

THIRTY MADISON

Code of Conduct

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REVISION HISTORY

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A message from the Thirty Madison Executive Team



At Thirty Madison, we are committed to providing the best experience for our patients. To do so, we have hired this amazing team.

As a leader in the digital health space, we've expanded access to high-quality and affordable specialized care, improved patient outcomes, and continue to innovate on new ways to **make healthcare better for our patients.**

All of this progress is dependent on conducting our business with integrity and high ethical standards. At Thirty Madison, **our Core Values guide our actions and goals of providing high-quality patient care.** We value and respect every patient we treat. Because of how integral this is to our company and our values, we want to make our ethical standards visible to our Employees, stakeholders, and the Thirty Madison community.

These ethical standards and expectations are outlined in the Thirty Madison Code of Conduct. **Our Code of Conduct reinforces our mission, vision, and values,** and it is a key component of our Compliance program.

We encourage you to use this resource as a foundation for ethical decision making in all business activities and operations. Although we cannot address all the laws, regulations, and policies that govern our company in this guide, the **Code of Conduct outlines many issues** that will be important to you when working here. This guidebook does not replace any existing policies. It should be used to supplement and clarify our company standards. If any aspect of this guide is unclear, or if you have questions about a situation, call the Thirty Madison Compliance Hotline at 1-844-990-0267, or make a report via EthicsPoint (thirtymadison.ethicspoint.com).

As we continue to grow the company and expand our patient base, ethics and integrity will remain at the center of our company's priorities. **By living our mission, vision, and values and complying with the Code of Conduct, we will continue to serve our patients** as the premier healthcare company for people living with chronic conditions.

Please help us deliver on our commitment.

Michelle, Steve, and Demetri

Our Vision and Mission



VISION

Building the premier healthcare company for people living with chronic conditions.



MISSION

Remaking specialty care for the better.

Our Values



ONE TEAM

We are one Thirty Madison team working toward a shared goal. We unlock our full potential when we collaborate with and support one another. We leave our individual egos at the door in favor of empathy, generosity, and abundance. We win together.



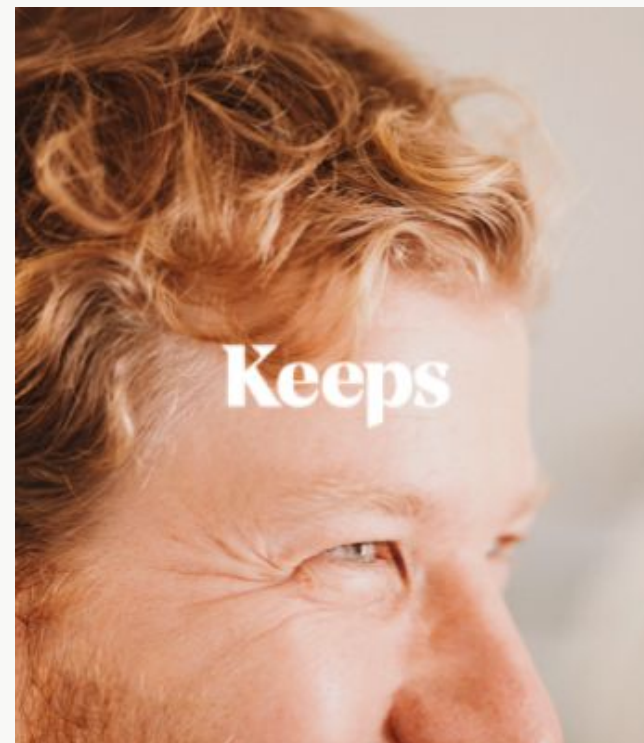
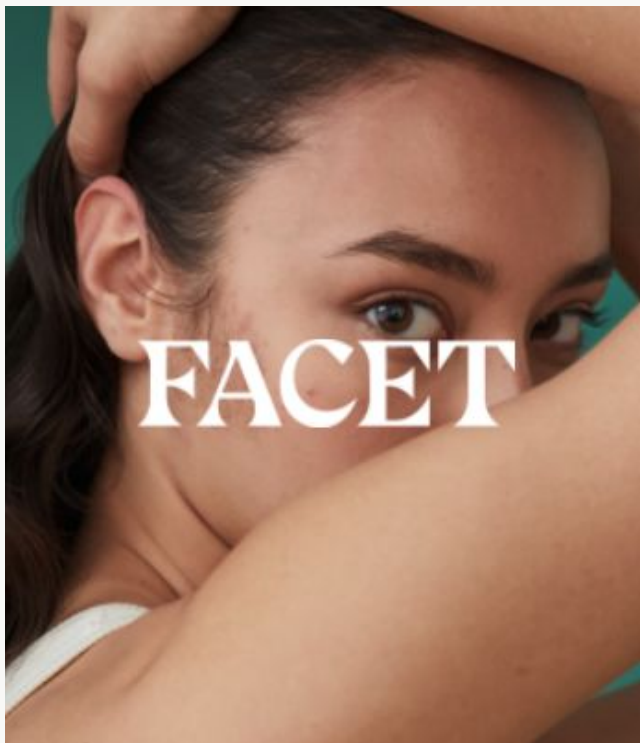
PATIENT FIRST

