



2024

Code of Conduct

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A LETTER FROM OUR CHIEF EXECUTIVE OFFICER

At Capital Rx, our suite of technology and services work together to help us advance our mission of changing the way prescriptions are priced and patients are cared for to create enduring social change. Everyone deserves full credit for helping evolve our promise into a nationally recognized health technology company that services millions of members in all fifty states.

To ensure our continued success as we redefine the pharmacy benefit industry, we all must maintain the highest standards of compassion, trust, and integrity. Through our unyielding vision and commitment to innovation, we continue to develop the electronic infrastructure generations will rely upon for healthcare delivery. To be clear, our mission is complex and challenging. To help navigate the obstacles on our journey, our Code of Conduct provides us with the framework for conducting our business ethically and compliantly.

Every member of our leadership team is committed to making sure that Capital Rx maintains the standards reflected in our Code of Conduct. Quite simply, compliance matters to us and we all must put integrity first in every decision we make. Each day, our company is entrusted with the awesome responsibility to support patients and administrate the critical workflows of care delivery. Throughout our busy days, we should always remember our character and reputation are defined by what we do, even when no one is looking.

Please take the time to review our Code of Conduct as our success is guided by these values. Together, we will transform our industry and ensure Capital Rx's legacy as a world-class organization.



AJ Loiacono

Chief Executive Officer

A LETTER FROM OUR CHIEF COMPLIANCE OFFICER

Capital Rx has earned the well-deserved reputation as a proud and innovative health technology company whose modern infrastructure is rebuilding trust in healthcare.

We maintain this reputation by acting with integrity, trust, compassion, innovation, and transparency while we reduce administrative costs, improve patient outcomes, and deliver a superior customer experience.

Together, we achieve our goals by upholding a strong culture of compliance and ethics. This means we comply with applicable laws and regulations and abide by our company values, policies and procedures, and Code of Conduct.

Our Code of Conduct is an essential resource as it lays the foundation for Capital Rx's ethical standards. The Code of Conduct is so important that we expect each of you to read, understand, and comply with it.

As Capital Rx's Chief Compliance Officer, I support and encourage you to make the best decisions and take the proper action to achieve our company's mission. If you have questions about how to do the right thing, refer to the Code of Conduct and the other resources available to you. If the answer is still unclear, speak up and ask for guidance. Our Corporate Compliance, Legal, and Human Resources departments are always here to help.

Together, we all play a part in strengthening a culture in which we all feel comfortable being ethical and honest. Each of us has a duty, and I believe we all have the courage to, speak up in good faith when we encounter potential violations.

Thank you for your commitment to do the right thing in every situation.



Lloyd Fiorini

Chief Compliance Officer

INTRODUCTION

HOW WE DO BUSINESS

Capital Rx, Inc. and all its affiliates (collectively “Capital Rx”) is on a mission to change the way prescriptions are priced and patients are cared for to create enduring social change. As a next-generation pharmacy benefit manager (PBM) and Pharmacy Benefit Administrator (PBA), Capital Rx oversees prescription benefit plans on behalf of employers, unions, municipalities, hospital systems, and health plans.

At Capital Rx, we work hard to change the way prescriptions are priced and administered to rebuild trust in the healthcare system by conducting our business ethically, transparently, and consistent with applicable laws, regulations, accreditation requirements, certifications, client contracts, and other guidance and company values, policies and procedures, and Code of Conduct.

PURPOSE OF THE CODE OF CONDUCT

Capital Rx is committed to upholding the highest ethical standards while complying with applicable laws, regulations, accreditation requirements, certifications, client contracts, and other guidance and company values, policies and procedures, and Code of Conduct.

Sometimes during our work, we may encounter difficult issues or situations. The Code of Conduct is a guide and resource that helps us navigate business decisions consistently with applicable laws, regulations, accreditation requirements, certifications, client contracts, and other guidance and company values, and policies and procedures.

While the Code of Conduct cannot answer every question, it lays the foundation for Capital Rx’s ethical standards. It provides us with certain information and resources and directs us where to go when the answer is not clear. Our policies and procedures may provide more information about many of the topics in the Code of Conduct.

Our Code of Conduct applies to all of us at Capital Rx, including employees, contractors, officers, and directors. The same high ethical standards apply to all of us, regardless of our job or level in the organization.

Adherence to the Code of Conduct is a condition of employment or contract with Capital Rx. Code of Conduct certification is a part of this requirement and failure to do so within the required time may result in corrective action, including termination of employment or contract.



Want to learn more about the Code of Conduct at Capital Rx?

- compliance@cap-rx.com
- Compliance Resources intranet site
- Standards of conduct policy and procedure



OUR RESPONSIBILITIES

WE ARE ACCOUNTABLE FOR OUR ACTIONS. WE ARE EXPECTED TO:

Act Ethically

Live by the values of transparency, integrity, trust, compassion, and innovation.

Follow the Laws, Code of Conduct, and Company Policies and Procedures

Understand and follow the requirements listed in applicable laws, regulations, accreditation requirements, certifications, client contracts, and other guidance. Also, read, know, and abide by the Code of Conduct and other company policies and procedures that apply to us and our job.

Report Noncompliance

Report all actual, suspected, or potential compliance and ethics concerns immediately. Whether we have a question or concern about a workplace issue or suspected illegal or unethical conduct, Capital Rx provides several channels for speaking up without fear of retaliation.

Remember, the decisions we make and the actions we take are essential to Capital Rx's culture of compliance and ethics. We are all expected to comply with applicable laws, regulations, accreditation requirements, certifications, client contracts, and other guidance and company values, policies and procedures, and Code of Conduct. We are also expected to treat people with respect, honesty, and courtesy.

Disruptive, unproductive, immoral, unethical, or illegal actions are not acceptable at Capital Rx.

CORPORATE COMPLIANCE PROGRAM

Capital Rx is committed to having an effective corporate compliance program based on applicable laws, regulations, accreditation requirements, certifications, client contracts, and other guidance.

Our corporate compliance program includes internal controls that support all of us in completing tasks in a compliant and ethical manner. These controls are set up to help reduce or eliminate noncompliance, including potential fraud, waste, or abuse (FWA), within Capital Rx.

This Code of Conduct is the underlying framework for our corporate compliance program.

We have a dedicated Chief Compliance Officer who is responsible for the oversight and implementation of the corporate compliance program. The Chief Compliance Officer provides regular status reports to the Capital Rx Corporate Compliance Committee and Board of Directors.

We are all expected to participate in and support the corporate compliance program as necessary.



