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Code of Conduct and Ethics



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1 About This Code of Conduct and Ethics

In this section, we look at:

1.1	Why This Code Is Important to the Company
1.2	Who This Code Applies To
1.3	How to Use This Code
1.4	Responsibility for This Code
1.5	Your Responsibilities
1.6	Raising Concerns
1.7	Compliance Policies
1.8	Consequences of Failure To Comply With the Code
1.9	Process for Review

This Code of Conduct and Ethics ("Code") sets forth the Company's basic standards of ethical and responsible business conduct. These standards are based on the Company's core values and our commitment to operate with integrity and in an ethical manner (in terms of both lawfulness and good judgment) that are critical to the Company's success and guide our work. We are all expected to uphold the Code. This Code is at the center of how we work together.

1.1. Why This Code Is Important to the Company

The Code is designed to provide the Company's workforce members with a framework of how we should do business and respect our commitments as an employer and as a business. This Code does not form part of any contract of employment or contract to provide services, and we may amend it at any time.

The Company understands that the public and organizations place significant trust in us and the healthcare services we provide. The Company's workforce members must consistently demonstrate a high level of professionalism and competence in order to maintain this trust.

1.2. Who This Code Applies To

This Code applies to all Company directors, officers, employees, and contractors ("workforce members") of Fuze Health and the Fuze Health family of companies, collectively referred to as "the Company."

While this Code establishes the minimum standard for the entire Company, individual entities may develop more specific local policies to address the unique cultural, legal, and business requirements of their region.

1.3. How to Use This Code

The Code is supplemental to, and does not replace, other operative policies that apply to you or your work, including for employees, your Employee Handbook. If you are faced with a decision at work and unsure of what action to take, we encourage you to first ask yourself the following questions to help you comply with this Code and other policies:

Questions to ask yourself when making a decision:

1. Is it in line with the Code and our policies?
2. Does it comply with the law?
3. Will it help us maintain the trust people place in the Company?
4. Would I feel comfortable if my decision was made public internally or reported externally?



If you answered “no” to any of these questions, or if you are navigating a grey area and something just does not feel right, and you’re not finding answers in the Code or other Company policies, then pause, evaluate, and ask for help. Consult your manager, your HR partner, or a member of the Compliance or Legal teams and discuss the matter openly before acting. Consult the Legal team if there is a situation where the Code conflicts with a local policy, law, or custom.

1.4. Responsibility for This Code

At the Company, the Board of Directors has overall responsibility for ensuring the Code complies with our legal and ethical obligations, and that all those under our control comply with it.

The Chief Compliance and Risk Officer, Chief Legal Officer, and Chief Human Resources Officer have primary responsibility for implementing this Code, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in managing ethics and conduct on behalf of the Company. Management at all levels is responsible for ensuring those reporting to them understand and comply with this Code.

1.5. Your Responsibilities

You must ensure that you read, understand, and comply with this Code. In particular, all Company workforce members are required to:

- Act in accordance with this Code and Company policies.
- Act lawfully, honestly, ethically, and in the best interests of the Company and our clients at all times.
- Complete required training, use the Code, and speak up when you have a question or concern.
- Cooperate fully with Company investigations, including requirements around confidentiality, participation, and honesty.
- Never retaliate against anyone who raises a concern in good faith about a possible violation of the Code, Company policies, or the law, or who cooperates in an investigation.

For those Company employees in management positions, you must lead by example. Be a role model. Your approach will influence others.

If you have questions about the Code, need advice on a particular topic or issue, or are unsure about how to report a concern, contact your manager, your HR partner, or a member of the Compliance or Legal teams.

1.6. Raising Concerns

Speak up. Be an upstander, not a bystander.

Speaking up is important if you see or suspect a violation of the law, this Code, or any of the Company's policies. You do not need to have all the information or details to ask questions or speak up. You should feel comfortable asking a question or reporting a concern using whatever channel you prefer. You can trust that any question or concern will be treated seriously and dealt with (and if required, investigated) promptly and as confidentially as possible.

