

2026

## Reliance Rx Code of Conduct and Ethics



## **Reliance Rx Values**

### **Collaborative**

We partner to effectively coordinate and promote continuity of care.

### **Accessible**

We provide access to comprehensive, high quality pharmacy services.

### **Results-Oriented**

We strive to be a leading innovator and produce impactful solutions.

### **Empowering**

We empower our customers to take an active role in achieving positive outcomes.

### **Supportive**

We find the right resources based on our customer's individual needs and goals.

## **Reliance Rx Mission**

We provide the highest-quality specialty pharmacy experience for our customers while promoting positive patient outcomes and efficient use of specialty services.

## **Reliance Rx Vision**

To be the trusted specialty pharmacy that provides consistent high-quality services while growing dynamically.

## WHY WE HAVE A CODE OF CONDUCT AND ETHICS

The Code of Conduct and Ethics (the Code) sets forth the principles every workforce member must adhere to and incorporate into their daily business activities.

## CULTURE OF COMPLIANCE AND ETHICS

Reliance Rx is committed to upholding a culture of compliance and ethics throughout our organization. Every workforce member in every role in the company has a responsibility to do the right thing, every day. Our Code clarifies Reliance Rx's mission, vision, values and principles, linking them with standards of professional conduct.

Workforce member responsibilities regarding the Code include:

- Avoiding possible or perceived conflicts of interest.
- Remaining compliant with regulatory requirements.
- Conducting ethical business practices, including data integrity and reporting.
- Remaining mindful of any suspected instances of Fraud, Waste or Abuse.
- Providing fair, high-quality service to our patients and partners.
- Completing annual education and attestations.
- Reporting receipt of gifts/events from outside entities.

Though this Code is intended as a guide for different scenarios which may arise, it all comes down to doing the right thing to live our values and fulfill our mission.

Maintaining the highest standards of compliance and ethics demonstrates the value of collaboration through integrity, fair dealing and high-quality service.

Any questions or concerns related to potential Code issues should be reported to the Reliance Rx Leadership Team, the Regulatory Compliance Manager, the Compliance Helpline (877) 229-4916, or discussed with the parent company Compliance Department at (716) 504-3233 or Ext. 3233.

## PROTECTING RELIANCE RX'S BUSINESS INFORMATION

All workforce members are responsible for safeguarding confidential and restricted business information at all times.

We protect Reliance Rx and our patients by ensuring:

- All information pertaining to the operations, activities and business affairs of Reliance Rx, our patients and business partners must be kept confidential to the greatest extent possible.
- Information that workforce members are exposed to in daily work activities is the property of Reliance Rx, and the work product remains the property of Reliance Rx after termination of employment with the company. Such information should not be disclosed or discussed with others, including family members.

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*Information and/or data classified as confidential  
should never be disclosed without prior approval.*

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Confidential business information should only be accessed through an approved Reliance Rx computing device. A computing device is any laptop, desktop, mobile device, server and/or network infrastructure owned or issued by Reliance Rx and on which Reliance Rx business is conducted.

Workforce members are strictly prohibited from sending confidential business information to their personal email accounts. Anyone found to be sending Reliance Rx business information to their personal email accounts will be subject to disciplinary action up to and including termination.

To ensure confidentiality of Reliance Rx business information, workforce members who are permitted to work from home must access Reliance Rx's systems through a secure remote access in accordance with the parent company's Alternative Work Arrangements Policy and Acceptable Use Policy.

## PROTECTING PATIENTS AND BUSINESS PARTNERS

As part of our business, Reliance Rx receives personally identifiable and protected health information from our payors and patients, as well as confidential business information from our business partners. Access to confidential information and systems is governed by a workforce member's job-related duties. Prior to disclosing or receiving any confidential information to third parties, steps should be taken to ensure appropriate agreements are in

place prior to receiving such information. If unsolicited confidential information is received, workforce members should contact either their supervisor, the Regulatory Compliance Manager or parent company's Information Risk Office immediately.