Want to learn more about the corporate compliance program at Capital Rx?

- compliance@cap-rx.com
- Compliance Resources intranet site
- Compliance policies and procedures

REPORTING NONCOMPLIANCE

We are all required to report suspected or actual noncompliance, including potential FWA, immediately.

We can contact any of the following reporting methods 24 hours a day, 7 days a week:

Non-anonymous

- Direct leaders
- compliance@cap-rx.com
- fwa@cap-rx.com

Anonymous

Anonymous reports are handled through an outside vendor.

- Website: www.lighthouse-services.com/cap-rx
- Mobile App: Keyword: cap-rx
- Toll-Free Telephone:
 - English speaking USA & Canada: 855-222-0934
 - Spanish speaking USA & Canada: 800-216-1288
 - Spanish speaking Mexico: 01-800-681-5340
 - French speaking Canada: 855-725-0002
- E-mail*: reports@lighthouse-services.com
- Fax*: (215) 689-3885

*Must include company name with report



When reporting any incident:

- Describe the situation in detail, including how it occurred.
- Share the names of anyone involved with the situation or who may have witnessed the incident.
- Provide dates when and where the events occurred.
- State whether the situation was witnessed or if someone shared it with us.

All of us are expected to report noncompliance. Failure to do so may result in corrective action, up to and including termination of employment or contract.

Reporting noncompliance not in good faith (e.g., knowingly false, made with malicious intent, made with reckless disregard for or willful ignorance of facts that would disprove the allegation) is prohibited and may also result in corrective action, up to and including termination of employment or contract.

Question:

What is noncompliance?

Answer:

Noncompliance is conduct that does not conform to applicable laws, regulations, accreditation requirements, certifications, client contracts, and other guidance and company values, policies and procedures, and Code of Conduct.



Want to learn more about non-retaliation at Capital Rx?

- compliance@cap-rx.com
- Compliance Resources intranet site
- Non-retaliation policy and procedure



Want to learn more about investigations at Capital Rx?

- compliance@cap-rx.com
- Compliance Resources intranet site
- Investigations policy and procedure

NON-RETALIATION

Capital Rx strictly prohibits and does not tolerate retaliation against anyone for reporting potential noncompliance in good faith, being involved with an investigation of noncompliance, or participating in the corporate compliance program (e.g., conducting self-evaluations, participating in auditing or monitoring activities, performing remedial actions, reporting potential compliance risks).

All forms of retaliation are prohibited, including any form of adverse action, discipline, threats, intimidation, or other form of retaliation. No one may seek revenge against or try to “get even” with anyone, regardless of who is implicated.

Capital Rx considers retaliation a violation itself, which may result in corrective action, up to and including termination of employment, contract, or any other working relationship with Capital Rx.

Anyone, who has been subjected to any conduct they believe constitutes retaliation for having made a good faith report of noncompliance or cooperating in an investigation about noncompliance, must immediately report the alleged retaliation.

If any of us observe or learn about potential retaliation, we must report it immediately using the anonymous or non-anonymous reporting methods.

INVESTIGATIONS

Capital Rx takes all reports of alleged noncompliance seriously and investigates each report of noncompliance immediately.

We take prompt and appropriate actions based on investigation findings.

If anyone is asked to participate in an investigation, they are expected to support the investigation of potential violations of the Code of Conduct and other company legal matters, including investigations and lawsuits. This includes providing timely, accurate, truthful, and complete information and documentation.



DISCIPLINARY STANDARDS & CORRECTIVE ACTION

As we perform our jobs, we must remain compliant with applicable laws, regulations, accreditation requirements, certifications, and other guidance and are expected to comply with Capital Rx’s values, policies and procedures, and Code of Conduct.

Failure to do so may result in corrective action, including:

- Performance counseling or re-training
- Warnings (verbal, written and final written warnings)
- Performance improvement plan
- Suspension
- Termination

Corrective action does not need to be taken in any particular order and may include any or all of the actions listed above.

Capital Rx sanctions anyone, regardless of their job title or level within the organization, for participating in, encouraging, directing, facilitating, or permitting noncompliance.

Capital Rx is committed to fairly and consistently issuing appropriate corrective action to address noncompliance and deter future noncompliance.



Want to learn more about disciplinary standards or corrective action at Capital Rx?

- compliance@cap-rx.com
- hr@cap-rx.com
- Compliance Resources intranet site
- Disciplinary standards policies and procedures
- Corrective action policies and procedures

FRAUD, WASTE, OR ABUSE

Capital Rx participates in federal and state programs with specific FWA requirements. Depending on our role, we may directly or indirectly come across FWA.

The differences between fraud, waste, and abuse are:

- **Fraud** requires intent to obtain payment and the knowledge the actions are wrong.
- **Waste and abuse** may involve obtaining an improper payment or creating an unnecessary cost but do not require the same intent and knowledge.

Even if our intentions are good, choosing not to follow a company policy or procedure could be interpreted by the government as fraud or payment abuse.

Failure to be compliant with applicable laws and regulations may result in corrective action, including termination of employment or contract, criminal convictions or fines, civil monetary penalties, loss of licensure, or exclusion from participating in federal health care programs.



Contact the Special Investigations Unit (SIU) immediately if there is ever a doubt that something may be considered FWA.

- fwa@cap-rx.com

Capital Rx has FWA programs designed to comply with applicable laws and regulations, including corporate compliance operational oversight, risk assessment, data analysis, investigations, training, and processes to manage identified issues through corrective actions.

Question:

What is healthcare FWA?

Answer:

- **Healthcare Fraud:** When someone knowingly submits, or causes to be submitted, a false claim, making representations of fact to receive payment when no entitlement would otherwise exist, or soliciting, receiving, offering, or paying any remuneration with the intention to induce or reward referrals for items or services reimbursed by healthcare programs.
- **Healthcare Waste:** When someone's practices, directly or indirectly, result in unnecessary healthcare program costs.
- **Healthcare Abuse:** When someone's practices, directly or indirectly, result in unnecessary program costs, improper payment, payment for services that fail to meet professional recognized standards of care, or services that are medically unnecessary.

CONFLICT OF INTEREST

We are all responsible for avoiding situations that cause a conflict of interest or may create the appearance of having a conflict of interest and completing actions in the best interest of Capital Rx. We must disclose all situations that could appear to be a conflict of interest.

The outside and personal activity, practice, interest, or act of immediate family members may also be considered a conflict of interest.

Situations involving a conflict of interest may not always be obvious. We must disclose any situation where our judgement may be influenced, or could appear to be influenced, by our or our immediate family member's relationship with a third party.