Before making decisions, we ask ourselves, “is this what’s best for the patient?” We empower people to take control of their health, focusing on health outcomes as a measure of success. We provide high-quality care with integrity as we commit to making healthcare more affordable, accessible, and enjoyable.



DARE TO BE BETTER

To grow our company and change how people receive care, we have to dare to be better every day. We seek to learn from the past, engage in respectful debate, and reimagine the future. Anything is possible when we innovate boldly and aim higher every day.



Introduction to the Code

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Thirty Madison's Code of Conduct ("Code") is one way the company ensures that its business processes and activities are in line with its mission, vision, and values.

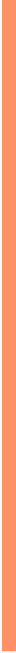
The Code applies to all Thirty Madison Employees, Employees of subsidiaries, and affiliates ("Employees"), as well as anyone working for or on behalf of Thirty Madison. At Thirty Madison we embrace a culture of honesty, responsibility, and trust. We are all responsible for maintaining a commitment to the highest levels of corporate ethics.

This Code should serve as a guide in your dealings with other Thirty Madison Employees, patients, consumers, competitors, business partners, vendors, government agencies, and stakeholders. This Code should also assist in making ethical decisions, adhering to applicable laws, rules, and regulations, and knowing how to report any potential compliance issues. When applying these principles to ethical decision making, we want you to use your best judgment. The standards of this Code do not affect or preclude other, more stringent standards required by law, by court order, or by the appointing authority.

We expect all Employees as well as anyone working for or on behalf of Thirty Madison to read, comprehend, and adhere to the Code. Failure to adhere to the Code may result in disciplinary action, up to and including termination of employment or engagement.

This Code in no way prohibits, limits, or restricts Employees from exercising any rights provided by law, including but not limited to any activity that is protected under Section 7 of the National Labor Relations Act, which includes the right of Employees to speak with others about the terms and conditions of their employment.

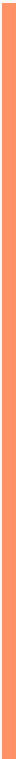
If you have any doubts, questions, or concerns about a situation, please discuss these concerns with your manager, People Operations, or the Compliance Department. If you wish to remain anonymous, you can report a suspected violation or concern to thirtymadison.ethicspoint.com at 1-844-990-0267. Thirty Madison prohibits retaliation against anyone who in good faith reports compliance issues or assists in the investigation of such violations.



We comply
with
applicable
laws and
company
policy.

We expect all Employees as well as anyone working for or on behalf of Thirty Madison to:

- Follow all applicable laws, rules, and policies that relate to your employment and areas of responsibility.
- Recognize the risks associated with noncompliance.
- Participate in mandatory training.
- Communicate with your manager, Compliance, or Legal if you do not believe we have given you adequate information about the laws, regulations, and policies that pertain to your position



We are
available
to answer
questions
and
provide
guidance.

At Thirty Madison, situations involving possible violations of ethics, laws, or the Code are not always apparent and may require difficult decision making. To further our mission, Thirty Madison has developed a Compliance Program to answer difficult questions related to laws, policies and procedures, and to provide guidance on relationships with third parties. If you have questions about application of this Code, seek guidance from your manager, Compliance, or Legal.

If you have witnessed or suspect a violation of applicable law, the Code, or Thirty Madison's related policies, you are required to report it promptly using the following channels:

- **Call the toll-free compliance hotline at 1-844-990-0267, 24 hours a day / 7 days a week**
- **File an incident report in the Compliance Portal at thirtymadison.ethicspoint.com**

In certain circumstances, Thirty Madison may direct that a complaint or related investigation be kept confidential or as confidential as possible to further the goals of compliance with applicable law, regulations, the Code, or Thirty Madison's related policies. Although reporters have the option to remain anonymous, furnishing names and any relevant contact information will help the company investigate your concerns.