Confidential business information obtained from outside sources must not be used or disclosed. Any confidential information that is in a workforce member's possession from an outside source (i.e. prior employer or family member) must not be disclosed to--or used by—Reliance Rx. If a workforce member suspects or knows that another workforce member is utilizing confidential information obtained from an outside source, it must be reported immediately to the Regulatory Compliance Manager or the parent company's Information Risk Office.

**Failure to adhere to Reliance Rx's confidentiality requirements can lead to disciplinary action, up to and including termination.**

## KNOW THE TERMINOLOGY

**HIPAA:** Health Insurance Portability and Accountability Act Law passed in 1996 to provide privacy standards to protect patients' medical records and other health information.

**PHI:** Protected Health Information, individually identifiable health information (including demographic information, medical history, test and laboratory results, insurance information, genetic information and other data) that is created, received, transmitted or maintained by Reliance Rx in any form. Relates to the past, present or future physical or mental health/condition of a patient, the provision of health care to the patient, or payment for such services and that identifies the patient (or could reasonably be used to identify a patient).

**PII:** Personally Identifiable Information. Any information about an individual maintained by Reliance Rx (including any information that could potentially be used, on its own or with other information, to distinguish or trace an individual's identity, such as name, Social Security number, date and place of birth, mother's maiden name or biometric records; and any other information that is linked or linkable to an individual such as medical, educational, financial and employment information).

RRX 35 – Use and Disclosure of PHI and PII

## COMPLIANCE WITH THE HEALTH INSURANCE PORTABILITY AND ACCOUNTABILITY ACT (HIPAA) PRIVACY RULE AND SECURITY RULE

All Reliance Rx workforce members are required to abide by HIPAA privacy and security policies. Reliance Rx patients and business partners expect that the company will safeguard and protect their confidential information. All workforce members and business partners are entrusted to take reasonable steps to ensure confidential information is not intentionally or inadvertently accessed by individuals that do not have a legitimate need to know. Reasonable steps to protect confidential information include, but are not limited to, securing workstations, physically securing confidential information, not sharing passwords, not discussing confidential information out in public and limiting access to information only to workforce members with a legitimate business need to know to perform their duties. Reliance Rx adheres to several policies to conform to the requirements of the privacy and security rule (collectively referred to as "HIPAA") to ensure security of a patient's protected health information (PHI) and personally identifiable information (PII). For questions regarding Reliance Rx's

privacy and security policies, please contact a member of the Reliance Rx Leadership Team or the Regulatory Compliance Manager at (800) 809-4763.

Workforce Members have an obligation to be vigilant for instances when colleagues or business partners inappropriately disclose, access or misuse confidential or restricted business information, PII or PHI. Immediately report such violations to the Regulatory Compliance Manager, the parent company Compliance Department, or parent company Information Risk Office. In some cases, a violation in this area may not be subject to progressive discipline and could result in immediate termination.

## CONFLICTS OF INTEREST

In order to maintain an accessible and trusting relationship with our patients, business partners, suppliers and payors, we must ensure that our personal situations do not create an actual conflict of interest or even the appearance of a conflict of interest.

A conflict of interest is a situation where an individual's personal interests or activities could influence one's judgment or decisions, and therefore, one's ability to act in the best interests of Reliance Rx. A conflict of interest may also arise from activities that appear to influence decisions or judgment.

A conflict of interest may arise where an individual or member of one's family stand to receive a personal benefit, whether monetary or otherwise, as a result of Reliance Rx's corporate action.

Reliance Rx workforce members, the Reliance Rx Leadership Team, and members of the parent company's Board of Directors must not engage in activities that conflict with or are incompatible with your responsibilities or the interests of Reliance Rx.

