Healogics®



CODE OF CONDUCT & ETHICS

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Welcome & Our Commitment to Integrity

Dear Team Members,

We recognize that you have many choices about where to invest your talent and expertise, and we appreciate your decision to be part of Healogics. Together, we are united in our mission to **FIND. TREAT. HEAL.™** by delivering exceptional patient care and making a meaningful difference in the lives of the patients we serve.

As a People-first, Patient-centered organization, Healogics is committed to doing the right thing - every day, in every action, and for every patient. This Code of Conduct and Ethics reinforces that commitment. It outlines the standards and expectations that guide how we work and support us in carrying out our responsibilities in alignment with our ethical principles. You are expected to review this Code and perform your duties in accordance with its requirements, Healogics policies and procedures, federal health care program requirements, and all applicable laws and regulations.

We are equally committed to addressing compliance concerns and ensuring you have clear, accessible ways to speak up. You are expected to report any suspected violations of federal health care program requirements, Healogics policies and procedures, or this Code. Concerns may be reported directly to our compliance team at compliance@healogics.com, or anonymously through our Compliance Hotline at 888.999.9460, or the reporting form at hotline.healogics.com.

Each of us plays a role in maintaining ethical and compliant workplaces, and we thank you for your commitment to doing so. Lead by example. Ask questions when something is unclear. Be proactive and promptly raise concerns about unethical or inappropriate conduct. Your engagement enables us to continue delivering exceptional care and operating with integrity and in compliance with the complex regulatory framework that governs healthcare.

Sincerely,



Pamela Mandel

Chairman and Chief Executive Officer



Noelle Valentine

Chief Compliance Officer



Our Ethical Responsibilities

The Healogics Code of Conduct and Ethics (the "Code") sets clear expectations for Board members, officers, team members, and contractors regarding our shared commitment to integrity. It defines how we are expected to act—both inside and outside the workplace—and provides resources for raising questions or concerns related to ethical conduct and compliance.

This Code reflects Healogics values, standards, and expectations and guides how we conduct business with our patients, team members, customers, contractors, and the communities we serve. Maintaining compliance is a collective responsibility, and we are committed to addressing any concern of non-compliance promptly and appropriately. The Code reinforces this commitment by promoting ethical and lawful behavior, accountability, and transparency across the organization.

At Healogics, Compliance means **Making the Right Call**. This goes beyond simply following rules—it means pausing to consider whether an action aligns with our values, our commitment to patients, and our ethical obligations, even when the right answer is not obvious. Making the Right Call requires sound judgment, personal accountability, and the willingness to ask questions or speak up when something does not feel right. When faced with uncertainty, team members are expected to seek guidance rather than make assumptions.

Making the Right Call also means understanding that integrity is non-negotiable. It is never acceptable for any Healogics officer, team member, or contractor to ask—or be asked—to act in a manner that conflicts with these standards. Everyone acting on behalf of the Company, including team members, contractors, and members of the Board of Managers, is required to comply with this Code, all applicable laws and regulations, and Healogics policies and procedures. Failure to do so may compromise patient care, damage our reputation within the community, and expose both the Company and individuals to regulatory or legal consequences. Violations of this Code or Company policies may result in disciplinary action, up to and including immediate termination of employment or contract.

Healthcare is a highly regulated industry, and the laws and regulations that govern our work are complex. While the Code addresses many areas of potential ethical and legal risk, it provides general guidance, as it cannot anticipate every situation. If you have questions or concerns about a potential compliance issue, you are expected to seek guidance by contacting **compliance@healogics.com** or by making a report anonymously through the Ethics and Compliance Hotline at **(888) 999-9460** or **hotline.healogics.com**.

Compliance is a team effort and relies on the active engagement of everyone—working together to identify actual or potential concerns, speaking up when something doesn't seem right, and supporting corrective actions when needed. Our ability to continue serving patients and customers with integrity depends on this collective commitment to legal and regulatory compliance.

ETHICAL BUSINESS PRACTICES

Accuracy of Business Records

Healogics expects its officers and team members to record and report information accurately, contemporaneously, and honestly. This includes accurate reporting of time worked, disclosure of conflicts, business expenses incurred, purchase and sales documents, patient outcomes, key performance metrics, and all other business- related activities. Officers and team members are expected to use good judgment and common sense when preparing any Company document so that it objectively and accurately reflects the reality of the situation.