The normal route for raising such issues is via your manager, your HR partner, or a member of the Compliance or Legal teams. Concerns can always be reported anonymously. For convenience, the Company has provided toll-free numbers along with several other anonymous reporting methods, all of which are available 24 hours a day, seven days a week.

LetsGetChecked and Veritas employees can:

Visit: www.lighthouse-services.com/LetsGetChecked

Call:

- English-speaking USA and Canada: 833-782-6653.
- Spanish-speaking USA and Canada: 800-216-1288
- French-speaking Canada: 855-725-0002 Spanish-speaking
- Mexico: 01-800-681-5340
- Spain and Portugal: 00-800 31 26 4001

E-mail: reports@lighthouse-services.com (must include Company name with report)

Fax: (215) 689-3885 (must include Company name with report)

Truepill, Fuze Care Services, Alto, and PatientsLikeMe employees can:

Visit: Truepill.ethicspoint.com or

Call: 844-235-9722

The Company will not tolerate retaliation against anyone who raises a concern in good faith or participates in an investigation. "Good faith" means that you have provided information that you believe to be comprehensive, honest, and accurate at the time, even if you are later proven to be mistaken.

This Code is not intended to and does not supersede or interfere with any workforce members' rights under applicable local laws or regulations. Workforce members remain free to exercise their legally protected workplace rights, to cooperate with any authorized governmental, regulatory, or judicial body, and to disclose information as permitted and/or required by any applicable local laws or regulations. Compliance with all external legal and regulatory requirements always takes precedence over this internal Code.

For U.S.-based workforce members: Nothing in this Code is intended or should be construed to interfere with any U.S.-based employee's rights under applicable state and federal law, including the National Labor Relations Act, nor does this Code in any way restrict or limit employees' right to disclose facts relating to certain claims for harassment, retaliation, discrimination, or other unlawful acts in the workplace, or related to terms and conditions of their employment, testify truthfully in any public forum, exercise any protected rights, or comply with any applicable law or valid order of a court of competent jurisdiction or an authorized government agency. Furthermore, nothing in this Code is intended to prohibit a Company employee, contractor, volunteer, officer, or director from reporting concerns to, filing a charge or complaint with, making lawful disclosures to, providing documents or other information to, or participating in an investigation or hearing conducted by the U.S. Equal Employment Opportunities Commission, National Labor Relations Board, Securities and Exchange Commission or any other federal, state, or local agency charged with the enforcement of U.S. laws.

1.7. Compliance Policies

The Company has established a compliance program (the "**program**") which sets out minimum standards and policies that must be adhered to by the Company's workforce members. The program has created (and continues to develop) various policies, procedures, and internal control systems. Please also be aware that additional policies, which should be reviewed by workforce members, will be provided from time to time as applicable.

1.8. Consequences of Failure to Comply With the Code

The Company may, at its sole discretion, take disciplinary action against employees (including termination of employment) and terminate business relationships as a result of any failure to comply with this Code.

1.9. Process for Review

This Code shall be approved by the Board of Directors and reviewed as required, following:

- Any relevant and material legislative changes or changes to industry guidance that might impact it; and
- Any relevant and material changes to other associated internal policies, processes, or procedures.

2 Respecting Our Commitments – As an Employer

In this section, we will take a closer look at the following topics:

- 2.1 Health, Safety, and Security
- 2.2 Diversity, Equity, and Inclusion
- 2.3 Discrimination, Harassment, and Bullying

2.1. Health, Safety, and Security

Core Company Principle

All Company employees have a right to a healthy, safe, and secure working environment, and safety at work depends on all of us.

We create conditions that protect the safety, health, and well-being of all employees in accordance with the applicable laws.

We commit to:

- Taking every reasonable precaution to maintain a safe and healthy working environment and follow the Company's policies, any guidelines, and applicable laws, and report any suspected breaches immediately.
- Ensuring we are not putting ourselves or others at risk by our actions.
- Making correct use of any article or substance provided for use at work or for the protection of our safety, health, and welfare at work, including protective clothing or equipment.
- Ensuring that we know what to do if an emergency occurs at our workplace.
- Following the Company's policies related to physical security, including managing visitors and access to Company facilities.
- Speaking and acting respectfully, avoiding language or behavior that could be perceived as threatening, aggressive, or violent.

