

BE FREE WITH
IWV P

BUILDING TRUST TOGETHER

CODE OF ETHICS AND CONDUCT 2023

TABLE OF CONTENTS

2 | FULFILLING OUR RESPONSIBILITIES TO OUR PATIENTS

- 3 Voicing Concerns
- 4 Non-Retaliation Policy
- 4 Audits & Investigations

5 | WORKING TOGETHER

- 5 Non-Discrimination
- 5 Sexual Harassment
- 6 Social Media
- 6 Community Activities
- 6 News Media Inquiries

7 | INTERACTING WITH REFERRAL SOURCES

- 7 Meals & Events
- 7 Gifts
- 8 Donations, Sponsorships, and Grants

9 | PROTECTING INFORMATION

- 9 Information Privacy
- 10 Information Security
- 10 Company Records

11 | AVOIDING CONFLICT OF INTERESTS

- 11 Personal and Family Relationships
- 11 Outside Employment and Other Financial Conflicts of Interest
- 12 Promoting Accountability



MESSAGE FROM MICHAEL GAVIN, CEO

Injured Workers Pharmacy (“IWP”) is committed to building trust with our patients by providing them with access to their prescription medications while conducting ourselves in an ethical and legal manner. This Code of Ethics and Conduct (“Code”), which is intended as a supplement to IWP policies and procedures and the Employee Handbook, establishes IWP’s ongoing commitment to the highest standards of ethical conduct. We all have a role in compliance. Every IWP employee is charged with continually building upon the foundation of trust and confidence we share with our patients, co-workers, referral sources, and business partners.

I believe that trust is a key to success in any organization and ethical conduct is the foundation upon which trust is built. Each of us can promote an ethical culture by acting with integrity, respecting our co-workers, and bringing forward concerns without the fear of retaliation while using this Code to make principled decisions. Adherence to this Code is non-negotiable and is a condition of employment. By ensuring that we consistently adhere to these standards, our collective dedication to upholding the principles contained in this Code will keep us on the path to continued excellence and future success.

I thank all of you for your continued commitment to compliance. Our reputation is based on our collective commitment to integrity in everything that we do.



OUR MISSION

IWP is “The Patient Advocate” for individuals who are injured in the workplace. Our passion and commitment is to provide a broad spectrum of valued services that exceed the expectations of those we serve. We tirelessly collaborate with the legal, medical, and insurance communities for the optimum care of our patients.

FULFILLING OUR RESPONSIBILITIES TO OUR PATIENTS

IWP is committed to providing quality care and service to our patients. Our employees are expected to act in accordance with the standards outlined in this Code while applying our values of advocacy, dependability, commitment, trust, and compassion to their everyday work.

This means that we treat everyone fairly, we are accountable to each other, and we never knowingly violate applicable laws, IWP policies, or contractual commitments. No one in a leadership position is empowered to ask you do to anything that would interfere with any legal or ethical obligations.



THIS CHECKLIST MAY BE USEFUL IF YOU THINK SOMETHING IS WRONG

Have I made a decision that feels right and is fair and just?

How would this situation look in a newspaper or on the internet?

If I'm not sure of something, have I asked for advice?

Managers and Supervisors have additional responsibilities including:

- Educating employees and contractors on this Code and the policies applicable to their work activities.
- Continuously promoting compliance with this Code and all IWP policies, and procedures.

No one is expected to memorize all of IWP's policies and procedures, but everyone should be familiar with the legal and ethical requirements of their own role. If you are unsure about what's expected of you, ask someone — your Supervisor, department Director, members of the Senior Team, and the Compliance Department are all good resources.

Visit [PolicyTech](#) on IWP's Intranet to see specific IWP policies and procedures. The Employee Handbook also contains important guidance. If you see a situation that you think may violate this Code, you should report it immediately to your Supervisor, to your department Director, or to the Compliance Department.

Q: Does this Code of Ethics and Conduct apply to me?

A: This Code is for all IWP employees, which includes:

- Full-time employees
- Part-time employees
- Contingent workforce (contract) members

VOICING CONCERNS

Each one of us plays a vital role in helping IWP uphold our commitments, and this starts with open communication.

IWP strongly encourages you to report ethics and compliance concerns to your Supervisor, department Director, or the Compliance Department. If you prefer to remain anonymous voice your concern through the Ethics Point Helpline. Links and contact information for the Ethics Point Helpline can be found on the IWP's intranet.

