002
- Website: www.lighthouse-services.com/iwpharmacy
- E-mail: reports@lighthouse-services.com (must include IWP name with report)
- Fax: (215) 689-3885 (must include IWP name with report)

Your issues and concerns will be taken seriously, and all information provided to the Hotline will be treated in a confidential manner.

- Legal Counsel: Jayne Kresac
- Compliance Officer: Kerrin Prince
- Compliance Audit: Danielle Jaffee

Disclosure and Non-Retaliation Policy: IWP does not tolerate retaliation or retribution against any individual who reports potential Compliance violations or concerns.

Investigations

IWP takes allegations of misconduct seriously and will take appropriate action. All reported violations of the Code of Conduct may be investigated by one or more of the following:

- Local management
- Human Resources
- Internal Audit
- Law
- Safety

You shall never obstruct or fail to cooperate with an investigation.

Employee Conduct Standards

Attendance Reporting

If you are unable to report to work for any reason, you must contact your supervisor before the start of your work period. Also, check with your supervisor to see if your department has additional call-in requirements.

Social Media

While social media can help IWP build and strengthen relationships with our customers, employees and community members, it also has the potential to negatively impact the public's perception of IWP or your personal or professional reputation.

When we refer to social media activity, it includes:

- all types of posts and other communications on the Internet;
- posts on social networking sites (such as Facebook, Twitter, Yammer, and LinkedIn);
- blogs and other online journals and diaries;
- bulletin boards and chat rooms; and
- posts of video or audio on media-sharing sites, such as YouTube or Flickr.

Social media activity also includes permitting, or failing to remove, posts by others where the employee can control the content of posts, such as on a personal page or blog.

IWP respects your right to participate in social media and understands that your time outside of work is your own. IWP also values its established brand reputation and goodwill relationships, which are important corporate assets.

If you engage in social media activity that identifies you as an IWP employee, or your work at IWP, even if done off premises and while off-duty, you could affect IWP's reputation.

Do these:

- Be open and honest about who you are (no false names or pseudonyms), especially if it could be reasonably construed that you're speaking on behalf of IWP.
- Recognize that your social media activity is subject to relevant IWP policies, standards, and procedures. This includes but is not limited to, this Code of Conduct as well as requirements for protecting confidential information.
- Use your personal email account (not your IWP email) when setting up or participating in external social media channels.
- Use your own personal device when making personal references or recommendations on social media outlets such as LinkedIn or Yelp. Personal references and recommendations on social media sites should be done as an individual and not on behalf of the company.

Don't do these:

- Don't post content about IWP, management, coworkers, shareholders, customers, vendors, affiliates or competitors that is vulgar, obscene, harassing, or a violation of IWP's conduct standards including those addressing discrimination, harassment and workplace violence.
- Don't make business commitments for IWP on social media platforms. Information generated on social media is considered temporary and not legally binding.
- Don't post photographs or video of the nonpublic areas of IWP's premises, or of IWP's processes, operations or products without IWP's prior written approval.
- Don't use IWP's logo, trademark or proprietary graphics in a way that suggests that you are representing IWP.

Please reference IWP's Social Media Policy and if you have questions, please contact HR or the Compliance Hotline at reports@lighthouse-services.com (must include IWP name with report) or call 844-990-0002.

Company Records

During the normal course of business, we generate, receive, and use, company information. Each employee must manage IWP information carefully and responsibly and be accountable for identifying records from information. Company records must be stored, managed and disposed of appropriately.

- Never misstate facts or omit material information
- Never hide, alter, falsify or disguise the true nature of a business transaction or commitment
- Never forge endorsements, approvals or authorizing signatures
- Never process, enter a system or approve a record or disclosure that you know is false or misleading

Report any issues to your supervisor or other appropriate person in management.

Records Retention

IWP has operational, regulatory, and legal requirements to retain prescription records for ten (10) years and you are expected to consistently retain records for the appropriate period of time and in an approved system of record.

There may be additional retention requirements for records you possess that relate to a topic of investigation or litigation, which may suspend the disposing of records. When this happens, the Law Department will notify you when records are placed on “legal hold.”

If you need help with managing records, ask your supervisor or your Compliance Department.

Confidential and Customer-Specific Information

You may have access to confidential proprietary nonpublic information on the job. You may work with information that contains personally identifiable material about IWP, employees or customers, such as their names, addresses, phone numbers, or Social Security numbers. Maintain the confidentiality of information entrusted to you by IWP and our customers, except when disclosure is properly authorized or legally mandated.