Any Healogics officer or team member who is found to have knowingly misrepresented or falsified any business record is subject to disciplinary action, up to and including termination of employment or contract.

Fraud, Waste, and Abuse

Healogics is dedicated to detecting and preventing financial fraud, waste, and abuse. Federal law and laws in some states protect government funds from fraud, waste, and abuse. Healogics has developed policies and procedures in accordance with these laws to detect and prevent fraud, waste, and abuse in its billing practices with government payors.

The False Claims Act

The False Claims Act imposes penalties for knowingly submitting or causing to be submitted claims for payment under federal programs, including Medicare and Medicaid, when the services were not actually performed or were not performed as claimed. Some examples of false claims in federal health care programs include:

- Billing for items or services not actually provided;
- Billing for items or services that were not documented;
- Billing for items or services that were not medically necessary;
- Billing for items or services provided by an unlicensed or excluded individual;
- Providing and billing for substantially excessive amounts of medical items or supplies; and
- Improperly upcoding claims to receive higher reimbursement.

Violating the False Claims Act may lead to criminal, civil, and administrative penalties. These penalties may include imprisonment, monetary penalties, loss of license, and exclusion from participating in federal programs.

Federal law and some state laws allow private citizens to file a claim against an entity they believe has violated the False Claims Act. A party that files a false claims suit, sometimes called a relator or whistleblower, may be entitled to collect a portion of the money recouped by the government and other monetary awards or equitable relief, such as being reinstated to a former position. Healogics is prohibited from and does not retaliate against relators because of their initiation of or participation in a false claims investigation, report, or proceeding.

Healogics has established policies and procedures to help detect and prevent fraud, waste, and abuse. These policies are available to team members, contractors, and vendors through the Hub or by contacting the Compliance Department.

As with all potential violations, team members are obligated to report to the Compliance Hotline any known or potential false or fraudulent billing or business practices.

The Anti-Kickback Statute

The Anti-Kickback Statute prohibits knowingly and willfully giving or receiving or offering to give or receive anything of value to encourage or reward referrals for any item or service payable under a federal health care program. Things of value can take many forms, such as money, rebates, or discounts and can be made directly or indirectly. Even if there are legitimate business purposes for the remuneration, if one of the reasons you give or receive the remuneration is to influence referrals, it is a violation of the Anti-Kickback Statute.

Healogics prohibits accepting, giving, or offering anything of value in exchange for direct or indirect patient referrals in violation of the Anti-Kickback Statute. Some examples of the Anti-Kickback Statute include:



- Giving gifts to a community provider with the expectation that the provider will refer more patients to our managed wound care center;
- Offering discounts or incentives on services ordered from the Company in order to obtain future orders;
- Entering into contractual arrangements with referral sources where the referral source provides few or unnecessary services on behalf of the Company;
- Paying a vendor or supplier rates that vary based on the number or value of

referrals that vendor provides; or

- Paying a referral source more than fair market value for services in exchange for referrals.

Violating the federal Anti-Kickback Statute is a felony and can lead to fines, imprisonment for up to 5 years, exclusion from participating in federal health care programs, or any combination of these penalties. Penalties can be assessed against both individuals who violate the law and Healogics.

Gifts, Entertainment, and Business Courtesies

Healogics prohibits giving or receiving, or offering to give or receive, any gift if the value of the gift is more than nominal value and is intended to influence or could be construed to be for influencing business opportunities. Giving or receiving cash or cash equivalents (like gift cards or gift certificates) is not permissible, regardless of value or purpose. Non-monetary gifts of nominal value, such as mugs and pens, may be given so long as they do not otherwise violate Healogics gift policies and are given infrequently. Gifts that do not violate these parameters may be permissible. Team members must comply with all policies regarding gifts in addition to these general guidelines. Note that hospital policies may be more strict than Healogics internal policies. Team members who work in the center must abide by their hospital's policies.