To avoid conflicts of interest, workforce members including all Reliance Rx Leadership Team members and members of the parent company's Board of Directors must disclose any financial, personal or material interests that they or family members have in either a competitor's business or other non-competitive company doing business (or seeking to do business) with Reliance Rx. Pursuing personal business opportunities using company property, information or position is prohibited.

## REPORTING REQUIRED



Reliance Rx requires workforce members to be aware of and to report potential, perceived or actual conflicts of interest that relate to their relationship and responsibilities to Reliance Rx. For further guidance, refer to RRX 39 – Ethical Practices, the parent company Conflict of Interest Reporting Policy or contact the Regulatory Compliance Manager or a member of the Reliance Rx Leadership Team. Questions or reports of potential, perceived or actual conflicts of interest should be reported to the Regulatory Compliance Manager or the parent company's Compliance Department using the Conflict of Interest Disclosure Form.

### HOW DO I KNOW IF I HAVE A CONFLICT OF INTEREST?

A conflict of interest arises when someone's personal interest may be at odds with their duty to Reliance Rx. No one wants to have a conflict of interest or end up in a situation where they have to answer uncomfortable questions about a situation that involves financial, social, or professional risk, but these situations happen often. Sometimes there is clearly a conflict, and sometimes the right decision is less obvious. When faced with a situation where there may be a conflict of interest, or the appearance of a conflict of interest, ask yourself these questions:

- Will I personally benefit from this decision?
- Will a member of my family benefit from this decision?
- Who could be hurt by this decision?
- How would I feel if this decision was reported in the newspaper, on television or social media?
- If I was asked about this issue in a court of law, how would I feel?
- If I saw someone else making this same choice, how would I react?
- Does this create a risk for Reliance Rx?
- Could it appear that I have been improperly influenced in making this decision?
- Is this something that might disappoint patients or damage Reliance Rx's reputation?

### GIFTS AND GRATUITIES

Business decisions should be free from even the appearance of influence. There is the potential for improper influence when we receive gifts, and there can also be the appearance of improper influence when we give gifts or gratuities. It is important for business decisions to be based on the merit of the business factors involved and not based upon the offering or acceptance of gifts, donations or favors.



Reliance Rx prohibits workforce members, including Reliance Rx Leadership Team members, from offering, accepting, giving or soliciting items of value in order to secure business or in return for giving business or if the intent is to influence. For more information on what is considered an item of value, refer to RRX 38 -Gift Giving and Acceptance Policy and the Reliance Rx Gift and Entertainment Disclosure SOP.

### GETTING GIFTS

Any workforce member, including Reliance Rx Leadership Team members, receiving a gift from an external entity or individual related to their employment with Reliance Rx must complete and submit the Receipt of Gift Form to the Regulatory Compliance Manager.

Gifts of cash or cash equivalence (e.g. gift cards) may never be accepted. Individual gifts valued over \$250 (cumulative) value may not be accepted in any calendar year.

An individual may not always be able to keep a gift received from a vendor or other outside third party, depending on the circumstances surrounding its receipt. If you are unsure about the receipt or giving of a gift, please contact the Regulatory Compliance Manager or parent company's Compliance Department for guidance. Failure to report the receipt of a gift may result in disciplinary action.

### GIVING GIFTS

Reliance Rx does not condone giving gifts if they could provide even the appearance of intending to improperly influence business decisions. Workforce members who elect to give gifts or conduct contests, sweepstakes or give-away activities are expected to adhere to Reliance Rx policies. Please see the RRX 38 - Gift Giving and Acceptance Policy and the Reliance Rx Gift, Entertainment Disclosure SOP and Receipt of Gift Form for more details about appropriate gift giving practices.