You may also report concerns directly to IWP's Compliance Department or by e-mailing compliance@iwpharmacy.com. Supervisors, Managers, or Directors who become aware of a potential issue are expected to report their concerns directly to the Chief Compliance Officer.

Q: I am a manager and one of my team members has raised a compliance concern to me. How should I handle this situation?

A: An employee who raises a concern is doing the right thing. The first thing you should do is thank them. Speak with the employee in a private location so you can talk without being overheard. Listen to them with an open mind. Use open-ended questions to ensure you fully understand their concern. You should also notify the Compliance Department to obtain guidance and assistance with next steps.

**THE ETHICS POINT HOTLINE IS AVAILABLE
24 HOURS A DAY, 7 DAYS A WEEK**



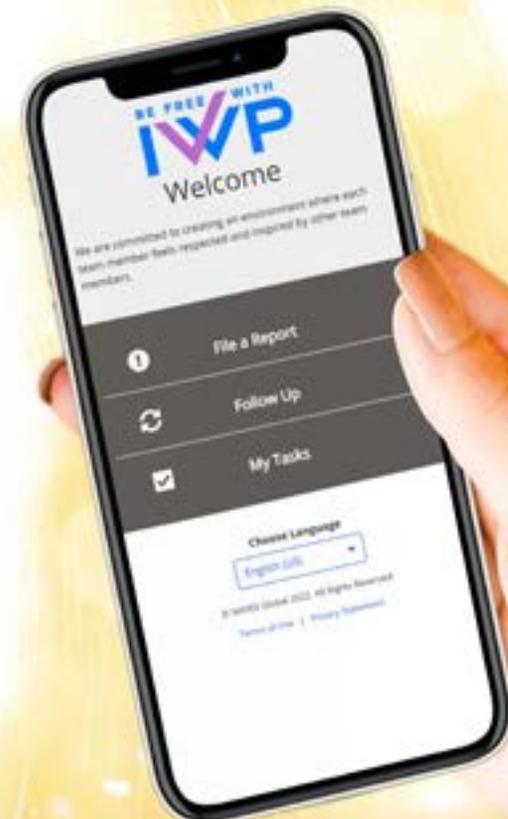
TOLL-FREE
1-844-991-2463



MOBILE PHONE ACCESS
<https://iwpharmacy.navexone.com>



WEBSITE
<https://secure.ethicspoint.com/domain/media/en/gui/75970>





NON-RETALIATION POLICY

You will not face retribution or retaliation for raising good-faith questions or concerns about conduct that may violate IWP's legal and ethical standards. If you believe you have been punished for raising a question or concern, please promptly report this to compliance@iwpharmacy.com.

All reports must be made honestly and out of genuine concern. Any employee who retaliates against another employee will be subject to disciplinary action up to and including termination. For further information, see IWP's Disclosure and Non-Retaliation Policy in [PolicyTech](#). Please also refer to IWP's Whistleblower policy located in the Employee Handbook.

AUDITS & INVESTIGATIONS

Employees and contractors may be required to participate in routine audits or investigations. Never obstruct an audit or investigation and provide all information, materials, and facts requested by auditors or investigators.

If an investigation reveals a violation of law or IWP policy, IWP will take corrective actions, which may include disciplining individual employees, notifying governmental agencies, and making systemic changes to reduce the risk of future violations.

If you are contacted by a government agency or external party about IWP workplace matters, immediately notify the Legal Department.

COMPASSION

WORKING TOGETHER

Because our employees make IWP an amazing company we must treat each other with compassion and respect.

NON-DISCRIMINATION

Everyone at IWP has a duty to respect the rights and dignity of others and to support the diversity of people, cultures, and ideas in the workplace. Although management is primarily responsible for implementing IWP's equal employment opportunity policies, all employees share in the responsibility of ensuring applicable policies are applied uniformly to everyone.

It is expected that we all treat each other fairly, regardless of race, religious creed, color, national origin, ancestry, physical disability, mental disability, medical condition, genetic information, marital status, sex, gender, identity, gender expression, age, sexual orientation, military and veteran status, domestic violence victim status, and/or any other status protected by law.

IWP is an equal opportunity employer in all areas of employment including recruitment, hiring, training and development, promotion, transfer, termination, layoff, compensation, use of company facilities, benefits, working conditions, and all other terms and conditions of employment. All personnel decisions are made using objective standards based upon an individual's qualifications.

