

Code of Conduct

INTRODUCTION

Our Code of Conduct demonstrates HNL Lab Medicine's absolute commitment to the highest standards of ethics and compliance and assists us with adhering to these standards, while carrying out our daily activities. The guidance in this Code applies to our relationships with others, including patients, other providers, third party payers, subcontractors, independent contractors, vendors, consultants, competitors and one another.

The Code is the cornerstone of our Compliance Program. We developed the Code to provide guidance on how to achieve our ethical standards and comply with applicable laws and regulations. Abiding by the Code is mandatory for everyone in our organization – this includes our Board, our leaders, our colleagues, and our vendors.

The guiding principles that are set forth in this Code are meaningful only if you are willing to make a personal commitment to maintaining the highest standards of ethical conduct. You are a valuable member of HNL's team. We trust you and expect that you will follow these guidelines – every day and in every decision you make.

This Code is not meant to cover every situation that may arise or provide every detail of our policies and procedures. In some instances, the Code fully addresses the covered subject. In other cases, however, the subject matter requires additional guidance for those who are (or should be) seeking direction. To provide additional guidance, HNL has developed policies and procedures to expand upon or supplement many of the principles addressed in the Code. **You will find cross references to pertinent policies in the footnotes.**

While all HNL colleagues are obligated to follow our Code, we expect our leaders (e.g., Supervisors, Managers, Directors, Executives, etc.) to set an example and to be role models for ethical conduct in every situation. Our leaders shall create an environment where all team members feel free to raise concerns and propose ideas. Our leaders will ensure that those on their team have sufficient information and resources to comply with applicable laws, regulations, and the policies that apply to their jobs.

We hope that you would feel comfortable bringing any concerns you might have to your immediate supervisor, so that any compliance issue or ethical dilemma may be resolved. If you are not comfortable doing so, you may contact the HNL Compliance Department by calling 484-425-8150.

Knowing who to reach out to for more information about a potential compliance or ethics issue makes it easier for us to investigate. However, if you prefer, you may report your concern anonymously through the Compliance Hotline by dialing 844-675-7684 or by completing a form on the internet at www.healthnetworklabs.ethicspoint.com. This hotline is operated by a third party vendor. You may reveal your identity if you choose to, but you are not required to do so, in order to file a report regarding an issue that causes you concern.

CORE VALUES

HONESTY: You are known for candor, authenticity, transparency and treating people with respect

You debate constructively, speak to people directly to resolve issues and are willing to have difficult conversations in the spirit of mutual trust and benevolent intent.

ACCOUNTABILITY: You take responsibility for results and learn from experiences

You are willing to make tough decisions and take smart risks. You don't deflect responsibility or finger-point. You are proactive, learn from mistakes and own results completely.

AGILITY: You are curious, proactive, innovative and strive to improve everyday

You keep us nimble by minimizing complexity and taking action, challenging the status quo and finding better solutions to continuously improve our outcomes.

COLLABORATION: You focus on innovating together and extend your efforts beyond your role

You listen well, compromise and are considered a great partner. The sum of joint efforts leads to superior results and you always maintain a safe and secure environment.

COMPASSION: You act in the best interest of your co-workers, partners and customers

You are kind and care about the well-being of everyone that you work with and for. You stay calm, show respect and foster a sense of belonging for all.

GUIDING PRINCIPLES

Our behavior will be guided by the principle that all patients, colleagues, providers, and visitors deserve to be treated fairly with respect and consideration.

OUR customers are our lifeblood

Exceed our customers' expectations and they will grow with us

OUR shareholders have placed their trust in us

Create value in everything we do

OUR people are our company

Develop our people's abilities and use their talents productively

OUR colleagues depend on us

Support each other so we can all be effective together

OUR vendors are our partners

Help our vendors succeed and they will help us succeed

We impact our communities

Improve our communities through responsible and caring leadership

PATIENT AND CUSTOMER INTERACTION

We treat all patients and customers with dignity, compassion and respect while providing cost-efficient, quality services that are medically necessary, timely, and appropriate. We will not discriminate on the basis of age, gender, disability, race, religion, national origin, sexual orientation, gender identity, or ability to pay in our interactions with patients and customers. We are accountable for the quality and integrity of the services we provide. This obligation includes maintaining individual

competence in judgement and performance and striving to safeguard patient and customers from incompetent or illegal practice by others. We maintain strict confidentiality of patient and customer information and test results. We safeguard the dignity and privacy of patients and customers and provide accurate information to other professionals about the services we provide.