### USE OF COMPANY RESOURCES (FUNDS/TIME/PROPERTY)

Reliance Rx's assets are solely for the benefit of Reliance Rx. Reliance Rx's assets include, but are not limited to, equipment, corporate funds, office supplies, business strategies, financial data, patient and payor information, intellectual property and other proprietary and confidential information about our business. While workforce members may use certain assets, such as the telephone, computer (i.e., email, Internet) or fax/copy machine, for limited and reasonable personal use, Reliance Rx's systems and assets are intended to be used for

business purposes that benefit the company. All workforce members must adhere to the acceptable use of information systems guidelines implemented in the parent company's Acceptable Use Policy.

### SAFEGUARDING INFORMATION

Workforce members are required to understand the types of information they are handling and protect that information accordingly. RRX 29 - Document Protection Policy may be referenced or you may contact the Regulatory Compliance Manager or the parent company's Information Risk Office with specific questions.

### FRAUD, WASTE AND ABUSE

Reliance Rx is committed to preventing, detecting, correcting, and reporting potentially illegal and fraudulent, abusive or wasteful practices. Reliance Rx has a comprehensive fraud and abuse program, led by its parent company's Special Investigations Unit (SIU). In furtherance of Reliance Rx's culture of fraud awareness, our workforce members undergo annual fraud, waste and abuse (FWA) education.

Reliance Rx adheres to policies on fraud laws, parent company's Corporate Fraud Prevention and Reporting Policy and parent company's Fraud Laws and Deficit Reduction Act Notice Policy, which contain important information about federal and state fraud and abuse laws, and whistleblower (Qui Tam lawsuits) protection laws. Collectively, these laws and rules create a framework for federal and state governments to detect and prevent fraud and abuse in the health care system and to protect the individuals and entities who provide information to the government about such fraud and abuse. For any questions regarding false claims or federal and/or state fraud laws, please contact the Regulatory Compliance Manager, or the parent company's Compliance Department or SIU.

### REPORTING FRAUD (ANONYMOUS AND CONFIDENTIAL)

Workforce members and business partners who become aware of fraudulent activity should contact the Regulatory Compliance Manager or a member of the Reliance Rx Leadership Team at (800) 809-4763. You may also contact the parent company's SIU confidential fraud and abuse phone number at (800) 665-1182 or the anonymous and confidential Compliance Helpline at (877) 229-4916.

### FEDERAL PROCUREMENT

Reliance Rx is committed to complying with all applicable regulations in the administration of government programs, including Medicare and Medicaid. For example, Reliance Rx is subject to federal and state false claims laws that prohibit submission of 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 health care program.

### GIFTS TO GOVERNMENT AND PUBLIC OFFICIALS

The Federal Procurement Integrity Act restricts certain business conduct by representatives of a company seeking to obtain a contract with the federal government, such as giving gifts to public officials or representatives of government agencies. Reliance Rx workforce members will follow this protocol in line with our principles of fair dealing and business integrity.

### EXCLUDED PERSONS AND ENTITIES

Reliance Rx will not employ, contract with, or pay any individual or entity that has been excluded from government-funded programs.

The parent company's Sanction, Exclusion, Preclusion and Medicare Opt-Out Review Policy, parent company's Background Check Policy, and parent company's Compliance Program FDR and Management Contractor Oversight Policy establishes the procedures Reliance Rx follows to ensure compliance with these requirements along with other regulations. Reliance Rx's business partners are required to follow regulations regarding excluded individuals and entities. For questions regarding whether or not an individual or entity appears on any of the sanction or exclusion lists, please contact the Regulatory Compliance Manager or the parent company's Compliance Department.

Workforce members aware of any current or prospective business partner or individual being included on any applicable exclusion list should contact the Regulatory Compliance Manager or parent company's Compliance Department immediately.

### GOVERNMENT INVESTIGATIONS, EXAMINATIONS AND AUDITS

In the normal course of business operations, Reliance Rx is subject to audits and periodic examinations from the New York State Department of Health, Centers for Medicare and Medicaid Services, New York and other State Boards of Pharmacy, New York State Office of Medicaid Inspector General and other entities. Such occurrences are part of the business of pharmacy and require full cooperation.