Capital Rx reviews each disclosure and determines if any action is required. Usually, no action is required beyond actually disclosing the information.

All workforce members and members of the Board of Directors are required to disclose all potential, actual, or appearances of conflicts of interest upon hire, annually, and if changes occur.

Failing to disclose a conflict of interest is considered noncompliance and can lead to corrective action, including termination of employment or contract.



Conflict of Interest:

Any outside and personal activity, practice, or interest with a company or organization that does business with, seeks to do business with, or competes with Capital Rx, that could, or could appear to, influence our ability to make objective business decisions, distract or hinder us from the performance of our job, or cause us to use Capital Rx resources for purposes other than company business.



Want to learn more about conflicts of interest at Capital Rx?

- compliance@cap-rx.com
- Compliance Resources intranet site
- Conflict of interest policy and procedure
- Certification and Disclosure Statement Form

Question:

What types of situations should be disclosed?

Answer:

- Other employment or volunteer service in the healthcare industry (e.g., second job at a pharmacy, member of a healthcare advisory group).
- An immediate family member with a financial interest in a company that does business with Capital Rx.
- Have an ownership investment with a company that will seek business with Capital Rx.
- An immediate family member works at a current vendor of Capital Rx.
- Outside activity that interferes with our ability to perform Capital Rx assigned job duties (e.g., missing meetings, not completing work timely).
- Discussing healthcare topics as a city council member.
- Have a formal relationship (e.g., Board member role) with a third party that is seeking to do business with Capital Rx.
- Are in a position to influence business with Capital Rx due to a relationship with an immediate family member.

ASSETS

We must always protect Capital Rx's assets. These assets include, but are not limited to:

Physical Items

- Equipment
- Cash and investments
- Corporate credit cards
- Office supplies

Information

- Business strategies and plans
- Financial data
- Intellectual property
- Confidential and proprietary information
- Other data
- Other business records

Assets should only be used for valid business purposes.



BUSINESS RECORDS & DATA

Capital Rx uses governance controls throughout the business record and data lifecycles (creation, placement, distribution, use, and retention).

Creation

Business records and data may be created when necessary due to the nature of Capital Rx’s business. The information must be accurate, factual, and objective.

Placement

Business records and data must be placed in approved storage locations. Capital Rx may remediate or delete the information if not placed in an appropriate storage location.

Distribution

Business records and data may be distributed to those who need it to complete their job. We may not send business records or data if it has not been requested or to individuals who do not need that information to complete their job.

Use

Business records and data may be used as necessary to complete our work at Capital Rx. We may only use the minimum amount of information that is reasonably necessary for us to do our job.

Retention

All data must be maintained in accordance with Capital Rx’s record retention policy and procedure. We must indefinitely retain all information subject to a legal hold until instructed otherwise by the Legal department.



Business Records:

The final and complete version of information; they provide evidence of meeting legal obligations, support business transactions, or document a business decision. Business records have long-term retention obligations required applicable laws, regulations, accreditation requirements, certifications, and other guidance.

Capital Rx cooperates with reasonable requests for information from government agencies and regulators. If anyone receives a subpoena, search warrant, request for an interview, or any other non-routine requests for access to Information related to company matters, they must immediately contact the Legal department.

We may never alter, withhold, or destroy records related to an investigation.

Question:	Answer:	
Where can I place business records and data?	<p>Business records and data must be:</p> <ul style="list-style-type: none"> Placed in approved storage locations. <ul style="list-style-type: none"> Store in-progress work on our OneDrive. Save business records in an approved collaboration application, (i.e: SharePoint) Save data to an access-protected department folder. Maintain required paper records at the Capital Rx facility. 	<p>Business records and data may never:</p> <ul style="list-style-type: none"> Be stored in-progress work on unapproved cloud platforms. Be stored on unapproved external websites. Be saved to a non-access protected (or public) folder. Be thrown away paper records in a normal trash bin

CONFIDENTIALITY & PROPRIETARY INFORMATION

Capital Rx's confidential and proprietary information is important to our business. We are expected to protect our confidential and proprietary information from theft, misuse, and improper disclosure.

We should always assume that all Capital Rx information is confidential, proprietary, and non-public.

We must:

- Only access, use, or disclose the minimum amount of information necessary to do our job.
- Limit information shared with external entities.
- Only share information with coworkers on a “need to know” basis.
- Never leave confidential, proprietary, or non-public information in a place where unauthorized people have access to it.
- Lock our computer when leaving it unattended.
- Return confidential, proprietary, and non-public information in our possession upon leaving Capital Rx.
- Remove any unnecessary data or non-requested information from reports before sending it to others.
- Pay attention to our environment and be mindful of others who could overhear our conversations, when discussing confidential, proprietary, and non-public information.



Confidential Information:

Any information material to the operations of a business which cannot be learned outside of that business. Confidential information exists in all forms (e.g., written, spoken, observed, electronic). Our own health information, performance reviews, corrective actions, and any other personally identifiable information (PII) that is not available to the public, is also considered confidential information.

Proprietary Information:

Any information developed, created, or discovered by Capital Rx. Also includes any information which became known by, or was conveyed to Capital Rx, which has commercial value in our business. Proprietary information can include secret system coding, internal detailed processes, future projects or clients, methods used in company production, or other trade secrets.

Non-public Information:

Includes information about:

- Capital Rx and its business.
- Capital Rx current or prospective investors, clients, and owners.
- Members, claims, or providers
- All other non-publicly shared records, documents, electronic communications, or other information that is confidential or proprietary.

Question:

What should I do if I need to provide a response to someone outside of Capital Rx that contains confidential, proprietary, or non-public information?

Answer:

- Make sure the information being provided answers the inquiry.
 - Never provide information outside of the request's scope.
- Make sure the information is allowed to be shared externally.
 - Protected health information (PHI) and PII must follow minimum necessary rules and can only be shared if there is an appropriate agreement in place to ensure the data will be handled appropriately.
 - Confidential or proprietary information, other than PHI, must also be limited and can only be provided if there is a non-disclosure agreement (NDA) or other agreement whereby the recipient must keep the information confidential.
- Receive the business area's approval before sharing their material (e.g., policies and procedures, training materials, other documentation).
 - Business areas need to confirm their material:
 - Is the correct material to answer the inquiry
 - Has accurate content documented

OTHER COMPANIES

We must always respect the confidential and proprietary information of other companies, even if that information is received as part of our work.

We cannot:

- Use confidential information from a previous employer in our work at Capital Rx.
- Lie, be deceitful, misrepresent, use invasive techniques, or utilize unauthorized access to obtain information from other companies.

