



APOTHECO
MEDICINALS

Code of Conduct

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A Message from our CEO

“At Apotheco, we are a team built of individuals, diverse in background, experience and skills. We share an unwavering commitment to our core value of always doing what is right for each other, our patients and the healthcare communities we serve. To succeed, we must set a high standard for winning business on merit, ability and fairness, and act vigorously to correct any irregularities we encounter.

The Apotheco Code of Conduct is our guiding framework. It provides us with the resources and the information we need to conduct our business responsibly, make ethical decisions and maintain trust with our patients, partners, and each other. As you go about your day-to-day work and deal with challenging issues, I encourage you to refer to our Code. The Code was designed to help establish appropriate “rules of the road” for associates looking for the right solutions to ethical questions or issues and in obtaining additional guidance when the correct path is not clear. The decisions we make everyday form the fabric of our reputation at Apotheco and must be protected at all cost.

It is incumbent upon everyone to read the Apotheco Code of Conduct and understand the guidelines represented.

We are all members of a great Apotheco team, driven by a commitment to success and measured by our reputation. Thank you all for your collective contribution to be the best.”

Sincerely,



Natasha Hennessy
Chief Executive Officer
Apotheco Medicinals



Introduction

Commitment to doing what's right

Apotheco, LLC, and its subsidiaries and affiliates (collectively referred to here as “Apotheco” or the “Company”) are committed to conducting business in an honest and ethical manner and in accordance with applicable federal, state, and local laws, and all contractual obligations.

At Apotheco, we are in the business of caring for people so they can be their best. To be at our best, both as individuals and as an organization, we act ethically and follow the laws and requirements that apply where we do business. It is our expectation that all of us at Apotheco act in this way —no matter who we are and no matter what we do for the organization.

About Apotheco Medicinals

Our Core Elements

Our Promise: Fast. Easy. Trusted.

Our Position: Where clinical trust meets technology and data

Our Identity: Unified. Innovative. Purposeful.

Purpose

We believe the best care happens when prescribers help shape it: delivering fast, easy, trusted care for patients everywhere. We get it.

Mission

Founded in dermatology, our mission is to leverage specialized clinical expertise to make access to the right therapy fast, easy, and trusted through 1 Connected Experience™.

Vision

Our vision is to be the trusted partner that prescribers choose because we think like prescribers, delivering comprehensive therapeutic solutions that simplify complex care.

Purpose of this Code

This Code is intended to help us make the best choices at work. In it, you will find a framework for conducting business the right and ethical way. We will also point to other Company resources and policies you may consult for more guidance. Please read the Code to know what is expected of you. Also, refer back to it for guidance any time you face a situation where you have concerns or questions.

Our Code applies to everyone at Apotheco – including colleagues, supervisors, managers, leaders, executives, and the board of directors. We also strive to do business with third party agents, suppliers, vendors, and business partners who demonstrate integrity equal to our own. By aligning with organizations who share our values, we strengthen our compliance culture.

Because we operate nationally, we may have to comply with different policies and rules depending on the various states in which we operate and serve patients. Although this Code should be your roadmap, remember that your decision making should be in compliance with local and state laws and regulations as well.

Contact your supervisor or the Compliance Department if you need assistance locating specific information and resources.

Speaking Up

At Apotheco, we ask questions when we need guidance. We speak up if we have a concern.

Caring for our patients, our colleagues, for each other, and for Apotheco means having the courage to speak up respectfully and in good faith when we believe conduct, decisions, or practices may compromise our patient care or be inconsistent with our ethical standards.

It also means fostering an environment where individuals can freely speak up when we identify and report concerns without fear of retaliation.

We are obligated to raise concerns to help the Company correct problems. Speak up if there is activity that appears to violate or violates our Code, other Apotheco policies and procedures, or applicable laws and regulations.

You should promptly discuss ethical or compliance concerns with a manager, the Legal and Compliance Department or Human Resources.

Internal Resources

You may reach out to any of the following individuals at the Company if you have a question or concern:

- Your Supervisor/Department Head
- Directors of Operations
- Another Manager or Leader You Trust

If, after discussing your concern with one of the resources listed above, you still have questions you need answered, or if you don't feel you can reach out to any of the above resources – please reach out to any of the following departmental inboxes:

- Compliance - compliance@apothecopharmacy.com
- Legal – legal@apothecopharmacy.com
- Human Resources - HR@apothecopharmacy.com

Ethics Hotline

Apotheco also has a third-party administrated reporting **Ethics Hotline** and web portal that are available 24 hours a day, seven days a week.

Apotheco encourages you to use this resource whenever you have a question or concern that cannot be readily addressed by your supervisor.

Apotheco understands there may be situations in which you would prefer to report a concern anonymously, and that option is always available to you.