A government official may request that Reliance Rx or its workforce members provide information prior to, during, or after a government investigation or examination. Reliance Rx or workforce members may be contacted directly by the government enforcement agency. If a government official contacts a workforce member directly, they should immediately notify their supervisor, the Regulatory Compliance Manager, and the parent company's Legal Department.

## DISCIPLINARY ACTION AND ENFORCEMENT FOR CONDUCT VIOLATIONS

Reliance Rx workforce members or business partners who, after a thorough investigation, are found to have committed a violation are subject to sanctions. Workforce members who violate the law, whether intentionally or unintentionally, who fail to report a known violation, or who make a false report, may also be subject to disciplinary action. Sanctions are recommended and issued in accordance with the parent company's Corrective Action/Progressive Discipline policy with the goal to prevent recurrence of the conduct or behavior. Actions such as privacy violations, failure to disclose wrongdoing or other acts of serious misconduct may be grounds for immediate termination. In the event of a violation involving a contingent worker, Reliance Rx will work directly with the agency/vendor of the contingent worker. The sanction activity for business partners may include termination of the contract and cessation of business dealings.

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*The parent company's Corrective Action/Progressive Discipline Policy provides guidance on the corrective action process and parent company's Compliance, Privacy and Security Event Scoring Policy establishes a standard procedure for recommending disciplinary and enforcement actions for associates with compliance violations.*

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## FAIR DEALING WITH SUPPLIERS, COMPETITORS AND THIRDPARTIES

All business dealings with customers, suppliers and third parties must be open, lawful, honest and fair. Our suppliers, contractors, business partners, and workforce members make significant contributions to Reliance Rx's success. If Reliance Rx cannot legally act directly, we will not act indirectly through agents, consultants or other third parties.

We must take special care to avoid engaging in anti-competitive activities or unfair trade practices. Our success in the market comes from the quality of the products and services we offer. Workforce members must avoid any conduct involving market manipulation, concealment of information that Reliance Rx has a duty to disclose, misuse of confidential information, misrepresentation or any other unfair trade practices. In addition, workforce members are prohibited from soliciting or obtaining confidential information about a competitor in a manner that would be illegal or violate any anti-compete contractual clause.

For questions about whether an exchange of information or communication in a particular situation would be appropriate, please contact the Regulatory Compliance Manager, or parent company's Compliance or Legal Departments. See also parent company's Compliance Program FDR and Management Contractor Oversight Policy, Offshore Contracting Policy, and Vendor Selection Policy for additional information.

### CONTRACTS WITH BUSINESS PARTNERS

Reliance Rx's business partners are entrusted with Reliance Rx's confidential business, financial and patient information. The selection of Reliance Rx's business partners is a multi-faceted process, which must be open, transparent and free from any appearance of impropriety. Departments are responsible for oversight of their business partners and must avoid accepting any gifts, paid expenses or undue influence during the decision-making process from current or prospective business partners.

Reliance Rx business partners must abide by all applicable federal and state regulations such as HIPAA. Reliance Rx remains ultimately responsible for the actions by our business partners.

To ensure appropriate due diligence and oversight of our business partner relationships, all contracting engagements should follow Reliance Rx's vendor contracting requirements. See the parent company's Vendor Selection Policy, Compliance Program FDR and Management Contractor Oversight Policy, and Offshore Contracting Policy for additional information.

## MAINTENANCE OF CORPORATE BOOKS AND RECORDS

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*Questions related to the retention period for a specified record should be reviewed against the parent company's Record Retention and Destruction Policy and Schedule, applicable regulation(s), or reviewed with the Regulatory Compliance Manager or parent company's Compliance Department for assistance.*

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Reliance Rx relies on all workforce members to be complete, accurate and honest in recording, preparing and reporting information. An integral part of our daily work activities as workforce member requires documentation (recording of data). We must be truthful and accurate in reporting information to regulators.

