Supplier Code of Conduct

SoNE HEALTH[1] is committed to complying with all laws and regulations that apply to our organization and operating in a manner consistent with the highest professional and ethical standards. As a SoNE HEALTH supplier[2], you play an integral role in helping us achieve these goals. We have created this Supplier Code of Conduct to communicate the minimum standards by which all SoNE HEALTH suppliers are expected to conduct themselves when providing goods or services to our system. Please note that SoNE HEALTH organizations or departments may establish guidelines that are more restrictive than those described in this document. It is your responsibility to share this Supplier Code of Conduct with all personnel who may be engaged in conducting business activities with a SoNE HEALTH organization.

Gifts – SoNE HEALTH recognizes that the cost of gifts, including meals, entertainment, and social activities provided by suppliers is ultimately borne in the cost of products and services we purchase. Consistent with our mission to be faithful stewards of our resources, SoNE HEALTH discourages suppliers from providing any gifts or other items of value to our colleagues or contractors working in SoNE HEALTH ("SoNE HEALTH Personnel"). The following items are never acceptable:

- Gifts given to SoNE HEALTH Personnel for the purpose of influencing a purchasing and contracting decision;
- Gifts that reasonably could be perceived as a bribe, payoff, deal, or any other attempt to gain a competitive advantage;
- Cash or items redeemable for cash such as checks, gift cards, stocks, etc.;
- Gifts to or from government representatives;
- Gifts or other incentives given for the purpose of encouraging or rewarding patient referrals;
- Gifts that may violate a law or regulation.

SoNE HEALTH expects all supplier representatives in the pharmaceutical, medical supply and device industries to adhere to the codes of conduct on interactions with healthcare professionals as published by the Pharmaceutical Research and Manufacturers of America (PhRMA) and Advanced Medical Technology Association (AdvaMed), as applicable.

All Supplier representatives should be familiar with SoNE HEALTH's policy on relationships with suppliers and other business partners as follows:

Entertainment and Social Activities – SoNE HEALTH colleagues may not accept gifts that involve entertainment or social activities, such as free or discounted tickets to sporting events, theatre or

[1] Throughout this document, references to SoNE HEALTH refer to Southern New England Healthcare Organization, Inc. and all of its affiliates and subsidiaries.

[2] The term "Supplier" is used herein to refer to all vendors, independent contractors, agents, and other business partners providing goods or services to SoNE HEALTH.

concert events, golf outings, travel and lodging, etc. SoNE HEALTH colleagues may attend an entertainment or social event with a supplier provided SoNE HEALTH colleagues, not the supplier, pays their own cost (e.g. the face value of a sporting event ticket) to attend such events.

Meals – In general, SoNE HEALTH discourages colleagues from accepting meals and refreshments paid by suppliers. SoNE HEALTH colleagues may accept an occasional meal or refreshments, paid by a supplier provided the following requirements are met:

(1) Such events are infrequent, which as a general rule means no more than 1-2 times per year.
(2) The event immediately precedes or follows a legitimate business meeting (e.g. discussion of business topics involving SoNE HEALTH).
(3) The setting for the meal is appropriate to discussing business matters (e.g. office or restaurant) and the host is present.
(4) The supplier's expense is modest which, as a general rule, means the cost of meals and refreshments does not exceed $50.
(5) SoNE HEALTH does not incur additional travel or overnight lodging costs as a result of a colleagues participation in a meal offered by a supplier.

The above requirements do not apply to meals and refreshments provided in connection with a conference or other educational program sponsored by a supplier for the benefit of all attendees.

Sponsored Events – SoNE HEALTH colleagues may attend supplier-sponsored local or out-of-town programs, workshops, seminars and conferences that have a legitimate educational purpose or otherwise support a SoNE HEALTH business objective (e.g. product training) provided such events are infrequent (i.e. no more than once annually) and SoNE HEALTH, not the supplier, pays for any related travel and overnight lodging costs.

Fundraising – SoNE HEALTH's foundation may solicit charitable contributions. Only SoNE HEALTH foundations or specific departments responsible for fundraising activities may solicit such gifts. SoNE HEALTH colleagues with responsibilities for ongoing business relationships with suppliers, including the negotiation or selection of suppliers, are prohibited from solicitation and fundraising activities with suppliers.

Other than legitimate fund-raising activities as described above, SoNE HEALTH colleagues are not allowed to solicit gifts, entertainment or meals from suppliers at any time. Suppliers who encounter situations where SoNE HEALTH colleagues are in violation of this policy are expected to contact the SoNE Compliance Line at 800.401.8004, or via the web at www.lighthouse-services.com/sfhcp.

Conflicts of Interest – Conflicts of interest, in which a SoNE HEALTH colleagues' relationship with a supplier conflicts, or could appear to conflict, with SoNE HEALTH's business interests, must be avoided. We recognize there are circumstances in which a member of a SoNE HEALTH colleagues' family or household may work for a supplier. SoNE HEALTH requires our colleagues to disclose such relationships in a timely manner. We also expect our suppliers to bring any actual, potential, or perceived conflicts of interest to the attention of a SoNE HEALTH high-level representative, other than the person who has a

relationship with the supplier. SoNE HEALTH colleagues are not permitted to work for a supplier if SoNE HEALTH is a customer of the Supplier.

Compliance with Laws – Suppliers are required to conduct their business activities in compliance with all applicable laws and regulations, including laws that are applicable to individuals and entities receiving Medicare, Medicaid and other federal funds.