Anyone who no longer works at Capital Rx may not use, keep, or share any Capital Rx confidential or proprietary information.



Contact the Corporate Compliance department immediately to report potential inappropriate disclosures of confidential, proprietary, and non-public information.

- compliance@cap-rx.com

If the disclosure contained PHI or PII, also contact the Privacy department.

- privacy@cap-rx.com
- Privacy intranet site



COMPUTER & DEVICE USE

Capital Rx monitors computer systems and may read and copy any files or data, even if they are marked personal, private, or confidential, at any time without prior notice. Capital Rx may also monitor communication tools, which include but are not limited to the content and usage of email and voicemail, and other communications which are the property of Capital Rx.

Any data or information created, received, sent, or stored on Capital Rx computers or any communications regarding Capital Rx's business on personal devices is considered Capital Rx's property.

Engaging in any activity that is illegal while using Capital Rx computer or system is strictly prohibited.

Question:

What is a best practice for computer use?

Answer:

- Try to avoid using Capital Rx computers for personal use.
- Do not lend company computer to anyone.
- Do not install personal software or software that has not been approved by the information technology (IT) department.
- Do not download or access non-public Capital Rx information on a personal device.

PRIVACY

We may collect, use, and maintain personal information, also referred to as PHI or PII, for those we serve. Maintaining the privacy and security of that personal information is an essential component of our commitment to integrity and provides the highest levels of customer service.

We are trusted and required to safeguard personal information reasonably and appropriately and to use or disclose personal information only as authorized by the member or in compliance with all applicable laws and regulations.

We can only use and disclose the minimum necessary amount of personal information.



Contact the Privacy department to report potential inappropriate or unauthorized access, use, or disclosure of PHI or PII as soon as the disclosure was discovered.

- privacy@cap-rx.com
- Privacy intranet site

We must always:

- Access, use, and disclose only the minimum amount of PHI or PII necessary to do our job.
- Provide only the minimum amount of PHI or PII to complete the task.
- Share PHI and PII only with those with a legitimate business need.
- Store PHI and PII in access-protected folders.
- Confirm the correct recipient's information is listed before sending PHI or PII.
- Avoid including PHI or PII in subject lines.
- Keep all PHI or PII confidential.
- Appropriately dispose of unneeded copies of documents containing PHI or PII.
- Keep documents with PHI or PII secure and inaccessible.
- Encrypt PHI or PII transmitted externally.
- Notify the Privacy department immediately if PHI or PII has potentially been accessed, used, or disclosed inappropriately.

We may never:

- View current or former plan member, coworker, celebrity, political figure, or any other individual's PHI or PII unless we have a legitimate business need within the scope of our job responsibility.
- Leave PHI or PII in a generally accessible area, such as an office printer or at-home office.

Question:

What is PII and PHI?

Answer:

- **PII:** Information that identifies or could be used to identify an individual, either by itself or when combined with other information.
- **PHI:** Information that is created or received by a health care provider (including a pharmacy), health plan, employer, or health care clearinghouse that relates to any of the following and either identifies or could be used to identify the individual:
 - The past, present, or future physical or mental health or condition of an individual
 - The provision of health care to an individual
 - The past, present, or future payment for the provision of health care to an individual.
- PHI and PII may include national identification numbers (such as Social Security numbers), dates of birth, financial and medical information, and other information that identifies or relates to a particular individual. PHI may include claim information, records regarding payment for care, or information such as a member's telephone number if we received it from a health plan

DATA SECURITY

Capital Rx has technical and security safeguards to protect Capital Rx's information technology systems and data, however, we are all also responsible for helping protect those systems and data.

We must always:

- Keep our user IDs and passwords private.
- Lock our computer or device when leaving it unattended.
- Never leave our computer or device unattended in public areas.
- Avoid using portable media drives, including portable thumb drives or external hard drives.
- Never store data on cloud drives unless they are approved by the IT department.
- Only use the Capital Rx-approved mobile email application.
- Avoid accessing public wifi or non-private hotspots.
- Adhere to all IT and IT Security and Compliance (ITSC) security policies and procedures.



Want to learn more about data security at Capital Rx?

- cybersecurity@cap-rx.com
- ITSC intranet site
- IT or ITSC policies and procedures

INTELLECTUAL PROPERTY

Intellectual property used at Capital Rx may be subject to certain terms and conditions as identified in vendor/licensing agreements, copyright and trademark laws, and other applicable laws and regulations.

Downloading or duplicating third party intellectual property contrary to the conditions agreed to by Capital Rx, with such third parties, may result in penalties and/or liability for Capital Rx or the individual.

We are expected to adhere to applicable vendor/licensing agreements, copyright and trademark laws, and other applicable laws and regulations.



Intellectual Property:

Work, product, invention, or other creation to which one has rights, and for which one may apply for a patent, copyright, or trademark.

PROPER ACCOUNTING

We are responsible for properly executing and recording all accounting transactions.

This includes:

- Ensuring financial reports and documents are fair, accurate, timely, and understandable.
- Charging labor and materials costs accurately to the appropriate cost center, project, and/or accounts.

Capital Rx's accounting system includes written policies and procedures and an annual financial statement audit by an outside audit firm.

We cannot:

- Improperly influence, manipulate, or mislead any audit.
- Interfere with any auditor engaged to perform an independent audit of Capital Rx's books, records, processes, or internal controls.
- Create or maintain unrecorded or secretive funds or assets for any purpose.
- Make records appear as though payments were made to one person when, in fact, they were made to a different individual.
- Submit inaccurate expense reports.
- Create any other records that do not accurately reflect the true nature of a transaction.

Fraudulent activity is grounds for immediate termination of employment or contract.

POLITICAL ACTIVITY

Capital Rx supports our right to vote and be active in the political process.

We are encouraged to be politically active on our own time and using our own resources to support political candidates and causes of our choice, as long as it is clear we are not speaking or acting on Capital Rx's behalf.

We cannot:

- Include political contributions or fundraising tickets in a Capital Rx expense report.
- Use company time or resources when acting as a volunteer for a political candidate or cause.
- Use company assets, including software & applications (e.g., instant messaging applications or company email software), for any political activity.
- Use Capital Rx property for personal political activities as this may violate applicable campaign finance and anti-bribery laws and regulations.
- Solicit or distribute literature for political campaigning or lobbying purposes.
- Solicit workforce members for political contributions or use vendor, customer or client lists for such solicitations.



Want to learn more about the rules and regulations regarding political activity?