2.2. Diversity, Equity, and Inclusion

Core Company Principle

We want everyone to feel a sense of belonging at work. We recognize that the diversity of our workforce helps us to make the best decisions for our business.

The Company is an inclusive, equal opportunity employer. We are respectful of the differences between people and their circumstances and do not tolerate discrimination. Our prohibition against discrimination applies to all employment decisions and working conditions in general, as well as our relationships with our suppliers, clients, business partners, and third parties.

We commit to:

- Creating an environment where everyone feels a sense of belonging.
- Treating each person with respect and fairness, embracing diverse perspectives and experiences.
- Making decisions about hiring, promotion, training, and working conditions based on merit and equity.
- Listening with empathy and openness to differing viewpoints.
- Holding ourselves accountable for upholding equal opportunity (gender, disability, marital status or family situation, sexual orientation, age, political and philosophical opinions, religious beliefs, union activity, ethnic, social, cultural or national origin or any other basis prohibited under applicable law) in all interactions.

2.3. Discrimination, Harassment, and Bullying

Core company principle

We all have the right to respect and human dignity. At the Company, this is key to how we run our business. Any behavior or action that would or could affect or interfere with this right, and in particular any form of harassment, sexual harassment, threat, or bullying, will not be tolerated.

The Company does not tolerate harassment, sexual harassment, discrimination, threats, bullying, or any similar behavior against anyone.

We commit to:

- Fostering a workplace free from all forms of harassment and bullying.
- Building professional relationships based on trust, fairness, and equity.
- Acting in ways that prevent favoritism or bias in decision-making, especially around employment decisions and supervision.
- Creating an environment where feedback and boundaries are respected, and where everyone feels safe to contribute.

3 Respecting Our Commitments – As a Business

In this section, we look at:

3.1	Conflicts of Interest
3.2	Fair Competition
3.3	Bribery and Corruption
3.4	Gifts and Hospitality
3.5	Intellectual Property
3.6	Confidential Information
3.7	Data Protection
3.8	Use of Company Resources
3.9	Record Retention and Protection
3.10	Social Media
3.11	Trade Sanctions and Import/Export Controls
3.12	Product and Services Safety and Quality
3.13	Responsible Use of Artificial Intelligence (AI)

3.1. Conflicts of Interest

Core Company principle

You should avoid a conflict, or an appearance of a conflict, between your personal interests and the Company's interests. Be loyal. Be transparent.

We avoid conflicts of interest to make the best choices for the Company, unaffected by personal interests or relationships. Having a conflict of interest may not be a Code violation, but failing to disclose it is. The most important thing to keep in mind when dealing with any conflict, or even potential conflict, is full disclosure of all the facts.

We commit to:

- Disclosing personal relationships (including family ties, close friendships, or mutual attraction) when they could create actual or perceived conflicts, ensuring they are managed transparently.
- Being transparent in our decisions, disclosing any situation that could present a real or perceived conflict.
- Promptly reporting personal or family financial interests, roles, or external activities that may overlap with Company business.
- Ensuring that our business decisions are objective, free from personal gain, and aligned with Company interests.

- Promptly disclose any circumstances that may result in an unfair advantage in the Company's dealings with any business partner (for example, a contractual arrangement with a drug manufacturer, which creates an incentive to include a certain drug in a program utilized by a family member).

3.2. Fair Competition

Core Company principle

The Company competes fairly. We commit to outperforming our competitors both legally and ethically.

It is in the Company's best interests to work in an industry where business practices are reputable. It makes our work easier and reinforces the trust of our clients. In most countries, competition law is strictly regulated (making certain actions not only a breach of this Code, but also illegal).