Submit a hotline report by phone or by filing a confidential report online:

Website: **Ethics Hotline**

Toll-Free Telephone: 855-222-0559

Email:

reports@lighthouse-services.com

Must state the specific Apotheco Pharmacy location name in the report

Reporting Really is Anonymous

Hotline calls and reports submitted via the web portal are truly anonymous. Reports are received by our third-party vendor, Lighthouse, and are not traced. Anonymous reports are not tracked through caller ID, tracking of IP address or otherwise.

If making an anonymous report, sufficient information must be provided to allow a proper investigation. The Compliance Department or Human Resources will make every attempt to investigate situations reported anonymously. Keep in mind that if you make an anonymous report, it may be difficult for the Company to ask follow-up questions, so try to provide enough detail so that someone can investigate. Under most circumstances, during the investigation phase, Lighthouse will continue the dialogue with the reporter to maintain anonymity. It is important that the reporter follow up via the reporting portal to answer the questions to assist in the investigation.

During an investigation, the Compliance Department may partner with Human Resources to ensure all relevant information is reviewed and considered.

No matter how you choose to speak up, your concerns will be promptly addressed with professionalism, care and respect. Apotheco does not condone questionable or criminal conduct by employees or others. Our reputation can be severely damaged, and our mission jeopardized, if even one employee violates the law.

Failure to report observed or known instances of wrongful activity or criminal conduct may be grounds for sanctions, ranging from reprimand to termination. Apotheco expects you and all employees and vendors to adhere to the highest ethical standards and to avoid even the appearance of wrongful conduct.

What Happens When I Make A Report?

- **Expect to be treated fairly.** In accordance with Apotheco's Whistleblower Policy, Apotheco prohibits retaliation against anyone who raises concerns in good faith. We take this very seriously.
- **Expect to be treated with integrity.** We appreciate any and all good faith reports, as they help to keep us at our best. Apotheco will keep your report as confidential as possible and follow up with you to the extent we are able.
- **Expect Apotheco to take action.** The appropriate individuals within Apotheco will review the situation and determine if an investigation is required. If so, the investigation will be conducted fairly and objectively based on the information provided in your report.
- **Expect that we are counting on you to cooperate.** In the event that Apotheco needs to investigate concerns of misconduct, cooperation is critical to a thorough and efficient investigation. We are counting on you to be patient, thoughtful, and truthful.

Non-Retaliation Policy

Apotheco is committed to its non-retaliation policy. Apotheco will not tolerate retaliation against any employee or business partner who in good faith raises a business practice, legal, or ethical concern, or cooperates with an investigation. In “good faith” means that a reporter has made a genuine attempt to provide honest and accurate information.

Reporting or raising a concern in good faith cannot and will not be a basis for any form of retaliation including but not limited to, denial of benefits, termination, demotion, suspension, threats, intimidation, harassment, or discrimination.

Suspicious of retaliatory behavior should be reported to a manager, Human Resources, the Compliance Department, or the Ethics Hotline. Apotheco takes allegations of retaliation seriously, and will review and investigate all complaints of retaliation and take appropriate actions.

Corrective Action Guidelines

Violations of the Code are taken seriously. Apotheco applies appropriate corrective actions to ensure compliance with the Code or any applicable law or regulation. Corrective actions depend on the circumstances of the violation and are applied in a manner consistent with Apotheco's policies and applicable laws. Consideration is given to whether a violation was intentional. Also considered is the level of good faith in reporting the violation and cooperating with any resulting investigation or plan of correction. The application of each corrective action varies case-by-case based on the severity of the violation, the intent of the violation, and whether the violation indicates a pattern or practice of violations of the Code or applicable law or regulation. Depending on the circumstance, the most appropriate level of corrective action is taken, up to and including termination.

Respecting One Another

Mutual Respect, Dignity, and Professionalism

In our work together, we can each contribute to a culture that is built on foundations of mutual respect, dignity, and professionalism. Showing respect means embracing and appreciating everyone around us — from our colleagues to our business partners to our patients. We uphold respect by creating an environment where everyone has the freedom to express him or herself, without fear of harassment or intimidation. That’s why at Apotheco, we:

Core Principles

- **Exhibit empathy.** We encourage everyone to practice empathy for those around us. Understand that everyone has different perspectives and experiences, and strive to approach interactions with kindness and consideration.
- **Treat everyone with respect.** The guiding principle for all interactions is the Golden Rule: Treat everyone the way you would want to be treated. This standard should be applied consistently in all professional settings, whether in-person, over the phone, or virtually.

Unacceptable Behaviors

- **Harassment.** We have zero tolerance for harassment in any form - verbal, physical, or emotional. This includes, but is not limited to, insults, bullying, threats, and harassment of any kind. Examples of harassment include:
 - Inappropriate physical contact
 - Unwelcome sexual advances, requests for sexual favors, suggestive comments, and any other unwelcome verbal or physical contact of a sexual nature
 - Displaying derogatory, vulgar, suggestive or obscene pictures, cartoons, calendars, posters,

- or drawings.
- Comments, jokes, insults, slurs, offensive language and other unwelcome actions that are offensive or stereotypical based upon age, religion, gender, gender identity or expression, race, color, sexual orientation, national origin, disability, military or veteran status or any other protected category or personal characteristic.
 - Threats or acts of violence and intimidation. Threats, stalking, even suggestions or violence in the workplace, are all considered inappropriate behavior.

