



Code of Conduct

A message from our CEO.



DEAR RELYMD FAMILY,

As quickly-growing provider of telemedicine services throughout the United States, RelyMD is dedicated to preserving our reputation as a trusted healthcare provider that acts with integrity and upholds ethical standards. We believe in treating each other and the patients and families we serve with dignity and respect.

In an effort to adhere to all laws, government regulations, third-party payor agreements, and our own policies and procedures, we maintain a Compliance & Ethics Program.

Our Code of Conduct is an essential component of our Compliance & Ethics Program. It provides us with the opportunity to keep compliance and ethics front and center. Our Code of Conduct supports our mission by reaffirming the values and professional standards that exist among the RelyMD Family...quality, honesty and integrity.

The Code of Conduct is a guide to help each of us do things the right way. Please take time to read and familiarize yourself with these responsibilities. If you ever have a question or concern that is unclear or not covered within the Code of Conduct, be sure to ask your manager or contact either HR@relymd.com or legal@relymd.com.

Thank you for your continued dedication to RelyMD.

Warm regards,

David Levin

CEO, the RelyMD group of companies



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Our Code of Conduct and our corporate policies tell us about what we must do (compliance) and what we should do (ethics).

Our values set us apart and we each must do our part to achieve and sustain these standards. While the Code of Conduct is designed to provide overall guidance, it does not address every situation. It will help guide us in making decisions that conform to the ethical and legal standards expected of us all. More specific guidance is provided in RelyMD's Team Member Handbook and in RelyMD's Medical Policies and Procedures.

This Code of Conduct is a critical part of our Compliance & Ethics Program and the standards herein apply to us all.

WE PLEDGE TO:

- Read the Code of Conduct and seek to understand how it applies to us
- Refer to the Code of Conduct and RelyMD Policies in all situations
- Ask questions and report issues
- Complete required annual training
- Attest our commitment to the Code of Conduct

The Code of Conduct is not an employment contract, nor is it intended to provide any express or implied rights of continued employment. Conduct contrary to the Code of Conduct will result in an investigation and possible disciplinary action, up to and including discharge.

OUR PROMISE

OUR MISSION

To improve the health and quality of life of the individuals and communities we serve.

OUR VISION

A trusted leader inspiring hope through the advancement of health.

OUR VALUES

People

We are committed to excellence in serving and supporting our patients, our physicians, our guests and fellow team members.

We not only care for people, we care about them.

We will do everything in our power to ensure that all people are treated with respect, dignity, kindness and compassion.

We will listen intently to our customers and each other with open minds and with open hearts.

We will make a positive difference in the lives of the people we serve.

Quality

We will never compromise on quality.

Our team will provide the highest quality of care and service in everything we do.

We will take responsibility for conserving time, money and resources.

We will be creative and versatile as a team in our solutions.

Community

We are proud to serve the people of this community.

We will never lose sight of the fact that we are a community-owned organization.

We will demonstrate, in our words and actions, the highest level of commitment to each community we serve.

POSITIVE ATTITUDE

- Choose and commit to a positive attitude every day.
- Smile and greet others.
- Treat taking care of people as an honor.

RESPECT

- Reduce suffering — be sensitive to the fears and frustration of patients and guests.
- Personally ensure that patients are connected to a physician without undue delay.
- Put our patients first in every situation.

OWNERSHIP

- See it, own it, solve it.
- Take ownership in creating a quality outcome for every interaction.
- Ask “What action can I take right now to improve the patient experience?”

MINDFULNESS

- Stop and focus on the person, not the task.
- Look and understand the uniqueness of each patient.
- Listen to each patient and remember to provide safe patient care.

INCLUSIVENESS

- Appreciate and value everyone as an individual.
- Be understanding of differing opinions.
- Validate others by showing empathy.

SUPERIOR COMMUNICATION

- Keep others informed by explaining routines, plan of care, delays and the “why” behind what you are doing.
- Ask for clarification when needed.
- Ask open-ended questions to further understand needs.