In addition, workforce members are required to report accurately: time worked; business expenses; individual, business partner and corporate production and performance data; patient related information, and any other business-related activities requiring the reporting and/or recording of data.

Alteration, omission, concealment or falsification of any information in a company document or record is strictly prohibited. If a workforce member is instructed by any coworker or supervisor to alter, omit, conceal or falsify a corporate record or document, immediately contact the Regulatory Compliance Manager, the parent company's Legal or Compliance Departments, or the anonymous and confidential Helpline (877) 229-4916.

Any workforce member found to have altered, omitted, concealed or falsified any information in a company document or record will be subject to the full range of disciplinary actions up to and including immediate termination of employment. In some cases, a violation in this area may not be subject to progressive discipline and could result in immediate termination.

All business records must be retained in accordance with the law, contracts and our corporate record retention policy and schedule. A business record means any document, in any format, that is created to comply with government regulatory or statutory standards and reporting requirements, document daily business activities and preserve the legal rights of the business. Reliance Rx is required to retain business records at minimum in accordance with the statutory period (e.g., records relating to Medicare Advantage and/or Medicare Part D must be retained for 10 years). See the record retention policy and schedule for specific timeframes.



The destruction of records which are a part of any ongoing investigation, legal proceeding or litigation hold is not permitted even if the corporate record retention policy would normally have ordered those records destroyed. The record retention period may also increase because of government regulation, judicial or administrative consent order, and private or government contract, pending litigation or audit requirements.

For questions concerning record retention, workforce members should contact their supervisor, the Regulatory Compliance Manager, or the parent company's Compliance or Legal Department (see contact guide near the end of this document).

### SAFE AND PROFESSIONAL WORK ENVIRONMENT

Reliance Rx is committed to maintaining a safe and professional workplace where all workforce members are treated with dignity and respect. See RRX 39 – Ethical Practices for additional information. All workforce members should be able to work in an environment free of all types of harassment and discrimination. Please review the parent company's Nondiscrimination and Anti-Harassment Policy for more detailed information on the different types of harassment, from bullying to sexual harassment. Workforce members who engage in any form of harassment or discriminatory behavior are subject to disciplinary action, which may include termination.

Reliance Rx is committed to complying with all laws, regulations, and policies related to nondiscrimination in all our personnel actions, including, but not limited to recruitment, promotion, wages, evaluations, transfers, corrective actions, discipline, terminations and staff reductions. Reliance Rx's responsibility includes providing our workforce members with the proper materials and training to help workforce members do their job correctly and safely. Reasonable accommodation will be made for individuals with disabilities to perform essential job functions. If an associates feels inadequately prepared to conduct their responsibilities in an ethical and lawful manner, needs more information about a particular law or standard, or has questions about an interaction that made the workforce member uncomfortable, the workforce member can talk to their supervisor or a member of the Reliance Rx Leadership Team, their HR Business Partner, the Regulatory Compliance Manager, or to the parent company's Compliance Department. The Helpline is also available for anonymous and confidential questions. Questions regarding our Human Resource policies should be directed to the HR Business Partner.



## SAFE AND ETHICAL PROFESSIONAL PRACTICES

Reliance Rx places the safe and ethical treatment of our patients of utmost importance in our operations. Reliance Rx associates, such as pharmacists and registered nurses, are required to maintain current professional licensure and follow the code of ethics and practice of those professional licensing organizations. Further, Reliance Rx outlines ethical practices in internal policies, see RRX-39 Ethical Practices. Reliance Rx prohibits the practice of pharmacy, other professional practices, and any services on behalf of Reliance Rx by individuals who are unlicensed or whose license has expired or been suspended, where their position requires such license, or who is impaired or otherwise under the influence of any substances which may alter that individual's capacity or sound judgment, including but not limited to alcohol and drugs (whether or not considered legal in New York State, such as marijuana). Any such impaired practice observed is required to be reported internally for appropriate discipline and further reporting as required to any Reliance Rx regulatory and standard of practice authorities.