When dealing with confidential information:

- Never view it for a non-business reason;
- Never use it for personal gain or advantage, and;
- Never share it without appropriate approval.

If you are required to share confidential information, make sure that it is appropriately protected and secure. This obligation continues even after you are no longer employed by IWP. Revealing nonpublic information that you obtained in the course of your employment with IWP is a violation of this Code of Conduct and may be illegal.

Confidential information includes all nonpublic information that is valuable to IWP or harmful to IWP or our customers if disclosed. There are four types of confidential proprietary nonpublic information.

Customer information includes any information about a specific customer that can be used to personally identify a customer, including such things as name, address, Social Security number, date of birth, phone numbers, and contact names.

- Never disclose any information about a customer to a third party without the customer's documented approval unless:
 - You are legally required to do so (for example, under a court-issued subpoena)
 - The information is necessary to be disclosed for IWP to bill for services

Employee information includes information about a specific employee, including such things as name, home address, Social Security number, personal phone numbers, benefits, images, photographs and performance evaluations.

- Never disclose such information to another employee, shareholder, or a third party without appropriate approval.
- Forward requests for employee information and references to your human resources representative.

Intellectual property and trade secrets are developed or collected by IWP from a variety of legitimate sources. Information and materials related to competitive strategy, trading, investment, costs, and financing methods are examples of this type of confidential information.

- If you observe intellectual property obtained accidentally or unethically, keep it confidential and immediately review it with your supervisor and the Law Department to determine the right course of action.
- It's against the law and this Code of Conduct to develop or gather intellectual property by trespassing, burglary, wiretapping, theft, accessing unprotected networks or other illegal activity.
- Don't disclose IWP confidential intellectual property to parties outside IWP unless you obtain approval from your director or officer. Also, you must obtain a signed non-disclosure agreement from the third-party.

Supplier information includes pricing and contract information.

- Never disclose supplier information to a third party without appropriate approval and a legitimate business reason.
- You also must comply with any nondisclosure agreement or the confidentiality provisions of an applicable supplier/vendor agreement.

Please exercise caution when using or handling proprietary information.

Please reference IWP's Confidentiality & Privacy Policy and if you have questions, contact the Compliance Department.

Community Activities

IWP is committed to supporting the communities we serve in various ways, such as encouraging our employees to volunteer. It may constitute implied or express support if you use your job title or affiliation or wear the IWP logo while participating in a community activity. If you're unsure if this is appropriate, please check with your supervisor or the Legal Department before participating.

News Media Inquiries

Immediately refer any media inquiries to the Legal Department.

In the case of an emergency, reporters arriving on the scene will try to gather information from any available source. If forced by the situation to respond to reporters, do not attempt to improvise an answer, do not speculate, and do not downplay the seriousness of the situation. Direct all reporter inquiries to the Legal Department.

Conflict of Interest Standards

You're expected to do your job for the benefit of IWP and its customers. You must not use company property, company information or your position for personal gain.

A conflict of interest occurs when your private interests interfere in any way, or even appear to interfere, with the interests of IWP as a whole. A conflict of interest can arise if you take actions or have interests that may make it difficult for you to perform your company work objectively and effectively. Conflicts of interest also arise when an employee or a member of his or her family receives improper benefits as a result of the employee's position in the company.

Disclose any potential conflict of interest to your supervisor and ensure that the appropriate decision-maker concurs in writing if you're allowed to remain in a situation that could be perceived as a conflict of interest.

Favored Treatment

Do not use your position to obtain or provide favored treatment for yourself or others with whom you have a personal relationship. This can include any business matter, including hiring or promoting employees, selecting contractors or vendors.

You also may not take for your own benefit any IWP business opportunity that is discovered through the use of company property, information or your position.

Close Personal Relationships

Any close personal relationship, especially a romantic one, should never exist between a supervisor and an employee within that supervisor's chain of command. There are also substantial risks even in consenting romantic relationships between employees outside this chain of command or between employees with comparable rankings.

Q. I am dating a coworker who occasionally serves as the acting supervisor for my group. Do we have to bring this to the attention of our supervisor or Human Resources?

A: Yes. This situation creates a conflict of interest in your group. Even if you and your colleague are currently equals in the same group, you should advise your supervisor of the relationship so that your supervisor can prevent an inappropriate reporting relationship.