We follow a strict whistleblower and non- retaliation policy.

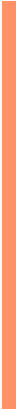
At Thirty Madison we value open communication of issues and concerns by all Employees without fear of retribution, disciplinary action, harassment, or retaliation. This is vital to the successful implementation of this Code and adherence to all laws and regulations. We will not tolerate harassment, retaliation, or any kind of discrimination or adverse action against an Employee who:

- Makes a good-faith complaint or report about suspected Employee violations of this Code, applicable laws, or Thirty Madison policies;
- Provides information or assists in an investigation; or
- Testifies or participates in a proceeding relating to violations of law.

Retaliation against anyone who reports an issue, provides information, or otherwise assists in a compliance investigation will, in itself, be treated as a violation of this Code. Any Employee found to have retaliated against another Employee in violation of this policy will be subject to disciplinary action, up to and including termination.

The Code or Thirty Madison policy does not shield Employees from the consequences of making reports in bad faith. Employees that make reports in bad faith will be subject to disciplinary action, up to and including termination.

If you believe you are being retaliated against for reporting in good faith please, notify [People Operations](#) and [Compliance](#). If you wish to remain anonymous, report the issue to the Compliance hotline by calling 1-844-990-0267 or submit a report to thirtymadison.ethicspoint.com.



We embrace diversity, equity and inclusion.

At Thirty Madison, we believe that diversity, equity, and inclusion among our Employees strengthens our ideas, fosters innovation, and benefits our patients. We are dedicated to creating a diverse and inclusive work environment that promotes personal development, supports unique skills, and serves the needs of our patients.

We aspire to have a positive impact on each other and our patients by creating an environment where everyone feels welcome, included, and heard. We treat each other with dignity and respect, and we are accountable for our actions. We work hard to keep our workplace safe and professional, free of all forms of harassment and discrimination.

We have zero tolerance for harassment and discrimination.

Thirty Madison prohibits harassment or discrimination based on race (including traits historically associated with race, such as hair texture and protective hairstyles), color, creed, gender (including gender identity and expression), religion, sex, pregnancy (including childbirth, breastfeeding, and related medical conditions), sexual and reproductive health decisions, marital status, registered domestic partner status, caregiver status, familial status, domestic violence victim status, citizenship status, age, national origin, ancestry, ethnicity, physical or mental disability, medical condition, military or veteran status, sexual orientation, genetic information or characteristics, or any other consideration protected by federal, state, or local laws. This includes sexual harassment or unwelcomed conduct which is sexual, or which is directed at an individual because of their sex.

- Employees that engage in harassment and discrimination will face sanctions or disciplinary action.
- Employees are prohibited from engaging in unwanted verbal or physical advances, making sexually explicit derogatory statements, or sexually discriminatory remarks which are offensive or objectionable, or which cause discomfort or humiliation.
- Employees are prohibited from engaging in “quid pro quo” harassment such as: trading job benefits such as hiring, promotion, continued employment, or any other terms, conditions, or privileges of employment for sexual favors.

We have a zero tolerance policy toward harassment and discrimination of any kind. Employees should not engage in conduct that could reasonably be interpreted as harassment and discrimination or is otherwise inappropriate under Thirty Madison policy.

If you believe you have been subjected to, witnessed, or otherwise learned of unlawful discrimination or harassment by anyone, file a complaint with your manager or contact [People Business Partners](#). If you wish to remain anonymous, report the issue to the Compliance hotline by calling 1-844-990-0267 or submit a report to thirtymadison.ethicspoint.com.

We are
committed
to quality
and we
always put
patients
first.

Thirty Madison patients are the reason we thrive. We are committed to providing products and services of the highest quality and value to our patients. We always listen to and prioritize patient choices and preferences when possible. In providing services, we strive to:

- Provide prompt and accurate services consistent with contractual obligations, corporate policies, and regulatory requirements.
- Serve our patients professionally, and with integrity, honesty, and respect.
- Address our patients' primary concerns.
- Handle medications safely and appropriately.
- Prevent, detect, and respond quickly to suspected mismanagement of medications.
- Comply with all applicable federal and state laws.