PATIENT CONFIDENTIALITY AND PRIVACY

We respect and strive to protect each patient's personal privacy and preserve the confidentiality of our patients' information. We make every effort to comply with all laws and regulations related to the privacy and security of patient information, including the Health Insurance Portability and Accountability Act of 1996 ("HIPAA").¹ Patients may find our Notice of Privacy Practices posted in each patient service center and on our corporate website, www.healthnetworklabs.com. We will also provide a copy of our Notice to a patient upon request. HNL has developed policies and procedures to safeguard patients' protected health information, and we endeavor to comply with these policies and procedures.

²We will not share patients' protected health information without their permission, except when authorized or required by law. We will not discuss patient information with co-workers, except when necessary to perform our jobs. We will not discuss patient information where it may be overheard by others, and we will not leave written patient information where the public or other patients might see it. **When you complete annual compliance training each year, you sign a Confidentiality Statement acknowledging that you understand what is expected of you in this regard and you will act in accordance with these expectations.**

WORKPLACE CONDUCT AND EMPLOYMENT PRACTICES

Statement of Philosophy on Diversity

HNL is committed to fostering, cultivating and preserving a culture of diversity and inclusion. We strive to attract, develop, and retain a diverse and inclusive workforce. By seeking top talent across a broad spectrum, we aim to ensure that we have the best people to help us reach our business goals.

Our human capital is the most valuable asset we have. The collective sum of the individual differences, life experiences, knowledge, inventiveness, innovation, self-expression, unique capabilities, and talent that our employees invest in their work represents a significant part of not only our culture, but our reputation and achievements as well.

We embrace, appreciate, and respect our employees' differences in age, color, disability, ethnicity, family or marital status, gender identity or expression, language, national origin, physical and mental ability, political affiliation, race, religion, sexual orientation, socio-economic status, veteran status, and other characteristics that make our employees unique.

HNL is an organization committed to core values such as, respect, integrity, and honesty. A key element of respect is rewarding competency, performance, and character. Individuals must be judged by their personal merits, not their membership in any group. Fairness is the cornerstone of who we are.

HNL's diversity initiatives are applicable—but not limited—to our practices and policies on recruitment and selection; compensation and benefits; professional development and training;

promotions; transfers; social and recreational programs; layoffs; terminations; and the ongoing development of a work environment built on the premise of equality that encourages and enforces:

- Respectful communication and cooperation between all employees.
- Teamwork and employee participation, permitting the representation of all groups and employee perspectives.
- Employer and employee contributions to the communities we serve to promote a greater understanding and respect for diversity and equality.

All employees of HNL have a responsibility to treat others with dignity and respect at all times. All employees are expected to exhibit conduct that reflects and fosters inclusion during work, at work functions on or off the work site, and at all other company-sponsored and participative events.

All employees are required to attend and complete periodic diversity awareness training to enhance their knowledge to fulfill the foregoing responsibilities.

Any employee found to have exhibited any inappropriate conduct or behavior against others may be subject to disciplinary action, up to and including termination of employment.

Employees who believe they have been subjected to any kind of discrimination that conflicts with HNL's diversity policy and initiatives should seek assistance from a supervisor or an HR representative.

Diversity and Equal Employment Opportunity

³HNL promotes an equal opportunity workforce and does not discriminate on the basis of race, color, religion, sex, national origin, age, disability, sexual orientation, gender identity, or gestation (pregnancy) with regard to any offer of employment, termination of employment, or condition of employment. We are committed to providing an inclusive work environment where everyone is treated with fairness, collegiality, and respect. We hold ourselves accountable for the manner in which we treat one another and for the manner in which people around us are treated.⁴We will not tolerate harassment in any form, including offensive or inappropriate language, jokes, slurs, or intimidation. We are committed to recruit and retain a diverse staff reflective of the patients and communities we serve. Additionally, we are dedicated to uphold fair and consistent employment practices relating to benefits, compensation, promotions, education opportunities and leave status.