We commit to:

- Competing vigorously but fairly, winning business based on the quality of our products and services.
- Speaking truthfully about our industry and competitors, avoiding disparaging or misleading statements.
- Ensuring that contracts and business practices comply with competition laws in every jurisdiction where we operate.
- Seeking guidance from Legal or Compliance before entering into exclusive arrangements or other practices that could impact competition. Any interaction with competitors should be reviewed with Legal ahead of the activity.
- Respecting competitor information and only using it when obtained through lawful, ethical means.
- Refraining from all disparaging remarks concerning competitors (including any false statements concerning their products or services)

3.3. Bribery and Corruption

Core Company Principle

Corruption is unacceptable; it can cause damage to our reputation and business, and to the communities in which we do business.

The Company takes a zero-tolerance approach to bribery and corruption. We are committed to acting professionally, fairly, and with integrity in all our business dealings and relationships. A bribe means a financial or other inducement or reward to improperly influence a business decision or obtain a business advantage. Bribes can take the form of money, gifts, loans, fees, hospitality, services, discounts, the award of a contract, or any other advantage or benefit. All interactions with prescribers, patients, vendors, and business partners must comply with federal and state fraud and abuse laws, including the federal Anti-Kickback Statute and any other applicable anti-bribery and corruption laws and healthcare professional ethical and regulatory guidelines.

We must not use intermediaries, such as agents, consultants, advisers, distributors, or any other business partners, to commit acts of bribery. The Company does not distinguish between public officials and private persons so far as bribery is concerned.

Always ask yourself before offering, giving, or promising anything of value to any person if what you are considering could be viewed as having an illegitimate purpose. If the answer is yes, you must not proceed. If you are in any doubt, consult the Legal or Compliance teams before proceeding.

Billing and claims integrity

We only bill for medications and services that are actually provided, properly documented, and medically necessary. Submitting false or misleading claims, or failing to follow payer requirements, is strictly prohibited.

We commit to:

- Ensuring business partners and intermediaries are informed of our standards and are committed to respecting them.
- Immediately informing management if we become aware of any action that might be contrary to this Code.
- Immediately informing management if facing extortion or attempted extortion, i.e., payment of cash or of anything of value, in order to avoid the immediate harm to a Company employee or representative, and thoroughly documenting this demand.
- Refusing to offer, solicit, or accept any payment or advantage intended to improperly influence decisions.
- Submitting accurate and truthful claims for payment.

3.4. Gifts and Hospitality

Core Company Principle

We invest in our business relationships in a responsible way. We offer and/or accept gifts, entertainment, or anything else of value, only to show our appreciation for a client or third party and not to improperly influence them.

While accepting or providing gifts, entertainment, and other hospitality can strengthen business relationships, it can also create conflicts of interest. We protect our reputation by ensuring that gifts are legal, appropriate, and reasonable. Cash gifts are strictly forbidden.

We commit to:

- Offering or accepting gifts, entertainment, or hospitality only when they are appropriate, symbolic, and consistent with Company policy.
- Ensuring that when establishing a new business relationship, all parties are aware from the outset of the Company's guidelines on gifts and entertainment. In turn, finding out what our business partner's policy is on these issues.

- Immediately disclosing any gift or invitation that could create a perception of bias or undue influence.
- Protecting our reputation by ensuring every gift or courtesy is legal, reasonable, and serves a legitimate business purpose.

Questions to ask yourself when giving or receiving gifts and entertainment

1. Am I following Company policies, including the limits for government officials?
2. Is it reasonable and appropriate according to local law and custom?
3. Does it serve a legitimate business purpose?
4. Does it avoid the risk or perception of bias for future decision-making?
5. Does it avoid the perception of improper conduct?

If the answer to any of these questions is “no,” the gift or entertainment likely is not appropriate and you should **not** give or accept it.

3.5. Intellectual Property

Core Company Principle

We respect our intellectual property and the intellectual property of others.

To maintain our competitive edge and customer confidence, it is crucial that the Company's Intellectual Property is protected. The Company's Intellectual Property contributes to our ability to effectively conduct our business and to grow and achieve our business objectives. All of us have a responsibility to identify, protect, and defend our Intellectual Property. Any questions about our intellectual property should be directed to the Legal team.