If you suspect or know of any violation of patient safety, you are required to immediately report this to the [Medical Operations lead](#) and [Pharmacy & Fulfillment lead](#).

If you wish to remain anonymous, report the issue to the Compliance hotline by calling 1-844-990-0267 or submit a report to thirtymadison.ethicspoint.com.

We protect patient information through security measures.

(1 of 2)

Thirty Madison Employees may have access to a wide range of patient records and confidential information. We are committed to following the Health Insurance Portability and Accountability Act (HIPAA), Health Information Technology for Economic and Clinical Health (HITECH) Act, state privacy laws, and all applicable policies. We use and disclose such information only as allowed by law, contract, and policy. Employees must review the guidelines below:

- Read and comply with all Thirty Madison policies, procedures, and contractual obligations that relate to Protected Health Information (“PHI”).
- Protect all “individually identifiable” health information that contains any element of personal identifying information that would allow identification of the individual.
- Only use or disclose PHI as otherwise permitted by federal and state law. PHI includes, but is not limited to:
 - Name
 - Address
 - Electronic Mail Address
 - Telephone Number
 - License Number
 - Social Security Number
 - Full face photos or other identifying images

We protect patient information through security measures.

(2 of 2)

Additional general guidelines for Employees:

- Exercise due care to preserve the security, integrity, and confidentiality of PHI.
- Take reasonable precaution to ensure the protection of PHI from unauthorized access, disclosure, or destruction.
- Do not use PHI in non-private communication channels and systems outside of secure platforms. Refer to Thirty Madison policy for requirements.
- Use the “minimum necessary” standard to provide the smallest amount of patient information necessary to accomplish a job-related purpose for payment and operational needs.
- Only share patient information with authorized individuals on a “need to know” basis.
- Do not use your Thirty Madison credentials to access or review your own medical records, your family member’s records , a friend’s records, or a coworker’s records unless authorized to do so. This includes including looking up phone numbers, birthdays, or addresses.
- Do not save or download protected information to a personal device or email it to your personal email address.
- Do not use or disclose patient information outside the organization, except as necessary to perform your job or as otherwise allowed under applicable laws.

If you encounter any unauthorized disclosures of PHI or any other privacy violations, you are required to immediately report the issue to [Compliance](#). If you wish to remain anonymous, report the issue to the Compliance hotline by calling 1-844-990-0267 or submit a report to thirtymadison.ethicspoint.com.



We are good corporate citizens

Thirty Madison expects all Employees to fully cooperate with Legal and Compliance in any litigation, government investigation, or audit, as well as to keep any information related to investigations confidential. We value our relationship with federal, state, and local governments and are committed to working fairly and honestly with local officials. The guidelines will enhance our partnership as good corporate citizens for officials that we engage with. We ask that you:

- Comply with Thirty Madison's policies as they relate to investigations and corrective actions.
- Assist in the gathering of all applicable documents necessary for a legal proceeding.
- Retain and not destroy or delete information relevant to an investigation.
- Do not direct or encourage anyone to destroy records relevant to an investigation.
- Be truthful and straightforward in your dealings with government officials.
- Do not direct or encourage another Employee or anyone else to provide false or misleading information to any government agency or personnel.

If a representative of the government seeks to interview you regarding Thirty Madison business activities, you have the right to be represented by counsel. If you are contacted by a government agent or representative and asked to provide information, you should request the agent or representative's information and contact Compliance and Legal before providing any information.

Nothing in this Code shall be construed to limit the right of Thirty Madison Employees to (1) respond accurately and fully to any question, inquiry, or request for information when required by legal process; (2) disclose information to any governmental agency with regulatory or oversight responsibilities for companies such as Thirty Madison; or (3) participate in any proceeding before an administrative agency responsible for enforcing labor and/or employment laws.

If you are contacted by a government agent or representative and asked to provide information, you are required to immediately contact the [Compliance](#) and the [Legal Department](#).

We are committed to reducing fraud, waste, and abuse.

Anti-Bribery Laws

Anti-Bribery laws prohibit giving, promising to give, or offering to give anything of value, to any person for the purpose of unlawfully influencing any act or decision, including in particular when interacting with healthcare professionals and government officials. Conversely, we will not receive anything of value that could be perceived to improperly and unlawfully influence our own conduct.