Reporting and Intervention

- **Proactive Intervention.** If you recognize or witness disrespectful behavior, you are expected to make efforts to help to stop it directly or by notifying your supervisor.
- **Reporting Violations.** If direct intervention is not possible, or the behavior is severe, you must report it. Notify your supervisor, Human Resources, or Compliance.

Diversity & Inclusion

We celebrate a world that is as diverse as our people and our patients. Treat everyone with kindness and professionalism, no matter how they look, where they come from, or how their ideas differ from your own.

- Never make an employment decision (such as whether or not to hire or promote someone) based on a characteristic protected by the laws.
- Recognize that, Apotheco benefits when colleagues contribute different perspectives, experiences, and backgrounds. This diversity is essential for our continued success.
- Apotheco provides an equal opportunity for employment and advancement on the basis of ability and aptitude without regard to race, color, creed, age, sex or sexual orientation, handicaps or national origin, except where age, sex or physical status is a bona fide occupational qualification.

Labor and Employee Relations

Apotheco is committed to compliance with all applicable laws and regulations to maintain the employer-employee relationship and the workplace environment. Apotheco complies with all federal, state, and local laws and regulations including but not limited to those concerning payment for all hours worked, human rights, and working conditions.

For questions about the laws governing labor and employee relations matters, please review the Employee Handbook and applicable State Addendums or contact Human Resources.

Occupational Safety and Health

Apotheco employees have the right to work in a safe and healthy environment. Unsafe practices can lead to serious consequences, such as personal injury, injury to fellow employees and damage to Apotheco property or other serious outcomes. Apotheco is committed to the well-being and safety of the employees.

Both federal and state laws regarding the promotion of occupational safety and avoidance of job-related hazards are designed to ensure that each of us works in a safe environment. Due regard and attention should be paid to those laws and regulations. Without a safe and non-hazardous environment in which to work, none of us can achieve the goals of community service to which we strive.

Therefore, at Apotheco you must:

- Always follow facility safety rules, regulations, procedures and warnings.
- Safely handle and dispose of medications or other substances that may be regulated.
- If you ever witness or suffer an accident, or see unsafe conditions, report the situation immediately to your Manager and Human Resources. An incident report must be completed through the Work Incident/Workplace Violence/ Injury Reporting form available in ADP .

Conducting Apotheco's Business with Integrity

Apotheco's activities involve multiple transactions each day. It is critical that Apotheco's books, records, and accounts are accurate and comply with all applicable laws, contractual requirements, and are not misleading. To adhere to this critical business obligation, we must ensure that we abide by strict rules to guard against fraud or dishonesty and follow guidelines for addressing problems that may arise.

We may not create, maintain or submit reports or statements that are inaccurate, false or misleading. We have a duty to be sure that any statement or representation made on Apotheco's behalf is truthful and accurate, including any statement, letter or document, which is directed to, or may be relied upon by, any governmental agency. Apotheco requires that all its records, financial and otherwise, reflect accurately and completely all aspects of any transaction or occurrence that the records purport to record.

Truth in Reports and Records

Truth in Reports and Records Procedures. Falsification in records, submissions or statements, is the type of conduct most likely to give rise to violations of the law, as well as the appearance of impropriety. Individuals who complete information, or who are responsible for the completion of information, or who make statements to governmental or regulatory agencies, must exercise care to ensure that such records or statements are accurate and complete.

Truth in Records is Critical. Maintaining the integrity and truthfulness of its reports is critical to the success of Apotheco. Any employee who directly or indirectly completes or makes an inaccurate report or provides inaccurate, misleading or otherwise untruthful information to cause the preparation of an inaccurate report, whether the inaccuracy is deliberate or the result of a mistake, may be subject to discipline, including termination.

Accounting and Record Keeping. Apotheco requires that all its records, financial and otherwise, reflect accurately and completely all aspects of any transaction or occurrence that the records purport to record. This policy specifically prohibits any “off-books” transactions or funds.

If you create company documents that record financial transactions or any other type of events, you are required to make such records as soon as is practical after the transaction or event being recorded. The documents should be sufficiently detailed to provide an explanation of the nature of the transaction or occurrence, the persons involved, and the sources of information used in compiling the document. Any person making any such report is required to sign and date the document. All documents, records and reports must comply with applicable laws, contractual requirements and good business practices.

Record Retention and Destruction

We are required by law to maintain certain types of medical and business records, usually for a specified period of time. Failure to retain these documents for such minimum periods could subject Apotheco to a number of negative outcomes including but not limited to penalties and fines. Apotheco has established controls to assure the retention and timely destruction of retrievable records, such as hard copies, and records on computers and electronic systems. We are expected to comply fully with the applicable record retention and destruction schedule.

