MedAdvisor
Solutions

Compliance and Ethics Code of Conduct

Code of Conduct

We hold ourselves to the highest standards of ethical conduct and are honest, transparent, and trustworthy in all our interactions with customers, partners, and each other.

We prioritize fairness, respect, and reliability. We honor our commitments, fulfill our promises, and take ownership of our mistakes.

1. Perform your work with integrity and comply with this Code of Conduct

Perform your work with integrity and in compliance with our Code of Conduct, policies and procedures, and with laws and regulations applicable to MedAdvisor. Strive to make good choices as you carry out your work.

2. Speak up when something doesn't seem right

We are responsible for reporting it if we ever suspect wrongdoing by other personnel, vendors, partners and customers. Reporting the suspicion of wrongdoing can be done (anonymously if you prefer) via MedAdvisor's compliance hotline, or by contacting the Director of Compliance directly. The Director of Compliance or an appropriate member of the Compliance Team will investigate and inform executive/Board leadership if evidence of wrongdoing is found.

3. Reporting wrongdoing

Anyone who reports possible wrongdoing will be protected. Confidentiality and anonymity will be preserved as much as possible when our Compliance Team investigates. Retaliation against you or anyone else reporting wrongdoing or providing information through an investigation is strictly prohibited.

4. Protect the privacy and security of patient and confidential business information

You are not allowed to share anything about our patients or confidential business information (e.g., employee data, contracts, business partner and customer information, financial data not otherwise publicly disclosed, and intellectual property) you come across performing your work with other MedAdvisor personnel, family, friends or anyone else. Do not put patient information at the risk of being seen by anyone: Lock your laptop when away from your workstation, don't post passwords where they might be seen, de-identify patient data, always encrypt emails containing PHI (Protected Health Information – health information pertaining to a patient) or PII (Personally Identifiable Information – any data that can be linked to an individual's identity) when being sent externally, and do not click on a link or scan a QR code in a possible phishing email.

5. Be honest and cooperate quickly

You are expected to be honest and cooperate quickly as requested with internal and external investigations (once the relevant authorities have been identified), attestations, audits, risk assessments and training that demonstrate MedAdvisor's commitment to safeguarding privacy and security, as well as complying with laws and regulations. However, do not provide information until you verify you're speaking to a person authorized by MedAdvisor to obtain the information (be careful not to speak to someone impersonating an auditor, regulator or whomever).

6. Avoid bribery, kickbacks, corruption, fraud, waste, abuse and conflicts of interest

Avoid bribery, kickbacks, corruption, fraud, waste, abuse and conflicts of interest (or the potential for actions to be perceived as such) when making business deals, hiring, awarding contracts, etc.

7. Approval of Suppliers

Potential new vendors and suppliers that may access Protected Health Information (PHI), Personally Identifiable Information (PII) or confidential business information, including independent contractors and consultants, must be approved by our Compliance Team before you arrange for new or renewal agreements to be signed. This is to ensure the vendors have adequate privacy and security safeguards in place, and language in the agreements addresses risks related to sharing information.

8. Checking and Training Suppliers

Vendors and suppliers, independent contractors and consultants who will access Protected Health Information (PHI), Personally Identifiable Information (PII) and/or business confidential information will be expected to complete our compliance training, be background and sanction-checked, and abide by our Code of Conduct and pertinent policies, or otherwise provide evidence that they have done this recently through their employer.

9. Treat colleagues, business associates and other people with dignity and respect.

No bullying, harassment or discrimination of any kind is tolerated.

10. We want you to be able to confidently carry out your job, knowing what's acceptable and not acceptable.

If you have any questions, please seek guidance from:

Australia	United States
Director of Compliance	Director of Compliance
Head of Legal & Governance	US Corporate Attorney
Global VP Human Resources	Global VP Human Resources

11. Review

The objectives and effectiveness of this policy will be reviewed by the Board annually as part of the annual Corporate Governance Statement approval process.

This policy will be formally reviewed by the Board no less than every 2 years.