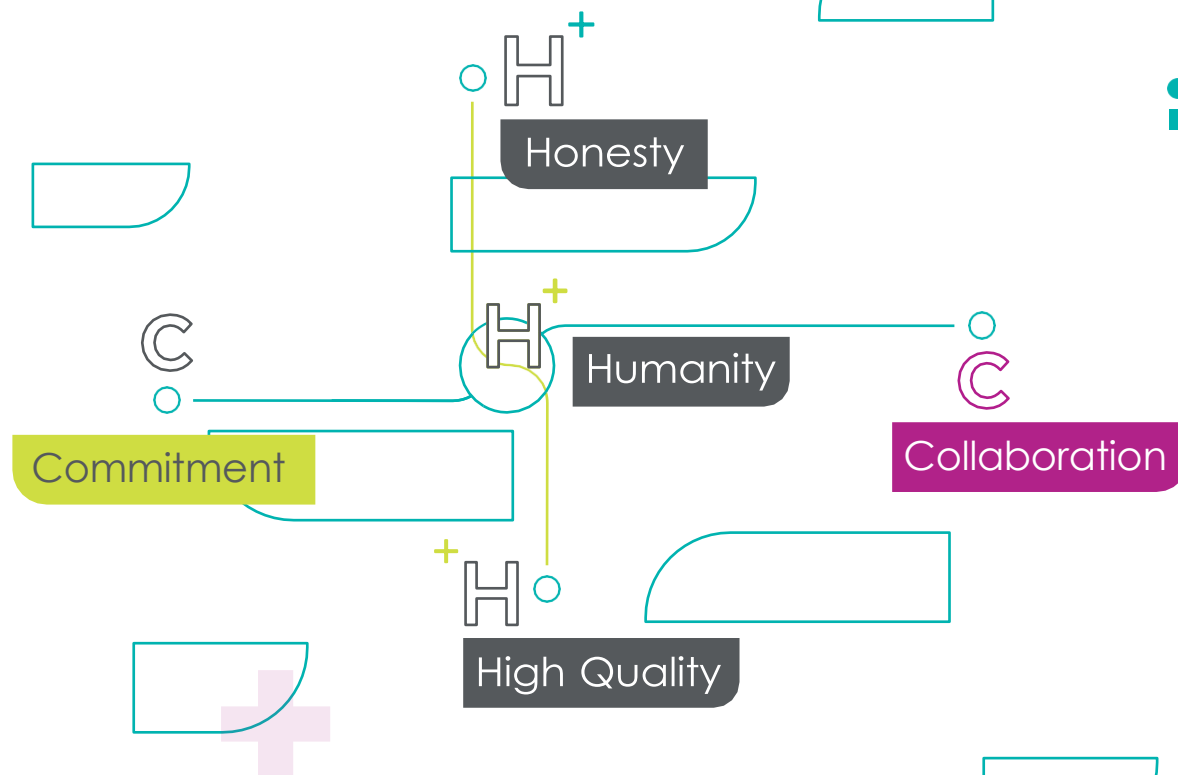


Code of **CONDUCT** & *ETHICS*

Our Code of Conduct and Ethics reflects the principles and values we expect all who represent Alivia Health to follow, in the workplace and beyond.

Everything we do is inspired by the core values that are reflected in **Formula H3C2**. But, we go further: every action, every gesture, every activity we perform as the Alivia Force reflects these values in a clear way. That is why we apply them every day.



Humanity

We put ourselves in the shoes of others to serve our community with empathy.



Honesty

We communicate with sincerity and act with integrity in everything we do.



High Quality

We pay attention to detail and exceed expectations.



Commitment

We give our all for the well-being of our communities.



Collaboration

We work together to achieve a common purpose.

DO

We abide by all applicable laws and regulations, both local and federal, through the implementation of policies and procedures, and training programs that guarantee patients receive the quality of service in duly authorized facilities.