## NON-RETALIATION AND NON-INTIMIDATION

Reliance Rx promotes an atmosphere of open and free dialogue without fear, intimidation or retaliation. Reliance Rx will not retaliate against anyone who makes a report in good faith or who exercises his/her rights under the law. Reliance Rx policy prohibits retaliatory or intimidating acts against workforce members or business partners who report known or suspected incidents of wrongdoing or noncompliance.

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*The parent company's Non-Retaliation and Non-Intimidation Whistleblower Protection Policy prohibits intimidating or retaliatory acts against associates and business partners who fulfill their obligation to report known or suspected incidents of wrongdoing or noncompliance and Reliance Rx monitors for compliance with this policy. All concerns about possible retaliation, intimidation or harassment should be immediately reported to the Regulatory Compliance Manager, a member of the Reliance Rx Leadership Team, or the parent company's Compliance, Legal or Human Resources Departments.*

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## ANONYMOUS AND CONFIDENTIAL HELPLINE (877) 229-4916

There are many reasons why someone might hesitate to report a compliance problem to their supervisor. Despite our safeguards in place to prevent it, there

may be concerns that someone will retaliate for reporting a problem or thinking that a supervisor will not take appropriate action to correct the problem. Maybe the problem involves an individual's supervisor, or a feeling that it is just not worth getting involved. Whatever the reason, reservations should not prevent the reporting of a problem. If problems and issues go unreported, they might go unnoticed and continue, and the workforce member may be at risk of sanctions for failure to report as required by Reliance Rx policy.

To make reporting problems easy and discreet, Reliance Rx has established an independent third-party compliance and ethics Helpline. The parent company's Mechanisms for Reporting Noncompliance and Corrective Action Policy describes the process for reporting issues or concerns in a confidential and anonymous manner. This confidential and anonymous Helpline operates 24/7/365 and can be accessed via two methods: (877) 229- 4916 or <https://reportit.net>. Either method you choose to report, you will need to provide the following information for the issue to be directed back to Reliance Rx for investigation (this information cannot be used to identify you): username: IHA, password: redshirt. The Helpline may be used for compliance related questions as well as incident reporting. The parent company's Mechanisms for Reporting Noncompliance and Corrective Action Policy additionally outlines Reliance Rx's responsibility to promptly respond to reported issues of potential or known non-compliance or fraud, waste or abuse issues and outlines the expectations and requirements for executing an effective corrective action plan when non-compliance is confirmed. All reports will be investigated to the fullest extent based on the information provided by the reporter. An independent committee has been established to review all reports of wrongdoing and to provide information to the parent company Board of Directors on what issues are being reported as well as how concerns are resolved.

### PRIVACY AND SECURITY REPORTS (716) 250-7300

Issues involving HIPAA privacy and security may be reported via the Helpline or directly to the parent company's Information Risk Office. The Information Risk Office is responsible for investigating privacy and security matters and keeping the Chief Compliance Officer apprised of such issues.

### FRAUD AND ABUSE CONFIDENTIAL REPORTS (800) 665-1182

Parent company's SIU maintains a confidential phone number for reporting fraud and abuse. Reports of fraud, waste and/or abuse may also be made via the Helpline. Anyone may contact the SIU for concerns related to fraud, waste or abuse. SIU is responsible for investigating tips received via the phone number or via the open-door policy.

## REPORTING VIOLATIONS OF THE CODE OF CONDUCT

Reporting an incident of suspected or actual noncompliance is an important part of protecting Reliance Rx's most valuable resources—our workforce. We strive to prevent, detect, and correct incidents through information received from workforce members who may see or hear something that makes them uncomfortable or concerned. A report does not indicate something wrong has definitively occurred. Rather, it is a structured process to provide appropriate investigation, clarity, and insight into concerns with behavior, processes or activities. If it doesn't feel right to you, it may not feel right to someone else. Making a report enables Reliance Rx to determine a course of action for correction, education or revising expectations.