Health and Safety

We will comply with all legal requirements, HNL policies, and industry standards that promote the protection of workplace health and safety. ⁵If there is a serious workplace injury or any dangerous situation presenting a risk of injury, you should report the situation immediately so that timely corrective action may be taken to resolve it.

Drug Free Work Environment

We are committed to a drug-free work environment. ⁶Reporting to work under the influence of any illegal drug, having an illegal drug in your system, or using, possessing, or selling illegal drugs while on HNL work time or property, will result in immediate termination. We may use drug testing as a means of enforcing this policy. We also recognize that individuals might take prescription or over-the-counter medications, which could impair judgment or other skills required for job performance. If you have questions about the effect of such medication on your performance, or if you observe

someone who appears to be impaired while at work, you should immediately report your observations to your supervisor.

Ineligible Persons

⁷We will not contract with or employ an individual or entity who/that is excluded from or ineligible to participate in state or federal healthcare programs; suspended or debarred from federal government contracts; or has been convicted of a criminal offense related to the provision of healthcare items or services, nor will we bill for items or services rendered, ordered, or prescribed by those individuals or entities. We also will not contract with, employ or bill for services rendered by an individual or entity who/that has not been reinstated in state or federal healthcare programs after a period of exclusion, suspension, debarment or ineligibility. HNL routinely searches the Department of Health and Human Services Office of Inspector General's (OIG's), certain states', and others' lists of such excluded and ineligible persons and entities. An employee must notify Compliance Services immediately by calling 484-425-8150 if the employee becomes excluded, debarred, or ineligible to participate in state or federal healthcare programs; or has been convicted of or charged with a criminal offense related to the provision of healthcare items or services.

License and Certification Renewals

All colleagues in positions that require professional licenses, certifications, or educational credentials shall maintain their credentials in active status and shall comply at all times with federal and state requirements applicable to their respective disciplines.⁸To ensure compliance, we will require evidence that an individual's license or credential is in active status. We do not allow anyone to work without a valid, current license or proper credentials.

Environmental Compliance

HNL strives to comply with all environmental laws, regulations, and related hospital policies and operate with the necessary permits, approvals, and controls. We act to preserve our natural resources to the fullest extent reasonably possible. We maintain proper procedures to provide a clean environment of care and to prevent pollution.

⁹In order for HNL to comply with these laws and regulations, all colleagues must understand how their job duties may impact the environment, adhere to all requirements for the proper handling of hazardous materials, and immediately alert their supervisor to any situation involving the discharge of a hazardous substance, improper disposal of hazardous or medical waste, or any situation which may be potentially damaging to the environment.

Reporting Information Accurately and Completely

We are required to ensure all documentation is accurate and complete to facilitate ongoing compliance with laws, regulations, rules or accreditation standards. Failures could lead to temporary or permanent loss of approval to perform certain testing, loss of licensure, or other sanctions which could impact contractual obligations or result in termination of or the inability to establish contracts with payors, clients or other business partners. Healthcare is a highly regulated industry and HNL has frequent dealings with governmental agencies. These agencies include, but are not limited to, the Department of Health and Human Services, Centers for Medicare and Medicaid Services, Occupational Health and Safety Administration, Food and Drug Administration, Internal Revenue Service and related state and local agencies. We make every effort to comply with the regulatory and reporting requirements of all federal, state, and local agencies.

We are required to record, compile, maintain, and submit substantial information to these governmental agencies on a regular basis. Dishonesty could result in severe penalties, such as monetary fines, imprisonment, or exclusion from participation in state or federal healthcare programs. Therefore, we expect all colleagues who prepare information for and/or submit information to government agencies to do so in a diligent manner and with the highest degree of integrity.

When HNL is asked to provide documents or information to a government agency, it is our policy to fully cooperate, as required by law. Any request for documents or information received from a government agency must be immediately directed to your manager. Managers shall notify Compliance Services.