We never destroy records subject to audit, pending investigation or pending litigation until the audit, investigation or litigation is completed, even if they have reached the end of the required retention period.

Eligibility and Documentation Standards

Eligibility for Services from Apotheco Pharmacists

Apotheco pharmacists must ensure that patients meet the appropriate eligibility requirements for admission and ongoing services, and that eligibility is documented appropriately.

Documentation

Documentation must be timely, accurate, truthful, complete, and legible. Records, including patient documentation and business records (such as employee timecards, reimbursement requests, and invoices) must be prepared, maintained, and submitted in an accurate and reliable manner. All reports submitted to governmental agencies, insurance carriers, and other entities will be prepared truthfully, timely, accurately, and in accordance with applicable laws, regulations, and contractual requirements.

Conducting Business with the Government

Apotheco is committed to adhering to and complying with all applicable rules, regulations and laws for providers enrolled with the Centers for Medicare & Medicaid Services (CMS). Many laws and regulations govern activity involving patient referrals, physician relationships, billing and payment practices, third party contracts, and employment practices. Since these laws are very complex, it is important that you understand Apotheco's policies and procedures on these topics.

Failure to comply with these laws and regulations may subject Apotheco to severe financial penalties and fines, possible exclusion from participation in federal healthcare programs, or even criminal prosecution of individual employees. Equally important is the impact on our brand and reputation that any such violation could cause.

Apotheco will not:

- Offer or accept any form of kickback, bribe or rebate made directly or indirectly, overtly or covertly, in cash or in kind to induce the purchase, recommendation to purchase, or referral of any kind of healthcare goods, services or items.
- Knowingly submit a false or fraudulent claim, or make false statements in connection with a claim.
- Employ or contract with individuals or entities that have been convicted of a criminal offense related to health care or fraud, or who are listed as debarred, suspended, excluded, or otherwise ineligible for participation in federal and state health care programs.
- Give or promise anything of value to any foreign government official or candidate for public office in order to obtain or retain business.

Government Inquiries and Investigations

Apotheco will cooperate with any lawful inspection, audit, inquiry or investigation, including warrants and subpoenas, while protecting the legal interests of Apotheco and its employees. We are expected to fully cooperate and not interfere with an investigation.

You should notify your immediate supervisor and the Compliance Department should you receive any government inquiry, including search warrants, subpoenas or other legal documents naming the Company and/or its Employees.

If you know of a visit by a government official or a request for Company document, you shall immediately report this information to their supervisor and the Compliance Department to ensure an appropriate and complete response is given.

Bribery & Federal and State Anti-Kickback Statutes

At Apotheco, we do not bribe. Bribery is bribery, whether we are dealing with a government official, agent, employee, supplier, guest, or anyone else. We comply with all laws that prohibit bribery, and we do not make promises or grant favors in exchange for a business advantage. Because Apotheco may be viewed as responsible for any unlawful actions by third parties who work on our behalf, we demonstrate diligence when employing and overseeing all third parties.

Both federal and state laws specifically prohibit any form of kickback, bribe or rebate made directly or indirectly, overtly or covertly, in cash or in kind to induce the purchase, recommendation to purchase, or referral of any kind of healthcare goods, services or items paid for by the Medicare or Medicaid programs.

The term kickback, as defined in these statutes, means the giving of remuneration, which is interpreted under the law as anything of value (including discounts or free goods or services). Care must be taken in

structuring relationships with persons not employed by the Company so as not to create the appearance of offering an improper inducement to those who may be in a position to refer or influence the referral of patients.

At Apotheco, we:

- Never use or offer funds, assets, services, or Apotheco facilities in order to improperly influence a business decision.
- Familiarize third parties with Apotheco's rules against bribery and oversee their actions closely.
- Record all payments and transactions truthfully and correctly, and do not try to hide the actual purpose of an expense.

Anti-kickback laws are complex. You should consult the Legal Department about whether it is appropriate to provide something of value.

Gifts and Entertainment

The general principle of this Code is that no gift, favor, or entertainment, whether a single event or a pattern of behavior, should be accepted or provided if it will obligate, or appear to obligate, the recipient. If you are uncertain about proper gifting practices, you should consult with your supervisor, review policy and procedure regarding gifts and gratuities, and/or contact the Compliance Department.

Apotheco's business relationships should always be based on trust, professionalism, and fair dealings, and be free from conflicts of interest. Providing gifts and/or entertainment in the course of conducting business with patients, referral sources, vendors, and other associates, can potentially pose ethical concerns and create significant risk for Apotheco.

Apotheco does not engage in any form of bribery, including the offer or acceptance of any improper payment, gratuity, or gift to obtain business or influence business decisions or receive preferential treatment.

We want to ensure we never allow gifts or entertainment to compromise our ability to make objective and fair decisions or give an impression of impropriety.