- legal@cap-rx.com

DEALINGS WITH PUBLIC OFFICIALS

Capital Rx is committed to dealing with public officials according to the highest ethical standards.

Our conduct with public officials, including any political contributions or business transactions, must comply with applicable laws and regulations, including disclosure requirements.

Capital Rx prohibits giving or offering anything of value, directly or indirectly, to a public official, including any colleague or agent of a government-owned business, to influence official action or obtain an improper advantage.

Contact with public officials must be done in coordination with the General Counsel.



Anything of value:

Means not only cash, but also gifts, meals, entertainment, political contributions, offers of employment, or other benefits.

WORKING WITH EXTERNAL PARTIES

At Capital Rx, we build relationships with potential or current suppliers, vendors, and customers. We also may purchase goods or services from an external party who also buys services from us.

These are normal business practices and are acceptable as long as our relationships remain free from any form of pressure or illegal activity.





Business Courtesies:

Gifts, favors, meals, entertainment, events, or other items of value.

Honoraria:

A voluntary payment that is given to a person for services for which fees are not legally or traditionally required (e.g., receiving a thank you payment for speaking at a conference).



Contact the Corporate Compliance department to receive prior approval for a business courtesy exception.

- compliance@cap-rx.com



BUSINESS COURTESIES

Giving or receiving business courtesies is a common business practice, however, it may be inappropriate or illegal depending on the circumstances.

When appropriate, Capital Rx may give or receive business courtesies to help build or strengthen relationships with current or potential business partners.

When providing or accepting business courtesies, we:

- Abide by the guidelines (including monetary amount) listed in the business courtesies policy and procedure.
- Attend the meal or entertainment with the person or entity who gave or received the business courtesy.
- Ensure the venue is in a location where business discussions can occur.
- Only accept gifts of nominal value, such as branded items (e.g., mug, clothing).

When traveling, we:

- Provide or accept travel for business-related activities where a service or benefit is being offered.
- Accept travel only if others providing the same service are treated equally.

Business courtesies must be compliant with applicable laws, regulations, accreditation requirements, certifications, client contracts, and other guidance and company values, policies and procedures, and Code of Conduct.

We may never:

- Accept or provide business courtesies that might compromise or appear to compromise the ability to make objective and fair business decisions or influence or appear to influence business relationships.
- Give, receive, or ask for a business courtesy in return for business.
- Accept large-scale meals or entertainment events where a disproportionate number of Capital Rx workforce members attend compared to the number of people from the entity hosting the event.
- Receive gifts of cash or cash equivalents (e.g., gift cards) in any amount.
- Give or receive business courtesies to and from:
 - Members
 - Prescribers
 - Pharmacies
 - Pharmaceutical manufacturers
 - U.S. government employees

Additionally, honoraria is not permitted.

At times, an exception to the business courtesies guidelines may be appropriate. All exceptions must be approved by the Corporate Compliance department prior to providing or receiving a business courtesy.

ANTITRUST

We are expected to never discuss business plans, marketing, pricing, costs, suppliers, or territories with competitors, nor make agreements with them on these or other competitive issues. Under certain circumstances, formal or informal discussions with competitors regarding these topics or other similar matters may be illegal.

Capital Rx is committed to gaining information about competitors only in legal and ethical ways. All of us must comply with applicable Antitrust laws and regulations and avoid even the appearance of anti-competitive and price-fixing conduct.

Price Fixing

Pricing decisions cannot be made in collaboration with our competitors, directly or indirectly, formally or informally, or orally or in writing.

We cannot exchange, consult, discuss, create, or participate in any understanding, agreement, plan, or scheme with any competitor about:

- Capital Rx prices
- Price policies and fees
- Competitor prices
- Terms or conditions of sale of any service or product

We may attend conferences, seminars, or professional gatherings with competitors; however, we are required to avoid or remove ourselves from any discussions about pricing and fees when a competitor is involved.

Market Allocation & Restraint of Trade

Market allocation and restraint of trade includes agreements, often referred to as non-competition agreements:

- Do not allow or limit someone or an entity from doing business with others.
- Do not allow us to do business or deal in particular territories that are otherwise authorized by law.

These agreements include those that are written or unwritten, formal or informal, understood or implied, or made with a competitor or customer.



Contact the Legal department before talking about or entering into any agreement that may restrict Capital Rx's ability to do business with others, not to do business with others, or deal in particular territories.

- legal@cap-rx.com

Question:

What are Antitrust laws for?

Answer:

Antitrust laws are intended to protect competition and promote fair competition by prohibiting monopolies, price fixing, predatory pricing, market allocation, group boycotts, and other practices that restrain trade and harm consumers from unfair business practices.

FAIR DEALING

Capital Rx's services are primarily contractual promises. As we strive to meet our promises and outperform competition, we do so honestly, fairly, openly, and with integrity.

We deal fairly with our clients, members, vendors, regulators, partners, and others with whom we do business.

We cannot:

- Participate in any conduct, sales, or other practice intended to mislead, manipulate, or take unfair advantage of anyone, or misrepresent products, services, contract terms, or policies.
- Participate in any practices that illegally restrain competition (e.g., price fixing, allocating or dividing markets or customers, boycotting or refusing to deal with competitors, customers, or vendors).
- Discuss or share sensitive competitive information with other companies or industry and trade associates.
- Engage in untruthful or misleading advertising.
- Break any law or regulation.



Contact the Corporate Compliance department if there are concerns about potential fair dealing misconduct.

- compliance@cap-rx.com
- Anonymous reporting methods



Want to learn more about the rules and regulations regarding fair dealing?

- legal@cap-rx.com

IMPROPER PAYMENTS

Capital Rx funds or assets may not be used for any illegal or unethical purposes.

We may not pay potential or current suppliers, vendors, or customers to obtain or keep their business or ask anyone to buy our products or services if they want to become or continue to be a Capital Rx supplier.

We should also not be asked to do the same by suppliers.



Contact the Corporate Compliance department if there are concerns about potential improper payments.

- compliance@cap-rx.com
- Anonymous reporting methods



INSIDER TRADING

Insider trading is the buying or selling (trading) of Capital Rx securities or our client’s securities by those with access to confidential, proprietary, or non-public information about Capital Rx or our clients.

Insider trading applies to privately held companies similarly to publicly held companies.

As part of our work at Capital Rx, we might learn about non-public information about Capital Rx or another company, such as merger or divestiture plans, a new product or service offering, or other information that could have an impact on that company’s stock.

Information we obtain through our role and work with Capital Rx cannot be used for our personal benefit or to the benefit of anyone else.