EXCEED EXPECTATIONS

- Anticipate needs to create a memory of kindness.
- Do something unexpected to delight patients...going above and beyond is often all about the little things.
- Thank patients for allowing you the privilege to care for them.

WE CARE ABOUT OUR PATIENTS

Treating Patients with Compassion and Dignity

RelyMD is committed to excellence in serving and supporting our patients and their family. We will do everything in our power to ensure that all people are treated with respect, dignity, kindness and compassion.

- We listen intently to our patients and each other with open minds and open hearts.
- We help our patients understand and exercise their rights, such as the right to privacy; to be free from discrimination; to make informed healthcare decisions and advance directives.
- We inform our patients and, when permission is given, their families and others about care, treatment, and service options.
- We help our patients understand financial assistance available to them.

Providing Quality Healthcare Services

We will never compromise on quality. Our team will provide the highest quality of care and service in everything we do.

At RelyMD, we believe that quality and safety go hand in hand. We are dedicated to providing an environment that embraces quality care, promotes health and safety, and delivers the best possible patient experience. We take our commitment to patient safety seriously, by following proven best practices and processes that decrease harm to both our patients and our team members.

RelyMD is constantly striving for excellence in quality and safety, demonstrating our commitment to the highest level of care and service. We do this by comparing our service quality against national standards to identify ways to continually improve the quality of care we provide. We will continue to be creative and versatile as a team in our solutions.

We provide the highest quality of care to all regardless of age, gender, race, color, national origin, or disability.



Patient Diversity

As a growing healthcare provider, RelyMD is continually striving to incorporate multicultural and diversity awareness into our patient care — making each and every patient experience the best experience possible. Given that we provide telemedicine services across the U.S., we are prepared to treat a diverse cultural population.

Our Culture and Language Resources Team is a valuable resource for providing culturally competent care for all of our patients.

Notice of Nondiscrimination

Discrimination is Against the Law

RelyMD complies with applicable Federal civil rights laws and does not discriminate on the basis of race, color, national origin, age, disability, or gender. RelyMD does not exclude people or treat them differently because of race, color, creed, national origin, age, disability, or gender.

RelyMD:

- Provides free language services to people whose primary language is not English, such as:
 - Qualified interpreters
 - Information written in other languages

If you need these services, contact any RelyMD team member or care provider, or call the Care Coordination Team at (855) 879-4332. Patients who use sign language please call TTY _____ (English) or TTY _____ (Spanish) to connect with the Care Coordination Team to inform them that you will be using our interpreter services during your telemedicine visit.

If you believe that RelyMD has failed to provide these services or discriminated in another way on the basis of race, color, national origin, age, disability, or gender, you can file a grievance with the RelyMD Compliance & Ethics department by mail at 510 Meadowmont Village Circle, Suite #323, Chapel Hill, NC 27517, by telephone at (855) 955-0948 or by email at Ethics@relymd.com.

You can also file a civil rights complaint with the U.S. Department of Health and Human Services, Office for Civil Rights, electronically through the Office for Civil Rights Complaint Portal, available at <https://ocrportal.hhs.gov/ocr/portal/lobby.jsf>, or by mail or phone at:

U.S. Department of Health and Human Services

200 Independence Avenue, SW

Room 509F, HHH Building

Washington, D.C. 20201

1.800.368.1019, 1.800.537.7697 (TDD)

Complaint forms are available at <http://www.hhs.gov/ocr/office/file/index.html>

WE SUPPORT OUR TEAM MEMBERS

Compliance & Ethics Program

Our Compliance & Ethics Program (CEP) exists to assist us in complying with laws, regulations and policies. The program supports team members and other affiliates by providing education on these requirements while being a resource to consult and interpret corporate policy and compliance matters. Compliance & Ethics sustains the CEP by helping us fulfill our job responsibilities in an ethical and legal way.

Compliance & Ethics refers to RelyMD's Corporate Compliance, Internal Audit, Privacy and Information Security teams collectively. The CEP Team is a great resource for any questions or concerns we have about our ethical responsibilities.

