

Purpose

Enclara Healthcare is passionate about the people we serve and about how we serve them. We are guided by our Core Values, which means we hold ourselves to high standards of ethics and business conduct. We are committed to doing more than simply following the law – we seek to do what is right, not just what is legal.

This Code of Conduct is both a statement of our ethical guidelines and a tool to help employees, managers, officers and Board members (“Enclara Team Members” or “Team Members”) “do the right thing.”

Core Values

Enclara Healthcare lives by its Core Values.

Compassion - We walk in the shoes of those we serve.

- Empathize with the circumstances and viewpoints of others
- Approach each situation with passion and determination
- Alleviate other’s distress by offering to help
- Recognize everyone has a unique role
- Demonstrate respect and appreciation for all

Customer Focus - We always do more than is required

- Build positive relationships through outstanding service
- Create, value and nurture long term relationships
- Be ethical, professional, fair and honest
- Provide prompt and consistent service
- Treat others the way that you would want to be treated
- Listen and respond to customer expectations

Creativity - We expect, accept and create change

- Promote new concepts and technologies
- Transcend traditional ideas by asking what's next and why
- Encourage team members to innovate and explore new ideas
- Empower and inspire others to imagine, learn and do more
- Embrace change while helping others to do the same

Collaboration - We believe together we achieve more

- Build trust through kindness and respect
- Work together towards a common vision
- Encourage and embrace diversity
- Communicate with open and honest dialogue
- Promote cross functional teamwork
- Hold ourselves accountable

Connection - We seek a healthy work and life balance

- Promote learning and growth
- Celebrate the contributions and success of others
- Foster a fun and positive work environment
- Be flexible to meet the needs of others
- Give back to the community
- Take pride in who we are and what we do

This Code of Conduct (“Code”) is an overview of Enclara Healthcare’s principles of ethics and business conduct. We created it as a guide for Enclara Team Members. The Code does not cover every situation and does not address every law and regulation that applies to our business. We expect individual Team Members to use their good judgment and sense of fairness, and to ask a supervisor, manager or member of the Compliance team for assistance when needed.

Every Enclara Team Member must read, understand and follow this Code and our policies. We take seriously any violations of law, company policies or this Code. Team Members who violate these standards could face disciplinary action, up to and including termination. Certain violations may also lead to criminal penalties, including prison, fines or both.

Any Enclara Team Member who learns of a potential violation of this Code or other policy or legal requirement must report it to a supervisor, manager or Compliance. Enclara forbids any retaliation against anyone who reports such matters.

Enclara's Compliance & Ethics Program

Statement of Policy

Enclara Healthcare has a compliance program that follows guidance published by the Office of Inspector General, U.S. Department of Health and Human Services ("OIG Guidance"), the Center for Medicare and Medicaid Services (CMS) and the Department of Justice (DOJ). The purpose of this Compliance Program is to prevent and detect violations of law and company policy, and to promote high standards of business ethics.

Our reputation for honesty, integrity and high ethical standards is vital to our success. Our policy is to maintain the highest level of professional and ethical standards in the conduct of our business through adherence to the company's Core Values as reflected in this Code of Conduct. These standards can be achieved and sustained only through the actions and conduct of all Enclara Team Members. Your commitment to ethical conduct is an important factor in evaluating your judgment and competence, and will be considered in your performance reviews. Team Members must be aware of and follow all federal and state laws and regulations that apply to their job functions, including billing, record-keeping and competitive practices, as well as the day-to-day activities of Enclara Healthcare ("Applicable Laws"). Any Team Member with questions about Applicable Laws must seek guidance from his/her supervisor, the Chief Ethics and Compliance Officer, or one of the company's in-house attorneys.

Training and Education

Training and education is a key part of our compliance program.

Each new Team Member must complete compliance training upon hire, and certify he/she has read, understands and will apply this Code in his/her work at Enclara. All Team Members must re-certify their understanding and agreement to follow the Code annually.

Team Members will also receive specific training based on the Team Member's position and responsibilities. Attendance and participation in mandatory training is a condition of continued employment and failure to comply with training requirements will subject the Team Member to disciplinary action.

