RestorixHealth®
Excellence in Wound Care

Corporate Code of Conduct and Ethics

Reviewed and Revised
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Submitted by:

Christina Peterson

Chief Compliance Officer

Our mission is simple…to restore health and improve the quality of life – and access to care – for patients with wounds.

MESSAGE FROM THE CEO

The mission of RestorixHealth is not just important, it's exceptional. Our core values are bold and honorable. For our mission to be achieved and for our core values to become our truth, we must commit each day to creating a culture where we collectively uphold the highest ethical standards during the conduct of our business operations.

This Code of Conduct and Ethics (our Code) is a guide for each of us as we strive to maintain this commitment. Our Code is a foundational part of our overall Corporate Compliance Program which further guides our compliance with all applicable regulatory requirements. Our leadership is committed to provide you with ongoing education, training, and coaching sessions you need to understand your compliance obligations.

While our Code and Compliance Program aims to support and guide us through potential problems, it is impossible to capture every scenario you may encounter. Please take the time to become familiar with your responsibilities and ask questions if you are unsure.

As a representative of RestorixHealth, you have an obligation to report any observations of conduct which might be deviating from our commitment to compliant and ethical behavior. We offer several different options for reporting concerns or observations including talking with your supervisor, calling the anonymous hotline 1-888-475-8376, filing online through EthicsPoint, or by emailing RXH.compliance@restorixhealth.com. We are expected to lead by example and align our day-to-day decisions to the standards of good faith and sound judgment.

Thank you for continuing to provide care in an environment where people love to work and where patients come to receive the best care.

Sincerely,

Todd Newton
Chief Executive Officer

PASSION CARING COLLABORATION EMPOWER INTEGRITY EFFICIENCY EXCELLENCE

Overview

RestorixHealth and its subsidiaries (collectively, the "Company") is proud of its business conduct and reputation in the health care field. Each employee (including directors and management personnel), agent, and medical staff member (collectively "Company Associates") and independent contractors are expected to adhere to this high standard of conduct whenever he or she acts on behalf of RestorixHealth, whether in dealings with hospital representatives, patients and their families, physicians, vendors, government regulators or the public. Violations of legal or ethical requirements jeopardize the welfare of the Company and its reputation within the healthcare community.

The Company's Directors have adopted this Code of Conduct and Ethics (the "Code"), which is intended to define the conduct expected of Company Associates and Independent Contractors, to emphasize and enhance a culture that values compliance. The basic principles by which we try to conduct our business are simple: Every employee and independent contractor should (1) comply with all applicable laws and regulations and (2) adhere to the highest ethical standards. These principles are at the heart of our Code, which is a central component of our Compliance Program.

If you have a suggestion for improving the Compliance Program or any compliance policy, please let your supervisor, manager, any member of the management team or the compliance team know. We strongly encourage you to think of ways to make the Compliance Program better and more effective.

Code of Conduct and Ethics

This Code contains the basic ethical rules and general standard of conduct that applies to all Company Associates and Independent Contractors. There may be times, though, when you face a situation that is not specifically covered by the Code. The complex challenges we face in the health care arena are not always easily categorized, and you may find that you need assistance in addressing a specific issue related to compliance. When you are faced with a potential compliance issue, please reach out to the many resources that are available and allow us to assist you. You are encouraged to consult with your supervisor or manager for clarification or guidance about what actions to take. If you do not feel comfortable approaching your supervisory or manager, you may also contact the Compliance Officer, a member of the Compliance Committee, or RestorixHealth management. Alternatively, if you prefer to report an issue or concern anonymously, you may call the Compliance Hotline at 1-888-475-8376 or submit online EthicsPoint. We will use all efforts to ensure that questions and issues brought to the attention of the Compliance Officer directly or through the Compliance Hotline will be kept confidential and that no adverse action will be taken against you for asking questions or raising good faith concerns about possible improper conduct or what is required by our Compliance Program Policies and Procedures.