RelyMD is committed to conducting its business in full compliance with all applicable laws, regulations and policies. When used in this document, "laws, regulations and policies" refer to:

- Federal, state and local laws and regulations
- Requirements such as the Centers for Medicare & Medicaid Services' Conditions of Participation
- Accreditation standards such as those required by The Joint Commission and other accrediting entities
- RelyMD Team Member Handbook
- RelyMD Medical Policies and Procedures
- RelyMD Code of Conduct
- Any other rules, regulations or requirements that may be applicable

Workforce and Recruitment Diversity

We recognize our responsibility to develop a workforce that reflects the communities which we serve. From the recruitment and hiring of our physicians and team members, to the identification and recruitment of our Board Members, RelyMD promotes diversity by selecting the most qualified and skilled representatives to meet the needs of a culturally diverse community. We know that by mirroring the diversity the U.S., we are better able to relate effectively to our patients and families.



Reporting Compliance Concerns

RelyMD's Compliance Hotline is a simple, confidential, risk-free method for us to report compliance concerns. Your concerns can be reported by calling 855.955-0948 or by sending an email to ethics@relymd.com. The Compliance Hotline is available 24 hours a day, seven days a week to ensure the integrity and objectivity of compliance reporting. Calls are not recorded, and confidentiality is protected up to the limits of the law and to the greatest extent possible. We use the Hotline if we have exhausted other means of communication or are uncomfortable with disclosing our identity when reporting a concern. Some concerns should be referred to Human Resources at hr@relymd.com. The charts below can assist you in determining who to contact in certain situations.

You should report concerns and suspected misconduct that could violate state or federal laws, RelyMD policies or this Code of Conduct.

Maintaining the high ethical standards of RelyMD is everyone's responsibility. If you become aware of or suspect a situation that might jeopardize the ethical integrity of our organization, it is your obligation to report the circumstances.

This means you should:

- Report any suspicious activity in good faith
- Provide true and complete information
- Keep matters under investigation confidential, unless otherwise required or permitted by law

These duties apply to all of us, including team members, board members, providers, vendor representatives, and independent contractors while carrying out their duties at or on behalf of RelyMD

If the situation involves:

- Workplace conduct issues
- Inappropriate behavior
- Harassment
- Discrimination
- Payroll questions
- Employee mistreatment
- Conflicts with coworkers
- Disciplinary issues

If the situation involves:

- Fraudulent billing and coding concerns
- Medicare/Medicaid fraud and abuse
- Bribes or kickbacks
- Privacy issues such as inappropriate access and breaches of patient or team member confidentiality
- Lost or stolen electronic devices containing protected health information (PHI)
- Violations of professional and business ethics
- Violations of patient rights
- Conflicts of interest
- Non-compliance with professional standards of practice

CONTACT HUMAN RESOURCES

**EMAIL ETHICS@RELYMD.COM OR
USE THE COMPLIANCE HOTLINE**

We developed a **Three-Step Communication Process** to assist us with your responsibility to report possible violations of laws, regulations or policies.

1

Speak to your immediate supervisor.

2

Speak to the manager or director responsible in your area.

3

Contact the confidential Compliance Hotline at 855.464.6747 or email ethics@relymd.com.

No Retaliation

RelyMD resolves reports made in good faith in a discrete and professional manner. We do not tolerate any type of retaliation from anyone. If anyone feels that they have suffered retaliation as a result of reporting concerns in good faith, they are to contact Human Resources by email at hr@relymd.com or make use of the Three-Step Communication Process.

Workplace Conduct and Integrity

RelyMD is dedicated to providing high-quality, skilled care in a courteous, professional and compliant environment. We are committed to fostering an atmosphere that promotes integrity, honesty and mutual respect. We encourage and foster a workplace where we are free to discuss any concerns we may have.

We maintain a positive work environment that supports our values and policies.