Communications and Reporting

All Team Members must promptly raise any concerns about possible misconduct, including suspected violations of Applicable laws, this Code or the company's policies and procedures. This

includes the potential misconduct of fellow employees, consultants, and contract or temporary workers. Team Members should raise concerns before problems develop. *This is one of the most important responsibilities of an Enclara Team Member.*

- A Team Member should first discuss any concern with his/her immediate supervisor, who is closest to the situation and is often best able to help resolve the issue.
- If a Team Member is uncomfortable discussing a concern with his/her immediate supervisor, the employee should report the issue to someone in an appropriate position, such as Human Resources, Quality, Legal or Billing/Finance. If any of these matters potentially involve compliance with Applicable Laws, the issue must be brought to the Chief Ethics and Compliance Officer.
- Don't try to investigate the issue yourself. The Chief Ethics and Compliance Officer will review if there is any concern or allegation the issue potentially involves compliance with Applicable Laws.
- Team Members should contact the Chief Ethics and Compliance Officer to ask questions or seek guidance regarding specific activities or policies and procedures related to compliance with Applicable Laws or the Code.
- If you don't feel comfortable raising your concern with a supervisor, manager or the Chief Ethics and Compliance Officer, or you want to be anonymous, call our Compliance & Ethics Hotline 844.600.0051 or www.lighthouse-services.com/enclarapharmacia. The Chief Ethics and Compliance Officer will respond promptly to all concerns received on the Compliance & Ethics Hotline by investigating each potential issue and reporting the results back through the hotline.
- We treat calls about compliance concerns in a manner that is confidential, but will also take steps necessary to investigate, cooperate with the government, and comply with legal obligations.
- The Chief Ethics and Compliance Officer keeps a log of all calls to the Compliance & Ethics Hotline, including the nature of the call, and the resolution of the issue identified. The Chief Ethics and Compliance Officer provides a summary of hotline activity in periodic reports to the Executive Compliance Committee and the Board of Directors.

Remember - Team Members who observe misconduct and fail to take action may be subject to disciplinary action. Our compliance program works best when we are all responsible for ensuring we do things "the right way" as an organization.

We understand that Team Members may not report concerns if they believe that doing so may result in retaliation or harassment. **Enclara Healthcare's compliance policy is to protect**

employees from retaliation and maintain confidentiality with respect to all concerns raised. Managers, supervisors and other Team Members must *not* engage in retaliation, retribution or any form of harassment directed against a Team Member who has reported, or is considering reporting, a compliance concern. Any manager, supervisor or Team Member who engages in such retribution, retaliation or harassment is subject to discipline, up to and including termination. For Impacted Contractors (defined as temporary staff under a long-term engagement with the company), such actions may lead to the termination of the contract under which their services are provided to Enclara Healthcare.

Corrective Actions

Our policy is to take prompt corrective when we learn of a violation of policies, this Code or Applicable Laws. These corrective actions may include notifying impacted customers or patients, reporting to appropriate government authorities, taking disciplinary action when necessary and implementing systemic changes to prevent recurrence.

Privacy and Confidential Information

Our customers and patients share sensitive information with us, including data about medical conditions and medications. We recognize how important it is to keep this information confidential. At Enclara, we follow the Health Insurance Portability and Accountability Act of 1996 (HIPAA) so we do not use or disclose patient information unless it is necessary to serve a patient, operate our business or comply with law.

We have detailed policies and procedures to protect the privacy and security of health information, as required by HIPAA. Enclara Team Members will be trained on HIPAA privacy and security requirements upon hire and annually each year thereafter. Team Members will also be trained on the privacy and security policies and procedures for the Team Member's specific job function.

You must contact the Privacy Officer or Security Officer if you have a question about privacy or security or if you think patient information may have been disclosed inappropriately.

We also protect other sensitive information that is vital to the company, such as, for example, proprietary information, financial data, contracts, employee files and internal policies and procedures. We expect all Team Members to keep company sensitive information confidential. You agree this information belongs to Enclara Healthcare and you will not share it with others (either inside or outside the company) unless you are authorized to do so. Each Team Member

must complete a Non-Competition, Non-Solicitation and Non-Disclosure Agreement, which includes details on the Team Member's responsibilities to protect privacy and confidentiality.