When accepting meals, gifts, or entertainment, apply the following rules:

- Never accept gifts or entertainment that might improperly influence a business decision.
- Never accept tips, money or individual gifts from patients or family members.
- Never accept gift cards, cash or cash equivalents as gifts.
- Never accept lavish gifts (e.g., an expensive bottle of wine, tickets to an expensive sporting event)

When providing meals, gifts, or entertainment, apply the following rules:

- Never give gifts cards, cash or cash equivalents as gifts.
- Keep meals and entertainment modest as judged by local standards.

- Attend with the person you are providing the courtesy to.
- Limit gifts to items of nominal value.
- Record all gifts on expense reports, in accordance with Company policy.

Physician Gifts: There are additional requirements if you are providing meals to a physician. In these situations, the meal must:

- Be approved in advance in writing by your supervisor.
- Be part of an informational or educational presentation.
- Not include or be part of an entertainment or recreational event.
- Occur in an office setting unless it is impractical to do so.

Holiday Gifts: Gifts given to pharmacies or corporate offices, and not individual teammates and are considered reasonable and customary (e.g. fruit baskets and cookie trays) may be accepted during the holiday season. However, the value of gifts accepted should not exceed \$75.

Patient Gifts: Apotheco has adopted the interpretation by the Office of the Inspector General that inexpensive gifts (other than cash or cash equivalents) or services to patients may be appropriate if the gift or courtesy does not violate applicable federal, state or local laws or Apotheco's policies and procedures. Inexpensive gifts or services are those that have no more than \$15 individually, and no more than \$75 in the aggregate annually per patient. Providing a gift and/or courtesy to a patient should be discussed with the Compliance Department and adhere to Apotheco's policies and procedures, including this Code.

If you have any questions about gifts, meals, and entertainment, please ask your Supervisor for guidance. If you are a Supervisor and unsure if any gift, meal, entertainment, or other thing of value should be approved, please contact the Compliance Department. It is important to report to the Compliance Department any offer of any gift that may violate this Code or any other applicable Apotheco Policy.

Conflicts of Interest

At Apotheco, we seek to avoid conflicts of interest and even the appearance of a conflict. You are expected to make decisions that are in the best interest of Apotheco, free from any personal potential or actual gain or influence. Apotheco expects you to avoid any activities, including entering into any relationships, transactions or other situations, that might affect your independent judgement and create or involve a conflict of interest.

A conflict of interest exists when a person's private interests interfere, or appear to interfere, in any way with the business interests of Apotheco. Conflicts of interest may arise in a number of ways and include any situation in which financial or other personal considerations may compromise or appear to compromise: the business judgment of an employee or contractor; and/or the ability for an employee or contractor to do his or her job. An actual or potential conflict of interest occurs when an employee or contractor is in a position to influence a decision that may result in a personal gain for that employee, contractor or a relative as a result of business dealings.

You should make reasonable efforts to avoid conflicts of interest. If you become aware of an actual or potential conflict of interest, you must report the matter to your supervisor and Human Resources or Compliance. Conflicts of interest are often not easy to determine and some cannot be avoided, so please be sure to direct any questions or concerns to the Compliance Department and Human Resources as promptly as possible.

Trade Practices, Antitrust, and Competition

Apotheco competes fairly by providing the best experience for our patients. You are obligated to conduct fair and honest business transactions and never attempt to restrict or restrain competition.

Antitrust laws in the United States, also known as competition laws, are based on the belief that public interest is best served by competition, free from collusion with and between competitors or potential competitors. Violations of antitrust laws can carry severe fines and penalties. The fines for violations can include individual prison sentences and fines to the organization in the millions.

An example of an antitrust offense is creating an agreement between competitors that limit independent judgment and restrain trade, such as agreements to fix rates, or to divide a market for customers, territories, products, or purchases.

To avoid violations:

- Never make agreements (in person or in writing, formally or informally) with competitors that could restrict competition.
- Do not have discussions or engage in other communication with competitors about geographic areas, strategies, or services, certain attempts to bundle services together, the circumstances under which business will be conducted with suppliers, insurance companies, patients or customers (including boycotts), or specific marketing efforts.
- Avoid discussions with competitors regarding the future business plans of Apotheco or any competitors.
- Deal fairly with Apotheco suppliers.
- Do not misrepresent facts when negotiating on behalf of Apotheco.

Any questions or concerns regarding this area should be addressed to the Compliance Department.

Political Involvement

Apotheco respects individual political participation, but political participation needs to remain separate from Company business. You can participate freely in the political process and make political contributions, as you deem appropriate; however, you cannot make political contributions on behalf of Apotheco or use any Apotheco funds or resources. The Company follows all laws that govern corporate participation in the political process.

Apotheco prohibits giving or offering anything of value, directly or indirectly, to a public official, including any employee or agent of a government-owned business, in order to influence official action or obtain an improper advantage. “Anything of value” means not only cash, but also gifts, meals, entertainment, political contributions, offers of employment or other benefits.