Criminal Health Care Fraud Statute

The Criminal Health Care Fraud Statute prohibits knowingly executing, or attempting to execute, a scheme to defraud any healthcare benefit program during the delivery of or payment for healthcare benefits, items, or services. Penalties for violating the Criminal Health Care Fraud Statute may include fines, imprisonment, or both.

Anti-Kickback Statute

The Anti-Kickback Statute makes it a criminal offense to knowingly and willfully offer, pay, or receive payment in return for referrals of items or services reimbursable by a federal healthcare program. If one purpose or reason for a financial transaction or arrangement with an individual or organization is to induce that individual or organization to refer patients or business to Thirty Madison, or to recommend Thirty Madison services, then such transaction or arrangement may constitute a violation of the Anti-Kickback Statute.

Stark Law (Physician Self-Referral Law)

The Stark Law generally prohibits a physician from making a referral for certain health services to an entity in which the physician (or an immediate member of their family) has an ownership/investment interest or with which they have a compensation arrangement.

False Claims Act

The False Claims Act imposes civil liability on any person who knowingly submits a false or fraudulent claim to the Federal Government. Civil penalties for violating the False Claims Act may include fines and up to three times the amount of damages sustained by the government as a result of the false claims.

Please keep in mind that these federal laws may have state law equivalents as well. If you suspect or know of any violation of these laws, you are required to immediately report this to the [Compliance](#) and [Legal](#) by calling 1-844-990-0267 or submit a report to thirtymadison.ethicspoint.com.

We are mindful of conflicts of interest.

(1 of 3)

At Thirty Madison we encourage all Employees to evaluate all business relationships and transactions for potential conflicts of interest. A potential conflict of interest may arise when:

1. You or a family member has a private interest that interferes, or appears to interfere, with the interests of Thirty Madison;
2. An Employee's loyalties or actions are divided between Thirty Madison's interests and those of another entity or person, such as a competitor, supplier, customer, family member, or friend;
3. An Employee (or their family members) receives improper personal benefits as a result of the Employee's position in Thirty Madison;
4. An Employee uses their position to obtain a personal benefit or to assist others in profiting;
5. An Employee directs business to a supplier owned, managed by, or employed by a relative or friend.

When engaging in business partnerships, transactions, and decisions, it is important that we ensure these relationships are impartial, objective, and free from potential conflicts of interest. Below are a wide range of conflict-related activities you may encounter as an Employee:

- Business meals and events are often used to strengthen business relationships and are a common part of business relationships today. These include beverages, meals, recreation, and tickets. We advise the following:
 - Do not take part in business meals and events that do not appear to strengthen business relationships between parties.
 - Do not accept or offer gifts, gratuities, or favors except common business courtesies of nominal value (\$50 or less) that are given to or received from one source.
 - Do not accept travel or accommodations in connection with entertainment that exceeds \$150 in value unless there is a specific and legitimate business purpose.
 - Do not engage in meals or events where both parties are not present, as we consider this gifting.

We are mindful of conflicts of interest.

(2 of 3)

- Gifts are any item of value given to you by a customer, patient, third party (e.g., a vendor). Employees should never accept or offer a gift if the purpose of the gift is to influence the recipient or if it might be perceived as an attempt to influence an individual. We outline recommendations for gifting below:
 - Modest gifts, including those associated with life events, are acceptable including: moderately priced clothing or memorabilia bearing the logo of the business partner or gift baskets of food, which you are encouraged to share with others in your group.
 - The value of gifts received in one year from all business sources must not exceed \$150. Gifts exceeding this policy must be approved by the Legal Department.
 - Do not accept or offer gifts of cash or cash equivalents (e.g., gift cards, checks, money orders).
 - Do not accept or offer gifts while engaged in active contract/business negotiations.
 - Do not accept or offer gifts to a competitor.
 - Do not accept or offer extravagant gifts (including assets) that are extravagant or not consistent with customary business practices.
 - Do not accept a gift that could be perceived as a kickback, bribe, or payoff.
 - Do not offer or accept anything of value from government officials or government Employees, including food and beverages.

We are mindful of conflicts of interest.