Fraud, Waste and Abuse

Enclara Team Members must not do anything that may violate Applicable Laws related to participation in federal or state healthcare programs. This includes laws to prevent fraud, waste and abuse. Here is what those terms mean:

- **Fraud** is knowingly and willfully executing, or attempting to execute, a scheme or plan to defraud any health care benefit program or to obtain (by means of false or deceitful representations or promises) money or something else of value from any health care benefit program.
 - **Examples of Healthcare Fraud** – Billing for medications not dispensed; forging or altering bills or receipts; using someone else's insurance card.
- **Waste** is overutilization of services that, directly or indirectly, result in unnecessary costs to the health care system, including the Medicare and Medicaid programs. It is a misuse of resources rather than the result of criminal behavior.
 - **Example of Healthcare Waste** – Over-dispensing medications by, for example, refilling prescriptions the patient no longer uses.
- **Abuse** is the payment for services when there is no legal entitlement to that payment and the individual or entity has not knowingly and/or intentionally misrepresented facts to obtain payment.
 - **Examples of Healthcare Abuse** – Repeatedly dispensing drugs that are not medically necessary; failing to maintain adequate financial or dispensing records; improper billing practices.

If you learn about or suspect fraud, waste or abuse, you must contact Compliance, either directly or by calling the Compliance & Ethics Hotline (844.600.0051 or www.lighthouse-services.com/enclarapharmacia).

False Claims Act

The federal False Claims Act (FCA) states that anyone who knowingly submits a false or fraudulent claim for payment from funds from the federal government can be liable and face significant penalties. Most of our clients are paid through Medicare, so we have to be sure the bills we send them are accurate and truly reflect the services we provide.

FCA fines include three times the amount of the payment on each false claim, penalties for \$5,500 - \$11,000 per claim and attorneys' fees.

Individuals or companies who violate the FCA may also be prohibited from participating in federal healthcare programs.

Anti-Kickback Laws

The federal Anti-Kickback Law is a criminal statute that prohibits the exchange (or offer to exchange) anything of value in an effort to induce (or reward) the referral of federal health care program business. Many states have similar laws.

Violating an Anti-Kickback law may lead to criminal penalties such as up to \$25,000 fines and up to 5 years in prison, \$50,000 penalties for each violation and exclusion from federal healthcare programs.

Enclara Healthcare policy prohibits unlawful incentives to customers or others to refer business to Enclara.

Excluded Persons

Enclara Healthcare will not hire or contract with any person or company that is excluded from participating in federal healthcare programs. We regularly check the United States Department of Health and Human Services, Office of Inspector General List of Excluded Individuals and Entities (OIG LEIE) to enforce this policy. We also screen all new hires and potential vendors against this list.

If you suspect a violation of the FCA or Anti-Kickback law, or have a question about these or any other law, contact Compliance directly or via the Compliance & Ethics Hotline (844.600.0051 or www.lighthouse-services.com/enclapharmacia) if you wish to remain anonymous.

Your Conduct at Work

Enclara Healthcare's Core Values call upon each of us to act with respect, honesty and integrity. As Team Members we hold each other accountable to these standards. If you see someone engage in conduct you feel is against our Code of Conduct, policies and procedures or Applicable Laws, you should "raise your hand." You can do this by speaking directly to the Team Member, involving a supervisor or manager, or contacting Compliance.

Conflicts of Interest

Enclara Team members may not use their position with the company to profit personally at the expense of the company. You must avoid conflicts of interest or even the appearance of a conflict of interest.

Here are some examples of possible conflicts of interest:

- A Team Member reports to a family member or close friend who has the authority to determine the Team Member's salary, job conditions or promotion (See also the Enclara Team Member Handbook, Section 4.4: Nepotism).
- A Team Member contracts with a relative or close friend as a vendor or consultant to provide services to Enclara Healthcare.
- A Team Member works part-time for a company that competes with Enclara. (See also your Non-Competition, Non-Solicitation and Non-Disclosure Agreement)
- A manager dates a Team Member who reports to the manager.