- Do not use Company funds, facilities, or any other assets to support political candidates, parties, organizations, or other political causes without express authorization from an appropriate person.
- Never solicit political support or contributions while at work.
- If you participate in the political process in your personal time, always be clear that your political views are your own views, and not the views of the Company.
- You cannot request the assistance of any elected representative or government official or express an Apotheco position on a public issue without the prior written approval of the General Counsel or CEO.

Protecting Information and Assets

Protecting Confidential & Proprietary Information

Working at Apotheco often gives us access to information about the Company, patients, colleagues or business partners that should not be made available to the public. We must ensure that only the appropriate people have access to confidential information and that we use this information in the right way in accordance with the laws and our policies. We must never access or disclose confidential information unless such access or disclosure is authorized for a valid business purpose or required by law.

Confidential and proprietary information includes:

- Strategies, products, and services;
- Operating manuals;
- Terms of Agreements or contracts;
- Personal Identifiable Information (“PII”);
- Personal Health Information (“PHI”);
- Financial information and projections;
- Databases, data processing systems;
- Sales and marketing information; and
- Information relating to employees, patients, referral sources, suppliers, vendors, agents, and government contracts.

You are responsible for safeguarding confidential and proprietary information and must ensure such information is used only for valid business purposes and not for personal gain or for non-Apotheco business purposes.

Responsible use of all confidential information is critical to maintain its confidential nature. Confidential

information may only be used to perform job responsibilities and cannot be shared with others unless necessary to carry out specific obligations or disclosure is authorized or required by applicable laws or regulations. You are also responsible for alerting the Compliance Department of any attempts by unauthorized person to obtain any confidential information. Failure to observe our obligation to protect the confidentiality of Apotheco information, including the information of patients, employees, vendors, and others who entrust Apotheco with this information for business purposes, may compromise Apotheco's business, including, but not limited to, resulting in securities, antitrust, or employment law violations.

You must:

- Use confidential and proprietary information only for job-related purposes.
- Share confidential and proprietary information with colleagues on a “need-to-know” basis, and not discuss it to persons outside the Company, including business associates or those we serve, expect under the terms of a confidentiality agreement approved by the Legal Department.
- Never discuss business information in public that might include Apotheco's strategy, trade secrets or confidential information.
- Not leave confidential information visible and unattended whether on your desk, a copy machine, or an unlocked computer screen.
- Follow all IT safeguards and policies. Use strong passwords on Company systems and devices, be cautious with emails from an unknown source, and do not open attachments or follow links unless you know they are safe.
- Recognize what information may be considered intellectual property and understand how to safeguard it.
- Never access or disclose confidential information unless such access or disclosure is authorized for a valid business purpose or required by law.

You are also responsible for alerting the Compliance Department of any attempts by unauthorized person to obtain any confidential information.

Safeguarding the Privacy of Our Employee and Customer Information

Personal Identifiable Information (PII) is information that can be used to distinguish or trace an individual's identity. Examples include name, Social Security number, credit card number, and bank account number. Other information, such as a person's birth date, place of birth, mother's maiden name may also be PII when used in combination with other personally identifiable information.

Some examples of confidential employee and associate information:

- Wage and salary data, performance reviews, corrective action, and other personnel records
- Marital status/military status
- Employee ID numbers
- Employment agreements
- Social Security numbers
- Financial/banking information
- Claims and medical information
- Personal data relating to Long and Short-term disability, the Family and Medical Leave Act (FMLA), Americans with Disabilities Act (ADA)

Safeguarding the Privacy of Our Patients' Protected Health Information - HIPAA

Confidentiality is more than a courtesy-it's the law. The practice of healthcare and the provision of healthcare services require that we gather a great deal of personally identifiable information about our patients. Federal and state laws and regulations protect the confidentiality of patients' medical, financial, and personal information.

The Health Insurance Portability and Accountability Act of 1996 as amended by the Health Information Technology for Economic and Clinical Health Act, and the privacy, security, and breach regulations that implement such laws (HIPAA) prohibits unauthorized use and disclosure of protected health information (PHI). A criminal action can be brought against an individual who knowingly obtains or discloses PHI without appropriate authorization. Criminal penalties vary based on the severity of the violation, but may include fines and imprisonment. Civil monetary penalties for a violation of HIPAA may be as much as \$2.1 million. Many state laws have more stringent requirements than HIPAA. The loss of PHI can result in substantial harm to individuals, including identity theft or other fraudulent use of the information. You have a special responsibility to protect that information from inappropriate use or disclosure.

PHI includes but is not limited to:

- Name, birth date, address, telephone and fax number
- Email address
- Health status
- Medical history
- Provider/facility information
- Social security number/certificate or license number
- Medical claim information
- Diagnosis codes
- Medical record number

- Health plan beneficiary and account numbers
- Device Identifiers and Serial Number

PHI may be exchanged in verbal, written, and electronic forms. HIPAA requires the protection of patient information from being seen, heard, or read by anyone who is not authorized to do so. Only specified individuals are permitted to access patient records: the patient or his or her authorized representative, the individual's physician, and the employees who need the information in the course of their work.