We commit to promptly identifying and reporting any conflicts, including unauthorized disclosure and violations of infringements by any third party of the Company's Intellectual Property. We will not discuss the Company's intellectual property outside of the Company or knowingly violate the valid intellectual property rights of third parties.

3.6. Confidential Information

Core Company Principle

The Company's information is valuable, and we must all protect it.

All Company information, unless approved for public circulation, is to be considered, by default, confidential. It must be protected. We all have a responsibility to safeguard Company information and the confidential information of our employees, customers, and third parties.

We commit to:

- Protecting Company information, as well as the confidential information of our employees,

customers, and partners.

- Accessing only the information needed to perform our roles and sharing it only with those authorized and with a legitimate business purpose.
- Handling sensitive conversations and documents with care, including avoiding public or unsecured settings.
- Immediately reporting suspected theft or abuse of confidential, proprietary, or trade secret information.
- Protecting our network from viruses and downtime by only installing approved software and installing security software and updates as directed by the Company.

3.7. Data Protection

Core Company Principle

The Company is committed to complying with its legal obligations with regard to data protection and privacy laws and regulations.

Data is one of the most valuable assets in every business, and if we don't protect this asset, it can have serious legal and financial consequences to the Company and its customers. There are some key things which we must do, and equally, which we must not do, to achieve our core Company principle.

We commit to:

- Collecting, using, and sharing data lawfully, fairly, and in a transparent manner.
- Limiting data collection and processing to what is necessary for legitimate business purposes.
- Keeping personal data accurate, secure, and only for as long as needed.
- Taking personal responsibility for protecting data in compliance with regulations such as GDPR, HIPAA, and other applicable laws.
- Promptly reporting incidents or breaches to ensure timely response and protection of individuals' rights.

The Company is accountable for the personal data that it processes and must be able to demonstrate its compliance with data privacy and security laws and regulations. We train our employees on the importance of privacy and security, including how to handle data in compliance with key regulations such as HIPAA and GDPR, and how to report incidents.

3.8. Use of Company Resources

Core Company Principle

We must respect and protect the Company's assets.

Our resources are the tools and information we use in our work each day. The Company's resources are intended to help workforce members achieve our business goals. We must respect and protect the Company's assets to ensure that they are not lost, damaged, misused, or wasted.

We commit to:

- Ensuring that all Company assets (e.g. laptops, mobile devices) are used appropriately and safeguarded from loss or misuse.
- Using Company technology, digital tools, and AI responsibly, ethically, and in alignment with Company policies.
- Protecting our networks and systems by following security protocols and using approved software and tools.
- Letting our manager know if any of our assets are damaged, missing, or in need of repair.
- Locking our workstations and accounts when stepping away to keep information secure.
- Respecting the Intellectual Property rights of others by confirming the Company has the right to use third-party content or tools before doing so.
- Asking for guidance from the Legal, Compliance, or IT teams when uncertain about technology use or new risks.

3.9. Record Retention and Protection

Core Company Principle

We maintain books and records that accurately reflect our business and financial situation and only retain these records for as long as necessary for the purpose for which they were collected or processed.

The Company must retain data where needed in order to comply with legal, regulatory, and contractual requirements, or for legitimate business needs. Once the respective retention period has elapsed, the Company undertakes to securely destroy or erase personal data. All of us have a responsibility to record transactions honestly and handle our records with care, being mindful of when it is okay to delete data or when a retention period may apply.

We commit to:

- Managing records properly and retaining the records we need to support our tax, financial, and legal obligations.
- Retaining records only for as long as they are needed to meet legal, regulatory, contractual, or business requirements.
- Maintaining records securely and following any guidelines on record retention.

- Seeking and receiving authorization before selling, transferring, or disposing of any Company assets or records.
- Cooperating fully with internal and external auditors and regulators to ensure transparency and compliance.
- Preserving records that may be relevant to an investigation, legal action, or subject to a legal retention hold.
- Practicing data minimization by collecting and retaining only the information necessary for the purpose at hand.