All company associates and independent contractors are responsible for following the policies in the Code and for seeking guidance and direction when necessary. Many of the issues described in the Code are broad and complex, and additional, more specific guidance will be provided in the Compliance Program Policies and Procedures, with which you should familiarize yourself.

Your responsibilities:

Know the Code of Conduct and Ethics

It is your responsibility to read and become familiar with the Code and how it applies to your job responsibilities. You will be required to acknowledge upon hire and annually thereafter that you have received, read, understand, and will comply with the Code by completing the Code of Conduct and Ethics Attestation Form, which will be kept on file with Human Resources.

Comply with All Legal and Regulatory Requirements

Company Associates and Independent Contractors must strictly observe every local, state and federal law, and regulations that apply to the Company and/or Hospital under contract with RestorixHealth, including the Anti-Kickback Statute and Physician Self-Referral Law (commonly referred to as the "Stark Law"). The Company will not pursue or condone any course of action involving a violation of these requirements. Company Associates and Independent Contractors are expected to be familiar and act in accordance with laws, regulations and RestorixHealth's Compliance Program Policies and Procedures, including the Code of Conduct and Ethics.

Company Associates and Independent Contractors can learn the laws and regulatory requirements that apply to their work by attending in-services or external training programs, consulting managers and supervisors, reviewing Company policies or asking questions of the Compliance Officer. Company Representatives are expected to use such resources whenever they require assistance in understanding their legal obligations. Attendance at Company provided new hire and annual compliance training is mandatory.

Keep Accurate Records

Company Associates and Independent Contractors are expected to comply with the contracted hospital and governmental requirements regarding recordkeeping, as well as the Company's Document Retention Policy (Policy Number 006). All records and reports, including data quality, safety, personnel, and financial records, are to be prepared accurately and retained in accordance with applicable requirements. All communications, whether within the Company or to outside facilities, must be truthful. Records include essentially everything you produce as an employee regardless of format. A record may be in the form of paper, a telephone message, computer disk, email, or voicemail. The failure to maintain accurate books and records may expose RestorixHealth and its employees to civil, criminal, or other penalties. You must not intentionally enter, record, or report false, misleading, or inaccurate information.

Whenever it becomes apparent that documents of any type will be required in connection with a lawsuit or government investigation, all possibly relevant documents should be preserved, and disposal or alteration of documents pertaining to the subjects of the litigation or investigation should be immediately suspended.

Alterations of records and other misrepresentations are prohibited including, but not limited to:

- Submitting orders for supplies/services not meeting medical necessity.
- Altering medical records, Detailed Written Orders (DWO), or delivery tickets.
- Manipulating a patient's diagnosis in an attempt to receive improper payment.

- Inappropriate use of place of service codes.
- Falsification of any documentation.
- Misrepresentation your status as an agent or representative of Medicare.
- Resubmission of denied claims with inaccurate information.
- Manipulating or misrepresenting records and/or information during internal and/or external audit activities.

Behave Ethically

Every Company Associate and Independent Contractor is expected to adhere to high ethical standards when they act on behalf of the Company. The Company expects each Company Associate and Independent Contractor to recognize and avoid activities and relationships that involve or might appear to involve conflicts of interest or compromise their integrity. Do not be pressured. You are never expected to violate a law, policy, or ethical standard. You should never be encouraged or pressured to do so, even if the violation would improve financial performance or help meet a financial goal. All Company Associates and Independent Contractors must adhere to the Conflict of Interest and Duality Guidelines Policy and complete an attestation yearly in RXH L.I.V.E. (Policy Number COMP-1015). You should always act with integrity.

Prohibited conduct includes but is not limited to:

- Interfering or misrepresenting relevant details during an investigation and/or audit, whether internal or external.
- Misrepresentation, signing, alteration, and falsification of Detailed Written Orders (DWO) by any individual other than the authorized practitioner.
- Persuasion and urging authorized persons to order equipment or supplies exceeding or not meeting medical necessity for patients.
- Ordering and delivering items requiring written orders from authorized practitioners prior to receiving a written order.
- Obtaining and submitting orders from a facility that is owned by the employee or an employee's relatives without Company's prior written consent.