Close personal relationships can interfere with an employee's independent judgment, create employee morale issues, and lead to claims of conflict of interest or even sexual harassment. Such relationships also can negatively impact or disrupt the workplace and create the appearance of impropriety. It is the company's expectation that employees will take personal responsibility for adhering to all company policies and standards and to ensure that they do not engage in relationships that disrupt or negatively impact the workplace.

To avoid these problems and to foster a positive team environment, you must promptly report to your Human Resources representative any close personal relationship that results, or could result, in a conflict with a policy or standard. After reviewing the facts, the Company will take appropriate action.

Outside Employment

You are not permitted to engage in outside employment activities that compete with services offered by IWP.

- Don't participate in an outside employment activity or business venture that could have an adverse effect on your ability to perform your duties for IWP.
- Don't use company time or assets for your own business or other job.
- Don't attempt to obtain personal advantage or benefit due to your association with IWP or by using the company name.
- If the outside employment activity is with a government entity, notify Government Affairs.

If you are, or plan to be, engaged in outside employment activities, and you are unsure if they might be in conflict with this Code, discuss them with your supervisor and document your joint conclusion. If you are a supervisor, and your employee comes to you with questions about outside employment, notify your director of the employment activities that your employee will be involved in.

Compliance Standards

Each of us is responsible for knowing and complying with the laws and regulations applicable to our work. Promptly report any violations of legal or regulatory requirements or IWP policies, standards or procedures to your supervisor, any other involved department, or the Compliance Hotline. IWP does not allow retaliation for any such reports made in good faith.

Following are descriptions of just a few of the compliance requirements that have widespread applicability at IWP.

Federal Workers Compensation Act (“FECA”)

The Federal Employees' Compensation Act (FECA) provides federal employees injured in the performance of duty with workers' compensation benefits, which include wage-loss benefits for total or partial disability, monetary benefits for permanent loss of use of a schedule member, medical benefits, and vocational rehabilitation. This Act also provides survivor benefits to eligible dependents if the injury causes the employee's death.

The FECA is administered by the Office of Workers' Compensation Programs (OWCP).

Federal law (18 U.S.C. 1920) provides: "Whoever makes, in an affidavit or report required by section 8106 of title 5 in a claim for compensation under subchapter I of chapter 81 of title 5, a statement, knowing it to be false, is guilty of perjury and shall be fined not more than \$10,000 or imprisoned not more than five years, or both" (or \$10,000 and 10 years for conspiracy to commit fraud).

Federal Anti-Kickback Statute (“AKS”)

The AKS is a criminal law that prohibits the knowing and willful payment of "remuneration" to induce or reward patient referrals or the generation of business involving any item or service payable by the Federal health care programs (e.g., drugs, supplies, or health care services for Medicare or Medicaid patients).

Remuneration includes anything of value and can take many forms besides cash, such as free rent, expensive hotel stays and meals, and excessive compensation for medical directorships or consultancies.

In some industries, it is acceptable to reward those who refer business to you. However, in the Federal health care programs, paying for referrals is a crime. (<http://oig.hhs.gov/compliance/physician-education/01laws.asp>)

Federal Beneficiary Inducement Penalties

Offering or transferring remuneration to a beneficiary of Medicare or a State health care program (including Medicaid) that is likely to influence the beneficiary to order or receive from a particular provider, practitioner, or supplier any item or service covered under Medicare or a State health care program.

Gifts and Donations

IWP employees are prohibited from providing gift items that may be used by health care providers for non-educational or non-business purposes. Promotional items like IWP labeled pens are not considered gifts.

Where permissible under applicable law, IWP may elect to permit IWP employees to provide items of nominal value, in IWP's sole discretion. Gifts must relate to the referral source's practice, benefit patients or serve a genuine educational function. Gifts must not be given in the form of cash or cash equivalents.

- a. All gifts of nominal value given on behalf of IWP must be approved and reported to the General Counsel.

Donations, grants and sponsorships to referral sources may only be provided to referral sources or associations of referral sources to the extent allowed by applicable laws and must:

- a. always be made with the purpose to support healthcare or research;
- b. always be approved by IWP's General Counsel and documented; and
- c. not constitute an inducement to prescribe, recommend, purchase, pay for, reimburse, authorize, approve or supply any IWP product or service.

Please reference IWP's Interactions with Health Care Professionals and Attorneys and Interacting with Referral Sources Policies. If you have any questions, please contact the Compliance Department.