Note that gift cards given by Healogics to bona fide team members of Healogics are not prohibited. These gifts must be reported for tax purposes as required by the Internal Revenue Service.

👉 Policy 13.01.001: Business Gifts, Meals, and Entertainment

Gifts and Gratuities to Physicians & Advanced Practice Clinicians

Gifts to physicians not employed by Healogics are permissible under certain limited circumstances. In order for a gift to be permissible, the gift must not be cash or a cash equivalent, must not have been solicited by the physician or physician's practice, must not be tied to the value or volume of referrals received from the physician, must not violate the Anti-Kickback Statute or other similar laws, and must not exceed the annual statutory limit for physician gifts. Healogics policy provides additional details on gifts to physicians.

Gifts and Gratuities to Government Officials

Federal law and the laws of most states prohibit giving anything to a government official when the gift is intended to influence the decisions of the official or the government. Healogics team members may not give anything of value to a government official or team member.

Federal and state law place certain limits on how much a corporation may give to a political candidate or party. Healogics does not contribute cash or in-kind donations unless allowable under applicable law.

Gifts and Gratuities to Patients

Offering valuable gifts to beneficiaries may inappropriately influence a patient's choice of provider. The government allows de minimis transfers of value, which are defined as non-cash gifts of less than $15 per item and no more than $75 per patient per year.

Accepting Gifts and Gratuities

Team members may not solicit or accept any gift, favor, loan, gratuity, reward, promise of future employment, or any other thing of monetary value that might influence, or appear to influence, the team member's judgment or conduct in performing their job. Team members may accept occasional, unsolicited courtesy gifts or favors (such as business lunches or holiday baskets) so long as the gifts or favors are modest as judged by local standards, and do not influence or appear to influence the judgment or conduct of the team member in Healogics business.



Patients at a center may wish to express their gratitude and appreciation for the help they received by giving the center or individual team members gifts such as gift cards, gift baskets, or homemade goods. These gestures are well-intentioned, but accepting these gifts can put team members in a situation, whether real or perceived, of favoring a particular patient or providing special treatment. Gifts of nominal value that can be shared among team members may be kept so long as they are shared. Gifts of cash, gift cards, or other gifts that cannot be easily shared must be returned with a thank you and polite decline of the gift, citing company policy.

Federal Physician Self-Referral Law (Stark Law)

The Physician Self-Referral Law, or Stark Law, prohibits referrals for certain Medicare and Medicaid items and services furnished by an organization with which the referring physician or the physician's immediate family member has a financial relationship, unless a specific legal exception applies. The financial relationship can be direct (e.g., between the hospital and physician) or indirect (e.g., between a third-party service company and physician). The financial relationship can mean an ownership interest in the provider, an investment in the provider, or compensation (monetary or non-monetary) from the provider. The

Stark Law also prohibits an entity, such as a hospital, from filing a claim for payment for any referred service that violates the Stark Law. Referrals and claims are only permitted if the financial relationship with the physician fits within a specific Stark Law exception.

Examples of potential Stark violations include:

- Payment to a referring physician for services that are greater than fair market value (FMV);
- A rental agreement with a referring physician where the physician pays less than FMV;
- Ownership interests by referring physicians in certain providers, such as clinical laboratories or Durable Medical Equipment companies; and
- Payments to referring physicians for services that exceed what are genuinely needed by the DHS provider.



The Stark Law can be violated whether or not you intend to violate the law. Claims that are submitted in violation of Stark must be refunded on a timely basis. Any person/entity that knowingly presents or causes the presentation of a claim in violation of Stark is subject to civil monetary penalties and exclusion from participating in federal health care programs. Team members are required to immediately report all known or suspected violations of any of these policies to Healogics Compliance Department.

Beneficiary Inducement

Offering a patient something valuable—like a gift, a free service, or a discount—to influence where they receive care is considered beneficiary inducement and is not allowed. Federal healthcare laws are intended to prevent unfair influence, unnecessary use of services, and misuse of government funds. Patients must choose their care based on medical need, not because of gifts or special treatment—even if the intent is to be helpful. Violating these laws can result in large fines and serious penalties. Team members are required to report any concerns to the Healogics Compliance Department.