For additional information, please refer to IWP's Employee Handbook.

ANTI-HARASSMENT

The company expects all employees to conduct themselves in a professional manner and to always treat patients, co-workers, and referral sources with respect. Harassment of any type undermines the person's sense of personal dignity as well as our focus on teamwork.

To ensure a safe and welcoming environment, IWP will not tolerate any form of sexual harassment, violence, or threat of violence in the workplace. IWP will also provide reasonable accommodations regarding workplace safety for an employee or applicant who is a known victim of domestic violence, sexual assault, or stalking, as required by State or Federal laws.

Sexual harassment includes unwelcome behavior including sexual advances, requests for sexual favors, offensive touching, or other verbal, visual, or physical conduct of a sexual nature. Any unwelcome sexually-oriented conduct, intended or not, that creates a hostile, offensive, intimidating, or humiliating workplace may be considered sexual harassment.

If you feel uncomfortable because of another employee's behavior or comments, IWP will work with you to make sure that your workplace is a safe and comfortable environment.

For IWP's full Sexual Harassment Policy, please refer to the IWP Employee Handbook.

Q: I observed a violation of IWP policies, but am afraid to report it because I fear a colleague at work might harass me if I do. If I make a report, what will IWP do to protect me?

A: If you share your identity when you report, IWP will monitor your situation and, if necessary, take disciplinary action against anyone who retaliates against you for reporting the concern. You should always share concerns about possible retaliatory behavior with the Compliance Department.

SOME SOCIAL MEDIA DOS AND DON'TS

✓ DO

- Be honest about who you are (no false names), especially if it could be perceived that you're speaking for IWP.
- Recognize that your social media activity is subject to IWP policies, standards, and procedures, including this Code.
- Make personal references or recommendations on social media outlets such as LinkedIn, or Yelp on your own behalf only and not on behalf of IWP.
- Use your own devices for personal social media activity.

✗ DON'T

- Post any content about IWP or in any way related to your work that is vulgar, harassing, or otherwise a violation of IWP's conduct standards.
- Make business commitments for IWP.
- Post photographs or videos of nonpublic areas of IWP's premises, or of IWP's processes, operations, or products without IWP's prior written approval.
- Use IWP's logo, trademark, or proprietary graphics without permission.
- Use your IWP e-mail address when setting up social media accounts.

SOCIAL MEDIA

Social media activity can help IWP build and strengthen relationships with referral sources, employees, patients, and community members. It can also negatively affect perceptions.

IWP respects your right to use social media and understands that your time outside of work is your own. However, whenever your social media activity identifies you with IWP, you could affect IWP's reputation as well as your own. Please consider how your social media activity could affect IWP before posting anything online.

COMMUNITY ACTIVITIES

IWP is committed to supporting the communities we serve by encouraging our employees to volunteer. If you use your job title or affiliation (or wear the IWP logo) while participating in a community activity, this may imply IWP is supporting that community activity.

While IWP supports your efforts to participate in community activities, please check with your supervisor, the Compliance Department, or the Legal Department before associating IWP with any community activities.

NEWS MEDIA INQUIRIES

Refer any media inquiries or requests for comment to the Legal Department immediately. In the case of an emergency, reporters arriving on the scene may try to gather information from any available source. If forced by the situation to respond to reporters, do not improvise an answer, do not speculate, and do not downplay the seriousness of the situation.



Q: I have a large event coming up before the holidays and several important referral sources are going to be there. I really want to wow them and pull out all the stops. Is this okay?

A: Entertaining referral sources can serve a legitimate business purpose. To ensure that the event is appropriate, enter a detailed description into Salesforce as soon as possible and make sure everything is approved in advance of the event, per current policy. Speak with your RSM to assist you if you have questions.



INTERACTING WITH REFERRAL SOURCES

IWP aspires to earn the trust of our patients and other stakeholders including referral sources and the public at large.

IWP employs a strong client services model in which our sales professionals, including Territory Managers and Account Managers, and referral sources are an important part of what makes us successful. Whether you are building or maintaining a relationship with a referral source it is essential to recognize that there are legal restrictions on providing anything of value to a referral source or a patient to generate business. IWP has policies in place outlining the types of information we share with outside partners.

“Items of value” can take many forms besides cash and include things such as a meal with no educational content, sponsoring non-educational events, or excessive compensation for professional consultancies. It is important to exercise special care when working with referral sources, hosting IWP events, or sponsoring outside organizations. Always check with the Compliance Department if you think a referral source expense or request raises a concern.