Although the primary purpose of a data retention policy is to ensure proper data management in accordance with relevant legal statutes and regulations, it is also an excellent way to enhance efficiency and minimize risk within the organization.

3.10. Social Media

Core Company Principle

Act with the Company's best interests at heart.

The Company's reputation depends on the behavior of each Company employee. There are some key things which we must do, and equally which we must not do, to achieve our core Company principle.

We commit to:

- Referring all media enquiries to management and obtaining advance approval for any statements or communications with the media in accordance with the Company's communication policy.
- Always ensuring that any digital communication on the Company has undergone adequate preparation.
- Ensuring there is no confusion between our opinions or personal interests and those of the Company.
- Avoiding giving our opinion on colleagues and the workplace on professional development sites.
- Always identifying ourselves as the Company employees when we use social media as part of our professional activities.
- Always keeping in mind that nothing is "secret" or "private" on the internet.
- Using Company communication tools, letterhead, and email accounts solely for appropriate business purposes.
- Seeking prior written consent from management before speaking at public forums, conferences, or seminars on behalf of the Company.

3.11. Trade Sanctions and Import/Export Controls

Core Company Principle

We trade with integrity and in compliance with all applicable laws.

Export controls and economic sanctions regulate where and with whom we can do business. These laws vary widely around the world. The laws of more than one country may govern a particular transaction. Failure to comply with these laws can seriously impact our business and reputation, lead to significant fines, and can even result in the loss of our export privileges.

We commit to:

- Complying with our policies and applicable law.
- Verifying that the transactions do not involve restricted or sanctioned individuals, entities, regions, or countries.
- Always keeping in mind that in certain countries where the Company does business, economic sanctions, embargoes, and other applicable laws may differ from those in Europe or the U.S. Contact the Legal team for guidance.
- Reviewing the export classifications of any hardware, software, technology, or services and ensuring any required export licences or other authorizations are in place before proceeding.
- Documenting transactions completely and accurately.

3.12. Product and Services Safety and Quality

Core Company Principle

Product and patient safety and quality of care is paramount at all times.

At the Company, we are committed to marketing products that have proven safety and efficacy. We are also committed to providing services that meet applicable standards of practice and quality of care requirements. Every Company workforce member involved in product development, manufacturing, marketing, and sales must seek to achieve total product quality. Workforce members involved in providing patient care must provide care that meets quality of care standards. The trust of our customers and patients is what underpins the reputation of our business, and therefore, we must strive to continually develop and implement processes in all aspects of our operations that meet or exceed legal and regulatory requirements.

We commit to:

- Ensuring our products and services comply with all applicable laws and regulatory requirements.
- Maintaining all required professional licenses, certifications, or other accreditations, and complying with all ethical standards of our respective professional regulating agencies and organizations.
- When we become aware of any claims, incidents, or safety problems in connection with our products or services, reporting them.

- Providing safety instructions and information to customers that is accurate, understandable, and prominently displayed.
- Ensuring that quality controls are applied at each stage of the product process, from product development to manufacturing and distribution.
- Raising concerns immediately if we identify potential product safety or quality issues.
- Directing customer questions to qualified representatives who are trained and authorized to provide accurate information.

3.13. Responsible Use of Artificial Intelligence (AI)

We recognize that artificial intelligence (AI) and related technologies can improve business and health-care operations, patient support, and decision-making. Any use of AI at the Company must meet these requirements:

- **Protect patient privacy** and comply with HIPAA, GDPR, U.S. state privacy, and AI regulations, and other applicable data protection laws.
- **Support, not replace, clinical judgment:** AI tools are aids and may not be used as a substitute for licensed medical decision-making.
- **Be transparent and fair:** Workforce members must avoid misuse of AI in ways that could create bias, discrimination, or harm to individuals, including patients.
- **Require approval:** All AI systems must be reviewed and approved through appropriate third-party risk and vendor onboarding channels, including legal, compliance, privacy, and security reviews before use.