Participating in insider trading is prohibited and may result in corrective action, up to and including termination of employment or contract.



Want to learn more about the rules and regulations regarding insider trading or to learn if information we possess may be considered non-public information?

- legal@cap-rx.com

Question:

What type of information may be considered non-public?

Answer:

- Results about winning or losing a client.
- Unannounced projections of future earnings or losses.
- Anticipated financial information that departs from what the market would expect.
- Pending or proposed mergers, acquisitions, or financing transactions.
- Major changes in senior management.
- Confidential and proprietary information about our business partners.

BRIBERY

Capital Rx demands compliance with applicable anti-bribery and anti-corruption laws and regulations.

We may not personally, or through Capital Rx, give or promise to give anything of value to any individual to obtain business or special treatment for the company.



Contact the Corporate Compliance department immediately if any request for authorization or payment may violate anti-bribery or anti-corruption laws.

- compliance@cap-rx.com
- Anonymous reporting methods

VENDOR MANAGEMENT

Our vendors are an extension of our company. It is important that we engage with vendors in ways that uphold our commitment to integrity and excellence.

Whenever we need to utilize a new vendor, renew an existing vendor's contract, modify a current vendor's contract, or terminate a current vendor's services, we must follow our vendor management process.

This process allows us to competitively source goods and services, mitigate legal, privacy, corporate compliance, and information security risks, minimize the potential for conflicts of interest, confirm exclusion status with federal programs, and ensure our clients are appropriately notified of first tier, downstream, and related entities (FDRs).

CHARITABLE CONTRIBUTIONS

We may not commit to charitable giving on behalf of Capital Rx without direct approval from either the Chief Executive Officer, the Legal department, or the Human Resources department.

No workforce member is obligated to work for or make contributions to any organization or person, even if the company or other Capital Rx workforce member provides a charitable gift to that organization or person.

This ensures giving is consistent with all applicable laws and regulations.

INTERACTING WITH THE GOVERNMENT

Capital Rx follows special rules when administering our client's government programs.

These rules:

- Are often different from, and may be stricter than, the rules that apply to other lines of business.
- Apply whether Capital Rx contracts with the government directly or indirectly through a client.

We must abide by all applicable:

- Federal Medicare, Medicaid, and Health Insurance Marketplace (HIM) laws and regulations
- State Medicaid and HIM laws and regulations
- Government procurement laws and regulations

When Capital Rx bids on government business (e.g., state employee benefit plans, federal benefit plans), we must ensure we conduct our business in a way that would not improperly influence a government official.



FALSE STATEMENTS OR REPRESENTATIONS

Capital Rx does not knowingly or willfully submit false statements or representation to the U.S. government.

We must always provide complete, current, honest, and accurate statements, claims, documentation, and any other information to the government.

When processing claims related to government contracts, ensure that documentation is accurate, complete, and made in accordance with government guidelines.



Contact the Corporate Compliance department immediately if there is concern about potential false statements or representations.

- compliance@cap-rx.com
- Anonymous reporting methods

<p>Question:</p> <p>What are false claim acts?</p>	<p>Answer:</p> <ul style="list-style-type: none"> • Federal and state false claims acts prohibit individuals or entities from knowingly submitting a false claim or making a false record or statement in order to gain reimbursement from, and/or avoid an obligation to, a government-sponsored program (e.g., Medicare, Medicaid). • Individuals or entities may face criminal penalties, including fines, imprisonment, or both for submitting false, fictitious, or fraudulent claims.
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HIRING

Some laws and regulations restrict the timing of employment discussions between federal, state, and local government employees and contractors. These “revolving door” laws and regulations restrict the types of activities that some former government personnel can perform in the private sector.

The Human Resources and Legal departments work together to ensure restrictions do not apply before anyone discusses potential employment with current or former government employees.



PROCUREMENT

Capital Rx only receives authorized information from government employees or third parties, including consultants.

We may not ask the government for or obtain certain types of restricted source selection information unless that information is released to all competitors.

Source selection information includes, but is not limited to:

- Criteria a federal agency uses to evaluate bids or proposals
- Contractor bid or proposal information
 - Non-public information submitted by bidders to a federal agency as part of the bid proposal
 - Direct and indirect costs, pricing, data, and labor rates
 - Proprietary information
 - Other information marked as ‘contractor bid’ or ‘proposal information’
- Previously submitted bid prices, proposed costs, or prices
- Source selection or technical evaluation plans
- Technical, cost or price evaluations of proposals, or rankings of bids, proposals, or competitors
- Reports and evaluations of applicable panels, boards, or advisory councils
- Other information marked as ‘source selection information’

CONVICTIONS

We are expected to report if we have been convicted of a crime (other than a minor traffic violation) or received a civil fine or penalty for activities related to Medicare or Medicaid, to the Corporate Compliance department immediately.

Conviction of a crime means:

- A finding of guilt
- A court’s acceptance of a plea of guilty or nolo contendere (no contest)
- An entrance into a pretrial agreement to avoid conviction
- An entrance into a first offender, deferred adjudication, pardon program, or other arrangement or program where a judgement has been withheld

Conviction does not include:

- Arrests or charges that did not result in conviction
- Convictions that have been sealed, erased, dismissed, or expunged by court order
- Convictions that state law does not permit an employer to consider

Any convictions involving controlled substances, convictions involving Medicare, Medicaid, or any state or federally funded program, and any convictions that could result in exclusion from participation in any state or federal health care program must always be reported.



Contact the Corporate Compliance department immediately to report a conviction.

• compliance@cap-rx.com

EXCLUSIONS

Capital Rx participates in the Medicare and Medicaid programs by servicing our clients. As a participant in these federal programs, individuals or third parties who have been excluded from participating in these federal programs are not able to service these programs.

The federal government and most states provide exclusion lists compiled of individuals and/or third parties who are excluded from receiving payments or reimbursements for providing Medicare and Medicaid services, in any capacity, for committing certain violations.

Individuals and/or third parties listed on any exclusion lists may be subject to certain civil monetary penalties and hiring or retaining someone on the exclusion lists could subject Capital Rx to those civil monetary penalties.

Exclusion checks are performed on all:

- Workforce members upon hire/contract and monthly thereafter
- Board of Directors members upon appointment to the Board of Directors and monthly thereafter
- FDRs upon contract and monthly thereafter



Want to learn more about exclusion checks at Capital Rx?