Privacy and Security – As a business associate to various covered entities, Federal and state laws require SoNE HEALTH and our suppliers to maintain the privacy and security of personal health information ("PHI"). Suppliers are responsible for ensuring that all supplier personnel who provide services to SoNE HEALTH are aware of and familiar with the requirements of both the Health Insurance Portability and Accountability Act (HIPAA) Privacy and Security Rules and, where applicable, those state laws that provide more stringent protection of PHI. I f your business relationship with SoNE HEALTH will require access to or usage of PHI, you will be required to sign a Business Associate Agreement with us.

Infection Control Policies – Supplier personnel whose activities require access to direct patient care environments within the SoNE HEALTH network are required to adhere to the infection control policies applicable to the organizations visited.

Eligibility to Participate in Federal and State Health Care Programs – SoNE HEALTH will not conduct business with any supplier excluded, debarred, or ineligible to participate in federal or state health care programs such as Medicare and Medicaid, or whose officers, directors or employees are excluded from participating in federal or state health care programs. Suppliers are responsible for taking all necessary steps to ensure personnel involved in providing goods and services to SoNE HEALTH, directly or indirectly, remain eligible to participate in federal and state health care programs.

Fraud, Waste and Abuse ("FWA") – SoNE HEALTH will promptly investigate any reports of alleged violations of law, regulations or SoNE HEALTH policies involving a supplier or a supplier's personnel, including allegations of FWA involving federal or state health care programs. Suppliers are expected to fully cooperate in such investigations and, where appropriate, in taking corrective actions in response to confirmed violations. The Federal False Claims Act and similar state laws make it a crime to present a false claim to the government for payment. These laws also protect "whistleblowers" – people who report noncompliance or fraud, or who assist in investigations, from retaliation. SoNE HEALTH policy prohibits retaliation of any kind against individuals exercising their rights under the Federal False Claims Act or similar state laws.

Deficit Reduction Act of 2005 ("DRA") Requirements – The DRA requires SoNE HEALTH to provide detailed information to its employees, contractors and agents regarding the Federal False Claims Act and applicable state false claims laws. Suppliers are responsible for reviewing the False Claims Act Information section of the SoNE HEALTH Code of Conduct available at ICP-700-SoNE-Code-of-Conduct-branded.pdf (sonehealthcare.com) and for sharing this information with your employees conducting business with SoNE HEALTH.

Environmental Purchasing Policy – SoNE HEALTH is committed to purchasing products and services whose environmental impacts are healthier for the environment and human health. SoNE HEALTH expects suppliers to develop price competitive, environmentally sound, and safe products and services that help us achieve these objectives.

Supplier Diversity Program – SoNE HEALTH supports programs that foster diversity in our organization, and in our communities. Where applicable, SoNE HEALTH expects its suppliers to mirror our commitment, through subcontracting opportunities with diverse businesses and providing information to SoNE HEALTH on supplier diversity when requested.

Visitation Policy – When visiting a location within the SoNE HEALTH network, suppliers must comply with applicable supplier visitation policies for each such location. Supplier representatives may be required to schedule appointments and register prior to visiting any medical facility within our network. Representatives may be required to state the area to be visited, and visits must be restricted to those location(s) only. If the facility requires visitor badges provided by the facility, such badges must be worn at all times consistent with the facility's policies and procedures.

Product Samples – With the exception of drug samples provided to a physician office or clinic as may be permitted by that location's policies and procedures, supplier product samples may not be provided without the advance review and approval of SNAP-PG, a subsidiary of SoNE HEALTH.

Publicity – Suppliers are not permitted to distribute advertising, press releases, or any other general public announcement regarding its products or services to SoNE HEALTH or within the SoNE HEALTH network/facilities unless you have obtained prior written authorization from an authorized SoNE HEALTH management employee.

Business Record Retention – SoNE HEALTH requires suppliers to retain and make available records related to business with SoNE HEALTH in accordance with applicable law, regulation, and contract requirements.

Government Contractor Requirements –For those SoNE HEALTH affiliates which are a federal government contractor, supplier acknowledges that the clauses regarding equal employment opportunity and affirmative action contained in 41 CFR 60-1.4(a), 41 CFR 60-300.5(a), and 41 CFR 60-741.5(a) shall apply. These regulations prohibit discrimination against all individuals based on their race, color, religion, sex, or national origin. Moreover, these regulations require that covered federal government contractors and subcontractors take affirmative action to employ and advance in employment individuals without regard to race, color, religion, sex, national origin, protected veteran status or disability.

Physician Owned Distributorships – SoNE HEALTH will not purchase or enter into agreements for the purchase of products or supplies, including, but not limited to pharmaceuticals, implants, instruments and other medical devices, from Physician-Owned Distributorships ("PODs") or similar entities that maintain ownership or investment interests held by physicians and/or immediate family members of

physicians on the medical staff of a SoNE HEALTH organization. Suppliers are required to disclose to SoNE HEALTH any such ownership or investment interests in their companies.

SoNE HEALTH Code of Conduct and Integrity & Compliance Line – The SoNE HEALTH Code of Conduct describes behaviors and conduct expected of all SoNE HEALTH Personnel. The Code of Conduct is available at ICP-700-SoNE-Code-of-Conduct-branded.pdf (sonehealthcare.com). Suppliers may use the Compliance Hotline to report any actual or suspected violations of this Code of Conduct including FWA matters, safety concerns, or other matters, on an anonymous basis without fear of retaliation. The Compliance Hotline is available 24 hours a day, 365 days a year at 800.401.8004, or via the web at www.lighthouse-services.com/sfhcp.