Respect Diversity

Most of us now live and work among people of differing cultural backgrounds, lifestyles, and world views. Respect for diversity and the uniqueness of everyone is a fundamental part of (a) maintaining a respectful and productive work environment and (b) serving a diverse customer base.

We hire and promote people on the basis of their qualifications, performance and abilities. We make sure that all employees and applicants for employment have equal opportunities for success. All Company Associates and Independent Contractors must abide by the rules, regulations, and policies of equal employment opportunity. Equal opportunity affects all employment practices. Please refer to the company's Human Resources policies (Policy Number 105) for details.

Company Associates and Independent Contractors who consider themselves to be victims of discrimination may file a grievance in writing with Human Resources of the alleged discrimination. If you choose to file a complaint with the Company, you do not lose your right to file with an outside enforcement agency.

Discriminating against or harassing a co-worker based on any of the following characteristics may be against the law and will not be tolerated: race, color, religion, sex, national origin, age, pregnancy, citizenship, disability, marital or familial status, sexual orientation, military or veteran status, size, gender identity, physical appearance, HIV status, ancestry, genetic predisposition, or family responsibilities. RestorixHealth treats harassment and discrimination as a form of misconduct, and sanctions will be enforced against individuals engaging in such behavior. State or local law may prohibit discrimination or harassment based on other characteristics, as well. We at RestorixHealth recognize that our strength lies in the talents of our people, and RestorixHealth is committed to providing all employees with a healthy, safe, and productive work environment.

Maintain a Healthy and Safe Environment

Maintaining a safe and sustainable environment both inside and outside the workplace is vital to the health and well-being of us all. Hazardous chemicals, for example, may not only be harmful to those who mishandle them, but also to those affected by them due to improper disposal or handling.

We strive to provide a safe working environment for our employees and to meet or exceed the standards of all applicable laws and regulations governing workplace safety, health, and the environment. You should be familiar with our emergency-preparedness plans to carry out your responsibilities and assist in implementing the necessary emergency response.

You should never be asked to do something that is either harmful to your health or the health of another person, or that is against applicable environmental laws. If you are asked to do something of this nature, do not comply and report it immediately.

Don’t Abuse Alcohol or Drugs

We are committed to protecting the health and well-being of all our employees by providing a safe and drug-free environment. We require our employees to be free of any measurable amounts of illegal drugs or alcohol in the workplace. Employees are not permitted to drink alcoholic beverages during work hours or on our premises, except at business meals or when served at events that we sponsor.

Don’t Tolerate Workplace Violence or Harassment

Violence, threats, harassment, intimidation, and other disruptive behavior in our workplace will not be tolerated; that is, all reports of incidents will be taken seriously and will be dealt with appropriately. Such behavior can include oral or written statements, gestures or expressions that communicate a direct or indirect threat of physical harm. We will not tolerate sexual advances, comments or other conduct that creates an intimidating or offensive environment, nor will we tolerate racial or religious slurs or other remarks, jokes or conduct that encourages an offensive working climate. Individuals who commit such acts may be removed from the premises and may be subject to disciplinary action, criminal penalties, or both.

We show proper respect and consideration to one another, regardless of position. Discriminatory treatment and harassment of any kind will not be tolerated. For more detail, refer to Policy Number 708.

Follow Rules Regarding Political Activity

While the right to free speech is at the core of our political system, the right to make political contributions and lobby government officials is heavily regulated by federal and state laws. Both our organization and you as an employee are subject to complex rules, including rules specifying the amount of, and way in which, contributions may be made. It is important to keep separate personal political activities from RestorixHealth activities.