We behave with professionalism, a sense of ownership, accountability, and honest communication in our day-to-day work activities. We properly utilize credentials and provide accurate representations concerning education, experience, competency, and performance.

We deliver competent, safe, and appropriate pharmacy services.

We maintain sensitive information received, maintained, or created by Alivia, confidential, including protected health information, intellectual property, employee, and financial information.

We have a duty to avoid personal, business, financial, clinical, or other direct or indirect interests or relationships that conflict with the interests of Alivia or that divide our loyalty to Alivia. We disclose any activity that is or even appears to present a conflict.

We exercise good judgment and maintain ethical relationships with providers and vendors.

We submit accurate and truthful information to government agencies or third-party payors.

We promote an environment of open communication and reporting. Retaliation and intimidation against any individual for making a good-faith report of concerns about actual or potential wrongdoing, including but not limited to violations of this Code, the Alivia Compliance and Quality Program, policies and procedures, or any applicable law or regulation, is prohibited.

Legal Compliance

Business Ethics

Quality

Confidentiality

Conflict of Interest

Business Relations

Fraud, Waste and Abuse

Protection for Employees Who Report Potential Violations

DON'T

We do not violate applicable laws, regulations, both local and federal, or internal policies and procedures.

We do not behave in an unprofessional manner and do not stray from our sense of ownership and accountability.

We do not deliver incompetent, unsafe, or inappropriate pharmacy services.

We do not disclose sensitive information received, maintained, or created by Alivia, including protected health information, intellectual property, employee, and financial information.

We do not engage in personal, business, financial, clinical, or other direct or indirect interests or relationships that conflict with the interests of Alivia or that divide our loyalty to Alivia. We do not fail to disclose real or perceived conflicts of interest.

We are prohibited from soliciting tips, personal gratuities, or gifts from patients and providers and from accepting monetary tips or gratuities.

We do not submit false, fraudulent, or misleading information to any government agency or third-party payer to gain or retain participation in any Federal or state program or to obtain undue payments for services under these programs.

We do not retaliate or intimidate individuals for making a good-faith report of concerns about actual or potential wrongdoing.

Whistleblower and Consequences of Unethical Behavior

A whistleblower is a person who could be an employee of a company, or a government agency, that discloses information to the public or some higher authority about any wrongdoing, which could be in the form of fraud, corruption, etc.

- + If an employee has a reasonable belief that any of the employees have engaged in any wrongdoing, the employee is encouraged to internally report, immediately, such information to the leadership team.
- + Consequences of unethical behavior or business practices will result in employee corrective action up to and/or including employment termination.
- + Understanding the prospective consequence, to the individual as well as Alivia, for failing to comply with Alivia's compliance program as set forth in the Code of Conduct, policies and procedures, as well as laws and regulations applicable to Alivia is vital.
- + The employee's supervisor, with the guidance of human resources will determine what type of consequences will be used based on the severity of the situation.
- + Examples of Whistleblower situations can include, but are not limited to:
 - Employees who report corruption, discrimination, harassment, and fraud. Examples of whistleblower cases cover considerable territory, from accounting irregularities and government fraud to racial discrimination and sexual harassment.

REPORTING

We promote the following avenues for reporting compliance, ethics, and quality related situations and invite you to raise awareness of any concerns you may have. Concerns may be reported anonymously. When in doubt, speak up.

1. **Speak to your supervisor**
2. **Speak to your HR representative**
3. **Speak to your compliance officer:**

Quality & Compliance Director

Leisvelvet Vega

E-mail: lvega@aliviahealth.com Telephone:

(787) 366-8844 Compliance;

(787) 709-4208

By mail to:

Att: Compliance Department

PO Box 246

Bayamón, Puerto Rico 00960

By Email to:

Compliance Alert E-mail:

cumplimiento@aliviahealth.com

Compliance Privacy E-Mail:

privacidad@aliviahealth.com

Compliance Hotline: (787) 709-4208