INFORMATION TECHNOLOGY AND COMPANY RESOURCES

Proprietary Information and Intellectual Property

Confidential information about HNL's business strategies and operations is a valuable asset. ¹⁰Colleagues shall not share this information with others unless the individual has a legitimate need to know this information and has agreed to maintain its confidentiality. Confidential information includes, but is not limited to, client lists and clinical information, pricing and cost data, employee lists, information pertaining to mergers and acquisitions, financial data, research data, strategic plans, marketing strategies, supplier information and proprietary computer software.

¹¹Colleagues shall protect HNL's copyrights, trademarks, and other intellectual property by complying with applicable policies and procedures. This obligation continues even after someone leaves HNL. Colleagues shall not enter into agreements relating to HNL's intellectual property without proper approval. HNL also strives to comply with all intellectual property laws and not infringe upon the intellectual property rights of others.

Retention and Disposal of Documents and Records

HNL is responsible for the integrity and accuracy of its documents and records to provide quality services, comply with regulatory and legal requirements, and to ensure that records are available to defend business practices and actions. HNL is committed to retaining protected health information and legal records for as long as they may be potentially useful for business purposes or as required under applicable laws or regulations. ¹²Medical and business documents include paper documents, such as letters and memos; computer-based information, such as e-mail or computer files on disk or tape; and any other media that contains information about HNL or its business activities. Colleagues shall not alter or falsify information in any record or document. Colleagues also shall not tamper with records or remove or destroy them prior to the specified destruction date, or in an attempt to prevent appropriate authorities from reviewing the information for a government or internal investigation or audit.

Personal Use of Company Resources

We are responsible for preserving HNL assets, including time, materials, supplies, equipment and information, and maintaining them for business-related purposes. As a general rule, personal use of any HNL assets without prior supervisory approval is prohibited. The occasional limited use of items or equipment, such as copiers or telephones, where the cost to HNL is insignificant, is permissible.

However, the use of HNL resources for personal gain unrelated to HNL business is strictly prohibited, and the use of HNL resources for any community or charitable event or purpose must be approved in advance by your supervisor.

All computers and communication systems, including computer files and drives, electronic mail, Intranet service, Internet access, and voicemail, are HNL property and will be used primarily for business purposes. HNL will permit very limited and reasonable personal use of computers and communications systems, but, when doing so, you should be aware that any HNL electronic mail and other communications are considered to belong to HNL and are not considered to be private. HNL reserves the right to periodically access, monitor and disclose the content of computer files and drives, e-mail and voicemail messages.

BUSINESS RELATIONSHIPS

Conflicts of Interest

HNL is committed to remaining free of conflicts of interest, when possible, and appropriately managing any potential conflict of interest. Conflicts of interest may arise in a variety of situations. A conflict of interest, or even the appearance of a conflict, may occur if outside activities or personal interests influence or appear to influence one's ability to make objective decisions while conducting business. Outside activities that require, or appear to require, so much of one's time that his or her professional duties are negatively impacted may also cause a conflict of interest. Conflicts of interest may also arise when an HNL colleague or family member receives improper personal benefits as a result of his or her position in our network.

You must immediately disclose any **potential** conflict of interest involving yourself or an immediate family member to your supervisor or by completing the conflict of interest questionnaire available online at hnlconflictofinterest.ethicspoint.com. You should not make a decision on your own regarding whether your personal situation constitutes an actual conflict of interest. You must disclose any POTENTIAL conflict.

Relationships with Subcontractors and Suppliers

HNL manages our consulting, subcontractors, and supplier relationships in a fair and reasonable manner, free from conflicts of interest, and consistent with applicable laws and good business practices. We promote competitive procurement to the extent it is feasible. Our selection of consultants, subcontractors, suppliers, and vendors is made on the basis of objective criteria including quality, technical excellence, price, adherence to schedules, service, and maintenance of adequate sources of supply. Our purchasing decisions are made based on the supplier's ability to meet our needs, rather than on personal relationships.

We employ ethical standards in business practices in source selection, negotiation, determination of contract awards, and the administration of all purchasing activities. We also comply with contractual obligations to not disclose vendor confidential information, unless permitted under the contract or otherwise authorized by the vendor.