The rules regarding political activity can be summarized as follows:

- We recognize your right to vote and be politically active on your own behalf, on your own time and using your own resources;
- Only our designated representatives may speak on the organization's behalf about politics and related matters, provided that the Compliance Officer has given prior written approval;
- Never use our organization's funds or resources for political activities, even if those funds are reimbursed; and
- You should never feel pressured to make a political contribution or to vote in a certain way by anyone working for us or on our behalf.

Obey Anti-Competitive Rules and Regulations

"Antitrust" laws are intended to promote competition in the marketplace for the benefit of consumers. These laws target the following anti-competitive practices:

- Agreements between competitors (a) to set prices or terms; (b) to allocate markets, customers or territories; or (c) to not do business with ("boycott") certain suppliers or customers;
- Agreements between manufacturers and distributors that the distributors may sell only in certain territories or to certain types of customers;
- Agreements between suppliers and customers to (a) set resale prices; (b) require a customer to buy all of its requirements from one supplier; (c) "tie" a customer's purchase of a desirable product/service to the purchase of a less desirable product/service; and certain predatory practices by companies with monopoly power in their markets.

As such, RestorixHealth's employees should obey all antitrust law. For example, RestorixHealth employees should not agree or attempt to agree with a competitor to artificially set prices or salaries; or divide, restrict, or block market competition. All antitrust concerns should be brought to the attention of the Compliance Officer immediately, as violations of these laws can result in criminal as well as civil liability.

Don't Engage in Fraud, including Bribery and Kickbacks

Employees may not give anything of value directly or indirectly, through agents or third parties, to a customer or supplier as an inducement to obtain business or favorable treatment. Nor may employees give anything of value to public officials as an inducement to have a law or regulation enacted or defeated, or for the award of business. Know and follow RestorixHealth's Marketing to Business Sources policy (Policy Number COMP-1011).

Likewise, employees may not accept anything of value either for themselves or for others in return for favorable treatment from customers or suppliers. All contacts and dealings with customers and suppliers must be conducted with integrity to avoid even the appearance of impropriety.

RestorixHealth does not tolerate fraud and is committed to the rigorous investigation of any suspected cases of fraud. Should any Company Associates or Independent Contractor believe they have good reason to suspect a colleague or other individual is engaged in fraud or an offense involving RestorixHealth or a serious infringement of RestorixHealth's Code of Conduct and Ethics, they should report such unethical action to the Compliance Officer. Please refer to RestorixHealth's Compliance Program Policies and Procedures for more information.

Avoid Conflicts of Interest

A conflict of interest is a situation in which you have a personal or private interest that interferes with (or appears to interfere with) your ability to do your job fairly and ethically. Our policy regarding conflicts of interest is simple:

Do not compete with our organization, and never let business dealings on behalf of the organization be influenced (or appear to be influenced) by personal or family interests.

Conflict-of-interest issues typically arise in these settings:

- Receiving gifts or favors from a customer or supplier;
- Participating in activities that compete with our organization;
- Allowing family or personal relationships to influence your business judgment; and
- Giving or offering gifts or favors to government employees.

We believe that all Company Associates owe a duty of loyalty to RestorixHealth. Therefore, all Company Associates and Independent Contractors should avoid any actual or apparent conflicts of interest. Directors and officers must disclose any material transaction or relationship that could reasonably be expected to give rise to a conflict of interest. Company Associates and Independent Contractors must not use their official positions to influence a business decision in which they know, or have reason to know, that they have a financial interest. Accepting or giving a gift can appear to be an attempt to improperly influence the recipient, and as such, Company Representatives may not accept or receive gifts or business courtesies. By exercising reasonable judgment and common sense, with respect to gifts, you will avoid situations that might bring you or our integrity into question. All Company Representatives must adhere to the Conflict of Interest Policy (Policy Number COMP-1015) and complete an attestation annually.