Fair Competition and Antitrust Compliance

Federal and state laws prohibit unfair methods of competition and unfair or deceptive acts and practices. Although Healogics intends to compete vigorously in the marketplace, we are committed to a free and open market. We expect our representatives, including our officers and team members, to comply with all applicable federal and state antitrust and unfair competition laws and to conduct themselves in a fair and honest manner at all times.

Examples of conduct which might violate these laws include:

- Collaborating with competitors, especially when taking actions that may result in price fixing, bid rigging, or boycotting or refusing to deal with particular persons or entities (such as vendors, payers, or health care providers);
- Sharing pricing, price formulas, bid formulas, and other proprietary information with competitors, either directly or through a trade association;
- Collaborating with a vendor or customer to limit competition within a market or territory or to limit free and open pricing;
- Conditioning a customer's ability to purchase one product or service on the purchase of another product or service; and
- Misappropriating another's proprietary information or trade secrets.

This Code cannot list all situations in which antitrust and unfair competition laws apply. You must take special care in this area and promptly refer any questions to the Compliance Department or Legal Department.

Penalties for antitrust violations are substantial and can result in civil liability and criminal penalties.

Political Activity and Contributions

Healogics works with several hospital entities that may be considered tax-exempt entities. Tax-exempt entities are prohibited from conducting political activities under Internal Revenue Service (IRS) regulations. In an effort to deter any activities that may reflect negatively on our hospital customers, Healogics does not engage in political activities prohibited under IRS regulations for tax-exempt entities. Healogics encourages team members to participate in the political process on their personal time. Team members are prohibited from engaging in political activities during work hours, and no Healogics resources may be used to distribute statements supporting or opposing any candidate. Personal political activity should not reference Healogics or the team member's position at Healogics.

- Do not enter or cause to be entered any political contribution on an expense report, either directly or indirectly, that causes Healogics to reimburse you for a prohibited expense. This prohibition includes the cost of fundraising tickets for political functions and fundraising dinners, even if business is discussed.
- Do not use Healogics property, facilities, time, or resources for any political activity. Examples of prohibited actions include using work time to send invitations for political fundraising events, using Healogics telephone systems to make political solicitations, and allowing a political candidate to use any Healogics meeting rooms for campaigning.
- Healogics electronic mail may not be used to communicate personal opinions to other individuals, elected representatives, newspapers, periodicals, or other external organizations. Your personal opinions might be construed as official Healogics policy.

This policy is in no way intended to interfere with team member rights protected under the National Labor Relations Act or under any other federal or state law regarding political activities. When protected by law, Healogics will not infringe on an team member's right to engage in such protected activities.

Foreign Corrupt Practices Act

The Foreign Corrupt Practices Act (FCPA) makes it illegal to offer or give anything of value to a foreign official for purposes of obtaining or retaining business with any person or directing business to any person. The business does not have to be with the government or a government-owned entity. The definition of foreign official is broad. Foreign officials include physicians who work for government-owned or -managed hospitals.

It is also illegal to offer or give something of value to someone who is not a foreign official if you know the payment will be passed on to a foreign official.

Healogics does not tolerate violations of the FCPA. Team members or contractors who are found to have violated the FCPA are subject to disciplinary action, up to and including termination of employment or contract.

Penalties for violating the FCPA include imprisonment and fines. You may also be subject to consequences such as exclusion from participating in federal programs, ineligibility to receive export licenses, and suspension or debarment from the securities industry.

Environmental Laws

Healogics manages and operates its business in a manner that respects our environment and conserves natural resources. Our representatives strive to utilize resources appropriately and efficiently, to recycle where possible, and to otherwise store, dispose of, and transport all waste in accordance with applicable laws and regulations. We work cooperatively with the appropriate authorities to remedy any environmental contamination for which Healogics is responsible.

Failure to prevent, report, or correct environmental problems can result in criminal and civil penalties as high as $50,000 per day per violation, conviction of a felony with imprisonment for up to two years, or both. Even merely negligent violations can result in imprisonment and substantial fines if they pose a threat to human health.