This means we:

Respect one another

- Support and observe a workplace free of alcohol, drugs and tobacco use
- Do not discriminate in employment opportunities or practices on the basis of race, color, creed, national origin, age, disability, sex or any other status protected by law
- Do not tolerate intimidating, threatening, or harassing behavior, such as:
 - Offensive comments, jokes, disparaging language and slurs
 - Unwelcome sexual advances, including verbal or physical conduct of a sexual nature that interferes with an individual's work performance or creates an intimidating, hostile or offensive work environment
 - Workplace violence

WE ARE COMMITTED TO OUR COMMUNITY

A Responsible Organization

RelyMD is dedicated to serve the virtual healthcare needs of the communities in which we operate. All of RelyMD's assets are used to further these goals. None of our assets may be used to benefit an individual who is in a position to exercise influence over the business concerns of RelyMD.

Political Activity

As an organization, RelyMD's political activities are limited by law.

As individuals we:

- Are encouraged to participate in personal civic and political activities on our own time and at our own expense
- Do not engage in partisan political activity using RelyMD organizational funds or resources (such as work time, paper, envelopes, secretarial time, postage or telephones)
- Do not seek reimbursement from RelyMD for any personal contributions to political organizations or campaigns
- Do not attempt to influence the decision-making process of governmental bodies or officials by improperly offering any benefit



Antitrust Commitment

Antitrust laws are designed to create a level playing field in the marketplace and to promote fair competition. We comply with applicable antitrust and similar laws that regulate competition. We do not discuss or make agreements with competitors regarding:

- Price or other terms for product sales
- Prices paid to suppliers or providers
- Dividing up customers or geographic markets
- Joint action to boycott or coerce certain customers, suppliers or providers

We are affiliated with numerous trade and professional associations. These affiliations promote the sharing of information; however, it is not always appropriate to share business information with these associations and their members.

- We engage in marketing and advertising activities to educate the public, provide information to the community, increase awareness of our services and recruit employees.
- We present only truthful, informative and non-deceptive information in our materials and announcements.

We seek advice from Compliance & Ethics and the Legal Department when confronted with business decisions involving a potential violation of antitrust laws.

Safeguarding our Environment

RelyMD is committed to providing a safe and secure environment for everyone. To accomplish this, we are consistent with the ergonomic standards that we implement, we strive to maintain a safe work environment, and we invest in technology to aid both in productivity and effectiveness.

WE PROTECT SENSITIVE INFORMATION

Confidentiality of Patient Information

We all play a role in protecting the confidentiality of patient information. To prevent unauthorized disclosures, we do not access confidential patient information or share it with anyone unless there is a legal need to know. We safeguard patient information and protect the privacy of patient medical records according to federal, state and accreditation requirements.

To avoid disclosures of PHI to unauthorized individuals, we must safeguard all communications. Examples of communications include faxes, emails, messaging apps, and conversations on the telephone or in public areas. We exercise caution when opening attachments, links, or providing credentials to or from unrecognized external sources. RelyMD does not tolerate inappropriate, intentional access and/or disclosure of patient information by team members.

Information Security

Information security refers to safeguarding confidential and sensitive information from damage, loss, unauthorized access or unauthorized modification. We maintain and safeguard all types of information, including, but not limited to, email communication, patient data, payroll records, personnel files, access codes and passwords to prevent unauthorized disclosures. We do not download software onto our digital devices (owned by RelyMD or personal devices used for RelyMD) without obtaining permission from Information Systems/Security department.

**Q**

I'm on my break and want to do some shopping online. Can I use my RelyMD computer to surf the web?

**A**

No. Websites can be infected with viruses that could infect your computer and compromise information, including protected patient information.

It is OK to access a patient's record when we are:

- Providing medical care to the patient
- Providing ancillary services to the patient (e.g., billing, coding, scheduling or registration)

It is NOT OK to access a patient's record when we are:

- Curious about a patient's condition or location
- Checking on a family member or friend's condition

Q My coworker has been complaining about stomach pain and was seen for a Telemedicine Consult. Can I use an electronic medical record system to see if it's troubling her?

A No. You cannot access a coworker's medical record using an electronic medical record system. In this situation you can contact her directly.

Q My neighbor mentioned that he used RelyMD for a Telemedicine Consult. Can I tell our other neighbors about his condition?