- compliance@cap-rx.com
- Exclusion check policies and procedures

<p>Question:</p> <p>Which exclusion lists does Capital Rx search?</p>	<p>Answer:</p> <ul style="list-style-type: none"> • Office of Inspector General (OIG) List of Excluded Individual/Entities (LEIE) • General Service Administration (GSA) System for Award Management (SAM) • Office of Foreign Assets Control (OFAC) Consolidated and Specially Designated Nationals and Blocked Persons (SDN) lists • State-specific lists
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Capital Rx does not hire, employ, contract with, or pay any excluded entities or individuals to provide services for any accounts involving federal and state funded healthcare contracts including, but not limited to, contracts issued under Medicare and Medicaid.

If any of us have been placed on a federal or state exclusion list, we are required to notify the Corporate Compliance department immediately.

SUSPECTED, DEBARRED, OR INELIGIBLE CONTRACTORS

Capital Rx is generally prohibited from doing business with companies and individuals who are:

- Debarred or proposed for debarment
- Suspended
- Otherwise declared ineligible to contract with government agencies or authorities

Capital Rx does not knowingly enter into a relationship with a third party, make a new purchase from, or enter into a new business relationship with any individual or company that is excluded from participation in any federal government program, or excluded from contracting with any government agency or department.



Want to learn more about the rules and regulations regarding suspected, debarred, or ineligible contractors?

- legal@cap-rx.com

ILLEGAL REMUNERATIONS

The Anti-Kickback Statute (AKS) is a federal criminal law which prohibits the offering or accepting of kickbacks for improperly obtaining a federal health care contract or rewarding favorable treatment in connection with a federal health care contract.

Sometimes, it is acceptable to reward those who refer business to us. However, in the federal health care programs, paying for referrals is a crime.

The AKS covers those who offer or pay remuneration (payers of kickbacks) as well as those who solicit or receive remuneration (recipients of kickbacks).

Capital Rx does not knowingly or willfully solicit/receive or offer/pay any remuneration (kickback, bribe, or rebate), whether directly or indirectly, for any acts, item, or service involving federal health care programs.

We may never solicit, receive, offer, or pay any remuneration related to federal health care programs.

Violation of the AKS is a felony, with serious penalties.



Contact the Corporate Compliance department immediately for concerns about illegal remunerations.

- compliance@cap-rx.com
- Anonymous reporting methods

Question:

What is a kickback?

Answer:

- Kickback: Remuneration given in exchange for improperly obtaining a federal health care contract or rewarding favorable treatment in connection with a federal health care contract.
- Remuneration: Anything of value and can take many forms such as money, fees, commission, compensation, gifts, financial incentives or rewards, or other items of value (e.g., expensive hotel stays and meals).

PROFESSIONAL COMMUNICATION

Whether we create formal communications, informally message others, or discuss work matters with differing opinions, we must always treat people with kindness and respect.

A respectful workplace recognizes that all of us come from different places and cultures and have a variety of experience, skills, and talents to offer. We all bring assorted skills and perspectives, and those diverse contributions are valuable.

As we communicate internally and externally, we must always be respectful and professional in our communications.

EMAIL & INSTANT MESSAGING

Email and instant messaging are common methods used to facilitate business communications. All email and instant messages must convey respect and professionalism.

Email

Capital Rx email utilization should be used for business purposes. Personal use should not interfere with our work and must not violate applicable laws, regulations, accreditation requirements, certifications, client contracts, and other guidance and company values, policies and procedures, and Code of Conduct.

We cannot email any PHI, PII, or non-public Capital Rx information to our personal email address.

Instant Message

Instant messaging allows us to reach each other more urgently than email. Instant messaging should not be used for formal business communications or to document business decisions as these should be documented in emails or other formal documentation.

MEETING ETIQUETTE

Participating in meetings can help facilitate business discussions, improve communication, increase productivity, and improve relationships. Meetings can occur remotely or in person, be formal or informal, and may include internal and/or external participants.

We must always behave professionally and foster a respectful environment.



SOCIAL MEDIA

The use of social media can be both personal and professional.

Personal social media is subject to company policies and procedures and Code of Conduct when posts, comments, or blogs contain anything relating to or referencing Capital Rx, even if it is outside of designated work hours and from a personal device.

Any social media posting that involves a workforce member where the company's reputation could be tarnished may result in corrective action, up to and including termination of employment or contract.

Social media refers to any forums and platforms including, but not limited to, social networking sites, LinkedIn, Facebook, X, Instagram, YouTube, Snap Chat, Reddit, WhatsApp, TikTok, WeChat, and Wikipedia. The use of social media includes posting content (including adding videos or pictures), adding comments to posts (including other's posts), replying to comments, and tagging the company or individuals employed at Capital Rx in posts.

When posting on a personal social media account, we can share that we work for Capital Rx; however, we may not post anything that:

- Violates applicable laws, regulations, accreditation requirements, certifications, client contracts, and other guidance and company values, policies and procedures, and Code of Conduct.
- Is detrimental to Capital Rx's best interests.
- May harm or tarnish the image, reputation, or goodwill of Capital Rx or any of its workforce members.
- Reveals Capital Rx confidential or proprietary information, including trade secrets, PHI, or client information.
- Uses the Capital Rx logo, trademarks, and other intellectual property unless approved by the Marketing department.
- Publishes content (including creating a site/page or adding content on a site/page) that was not initiated or authorized by the Marketing department.

When posting on social media, we cannot have any PHI, PII, confidential, proprietary, or other non-public information included in the post (including in the background of photographs).



Contact the Marketing department to approve and coordinate messages that will be speaking for or on behalf of Capital Rx or providing information about new ideas or operations.

- marketing@cap-rx.com



EXTERNAL COMMUNICATION

Capital Rx’s reputation is affected by what people hear about us, either directly or indirectly through the media.

Always ensure that our external communications are honest, accurate, respectful, coordinated, and consistent.

Question: What type of situations require Marketing/Legal approval?	Answer: <ul style="list-style-type: none">• Representing that we are authorized to speak on behalf of Capital Rx.• Posting photographs or videos of the non-public areas of Capital Rx premises.• Sharing financial/operational information.• Using Capital Rx logos or trademarks in a way that suggests that we are representing Capital Rx’s brand.
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Contact the Marketing department if approached by the media, a vendor, or a professional industry newsletter, website, or similar publication for an interview, testimony, or to provide Capital Rx information.

- marketing@cap-rx.com



WORK ENVIRONMENT

Capital Rx complies with applicable federal, state, and local laws and regulations that ensure workplace safety, workforce member health, labor practices, and environmental protections.