Team Members must report in writing any potential conflict of interest to the Chief Ethics and Compliance Officer or Compliance Hotline. The Chief Ethics and Compliance Officer will review the matter. If there is a conflict of interest, you must follow the Chief Ethics and Compliance Officer's guidance to correct the situation.

Equal Employment Opportunity/Diversity

We embrace and encourage diversity at Enclara. This statement comes directly from our Core Values. It means we actively seek and promote a diverse workforce at all levels, and we all work together to create an inclusive and nurturing environment where everyone is treated with respect. We listen to one another, learn from each other and challenge each other to be accountable for our actions. Our commitment to respect diversity extends to our patients, customers and vendors as well.

Enclara Healthcare is an equal opportunity employer. We make employment decisions on the basis of merit. This policy reflects our Core Values and it's the law. All employment decisions, including recruitment, selection, hiring, training, transfer, promotion and demotion, layoff and recall, termination, compensation and benefits are based on merit.

Enclara Healthcare's Code of Conduct and related policies prohibit unlawful discrimination based on race, religion, creed, color, national origin or ancestry, sex (including pregnancy), gender, age,

marital status, sexual orientation, disability, veteran or military status or any other basis that would violate any applicable federal, state, or local law.

Contact your supervisor, a manager, or Human Resources if you have questions or concerns about any type of alleged discrimination. Enclara Healthcare investigates all discrimination claims promptly. If we find a violation of this policy, we will take appropriate remedial action. We take these matters very seriously – anyone found in violation of this policy will be subject to disciplinary action, up to and including termination. Retaliation against an employee for bringing forward in good faith a concern about discrimination is prohibited.

See the Enclara Healthcare Team Member Handbook, Section 1.1: Equal Employment Opportunity (EEO) for more information.

Harassment

Discrimination and/or harassment in any form is misconduct. Threats, slurs, jokes, or comments based on an individual's sex, race, color, national origin, age, religion, disability, sexual orientation, gender identity, marital status, medical condition, military service, pregnancy, childbirth and related medical conditions, or any other classification protected by law will not be tolerated.

Our anti-harassment policy applies to all Enclara Team Members, including Board Members, managers, supervisors and co-workers, as well as customers and Impacted Contractors.

We are all responsible for creating a pleasant and friendly work environment. If you feel you have been subjected to harassment and/or discrimination, or you have witnessed sexual or other harassment, you are encouraged, but not required, to tell the person engaging in the harassing and/or discriminating conduct that it is unwelcome, offensive and should stop at once. You must also report any discrimination and/or harassment to your immediate supervisor, a manager or Human Resources. Any supervisor or manager who becomes aware of possible violations of this policy must contact Human Resources immediately.

All allegations of harassment will be promptly and thoroughly investigated by Human Resources. To the extent possible, the confidentiality of all parties will be protected. Enclara Healthcare will take appropriate steps to remedy the situation. Anyone violating this policy will be subject to disciplinary action, up to and including termination. Retaliation against any Team Member for raising a concern about harassment or discrimination or participating in an investigation is strictly prohibited. However, a Team Member who knowingly makes a false claim of harassment and/or discrimination will be subject to disciplinary action, up to and including termination.

See the Enclara Healthcare Team Member Handbook, Section 1.22: Non-Discrimination and Harassment Free Workplace.

Ensuring a Safe Workplace

Enclara Healthcare has developed policies and procedures to comply with Applicable Laws related to workplace health and safety. We created these policies and procedures to protect Enclara Team Members. We train Team Members on these policies and expect Team Members to follow them.

If you have a question or concern about workplace safety, and especially if you see a potential hazard, contact your supervisor or a manager as soon as possible. In the case of injury or potential injury, notify a supervisor or manager immediately so we may address the situation and prevent further injuries.

Drug Free Workplace

Enclara Healthcare has a zero tolerance drug and alcohol policy – we seek to establish and maintain a drug and alcohol free workplace. We do this to protect Team Members, as well as the patients and clients we serve.

Enclara Healthcare prohibits the use, sale, manufacture, distribution, dispensation or possession of alcohol or illegal drugs or drug paraphernalia on company property or at any location where a Team Member is performing his/her job duties.