No medical, financial, or personal information about a patient may be used by or disclosed to anyone else, in any form, without written authorization from the individual or his/her authorized representative.

Any employee who engages in unauthorized disclosure of information in violation of the privacy rights of our patients or others may be subject to immediate termination, in addition to possible civil or criminal penalties and sanctions. Any questions about patient privacy can be directed to a manager or the Compliance Department.

Failure to observe our obligation to protect the confidentiality of Apotheco information, including the information of patients, employees, vendors and others who entrust Apotheco with this information for business purposes may compromise Apotheco's business, including, but not limited to, resulting in securities, antitrust, or employment law violations. Violating our obligations to maintain confidentiality may also violate agreements providing for the protection of such confidential information.

Cybersecurity and Data Protection

Apotheco maintains cybersecurity controls designed to protect patient information, employee information, systems, and operational environments.

You must:

- Complete mandatory security awareness training annually.
- Follow secure email practices, including verifying sender identity before opening attachments or clicking links.
- Report all suspected phishing attempts, malware alerts, security incidents, or potential breaches immediately.
- Create and use strong, unique passwords and never share credentials.
- Use multi-factor authentication (MFA) where required.
- Store and transmit PHI, PII, and proprietary information only using Company-authorized secure tools and systems.

Incident Reporting Expectations

- Immediately report any suspected or confirmed cybersecurity incident, privacy incident, malware infection, system anomaly, or unauthorized disclosure of information to IT and Compliance.
- Do not attempt to investigate, delete files, or otherwise “fix” a suspected incident unless directed by IT or the Security team. This helps preserve forensic evidence and supports an effective investigation.

These actions will also facilitate the safeguarding of our employee, customer, and other confidential information of the Company.

Responsible Use of Technology, Systems, and Networks

Apotheco provides technology resources—including computers, mobile devices, email, messaging platforms, systems, applications, and network access—to enable employees to perform their work safely, securely, and efficiently.

You must:

- Use Company systems and networks primarily for business purposes. Limited personal use is permitted only if it does not interfere with business operations or violate policy.
- Follow all IT and cybersecurity policies, including the Acceptable Use Policy, Information Security Policy, Password & Authentication Policy, Data Handling Policy, and Change Control Policy.
- Access only systems, applications, and data for which you are authorized.
- Never attempt to bypass security controls, monitoring tools, or technical safeguards.
- Immediately report suspected cybersecurity incidents, phishing attempts, unauthorized system access, or lost/stolen devices to IT and Compliance.
- Maintain the security of devices by ensuring they are locked when unattended, used with approved security software, and not connected to untrusted networks or storage media.
- Use only Company-approved software, cloud services, and AI tools, and never install or use unlicensed or unapproved applications.

You must not:

- Use personal email, personal messaging applications (for example, SMS, WhatsApp, Signal, or similar tools), or personal cloud storage (for example, personal iCloud, Dropbox, Google Drive) to conduct Company business or to store or transmit PHI, PII, or other confidential Apotheco information.
- Connect unauthorized personal devices, USB drives, or other external storage media to Company systems.

- Disable, uninstall, or circumvent mobile device management (MDM), antivirus, endpoint detection and response (EDR), or multi-factor authentication (MFA) deployed by Apotheco.
- Install unapproved software, browser extensions, or applications that have not been authorized by IT.

When working remotely or at an off-site location:

- Use secure, private networks whenever possible. If you must use public Wi-Fi, you must connect through a Company-approved VPN.
- Position screens and devices so that PHI, PII, or other confidential information cannot be viewed by unauthorized persons.
- Secure Company devices and paper records when not in use, including locking them in a safe location and not leaving them in vehicles or unattended public areas.
- Follow all Apotheco policies and procedures exactly as you would when working at a Company facility.

Monitoring of Systems: Apotheco may monitor, access, and review activity on Company systems, devices, networks, and applications, as permitted by law, to ensure security, operational integrity, and compliance with Company policies. Employees should have no expectation of personal privacy when using Company systems or devices.

Use of Artificial Intelligence, Automation, and Digital Tools

Employees must not input PHI, PII, proprietary data, or confidential information into generative AI tools, external applications, or automated systems unless the tool has been expressly approved by IT, Compliance, and Security.

Use of AI tools must follow the Company's Acceptable Use of AI Policy.

Protect Our Assets

At Apotheco, we need to be conscientious and responsible with Company assets, including Company funds and Company property. Company property includes physical items such as inventory, office supplies, reports and records, equipment, telephones, computers, laptops, tablets and any other tangible property that Apotheco owns, rents, or leases. Assets may also be non-physical and intangible such as the Company name, trademark or logo, strategies, and business information. Apotheco employees are expected to protect assets against loss, theft, or other misuse. We must ensure and safeguard the assets of Apotheco, including Company funds and Company property.

Being responsible means we demonstrate good judgment when using the Company's assets.