A No. Unless you have permission from the patient, you are not allowed to disclose any protected information.

It is appropriate to disclose a patient's record to:

- A team member providing care to the patient (treatment)
- The insurance company of the patient in order to receive payment for care provided (payment)
- A RelyMD Quality or Peer Review Committee for quality assessment and improvement activities

Q I recently used RelyMD for a Telemedicine Consult and was diagnosed with an infection. I have not shared this information with anyone, but I'm concerned that my coworker has been accessing my records. She seems to know a lot about my diagnosis.

A Report your concern using the Three-Step Communication Process. Do not investigate the matter on your own.

Social Media

Social media provides unique opportunities to participate in interactive discussions and share information using a variety of platforms, such as Facebook, LinkedIn, Twitter, YouTube, Instagram, Snapchat, Pinterest, blogs, forums and posted comments. We recognize that all information, comments and opinions placed on social media sites and blogs can shape the way the public views our delivery of care and treatment of patients. We are committed to ensuring that the use of such communications serves the needs of our business by maintaining RelyMD's identity, integrity and reputation in a manner consistent with our corporate and brand strategies. When participating on social media please keep in mind:



- Posting of any confidential or proprietary information is prohibited.
- Posting material that is discriminatory, obscene, or defamatory is prohibited, whether the subject is RelyMD, fellow team members, colleagues, business partners, competitors or patients.
- If you mention RelyMD, or your connection to RelyMD is apparent, make it clear that you are speaking on your own behalf.

For more information on the established rules and guidelines, please refer to your Team Member Handbook.



Media Relations

To protect patient and team member privacy, we coordinate all requests from the media for interviews with team members, medical staff members or employees of contracted services through Media Relations.

If we receive an inquiry from the news media, including requests for information about a patient's condition, we immediately contact marketing@relymd.com. There is an on-call Media Relations representative available 24 hours a day, seven days a week.

Team Member and Human Resources Information

We maintain team member salary, payroll, benefits, disciplinary records and other personal information in a confidential manner. We exercise care and reasonable judgment to protect unnecessary disclosures of such information.

Proprietary Information

Just as we protect patient and team member information, we also protect RelyMD proprietary information.

Therefore we:

- Safeguard information technology and proprietary electronic information, and protect it from improper use and access
- Guard our assets and the assets of others entrusted to RelyMD, including physical and intellectual property, and protect sensitive information against loss, theft or misuse
- Use RelyMD property appropriately and take measures to prevent any unexpected loss of equipment, supplies, materials or services
- Adhere to established policies regarding approval for disposing of RelyMD assets and data

A large, stylized blue letter 'Q' used as a question icon.

My brother-in-law sells medical equipment. Am I allowed to tell him how much RelyMD pays for similar products so that he can prepare a competing bid?

A large, stylized blue letter 'A' used as an answer icon.

No. Pursuant to corporate policy, we do not use RelyMD information for personal benefit or personal business purposes.

Intellectual Property

RelyMD follows laws regarding intellectual property, including patents, trademarks, marketing, copyrights and software. We comply with the law in all our internal and external activities.

As a result, we:

- Do not make, acquire, use, distribute or reproduce intellectual property
- Follow all copyright laws of the United States, even if the work does not carry the copyright symbol
- Do not reproduce documents for distribution outside of RelyMD unless you have the appropriate permission from management and the copyright holder

Search Warrants, Subpoenas, and Government Inspections and Investigations

RelyMD has established policies and procedures to help us handle search warrants, subpoenas, government inspections and investigations. If we receive an inquiry such as a search warrant, subpoena or investigation, please immediately contact legal@relymd.com.



Record Keeping

RelyMD produces a large number of records and documents. Some examples include:

- Patient medical records
- Financial records
- Email communications
- Chat or SMS text messages
- Presentations
- Diagnostic images, e.g., X-rays
- Vital records
- Company business records

Some rules we follow about documentation include:

- We do not falsify facts or make false records.
- We do not sign someone else's name on any document.
- We do not document records as someone else.
- We only create records that are necessary and required.
- We only give records and information to people who have a legal need to know.
- We preserve patient and team member security, confidentiality and privacy.