Licensure and Certification

Some positions require an team member to maintain a particular license or certification in order to comply with state or federal law. Team members are required to maintain any required license or certification in good, active standing. Team members are responsible for renewals with their respective licensure and certification boards. In the event disciplinary action is taken against a license or certification, team members are responsible for reporting that action or potential action to their supervisor. Disciplinary action will be taken against an team member if their license lapses or if action is taken against their license during employment.

Exclusion Programs

Healogics does not employ, contract with, grant privileges to, or otherwise conduct business with individuals and entities who have been excluded from participating in federal health care programs, including state Medicaid exclusion lists, the Office of Inspector General's List of Excluded Individuals and Entities, and the General Services Administration's System for Awards Management. Individuals and entities must be screened against these exclusion lists prior to employing or contracting with that party. Individuals and entities are responsible for immediately notifying Healogics if they receive notice that they have been or will be placed on an exclusion list.

👉 Policy 04.01.004: Exclusions and Sanctions Screening

Conflicts of Interest

Transparency in business dealings is critical and helps protect the integrity and reputations of both Healogics and its team members. Officers and team members have a responsibility to put Healogics business interests ahead of other business interests. A conflict of interest occurs when an individual's private interest interferes, or appears to interfere, with the interests of Healogics. A conflict situation can arise when an officer or team member has interests that may make it difficult to perform his or her role impartially. Conflicts of interest may also arise when an officer, team member, or a member of their family receives improper personal benefits as a result of their position in the Company. Officers and team members must disclose conflicts of interest on hire or when the conflict occurs. The conflict must be reviewed as required by Healogics policy before the officer or team member may continue to act where the potential conflict arises.

👉 Policy 14.01.001: Conflicts of Interest

Protection of Information and Assets

Confidential and Proprietary Information

Healogics, its officers, and team members have access to confidential, sensitive, and proprietary information. Officers and team members have an obligation to protect and safeguard confidential, sensitive, and proprietary information.

Healogics officers and team members may not steal or misuse confidential or proprietary information belonging to another person or entity. Officers and team members may not copy documents or computer programs in violation of applicable copyright laws or licensing agreements. Officers and team members may not use proprietary business information or trade secrets, including customer lists, price lists, contacts, or other information, in violation of applicable laws, regulations, or contractual obligations.

Confidential information includes all non-public information that, if disclosed, may either be helpful to competitors or harmful to Healogics or its customers. Obligations to protect confidential or proprietary information continue as required by applicable laws, regulations, and contractual obligations even when an individual is no longer employed by, or otherwise associated with, Healogics.

Data Privacy and Security

Healogics is committed to protecting the privacy and security of all protected health information ("PHI") and personal information ("PI") it receives and

creates. Federal and state laws protect PHI and PI, and how Healogics uses or discloses information about patients and team members. Healogics team members may use and disclose PHI and PI only as allowable by law. Additionally, all Healogics team members may access only the minimum amount of patient information necessary to perform their job-related functions.

Healogics team members are required to maintain the privacy and security of patient information by

- Keeping account information, like passwords, confidential;
- Not opening attachments or clicking links on emails that appear suspicious;
- Protecting paper documentation, such as by keeping it out of plain view; and
- Complying with all Healogics privacy and security policies.

Any known or suspected violations of privacy laws must be reported to the Compliance Department promptly, either directly or through the Hotline. The Compliance Department ensures breaches of information are reported when required by law.

Records Management and Retention

Retention of certain documents is required by law. The Company is committed to compliance with all applicable laws and regulations relating to document retention. Healogics has established policies and procedures related to preserving, retaining, and destroying documentation. These policies serve as a reference for all retention matters. Contact the Legal Department with any questions related to document retention.

👉Policy 15.01.001: Records Management and Retention

Respectful, Safe, and Inclusive Workplace

All team members, contractors, and visitors to Healogics facilities have the right to expect a safe and healthy environment.

Healogics commitment to safety and health in the workplace means more than simply obeying safety rules. All team members and business partners are expected to understand and follow our safety and health policies and procedures.