- Use Company property and assets responsibly and only for business activities.
- Exercise care when using our computers and networks. Never use someone else's username, password, or other access information.
- Be accurate and timely when you submit business expense reports and time cards.
- Ensure you do not use personal devices for PHI or PII unless authorized and only within Apotheco approved and managed applications on your personal device.
- Protect Company assets provided for your work from theft, loss, or unauthorized use.
- Refrain from modifying configurations, disabling software or otherwise modifying Company configurations on Company devices.

All managers should establish appropriate internal controls over their areas of responsibility to ensure the safeguarding of the Company's assets and the accuracy of records and reports. Managers should work with Accounting to establish and maintain appropriate internal controls over financial reporting to ensure that inputs into the financials statements are complete and accurate. Accounting practices and procedures established by Accounting must be followed to ensure the complete and accurate recording of all transactions.

Social Media

Apotheco employees who make use of social media or other online communications as an identifiable Apotheco employee must be mindful to ensure that confidential information is not disclosed in or on their social media platforms whether such platforms are personal or professional.

Social media such as Facebook, Twitter, Instagram, LinkedIn and blogging sites, can be an efficient means of establishing and maintaining professional and personal relationships, and for sharing information.

You may not share information that is confidential and proprietary about the Company and its customers. This includes information about trademarks, finances, strategy, customer lists, and any other information that has not been publicly released by the Company. It is critically important for you to exercise good judgment and discipline to know the difference between work-related information and information that is relevant to their personal lives.

Only persons authorized to speak on behalf of Apotheco should create pages or platforms that purport to be official Apotheco sites or social media platforms. Any internet posting by you that is not an authorized Apotheco post on an authorized Apotheco social media platform may not include any Company logo or trademark. Any internet posting on social media platforms must not violate any Apotheco policy or procedure, including, but not limited to, those set forth in this Code and the Employee Handbook. Individuals are legally responsible for their postings, and they may be subject to liability if their posts are found defamatory, harassing, or in violation of any other applicable law. They may also be liable if they make postings which include confidential or copyrighted information (music, videos, text, etc.) belonging to third parties.

You may not post obscenities, slurs, or defamatory remarks that may damage the reputation of the Company, its employees, and its customers. The Company may monitor content put on social media by its employees. Violating this policy may result in discipline, up to and including termination of employment.

Expectations

What Are You Expected To Do?

We must hold ourselves and each other accountable for compliance. Apotheco expects you to make a personal commitment to adhere to the guiding principles set forth:

- Commit to excellence by obeying applicable laws and regulations governing our organization.
- Be honest, fair and trustworthy in all your activities and relationships.
- Disclose any potential conflicts of interest for discussion and resolution.
- Avoid the appearance of impropriety.
- Avoid all conflicts of interest between work and personal affairs.
- Create an atmosphere in which equal opportunity extends to every member of our diverse community.
- Strive to create a safe and positive workplace and to protect the environment.
- Foster leadership at all levels to sustain a culture where ethical conduct is recognized, exemplified, and valued by all employees and others doing business with Apotheco.
- Follow professional codes of ethics, association guidelines, and professional regulations as applicable.
- Empower others to speak up about conduct that does not represent our commitment to the highest ethical standards and adherence to applicable laws and regulations.

We acknowledge that being your best takes hard work and commitment, and for that all of us at Apotheco are grateful for:

- Your unwavering commitment to conducting business with integrity; the right way, always.
- Your care for others and for the care you show the Company when you ask questions, speak up, and raise concerns.

Thank you for cooperation and care for those around you, and for doing what's right!

What If I Have Questions About the Code?

Adhering to the Apotheco Code is a team effort. Any questions, concerns, or challenges regarding the Code or any policies or procedures should be directed to your supervisor, manager, director, Legal and Compliance Department or Human Resources.

Apotheco fosters trust and respect and prohibits retaliation against anyone who reports or participates in an investigation of a possible violation of the Code, policies, or the law. If you believe you are being retaliated against, please contact the Compliance Department.

Contact Us

Leadership is always by your side for assistance. Please do not hesitate in contacting us.

Legal & Compliance

- Elizabeth Haley, General Counsel and Chief Compliance Officer
 - elizabeth.haley@apothecopharmacy.com
 - legal@apothecopharmacy.com
- Brielyn Sampson, Director of Compliance
 - brielyn.sampson@apothecopharmacy.com

Human Resources

- Divya Dua, Director of Human Resources
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Operations

- Ross Rortvedt, Senior Vice President of Operations
 - ross.rortvedt@apothecopharmacy.com

IT & Security

- Patrick Rafferty, Vice President of Information Technology
 - patrick.rafferty@apothecopharmacy.com
- Enzo Mastromarco, Director of Information Technology
 - enzo@apothecopharmacy.com

Ethics Hotline

Website: www.lighthouse-services.com/apothecopharmacy | **Toll-free Telephone:** 855-222-0559 | **Email:** reports@lighthouse-services.com