Record Retention and Destruction

We follow the guidelines established in corporate policies and procedures regarding the proper storage and destruction of records. Some of those guidelines are:

- All records are kept for the legally required timeframe.
- After the time requirement has been met, it is important to destroy the records in a timely and appropriate manner in accordance with corporate policy.
- Records to be disposed of that contain patient, financial or other confidential information must be discarded in a designated shred bin.
- Under no circumstances should these documents be thrown in the trash.

WE VALUE ETHICAL BUSINESS PRACTICES

Fraud, Waste and Abuse

RelyMD has adopted policies and procedures to prevent, detect, deter and correct fraud, waste and abuse in accordance with federal and state laws. Various federal and state laws, such as the Federal False Claims Act, prohibit false claims and other fraudulent activity. Violations of these laws can result in civil and penalties. Other laws and regulations governing the integrity of the Medicare and Medicaid programs are in place to reduce fraud, waste and abuse.

If you know or suspect activity of this nature, you must report it immediately using the Three-Step Communication Process. If you are uncertain whether an activity is fraudulent, please email ethics@relymd.com for guidance. Individuals who lawfully report false claims or other fraudulent conduct, or who otherwise assist in an investigation, action or testimony, are protected from retaliation under federal state laws and corporate policy. We do not discriminate or retaliate against any whistleblower who files, in good faith, a civil action for false claims or who participates in any RelyMD investigation.

The Federal False Claims Act makes it a crime for any person or organization to knowingly make or file a false claim for payment from the federal government.

We Do Not:

- Forge patient billing-related items
- Bill for services or supplies that are not rendered medically necessary, nor documented
- Misrepresent a diagnosis or procedure code in order to obtain a higher payment
- Alter or forge checks
- Mishandle or improperly report financial transactions
- Falsify or alter any record or report, such as an employment application, payroll or time record, expense account, cost report, patient medical record, scientific research or data collection record
- Destroy any information considered part of the patient medical record



We accurately and legally code and bill the government, third party payors and patients.

We are committed to full compliance with federal healthcare program requirements, including preparing and submitting accurate claims consistent with such requirements. Our processes assist us with monitoring and verifying that claims are coded and submitted accurately and appropriately. Strict federal and state laws and regulations govern third-party billing of our insured patients.

Internal Investigations and Requests for Information

We promptly and thoroughly investigate all reports of illegal activity or violations of our Code of Conduct and corporate policy. We cooperate fully with these investigations. We do not act in any way to prevent, hinder or delay the discovery and full investigation of these matters.

Criminal Conduct

RelyMD does not tolerate or condone criminal activity. If we suspect possible criminal activity, we report it immediately using the **Three-Step Communication Process**.

We report instances of criminal or illegal activity that present an immediate risk to the safety of any person to the local police. We understand that any team member found to be involved in criminal conduct will be disciplined in accordance with the Team Member Handbook. Disciplinary action will be appropriate for the offense committed, up to and including termination.

While fully cooperating with all investigations, we still protect the legal rights of RelyMD and our team members.



Screening of Covered Persons

We do not knowingly contract with, employ or bill for services rendered by an individual or entity that is excluded or ineligible to participate in federal healthcare programs, suspended or debarred from federal government contracts, or has been convicted of a criminal offense related to the provision of healthcare items or services.

On a prescribed schedule, RelyMD confirms that all covered persons performing functions or services on RelyMD's behalf are verified against the government's exclusion lists to ensure that we are not employing or conducting business with excluded persons or entities.

Q Who is included in the definition of "covered person"?

A

Covered persons include, but are not limited to, employees of RelyMD, board or committee members, medical staff members, providers, allied health professionals, vendors, independent contractors and individuals doing business on behalf of RelyMD.

Financial Relationships

We carefully review financial relationships for compliance with the Anti-Kickback Statute and Stark Law. We must not attempt to gain any advantage or encourage favors with improper payments, business courtesies or other inducements. We do not offer any improper inducements or favors to patients, providers or others to encourage the referral of patients to our facilities or to use a particular product or service. We will not solicit gifts or favors in exchange for influence or assistance in a transaction when conducting business with an individual or entity, including vendors.