Interactions with Referral Sources

HNL is committed to conducting all business in a compliant manner. Federal and state laws, including the federal Anti-Kickback Statute, prohibit direct, indirect or disguised payments (in the form of a cash payment, gift, contribution or other compensation) or **anything** of value in exchange for referrals of business.

No one affiliated with HNL shall provide, or offer to provide, any payment or incentive (i.e., anything of value) – monetary or other – to any individual or entity as a way of increasing volume of referrals. Any compensation arrangement with a physician or other healthcare professional must be in the form of a written contract that is executed and maintained in accordance with federal, state and local laws, as well as applicable HNL policies.

HNL shall not offer or accept payment or anything of value (i.e., items or services) in exchange for referrals of business. All referrals must be made solely on the basis of what is in the patient's best interest and in accordance with all applicable laws and regulations.

Accepting and Giving Gifts

No one to whom this code applies shall offer or receive gifts as bribes or kickbacks or in exchange for, or as a reward for, business referrals. Cash or a cash equivalent (e.g., gift card) should never be offered to or accepted from referral sources. When giving or receiving gifts to or from potential referral sources, the value must be minimal enough so as to avoid being, or even appearing to be, improper. Gifts may only be given or received in full compliance with HNL policies and procedures.

All employees and representatives of HNL should fill out the Gifts, Gratuities, and Non-Monetary Compensation Disclosure form available online at hnlnonmonetarydisclosure.ethicspoint.com for the following reasons:

- A Business contact has offered an item, meal or entertainment that exceeds the value guidelines in the HNL Business Ethics and Vendor Relationship Policy.
- Whenever providing non-monetary compensation to physicians who are employed by HNL or their immediate family member, employed physicians who receive non-monetary compensation outside of a bona fide employment benefits and other referral sources/entities.
- When conducting business with a government official, including but not limited to employees of state-owned business enterprises, any time you are considering or proposing to offer or give that individual anything, regardless of form or value, prior to making the offer or giving the item.

Political Relations

Local, state and federal laws govern contributions made by organizations to political parties. As an organization, HNL does not participate in any political campaign on behalf of, or in opposition to, any candidate for public office. To ensure compliance, all efforts to influence legislative and regulatory matters related to local, state, or federal levels of government, as well as any other non-lobbying contact with political officials or candidates, must be pre-authorized by, or coordinated through, HNL Compliance Services.

No colleague should be forced, directed, or in any way urged to make a political contribution by a supervisor or fellow colleague. It is each colleague's right to decide whether or not to participate in political and community activities. Decisions by our colleagues regarding whether to contribute their own time, money, or resources to any political or similar activity, shall be entirely personal and voluntary.

Marketing and Advertising Practices

Consistent with laws and regulations that govern such activities, HNL may use marketing and advertising activities to educate the public, provide information to the community, increase awareness of our services, and to recruit colleagues. To ensure an accurate depiction of the

services available to current and prospective patients, we are committed to maintaining truthful and unambiguous representations and descriptions of clinical services through all communications, including advertising and marketing.

Billing Practices

HNL is committed to accuracy in billing and coding practices and to compliance with all governmental and third-party payer requirements. ¹³We shall not knowingly allow anyone to present or cause to be presented any false, fictitious or fraudulent claims. Documentation in laboratory information systems must be accurate and complete. All claims for payment must be for services actually rendered and must be supported by adequate documentation obtained from the ordering provider. Inaccuracies in claims that are identified after submission must be immediately reported to a manager or to Compliance Services, so that corrective action may be taken.

RESEARCH, INVESTIGATIONS AND CLINICAL TRIALS

HNL follows the highest ethical standards in full compliance with federal and state laws and regulations in all human subject research projects supported by our staff. We do not tolerate research misconduct, such as fabricating or changing results, copying results from other studies without performing the clinical investigation or research, failing to identify and appropriately manage investigator or institutional conflicts of interest, or proceeding without Institutional Review Board (IRB) approval. Our first priority is always to protect patients and human subjects and respect their rights during their participation in human subject research projects.

HNL colleagues who participate in research of any type must follow all applicable federal, state, and institutional research policies and maintain the highest standards of ethics and accuracy in any written or oral communications regarding the research project. As is true for all accounting and financial record-keeping, HNL's policy is to submit only true, accurate, and complete costs related to research activity. All human subject research must be submitted to, and approved by, an IRB and conducted in accordance with established HNL policies.