Subject to Applicable Laws, Enclara Team Members are subject to drug testing.

An Enclara Team Member taking a prescription drug must consult with his/her physician to ensure the drug will not impair the Team Member's ability to perform his/her job functions.

All Team Members must comply with this policy and must report any convictions under a criminal drug statute for violations occurring on or off company premises. The Drug Free Workplace Act of 1988 requires Team Members to report such a conviction within five days.

Use of Company Property

Enclara Healthcare provides supplies, equipment and materials to help Team Members do their jobs. Each Team Member must use company property for Enclara Healthcare business only and not for the individual Team Member's personal benefit. You may not use Enclara resources for your personal financial benefit unrelated to company business.

Email and Computer Software

Team Members should use the company's email and software for legitimate business purposes only. You may use company email or computer systems for incidental personal use on a limited basis, but you accept that such access and any content transmitted are not private. Enclara Healthcare may monitor email and Internet usage.

You may not use Enclara Healthcare equipment or software to access, post or transmit any of the following:

- Obscene material
- Harassing or threatening materials
- Materials that may be considered criminal or encouraging criminal conduct, or potentially violating a law.

Enclara Team Members and any third parties to whom we grant systems access agree to follow all relevant privacy and security policies and procedures.

Telephone Usage and Monitoring

Customer Focus is a Core Value at Enclara Healthcare. Team Members must treat customers with courtesy and respect in all interactions, including on the phone.

Enclara Healthcare may monitor Team Members' telephone conversations in the normal course of business. We notify our customers of possible telephone monitoring so we can ensure the highest level of customer service. We perform this monitoring to ensure quality customer service, identify coaching and improvement opportunities and support other business objectives.

Social Media

Enclara Healthcare expects all Team Members to use good judgment when accessing or posting on social media platforms such as Twitter, Facebook, LinkedIn, YouTube and Instagram. Our policy does not intend in any way to interfere with an individual Team Member's free expression. We simply remind Team Members of the following:

- Everything posted online could eventually become public, even if originally shared privately.
- Everything posted online is permanent; deleting a post does not mean you have removed it for good.

- Your conduct online reflects on the company when you talk about issues relevant to our business. This is true even if you don't identify yourself as an Enclara Team Member online.

With this in mind, Enclara Healthcare's Social Media Policy in general is that Team Members should follow the same policies for business conduct online as they do offline. In other words, Team Members should treat others with respect, compassion and understanding. You must also follow other company policies, such as privacy and security, anti-harassment, anti-discrimination and business records policies.

You may not speak on behalf of Enclara Healthcare unless you have been authorized to do so. When you comment or post online and you identify yourself as an Enclara Team Member, you must state clearly that you are speaking on your own and not on behalf of Enclara.

Once again, Enclara Team Members should use good judgment when online. Never share any information on patients or customers online, including photos, video or any health-related information.

See the Enclara Healthcare Team Member Handbook, Section 4.9: Electronic Communication and Social Networking.

Licenses and Certifications

Some positions at Enclara Healthcare require Team Members to be licensed and/or certified. Individual Team Members are responsible for maintaining required licenses and certifications, and Team Members must cover the fees and expenses associated with licenses and certifications.

We may ask individual Team Members to obtain a specific license or certification to support Enclara Healthcare's compliance with state or federal law. Enclara Healthcare will cover Team Members' licensing fees in these cases.

You must immediately notify Human Resources and Compliance of any action or potential action against your license or certification. In some cases we have to inform government regulators about these matters so you must notify us as soon as possible about potential licensing actions.

Handling Controlled Substances

Enclara Healthcare dispenses controlled substances regulated by state and federal law. We have developed policies and procedures to promote compliance with both U.S. Drug Enforcement Administration (DEA) and state regulations. Team Members who handle controlled substances

will be trained on these policies and procedures. Team Members are expected to understand the legal requirements that apply to controlled substances, and to follow our controlled substance policies and procedures.

Team Members who have questions about controlled substance requirements should contact a supervisor, manager or Compliance. If you suspect a loss or theft of controlled substances you must contact the Pharmacist-in-Charge or Compliance immediately.