MEALS & EVENTS

Educational events are an important way to educate referral sources about IWP’s value proposition. Hospitality at these events, such as meals, may be offered if appropriate and approved in advance of the event. Be mindful that, although providing meals during educational events is acceptable, IWP’s Interactions with Referral Sources Policy must be followed at all times. Violations of IWP Policy will be deemed to be employee misconduct as it violates the law and puts IWP’s reputation at risk.

For additional guidance, please refer to the IWP Interactions with Referral Sources Policy in [PolicyTech](#).

GIFTS

IWP employees must never provide or promise a referral source with gifts or anything of value to obtain referrals. The consequences of doing so far outweigh any advantage you could gain by making or receiving an illegal transfer of value.

IWP employees should also avoid providing gifts to each other to avoid situations which may influence or give the appearance of influencing the employee’s judgment in a decision-making process.

Small seasonal expressions of value may be given to referral sources. See IWP’s Interacting with Referral Sources Policy for more information.

Q: A potential referral source said she likes the services that IWP offers but wants to know “what’s in it for her” if she’s going to refer patients to us. What should I do?

A: Speak with your Manager and/or the Compliance Department right away to obtain appropriate guidance. Never put your reputation or IWP’s reputation at stake. Before doing anything that might affect the company’s reputation consider how it would look on the front page of the newspaper.

TRUST

DONATIONS, SPONSORSHIPS, AND GRANTS

As a national voice for injured workers, IWP is often asked to sponsor events related to the promotion of healthcare services.

Our stakeholders, both internal and external, must have confidence in the integrity of the support that IWP chooses to provide to organizations that influence the health care injured workers receive.

IWP employees must seek prior approval from the Compliance Department before funding:

- Sponsorships
- Educational events
- Workers' Compensation advocacy organizations

Donations, grants, and sponsorships must always be:

- Approved by IWP's Compliance Department
- Free from an explicit or implied agreement to induce patient referrals in return

For more information, see the Donations, Sponsorship, and Grants Policy in [PolicyTech](#).

Q: A referral source asked whether IWP would make a donation to the Massachusetts Pharmacy Association's scholarship program for aspiring pharmacy students. How should I handle this?

A: IWP supports efforts to support injured workers' access to prescription drugs. Supporting pharmacy students is clearly within our mission. If you think that a donation, sponsorship, or grant opportunity will benefit injured workers, reach out to the Compliance Department for approval. Be sure to follow the steps outlined in the Donations, Sponsorships and Gifts policy.

Q: A referral source asked us with assistance in underwriting the cost of a happy hour for their referral sources. Can IWP do this?

A: No, we do not pay for events solely for entertainment purposes. IWP policy only allows for providing food and drink options when they are part of an educational event. Don't risk serious penalties to yourself and IWP. In general, if there is ever any question about items of value you can provide to patients or referral sources, your ears should perk up and you should seek clarification from the Compliance Department right away.



PROTECTING INFORMATION

During the normal course of business, you may generate, receive, and use company information. We all must manage IWP information carefully and responsibly and be accountable for identifying records with vital information.

INFORMATION PRIVACY

You may have access to confidential, proprietary, nonpublic information on the job. You may work with information that contains personally identifiable material or proprietary information about patients and co-workers such as names, addresses, phone numbers, Social Security numbers, and health information. Employee should be careful to not disclose any information that is not necessary to complete the task at hand.

Always maintain the confidentiality of information entrusted to you by IWP and our patients, except when disclosure is properly authorized or mandated by law.

When dealing with confidential information:

- Never view it for a non-business reason.
- Never use it for personal gain or advantage.
- Never share it without approval.

Because of the nature of our business, we work with significant amounts of prescriber and patient data, which is subject to special policies and procedures to ensure dependably safe dispensing.

If you are required to share confidential information, make sure that it is appropriately protected and secure. This obligation continues even after you are no longer with IWP. Revealing non-public information that you obtained while at IWP may be a violation of this Code and may be illegal.

For more information, please refer to IWP's Confidentiality & Privacy Policy in [PolicyTech](#).



ADVOCATE

INFORMATION SECURITY

Exercise caution when using or handling patients' personal information or IWP proprietary information. When you leave your workstation lock your desktop so that information is not accessible or viewable. Lock up hard-copy documents containing confidential information or data when not in use, and always keep company equipment (e.g., laptops and mobile phones) in secure locations. File a report with your supervisor immediately if confidential information or company equipment is lost or stolen.