DUTY TO REPORT SUSPECTED VIOLATIONS

Illegal acts or improper conduct may subject HNL to severe civil and criminal penalties, including large fines and being barred from certain types of business. ¹⁴Any colleague who becomes aware of a violation or suspected violation of any of the laws or regulations that apply to our operations has a duty to report such violation or suspected violation immediately to their immediate supervisor or Compliance Services. Reporting a concern directly allows the investigator to obtain additional information, if needed. However, if you are not comfortable reporting your concern directly, you may report anonymously through the Compliance Hotline (EthicsPoint), either by phone or via the internet. (See below.)

A report of a suspected violation may be made in person, by phone, or in writing, to:

A supervisor or department manager

Compliance Department:	484-425-8008/5736 or compliance@hnl.com
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Compliance Hotline (EthicsPoint):	844-675-7684 or www.healthnetworklabs.ethicspoint.com
Vice President, Human Resources:	484-425-5523

All reports of suspected violations of law, this Code, HNL policies, or ethical standards will be promptly investigated. Anyone involved is expected to cooperate with these investigations. It will be considered a violation of this Code to prevent, hinder, or delay discovery and full investigation of suspected violations.

Talking It Through

There are countless examples of ethical and legal problems and dilemmas that can arise in the workplace. When deciding how to best manage these situations, colleagues are encouraged to seek guidance from Compliance Services.

When making a difficult decision, seeking input from others is more likely to result in a reasonable solution. When you keep an ethical dilemma to yourself and struggle to address it alone, the outcome is likely to be less than optimal. Do not hesitate to call on those who are here to help you.

Adherence to all laws, regulations, and policies that apply to what we do each day at HNL requires constant diligence. That is why it is important for each of us to know and understand the laws, regulations and policies that are fundamental to our duties and to seek guidance when the path to the right decision is not clear.

The well-being of our organization and those within it requires each and every one of us to make a personal commitment to always do what is right. We must never compromise our ethics in order to meet business objectives. This commitment will help ensure the continued success of HNL and foster a working environment that conveys pride and enthusiasm.

CONFIDENTIALITY AND NON RETALIATION

HNL makes every effort to maintain, within the limits of the law, the confidentiality of any individual who reports a concern or potential misconduct. If a colleague reports an actual or potential compliance issue in good faith, no discipline or retribution shall be taken or threatened against the individual in retaliation for making the report.

INVESTIGATION AND ENFORCEMENT

HNL is committed to ensuring that all reported compliance concerns will be investigated promptly and confidentially protected to the extent possible. Compliance and Human Resources are often involved in these investigations, and all colleagues are expected to cooperate fully in any such investigation.

If a concern is substantiated, it will be determined whether the violation resulted in a problem that requires remedial or corrective action. Such corrective action may include education, modifying policies and/or procedures, enhancing monitoring of existing processes, disciplinary action, or other action necessary to detect similar non-compliant conduct and prevent it from occurring in the future. The corrective action(s) will be documented, and implementation of the action(s) will be confirmed. If the violation resulted in receipt of any overpayments, HNL will report and refund such overpayments, as required by law.

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- ¹ Notice of Privacy Practices (Privacy Policy)
 - ² Social Media Participation (HR Policy)
 - ³ Equal Employment (HR Policy)
 - ⁴ Harassment (HR Policy)
 - ⁵ Workers' Compensation (HR Policy)
 - ⁶ Substance Abuse and Possession for Cause Testing (HR Policy)
 - ⁷ Compliance Background Investigation (Compliance Policy)
 - ⁸ Validation Licensure Certification Registration Credentialing (HR Policy)
 - ⁹ Waste Management Program (Safety Policy)
 - ¹⁰ HIPAA-Confidentiality (Privacy Policy)
 - ¹¹ Intellectual Property (Marketing Policy)
 - ¹² Record Management (Laboratory Operations Policy)
 - ¹³ False Claims and Fraud Prevention (Compliance Policy)
 - ¹⁴ Compliance Hotline (Compliance Policy)

Approved by Compliance Committee 9/2020