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*Concerns regarding Code violations must be reported. Failing to report a violation of the Code is itself a violation of the Code.*

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Reliance Rx workforce members and business partners may utilize various methods to report a violation or concern. Such methods include reporting violations to immediate supervisors, a member of the Reliance Rx Leadership Team, the Regulatory Compliance Manager, or the parent company's Human Resources Department, utilizing the anonymous and confidential compliance Helpline, or contacting the parent company's Compliance Department directly by email or telephone. No matter the method utilized, workforce members and business partners must provide sufficient information in order for the matter to be investigated. Sufficient information includes, but is not limited to:

- Detailed description of the violation or concern;
- Identity of the perpetrator and/or department, if known;
- Names of any others who might have information about the incident;
- Date, place and time of the incident;
- Any supporting documentation; and
- Advise if/of previous reports of the incident or concern to an individual's supervisor and any action taken.

Reliance Rx maintains the confidentiality of information received or collected via the compliance Helpline or reported directly to the compliance officer. Issues or concerns not determined to be compliance-related are submitted to the appropriate department for review and investigation. Workforce members are protected from retaliation in accordance with the parent company's Non-

Retaliation and Non-Intimidation Whistleblower Protection Policy as referenced previously.

### COMPLIANCE QUESTIONS

This Code cannot answer every question our workforce members may have, which is why the Regulatory Compliance Manager is always available to provide you with the support you need to have your questions and concerns addressed in a timely manner.

## **INCIDENT REPORTING QUICK GUIDE**

### **OVERVIEW OF REPORTING**

When reporting an actual or suspected incident of noncompliance or a violation, at a minimum, the following information is necessary to conduct an investigation:

- A description of the incident
- Suspected party's name (if available)
- Names of any others who might have information about the incident
- Department/area incident occurred
- Date and time of incident
- Any supporting documentation

For a suspected noncompliance, fraud, or a privacy/security violation, please immediately contact the appropriate department listed below. Reports could also be made to the Regulatory Compliance Manager, the parent company's Compliance Department and/or the workforce member's supervisor or a member of the Reliance Rx Leadership Team.

#### **Compliance Department**

Responsible for responding to and investigating issues of suspected or actual noncompliance with federal and state laws, rules and regulations, agency guidance, improper reporting to regulators, questionable sales techniques, conflict of interest, violations of the Code, corporate policies and procedures, etc. For general compliance questions or guidance, contact the Chief Compliance Officer.

#### **Special Investigations Unit (SIU) Department**

Responsible for responding to and investigating issues regarding identity theft, fraud, waste and abuse of providers, patients, workforce members, business partners, etc.

#### **Information Risk Office**

Responsible for addressing privacy issues and security breaches as they relate to Reliance Rx's information and records to comply with the Health Insurance Portability and Accountability Act (HIPAA).

## **INCIDENT REPORTING QUICK GUIDE (cont'd)**

### **HOW TO ACCESS COMPLIANCE RESOURCES**

Helpline: 1-877-229-4916 or <https://reportit.net>; username: IHA, password: redshirt (third-party anonymous and confidential)

Compliance Department: (716) 504-3233 or Ext. 3233

Fraud and Abuse: 1-800-665-1182 (confidential)

Privacy and Security: (716) 250-7300 or Ext. 2800

Reliance Rx Leadership Team (800) 809-4763

### **INDIVIDUAL CONTACTS**

Nicole Britton, Chief Compliance Officer: (716) 635-4874 or Ext. 4874

Peter Jabrucki, Chief Information Security Officer: (716) 250-7383 or Ext. 7383

Sheila Caulfield, Director, Corporate Recoveries & SIU: (716) 635-3783 or Ext. 3783

Emily Paige, Regulatory Compliance Manager: compliance-contracting@relianceroxsp.com