Maintain Confidentiality of Patient Records

Every employee is expected to maintain the confidentiality of patient records and information to the full extent of the law. Confidential patient information may be provided only to employees who need to know the information to perform their business duties. Confidential patient information may be distributed to outsiders only when and as required by law. Please refer to the company's HIPAA Privacy Policies for details or contact the Company's Privacy Officer.

Comply with all Marketing Rules and Regulations

RestorixHealth conducts its marketing activities in an honest, trustworthy, and ethical manner. All marketing will be presented in a fair manner and will not be deceptive, misleading, or likely to be misled. When providing information about our services, we shall communicate clearly and accurately. We shall take necessary measures to ensure that all marketing activities conform to the requirements of applicable federal and state law. Company representatives should familiarize themselves with all applicable marketing policies and procedures, including the Marketing to Business Sources Policy (Policy Number COMP-1011) regarding marketing to business sources.

Employees are prohibited from engaging in any marketing program not approved by the Company. This includes but is not limited to:

- Telemarketing or directly soliciting Medicare beneficiaries.
- Joint ventures between parties, one of whom can refer Medicare or Medicaid business to the other, other than as specifically authorized under law.
- Onboarding any facility furnishing services to patients that is owned by the employee or an employee's relatives.

Respond Appropriately to Government Inquiries

Various external organizations may contact individuals associated with RestorixHealth to initiate a compliance-related inquiry. We will comply with lawful and reasonable requests or demands made as part of a government investigation. We will cooperate with government investigations and will provide truthful responses to government inquiries. At the same time, it is imperative that we protect the rights of RestorixHealth and its personnel. Both RestorixHealth and its employees have the right to be represented by legal counsel during any government inquiry. That means that Company Associates have the right to have an attorney present during questioning, whether that questioning occurs at work or away from work. Consulting with an attorney does not mean the individual is unwilling to cooperate. If you receive an inquiry, visit, subpoena, or other legal documents from a government agency, at home or at work, regarding RestorixHealth business, are contacted by a third party in connection with a government investigation, or you learn of a government investigation, immediately notify your supervisor or manager and the Compliance Officer.

It is illegal to give anything to a government official or employee to influence that government official or employee to use his or her government position and power to help RestorixHealth. Not only must we refrain from this activity, but we must also avoid the appearance of inappropriate influence. Company Associates and Independent Contractors may not buy lunches, give gifts, or do anything that directly or indirectly benefits government officials as it relates to a RestorixHealth matter.

Refrain from Misrepresentations

Honesty is the cornerstone of ethical disclosure of information. Company Associates and Independent Contractors shall be honest and make no misrepresentation or dishonest statements in conducting Company business. Company Associates and Independent Contractors must report and record all information accurately and honestly whether on marketing materials, patient records, requests for payments, timesheets, clinical research records or otherwise.

Internal Audit

Bound by strict compliance to auditing procedures, the role of internal audit is to assess whether the risk management, quality assurance, internal controls, and oversight, as designed and implemented by management, are effective and ensure:

- Appropriate risks are identified and managed.
- Relevant regulatory guidelines impacting business operations are recognized and addressed.
- Significantly relevant operating information available accurately reflects proper procedures, is reliable, and made available timely.
- Company Associates and all other representatives of the Company perform their jobs in compliance with relative policies, procedures, and applicable laws and regulations.

Internal Audit holds the authority to have unrestricted access to records, property and Company Associates. The auditor(s) reserves the right to allocate resources, prescribe time-frames, subjects, define scope of work, and apply any other techniques necessary to accomplish audit objectives. Company Associates and Independent Contractors are required to assist internal audit exercises in areas under their responsibility. As such, Company Associates and Independent Contractors who interfere with audit procedures by altering documents, coaching, or providing misleading information in an attempt to change the outcome of the audit findings will not be tolerated and will be subject to progressive disciplinary action, leading up to termination.

Internal Audit is not authorized to perform operational duties outside of the scope of the Internal Audit department. This includes creating/implementing internal controls, preparing documents or records, or engaging in any activity that could compromise audit integrity or impair auditor judgment.