To accomplish our goal of a safe and healthy work environment, we all must:

- Be alert to health and safety risks;
- Follow Healogics safety and workplace procedures and expect third

parties and visitors to do the same;

- Only undertake work that you are qualified to perform;
- Stop work if you consider it unsafe;
- Speak up if you observe an unsafe working environment, and listen to others who may speak up;
- Report any accident, injury, illness, or unsafe condition immediately. Never assume that someone else has reported a risk or concern;
- Know the emergency procedures that apply where you work;
- Maintain a neat and safe working environment by keeping workstations, aisles, and other workspaces free from obstacles, wires, and other potential hazards;

Discrimination-Free and Harassment-Free Workplace

Healogics, LLC, is an Equal Opportunity employer. Healogics and its affiliates comply with all federal, state, and local equal employment opportunity laws prohibiting discrimination against team members and applicants based on race, color, religion, sex, sexual orientation, gender identity, gender expression, age, national origin, citizenship status, disability, genetic information, or veterans' status. Equal opportunity extends to all aspects of the employment relationship, including hiring, promotions, training, working conditions, compensation, and benefits.

Speaking Up and Reporting Concerns

Healogics Disclosure Program

When and How to Report

Reporting issues is an important part of the effectiveness of Healogics Compliance Program. Healogics has established a Disclosure Program, often known as the Compliance Hotline, to allow individuals to report suspected instances of unethical or improper conduct. Team members, patients, customers, and vendors have the right to use this Disclosure Program to report issues or have questions addressed regarding Healogics policies or practices. It is not acceptable to overlook actual or potential wrongdoing. Team members are required to report through one of the ways listed below, any activities they suspect:

- are harmful to a patient, family member, or staff member;
- are illegal or unethical;
- violate any state or federal health care program requirements; and/or
- violate this Code of Conduct and Ethics or any policy or procedure.

Reports under the Disclosure Program can be made anonymously, 24 hours a day, 7 days a week, 365 days a year. The Compliance Department protects the identity of those who report compliance issues to the fullest extent possible. Information disclosed to the Compliance Department is maintained confidentially within the Department and is only shared on an as-needed basis.

By mail to Healogics
5220 Belfort Rd, Ste 130
Jacksonville, Florida 32256
Attn: Compliance Department

By telephone at 888.999.9460

By email at compliance@healogics.com

Online at hotline.healogics.com

An outside vendor administers The Ethics and Compliance Hotline. A live person will answer all telephone calls. Calls are not recorded and are not traced. Callers may choose to remain anonymous regardless of how the report is made. Once the call is completed, a report will be generated and sent to the Compliance Department for review under department policies and procedures.

No disciplinary action or retaliation will be taken against someone who reports in good faith a perceived issue, problem, concern, or violation through the Disclosure Program. Reporting in good faith means the reporter actually believes the information reported to be true, regardless of whether the allegation is substantiated or found to be improper.

The integrity of the Hotline requires that it be used only for legitimate purposes. Improper use of the hotline, including filing a report you know to be false, is not acceptable. Individuals who knowingly file false reports are subject to disciplinary action, up to and including termination of employment.

What Happens After a Report is Made

The Compliance Department reviews all Disclosure Program reports it receives. Concerns are addressed following department policies and procedures. Based on that review, the concern may be addressed through guidance or may be investigated.

Outcomes of compliance investigations are not available to Hotline

representatives. Disciplinary action taken in response to a complaint is not disclosed in order to protect the rights of those parties. Team members may see education provided in the center to address any problems, or may see changes in the way the center operates.

You should not investigate a compliance issue on your own. The Compliance Department, using internal and external resources such as Human Resources or legal counsel as appropriate, will investigate and resolve all reports.

Obligation to Cooperate

Healogics board members, officers, and team members are required to cooperate with internal investigations. Healogics prohibits destroying, creating, or altering documents (whether paper or electronic) that are part of a current or potential investigation. Lying to or misleading an investigator or taking steps to obstruct an investigation is prohibited and could result in disciplinary action.

👉Policy 05.01.00: Compliance Hotline and Investigations (Disclosure Program)

Our Commitment to Non-Retaliation

Retaliation, retribution, intimidation, or harassment of anyone who makes a good faith report through the Disclosure Program is not tolerated. Any team member who engages in or condones retribution, retaliation, or harassment is subject to disciplinary action, up to and including termination of employment.

👉Policy 07.01.001: Non-Retaliation