Business arrangements with physicians must be pursuant to signed, written contracts and appropriately structured to comply with legal requirements. All transactions with physicians require review and approval by the appropriate RelyMD leader for the contracting RelyMD entity and approval as to form by the Legal Department and, in some arrangements, Compliance & Ethics in accordance with the RelyMD physician transaction policies.

All RelyMD team members who interact with physicians, particularly those in a position to approve financial arrangements with physicians or process payments to physicians, must be aware of the legal requirements and RelyMD policies that address relationships between RelyMD entities and physicians.

Business Inducements

A business inducement is an economic advantage or benefit given to an individual or entity based on their position or relationship to RelyMD. To prevent engaging in business inducements, our policies include the following:

- We accept patient referrals based solely on the patient's medical needs and our ability to render the needed medical services.
- We do not ask for or receive anything of value, directly or indirectly, in exchange for the referral of patients.
- We do not pay or offer to pay anyone — employees, physicians or vendors — for the referral of patients.
- We do not accept payment for referrals that RelyMD makes.
- We do not allow hospital charges owed by an affiliated physician to be waived, in whole or in part.

"I can't find a policy to address an issue that recently came up in my unit. Where else can I look for answers?"



"I found a policy related to my question, but I'm not sure if it agrees with the Code of Conduct. Which one should I follow?"



Competitors and Vendors

Team members will not be employed by, act as a consultant to or have an independent business relationship with any of RelyMD's vendors or Third-Party Payors unless prior approval is obtained from the CEO. Further, management and executive team members will not be employed by, act as a consultant to or have an independent business relationship with any entity that provides goods or services that are substantially similar to those that RelyMD provides or is considering making available.

Team members will not invest in a vendor, payor, provider, supplier or competitor above the limits established in corporate policy unless we first obtain written permission from the CEO.



Contracting and Business Relations

- All contract negotiations, contracts and business relations must be consistent with laws, regulations and policies.
- Contracts must be in writing and signed by an Authorized Representative of RelyMD.
- Contracts identified with potential conflicts of interest are reviewed by the chief compliance & ethics officer.
- Information about RelyMD business activities, including strategy, prices, costs, finances and similar matters, is private and confidential.
- RelyMD does not enter into any agreement that is a refusal to deal with another organization or could impair the business of RelyMD or the other organization.



Vendor and Product Selection

We:

- Select vendors using objective measures
- Afford all vendors who meet these standards equal opportunity to present their products and services
- Do not give or receive any form of payment, kickback or bribe to induce the referral or the purchase of any product or service
- Select the product or service that best meets the needs of our patients and RelyMD

Gifts and Business Courtesies

All gifts or business courtesies (including business meals and entertainment) offered, received or exchanged with non-RelyMD entities and persons must meet the requirements as established in the Team Member Handbook. If you are unclear whether a specific offer or exchange is prohibited by policy, contact ethics@relymd.com for further guidance.

We do not:

- Solicit gifts
- Allow gifts to improperly influence relationships, business outcomes or decision-making, or promote the appearance thereof
- Use gifts for the purpose of inducing, securing, or rewarding the referral of a patient or the ordering of a service or supply
- Give or receive gifts from patients, families or representatives
- Give or accept cash or any cash equivalents (e.g., checks, gift cards, gift certificates, vouchers, loans, stock investments) to or from any patient or non-RelyMD person or entity
- Allow vendors to pay for travel or lodging expenses

Workshops, Seminars and Training Sessions

You are required to obtain management approval before accepting a vendor's offer to conduct or fund training sessions or product knowledge classes. If invited to attend a conference, seminar, workshop or other similar function sponsored by a third-party, you must first seek management approval.

Generally, if approved, vendors are only allowed to pay for the registration fees.

IMPORTANT

We do not accept gifts or business courtesies at any time during active negotiations or throughout the Request for Information/Request for Proposal process with a potential vendor.

