



173 Pharmacy Corp

Code of Conduct, Business Ethics and Conflict of Interest Policy

EFFECTIVE January 29, 2025

Who Must Follow This Code?

This Code of Conduct, Business Ethics and Conflict of Interest Policy (herein referred to as "Code") is applicable to 173 Pharmacy Corp, its owners, officers, agents and all affected individuals including but not limited to employees. The reputation, respect and standing within the community served by 173 Pharmacy Corp is the result of our dedication to professional and business standards of the highest integrity.

Your Personal Pledge to Do the Right Thing

The Code represents a commitment to doing what is right. By working for 173 Pharmacy Corp, you are agreeing to uphold this commitment; you understand the standards of the Code and will always follow them. If you fail to follow these standards you place 173 Pharmacy Corp, your fellow coworkers and yourself at risk. This Code of Conduct is more than just a description of our standards; it is the centerpiece of our compliance and integrity program and assures that all of us conduct business with the highest standards of integrity.

Honest and Ethical Conduct

173 Pharmacy Corp is committed to honest and ethical conduct, including the ethical handling of actual or apparent conflicts of interest between personal and professional relationships. We recognize that 173 Pharmacy Corp is harmed when the real or apparent private interest of an owner, officer, agent or affected individuals including but not limited to an employee is in conflict with the interests of 173 Pharmacy Corp. This occurs, for example, when someone receives improper personal benefits as a result of their position with 173 Pharmacy Corp, or has other duties, responsibilities, or obligations that run counter to their duty to 173 Pharmacy Corp.

Conflicts of Interest

A "conflict of interest" arises when a personal, social, financial or political activity has the potential of interfering with your loyalty and objectivity to 173 Pharmacy Corp. Actual conflicts must be avoided; even the appearance of a conflict of interest can be harmful and should be avoided. Our Policy & Procedure Manual describes common ways that conflicts of interest can arise. If affected individuals including but not limited to



employees are unsure if a "conflict of interest" may exist, ask 173 Pharmacy Corp's management, for permission first. It is better to make sure the action is appropriate rather than hoping for forgiveness after the fact.

173 Pharmacy Corp Opportunities

All affected individuals including but not limited to employees, officers and directors may not use 173 Pharmacy Corp or 173 Pharmacy Corp's property or proprietary information, or their positions with 173 Pharmacy Corp, for personal gain. You should never take or claim as your own business opportunities that you learn about through your work for 173 Pharmacy Corp. Also, never engage in any business activities that compete with 173 Pharmacy Corp.

Receiving Gifts and Entertainment

Relationships with others must be based entirely on sound business decisions and fair dealing. Business gifts and entertainment can build goodwill, but they can also make it harder to be objective about the person providing them. In short, gifts and entertainment can create their own "conflicts of interest." All affected individuals including but not limited to employees of 173 Pharmacy Corp must follow the written procedures regarding acceptable and unacceptable gift giving and receiving.

Financial Integrity

173 Pharmacy Corp always strives to retain the trust of our affected individuals including but not limited to employees and business associates. Any invoices, claims for payments, reports and documents that 173 Pharmacy Corp submits to any governmental agency or business associate shall always be full, fair, accurate, timely and understandable.

Accurate and Complete Books, Records and Accounting

173 Pharmacy Corp's credibility is judged in many ways—and one very important way is the integrity of its books, records and accounting. In addition to our own commitment to accurately report financial performance, 173 Pharmacy Corp is required by law to follow generally accepted accounting principles.

Every affected individuals including but not limited to employee of 173 Pharmacy Corp must ensure that the reporting of business information, electronic, paper or otherwise, is accurate, complete and timely. This includes accurately booking costs, sales, time sheets, vouchers, bills, payroll and benefits records, regulatory data and other essential 173 Pharmacy Corp information.

In addition, all affected individuals including but not limited to employees must:

- Never deliberately make a false or misleading entry in a report or record.
- Never alter or destroy 173 Pharmacy Corp records except as authorized by established policies and procedures.



- Never sell, transfer or dispose of 173 Pharmacy Corp assets or any 173 Pharmacy Corp confidential information without proper authorization and documentation.
- Cooperate with 173 Pharmacy Corp's Compliance Officer and any investigation by the Compliance Officer.
- Contact the 173 Pharmacy Corp Management or 173 Pharmacy Corp's Compliance Officer with any questions about the proper recording of financial transactions.
- Never encourage, direct, facilitate or permit non-compliant, illegal or unethical behavior.

If you have a concern about a legal or business conduct issue, you are obligated to report and raise the issue with 173 Pharmacy Corp's Compliance Officer.

We All Must Follow the Code of Conduct and Government Laws and Regulations.

All affected individuals including but not limited to employees who perform work for 173 Pharmacy Corp shall be held accountable for complying with applicable laws, government rules, regulations, including Medicare Part D and this Code. In addition, all affected individuals including but not limited to employees shall be committed to following 173 Pharmacy Corp's Fraud, Waste and Abuse Compliance Program to prevent, detect, report and correct fraud, waste and abuse to the maximum extent possible. 173 Pharmacy Corp does not employ any person who has been excluded from participating in any government funded program. 173 Pharmacy Corp runs a background search of both the Office of the Inspector General's and General Service Administration's Exclusion Lists to screen new hires prior to employment and all affected individuals including but not limited to employees on a monthly basis.

Unauthorized Release of Confidential Information

Unauthorized release of confidential 173 Pharmacy Corp information, including, but not limited to, proprietary information, lists, contracts, financial information, or patient personal health information; shall be considered a major violation of the Code.

Any owner, officer, agent or affected individuals including but not limited to employees of 173 Pharmacy Corp that releases confidential information without authorization may be terminated from employment.

Enforcement: Discipline Imposed for Violations

Violations of this Code are subject to discipline by 173 Pharmacy Corp Management including oral and written warnings, reprimands, suspensions, terminations and financial penalties. The Compliance Officer and Management of 173 Pharmacy Corp reserve the right to determine the appropriate discipline to fit the circumstances. Violations shall be dealt with swiftly and illegal acts of violators may be reported to the authorities as appropriate. Enforcement of the Code shall be prompt and consistent, applying appropriate standards and processes as determined.



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New York, NY 100321635
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Annual Commitment

All affected individuals including but not limited to employees will be required to renew their acceptance of the Code annually.