Avoid Theft and Misuse of Company Assets

Company Associates and Independent Contractors must not take, convert, consume, or use property or funds belonging to the Company, client or any company private person for personal use without the owner's written consent or proper authorization. Company assets, intellectual property, and other proprietary information are not to be used within any circumstance or associated activity outside of your role with RestorixHealth.

Under no circumstances are you allowed to use Company assets, including company-issued electronics in a manner that is contrary to our policies or is connected to inappropriate, offensive or sexually explicit material.

Comply with Software Copyright Rules

Unauthorized duplication of copyrighted computer software violates the law and is contrary to our organization's standards of conduct. We disapprove of such copying and recognize the following principles as a basis for preventing its occurrences:

- We will neither engage in nor tolerate the making or using of unauthorized software copies under any circumstances.
- We will provide legally acquired software to meet the legitimate software needs in a timely fashion and in sufficient quantities for all our computers.
- We will comply with all license or purchase terms regulating the use of any software we acquire or use.

- We will enforce reasonable internal controls to prevent the making or using of unauthorized software copies, including effective measures to verify compliance with these standards and appropriate disciplinary measures for violation of these standards.

Secure Company Data, Physical Assets and Facilities.

Ensuring the proper privacy and security of data, physical assets and facilities is the responsibility of every Company Associates and Independent Contractors. Everyone must understand and comply with the acceptable use of these assets. Not only is it critical to maintain security within a Company or hospital client facility, but security needs to be extended to those remote situations such as in a mobile or telecommuting environment. Maintaining complex and unique passwords to each system while never sharing your passwords with others is essential. Any situation where a security incident is witnessed must be reported to your manager, IT Security Officer, the Privacy Officer or Compliance Officer immediately to help mitigate the incident. Company Representatives need to adhere to all IT Security and HIPAA Security policies.

Report Possible Violations

As a Company Associates and Independent Contractors, if you observe or have information about events or behaviors that you believe are unethical, illegal, against policy or against prescribed protocol, it is your duty and obligation to report such concerns. Every Company Associate or Independent Contractor must report any possible violations of law or ethical standards in accordance with procedures identified in the Corporate Compliance Program. Specifically, you should report known or suspected compliance issues to the anonymous Compliance Hotline, at 1-888-475-8376 or to the Compliance Officer. You may also report any suspected violations via the Hotline Web Site: EthicsPoint . These resources have been put in place to help us meet our compliance obligations. As such, do not hesitate to ask for assistance. RestorixHealth will not tolerate any intimidating or retaliatory act against an individual who, in good faith, makes a report of practices which he or she believes to be in violation of the Compliance Program or applicable laws, rules or regulations.

Summary of Compliance Principles

All Company Associates and Independent Contractors must abide by the letter and spirit of all applicable laws and regulations. Company Associates and Independent Contractors must adhere to the highest ethical standards of conduct in all business activities and must act in a manner that enhances the Company's standing within the healthcare community. To this end, the Company will promote relationships based on mutual trust and respect and provide an environment in which individuals may question a practice without fear of adverse consequences.

The appointment and retention of Company Associates is contingent upon acceptance of and compliance with the Code. It is expected that outside colleagues, e.g., vendors, independent contractors, consultants, and others whose actions could be attributed to the Company, will adhere to similar standards in their dealings with us and with others on our behalf. This Code and the Compliance Program are intended to establish a framework for legal and ethical conduct by the Company, particularly compliance with federal and State laws on fraud and abuse. It is intended to reflect collective good judgment and common sense. It is not intended to replace other compliance practices or rules and regulations as defined in the Corporate Policies and Procedures Manual.

Whenever a Company Associates or Independent Contractor sees a situation that does not appear to comply with the Code, he or she has the responsibility to bring the concern to the attention of their supervisor or the Compliance Officer. An employee who has a question regarding the application or interpretation of the Code should use the procedures specified in Corporate Compliance Program.