Dealing with Parties Outside Enclara Healthcare

Customer Relations

Customer Focus - We always do more than is required

- Build positive relationships through outstanding service
- Create, value and nurture long term relationships
- Be ethical, professional, fair and honest
- Provide prompt and consistent service
- Treat others the way that you would want to be treated
- Listen and respond to customer expectations

Customer Focus is a Core Value of Enclara Healthcare. We listen to our customers, build strong relationships with customers and treat them with fairness, respect and compassion.

Each Enclara Team Member understands his/her role in promoting a positive customer experience and we work together to ensure successful customer relationships. If you get a customer question or request and you can't help the customer, make sure you find someone who can help and follow-up to make sure that Team Member has responded to the customer.

For the standards on gifts, entertainment and other business courtesies from customers, see the Section below on Gifts.

Vendor Relations

Enclara Healthcare holds its business partners, including vendors and other Impacted Contractors, to the standards described in this Code and related policies and procedures. A member of the Executive Management Team (CEO or direct report) must approve all vendor selection decisions. Any agreement with a vendor must be reviewed and approved by Legal.

All vendor selection decisions are based on merit; individual Team Member relationships or preferences must not influence our decisions.

For the standards on gifts, entertainment and other business courtesies from vendors, see the Section below on Gifts.

Government Relations

Healthcare is a heavily regulated industry. As a national healthcare provider we must comply with many varying state and federal requirements to do business.

To support our compliance efforts, Enclara Healthcare authorizes a limited number of Team Members to represent the company with state and federal government personnel. Unless you are one of these designated Team Members you may not speak with government officials on behalf of Enclara. This guidance applies to communications with government officials ON BEHALF OF Enclara Healthcare only, and is not intended to restrict or inhibit employees from communicating on behalf of themselves or their families about their own concerns.

If a government representative contacts you by phone, email or in writing, you should take down their request and contact information, let the person know someone will respond promptly, and forward all information to the Chief Ethics and Compliance Officer directly or via the Compliance email distribution list.

Many government agencies prohibit their employees from accepting anything of value, even a lunch for example, from private parties. Contact the Chief Ethics and Compliance Officer or a member of the Legal Department if you have any questions about your interactions with government representatives, or before you meet with anyone from a government agency (such as a Board of Pharmacy).

Gifts

Receiving Gifts

At Enclara Healthcare we hold ourselves to the highest standard of business ethics. This means our decisions are based on a fair and open process that is not influenced by favors or other undue influences. For this reason we limit the gifts or other business courtesies (such as entertainment, honoraria or travel) Team Members may accept from vendors or customers.

Enclara Team Members may accept gifts from vendors or customers under the following conditions:

- The gift is of nominal value (\$25 or below), such as pens, t-shirts or other promotional items.
- If above nominal value, the gift is shared with other Team Members, such as a gift basket shared with others in the office.

Team Members may not accept gifts from a potential vendor who may be considered for a future contract with Enclara Healthcare.

Offers of Travel or Registration at Conferences/Trade Shows

Enclara Team Members may accept vendor or customer payment of registration or travel expenses to attend a conference or trade show under the following conditions:

- The offer has been extended to other similar parties. In other words, the offer has not been extended to Enclara only.
- There is a legitimate business opportunity or need for the Enclara Team Member to attend.
- The Team Member's immediate manager or supervisor approves the Team Member to accept the offer.

Enclara Team Members may not accept honoraria or other direct compensation for speaking or attending a conference or trade show.

Giving Gifts or Making Donations

We must always promote our reputation for fairness and honesty so we avoid giving the appearance of undue favoritism by giving gifts above nominal value to individuals we do business with, or who seek to do business with Enclara Healthcare.

From time to time we may receive requests to donate to a customer or charity affiliated with a customer. Enclara Healthcare's general policy is not to donate to any customer-affiliated charity to avoid the perception of favoritism or bias toward any specific organization. Enclara Healthcare has established corporate partnerships with charities as directed by the Core Values Committee. All other donations must be approved by a member of the Executive Team (CEO or direct report) and the Chief Ethics and Compliance Officer.

If you have a question about receiving or giving gifts, please contact Compliance or speak with your supervisor or manager.