Pay attention to any possible phishing and ransomware. Phishing e-mails are meant to look like e-mails you normally receive but are used by hackers to gain access to company systems and potentially steal data. Hackers use ransomware to lock down company data and demand payment for it to be unlocked.

If you see an e-mail, offer, or message that you suspect may be a scam, do not interact with it and remember to report it using the phishing button in your Outlook e-mail menu bar. Do not share any information related to your username or passwords for any company accounts or technology with anyone. If you think your login credentials have been compromised, report it immediately.

COMPANY RECORDS

Good practices for creating and managing company records include the following:

- Be sure information is accurate.
- Be honest about the true nature of a business transaction or commitment.
- Never forge endorsements, approvals, or authorizing signatures.
- Only process or approve records or disclosures that you know are true and not misleading.
- Report any issues to your supervisor or another appropriate person in management.



BEST PRACTICES: DATA PRIVACY & SECURITY

- When you leave your desk, lock your workstation by pressing CTRL + ALT + DELETE on your keyboard.



- Do not leave documents with patient information on your desk when leaving at the end of the date.
- Lock all confidential information in your desk drawer at the end of the day.
- Do not leave your laptop or phone visible in your car.
- Do not share your password with anyone.
- Do not click on suspicious links in e-mail.

Company records must be stored, managed, and disposed of appropriately and in accordance with IWP's Record Retention Schedule, which can be found in the Records Management Policy in [PolicyTech](#).

There may be additional retention requirements for records that relate to an investigation or legal proceeding (i.e., legal hold), which may suspend the disposal of such records. When this happens, the Legal Department will notify you when records are subject to additional legal requirements.

If you need additional guidance on managing records, ask your supervisor or the Compliance Department. For further information, see the Records Management Policy in [PolicyTech](#).

AVOIDING CONFLICTS OF INTEREST

Only through honesty and fair dealing can IWP fulfill its mission to injured workers. A conflict of interest can occur when your personal interests—financial or otherwise—interfere, or even appear to interfere, with IWP’s interests. If you identify a potential conflict of interest, discuss it with your supervisor.

You must never use company property, information, or your position for personal gain. You should also never use any information discovered using company property, information, or your position for personal business interests.

PERSONAL AND FAMILY RELATIONSHIPS

To protect IWP and our patients, all business decisions must be made in IWP’s best interest. Do not use your position to obtain or provide favored treatment for people with whom you have a personal or family relationship.

Close personal relationships between colleagues can also interfere with an employee’s independent judgment. Romantic relationships between a supervisor and an employee within that supervisor’s chain of command are not permitted under any circumstance.

IWP expects employees to take responsibility for identifying potential conflicts of interest. If you have any questions on possible conflicts of interest, please notify the Compliance Department for assistance in determining if a conflict exists.

OUTSIDE EMPLOYMENT AND OTHER FINANCIAL CONFLICTS OF INTEREST

Outside employment may also create a conflict of interest, even when employees take other opportunities with the best of intentions. While employed by IWP, you must not engage in business activities that compete with IWP or use IWP resources for non-IWP work.

If you have, or are thinking about, an additional job or business venture, discuss the situation with your supervisor right away to avoid potential conflicts with your IWP duties.

If you have a question about possible conflicts of interest notify the Compliance Department. Further policies and procedures for managing potential conflicts of interest are available in the Employee Handbook.



PROMOTING ACCOUNTABILITY

Compliance and ethics are integral to maintaining IWP's reputation as a trusted pharmacy and advocate for injured workers. IWP aims to maintain a culture of ethical conduct and compliance with the law by enforcing all company policies.

Managers and Supervisors are expected to ensure that all employees know the contents of this Code and may be held accountable for the actions of their employees. All contractors must comply with this Code and all IWP policies and procedures. Failure to do so may result in termination of the contract and further legal action.



COMMITMENT



IWP IS “THE PATIENT ADVOCATE” FOR THOSE WHO ARE INJURED IN AN ACCIDENT.

Our passion and commitment is to provide a broad spectrum of valued services that exceed the expectations of those we serve. We tirelessly collaborate with the legal, medical, and insurance communities for the optimum care of our patients.



BE FREE WITH
IWVP

www.IWPharmacy.com © IWP Updated 2023