DIVERSITY, EQUITY, AND INCLUSION

Capital Rx is committed to cultivating an authentic approach to diversity, equity, and inclusion (DEI) that reflects the core values of our leadership and company and is woven throughout Capital Rx culture and strategy.

The more diverse we are, the stronger we are. Capital Rx works hard to build strong and diverse teams that mirror our clients and the communities where we live and work.

DEI Committee

Capital Rx has a rotational DEI committee that consists of leadership and other workforce members across the organization. The committee develops and plans ongoing programming, events, speakers, cultural celebrations, affinity groups, and more.

Affinity Groups

Capital Rx celebrates and champions our diverse perspectives, backgrounds, cultures, and nationalities throughout the year. Our workforce members are welcome to join any internal affinity groups.

Community Outreach

Capital Rx leads a growing number of initiatives at the interpersonal and organizational levels to support our communities.

- Dr. James McCune Smith Endowed Scholarship at Howard University's College of Pharmacy supports the next generation of pharmacists.
- Student internship enables students, at various higher education institutions, to intern at Capital Rx and advance their healthcare career.
- A day of volunteer helps our local communities through a variety of activities.



Contact the Human Resources department if contacted by a regulatory or enforcement agency related to workplace safety, workforce member health, or environmental protections.

- hr@cap-rx.com



STRONGER TOGETHER
DIVERSITY, EQUITY + INCLUSION

Want to learn more about DEI at Capital Rx?

- dei@cap-rx.com



EQUAL EMPLOYMENT OPPORTUNITY

Capital Rx is an equal-opportunity employer and is committed to diversity, affirmative actions, and equal employment opportunities. Capital Rx strives to be a positive environment where individuals are proud to work, diversity is celebrated, and all are treated with respect.

Capital Rx provides equal employment opportunities (EEO) to all individuals in all aspects of employment, regardless of race, ethnicity, ancestry, national origin, color, religion, creed, sex, sexual orientation, gender identity or expression, genetic information, marital status, familial status, age, physical or mental disability, reproductive health decision-making, medical condition, genetic information, veteran status, military status, citizenship or immigration status, public assistance status, political affiliation, membership or activity in a local commission, or any other legally protected class under federal, state, or local law.

Capital Rx makes employment decisions on the basis of merit.



Want to learn more about EEO at Capital Rx?

• hr@cap-rx.com

Question:

What areas of employment does EEO apply to?

Answer:

- EEO applies to all areas of employment, including recruitment, selection, hiring, training, transfer, promotion and demotion, layoff and recall, termination, compensation, and benefits.

NONDISCRIMINATION

Capital Rx is committed to maintaining a workplace environment free from discrimination and does not discriminate in its activities or services on the basis of race, ethnicity, ancestry, national origin, color, religion, creed, sex/gender, sexual orientation, gender identity or expression, genetic information, marital status, familial status, age, physical or mental disability, reproductive health decision-making, medical condition, genetic information, veteran status, military status, citizenship or immigration status, public assistance status, political affiliation, membership or activity in a local commission, or any other legally protected class under federal, state, or local law.

Capital Rx prohibits discrimination against applicants and workforce members with disabilities and makes reasonable accommodations to allow qualified individuals to perform the essential functions of their jobs, unless doing so would impose an undue hardship.

Capital Rx has zero-tolerance for any prejudicial or discriminatory behavior. This behavior is grounds for immediate termination of employment/contract.



Contact the Human Resources department to request reasonable accommodations.

• hr@cap-rx.com

VIOLENCE-FREE & HARASSMENT-FREE WORKPLACE

Capital Rx is committed to providing a safe and healthy work environment that is free from harassment, threats, and acts of violence.

Any acts or threats of violence, possession of any firearms or any other weapons, and sexual harassment or any other harassment based on any characteristic prohibited by applicable federal, state, or local law at Capital Rx is strictly prohibited.



Contact 911 if an instance of workplace violence or a threat poses imminent danger.

Contact the Human Resources department for other concerns of violence or harassment.

- hr@cap-rx.com
- Anonymous reporting methods

Question:

What are examples of harassment?

Answer:

- Comments, jokes, insults, slurs, offensive language, and other unwelcomed actions that are offensive or stereotypical.
- Displaying derogatory, vulgar, suggestive, or obscene pictures, images, GIFs, cartoons, calendars, posters, or drawings.
- Inappropriate physical contact.
- Unwelcomed sexual advances, requests for sexual favors, suggestive comments, and any other unwelcome verbal or physical conduct of a sexual nature.
- Suggested or actual threats, acts of violence, stalking, and intimidation.
- Retaliation for reporting or threatening to report acts of misconduct for work-related injuries or illnesses.
- Actual or threatened infliction of physical violence.
- Possession or use of firearms or other weapons at the workplace.

SUBSTANCE-FREE WORKPLACE

Capital Rx is committed to protecting the safety, health, and well-being of all workforce members. The use of illegal drugs, reporting to work under the influence of alcohol, and the abuse of legal prescription pharmaceuticals, not only are a violation of applicable laws and regulations but diminish the safety of all workforce members and visitors, can have severe health and personal consequences, and may tarnish the reputation of the company.

The unauthorized use, possession, sale, exchange or purchase of alcohol, drugs, or illegal substances on company premises or any time when representing the company is strictly prohibited.

We should never come to work under the influence of alcohol, drugs (including lawfully prescribed drugs) or any other substances that could impair our ability to perform our job or jeopardize the safety of others.

Capital Rx may require us to be tested during employment/contract if it reasonably suspects a workforce member is under the influence of drugs or alcohol during working time or on Capital Rx premises.



Contact the Human Resources department to report concerns about a substance-free workplace.

- hr@cap-rx.com
- Anonymous reporting methods

PROFESSIONAL LICENSES, CERTIFICATIONS, AND REGISTRATIONS

Many of us, including our pharmacists, pharmacy technicians, and medical directors, may be required to maintain current professional licensure, certification, or registration.

If our job position requires professional licensure or certification, we are required to notify the Human Resources department if:

- We have received disciplinary or corrective action regarding our current license, certification, or registration.
- Our license, certification, or registration has been revoked, debarred, suspended, or has otherwise become inactive.

We always maintain federal and state licenses as required for business activities.

FINAL NOTES

Nothing in this Code of Conduct constitutes a contract of employment/contract with any individual or entity. Additionally, nothing in this Code of Conduct changes the at-will nature of employment/contract at Capital Rx.

OVERSIGHT

The Board of Directors review and approve the Code of Conduct annually as part of their oversight responsibilities.



*Code of Conduct last edited:
January 1, 2024*