Q My patient's father gave me a \$25 gift card. Can I keep it?

A No. RelyMD policy prohibits team members from accepting cash and cash equivalents. One reason for this policy is to ensure that all patients are given the same level of care.

Q My department would like to host a holiday party. Is it acceptable?

A Yes. Team members can pay for the costs of social events as long as the team members are not acting on behalf of RelyMD. The cost of these private social events cannot be a business expense for tax purposes, and team members will not charge RelyMD or otherwise receive reimbursement from RelyMD to cover this expense, unless prior written approval is obtained from the CEO.

Q A medical device company invited me to speak at a national conference about a product that RelyMD is using. The vendor offered to pay the cost of the conference, travel and lodging for three days. Is this acceptable?

A No. RelyMD policy sets the guidelines for our team member's involvement:

- The team member cannot accept payment from the vendor for their plane ticket to the conference.
- The team member cannot accept payment from the vendor for the cost of the hotel.

Conflict of Interest

Our corporate policy sets forth standards of conduct expected by RelyMD with regard to conflicts of interest. We act in the best interest of RelyMD and carry out our duties with total objectivity.

In our dealings with and on behalf of the organization, we hold ourselves to a strict rule of honest and fair dealing and conduct ourselves in accordance with laws, regulations, policies and employment agreements when applicable.

We do not use our positions, or knowledge gained as a result, in any manner that creates a conflict between the interest of RelyMD and ourselves.

Here are some examples of potential conflicts of interest:

- Direct reporting relationship between family members
- Using RelyMD property, information or resources for non-RelyMD purposes
- Holding outside jobs or positions that distract from our work at RelyMD
- Making business decisions that could benefit family or friends
- Having a financial or ownership interest in an entity that competes with RelyMD
- Having financial relationships that could appear to influence the independence of patient care decisions
- Issuing testimonials, endorsing or promoting a vendor, payor, provider, product or service

A conflict of interest refers to a situation in which financial or other personal considerations may compromise, or have the appearance of compromising, an individual's ability to make objective decisions in the course of the individual's job responsibilities.

Q

What should I do if I see a potential conflict of interest or have a question about conflicts of interest?

A

Speak with your manager or immediate supervisor, or reach out to Compliance & Ethics for guidance.

PROTECTION OF ASSETS

Financial Reporting

Financial statements aid in business management and are important in meeting our obligations to our patients, team members, suppliers and creditors. We are committed to providing accurate financial statements as they are essential in complying with tax and financial reporting requirements.



This means we:

- Utilize generally accepted accounting principles to maintain and report accurate financial statements
- Maintain a financial reporting system that provides timely, accurate and comprehensive disclosures
- Promptly report concerns involving accounting, financial reporting, use of assets and internal controls to ethics@relymd.com
- Record all transactions, payments and receipts timely, accurately and in a consistent manner
- Do not create false or misleading entries in any financial record
- Do not take any action to fraudulently influence, coerce, manipulate, mislead or obstruct any auditor engaged in an audit for the purpose of misrepresenting RelyMD's financial condition

Use of Company Assets

RelyMD assets should be used solely for business purposes, and not for personal gain or benefit. Some examples of RelyMD assets are:

- Equipment
- Funds
- Team member time
- Inventory
- Software
- Business strategies and data (financial, patient or otherwise)
- Supplies

If you have any questions about how to use RelyMD assets, you should speak to your manager first. If you suspect any loss, misuse, waste or abuse of RelyMD assets, you should report it to ethics@relymd.com.



Travel and Entertainment

RelyMD funds travel, entertainment and business-related expenses in accordance with corporate policy found in the Team Member Handbook.

Travel and entertainment must be consistent with your job responsibilities and support the interests of RelyMD. You must exercise reasonable judgment when utilizing RelyMD resources to fund travel and entertainment expenses, and you should not ask RelyMD to reimburse you for personal expenses incurred during travel and entertainment.

Maintaining the Highest Standards of Ethical Excellence

If you have any questions regarding the *Code of Conduct*, or compliance, please contact ethics@relymd.com.



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