(3 of 3)

- Secondary employment/moonlighting exists when Employees have or desire to take a second job or perform services for another company. Recommendations for managing secondary employment/moonlighting are outlined below:
 - Do not engage in work with another company that creates a conflict of commitment or a conflict of interest with your responsibilities at Thirty Madison.
 - Report potential secondary employment with a Thirty Madison partner, competitor, client, or supplier to People Business Partners.
- Personal relationships that appear to present conflicts of interest or favoritism where a family member (defined as spouse, romantic partner, domestic partner, cohabitant, child, grandchild, parent, sibling, and corresponding step and in-law relationships) or significant other (defined as someone with whom you have a romantic relationship, including cohabitants) can benefit can affect stability and goodwill in the workplace and should be avoided.
 - Thirty Madison reserves the right to make organizational changes to avoid a conflict of interest.


If you are interested in seeking secondary employment that may pose a potential conflict, contact your manager or the [People Business Partners](#) team.



We safeguard proprietary information.

As a condition of employment we expect all Thirty Madison Employees to maintain confidentiality of Thirty Madison “proprietary information.” Proprietary information includes all non-public information that is maintained as confidential by Thirty Madison. Examples of such information include but are not limited to: trade secrets; business plans; business records; business strategies; financial information; Employee information; databases; supplier lists; intellectual property; and pricing information.


Unauthorized use or distribution of proprietary information violates company policy. You must maintain all proprietary information in strict confidence unless disclosure is authorized by Thirty Madison in writing or required by law. This obligation continues even after you leave Thirty Madison. Employees that violate company policy will face disciplinary action or potential legal implications for distributing proprietary information.



We take intellectual property seriously.

To the extent permitted under applicable law, as a condition of employment all Thirty Madison Employees grant ownership of intellectual property, or anything developed or produced in conjunction with their work, to Thirty Madison. This also applies to non-Employees (vendors, contractors, and consultants) that sign non-disclosure and assignment of work product agreements. Examples of such intellectual property include but are not limited to: documents; procedures; research; technologies; programming code; and marketing plans.

Thirty Madison retains all rights to ideas, code, programs, designs, and systems developed for the company. Employees should direct any concerns regarding Thirty Madison intellectual property rights and your role in protecting such rights to Legal.



We are conscious of our investments and financial interests.

Thirty Madison Employees are allowed to buy stock or hold investments in other companies that compete, do business, or are negotiating to do business with Thirty Madison. Not permitted is the use of material nonpublic information obtained through involvement with the company to make decisions to purchase, sell, give away, or otherwise trade securities or to provide that information to others outside the company. Do not pursue a loan or guarantee of an obligation as a result of your position at Thirty Madison.

The following are unlikely to cause a real or perceived conflict of interest:

- Ownership of less than 1% of the stock of a company.
- Investment in a mutual fund or other portfolio investment account.
- Routine investments in publicly traded companies not involving material nonpublic information related to the company.




We use technology and resources in a responsible manner.

Thirty Madison Employees are responsible for properly and appropriately using and protecting Thirty Madison technology resources, including the email system, the internet, and company-issued mobile devices and computers. Incidental personal use of such resources is allowed as long as the usage does not interfere with your job responsibilities.

- Do not use the technology resources to solicit causes, commercial enterprises, outside organizations, or other activities that are unrelated to our responsibilities at Thirty Madison.
- Do not have any expectation of privacy while company devices are in your care as email and other electronic communications generated on Thirty Madison computer networks and devices are subject to disclosure in litigation or a regulatory inquiry pursuant to applicable federal, state, and local laws.
- Do not use technology resources for bullying, harassment, discrimination, piracy, data theft, hacking, and other illicit or unsafe activity.
- Pursuant to applicable federal, state, and local law, violation of these policies may be grounds for disciplinary action, up to and including termination.

If you have questions about the appropriate use of Thirty Madison technology resources should be directed to your manager, [Legal](#) or [Compliance](#).



We do not engage with press or on social media unless authorized.

Thirty Madison may consult with the press and use social media - including blogs, podcasts, discussion forums, and social networks - to release company-related communications. You should only respond to press inquiries or utilize these outlets when properly authorized, and all communications should comply with this Code. We encourage all Employees to review the guidelines below as it relates to press inquiries and social media use.

- Do not speak to the press without approval from Communications and Legal.
- Only approved personnel can speak for Thirty Madison.
- Personal recommendations and opinions should include a disclaimer, such as “Any opinions expressed are solely my own and do not express the views or opinions of my employer.”
- Do not share patient information in public forums (e.g., Facebook, Twitter, Snapchat, Instagram, LinkedIn, etc.).
- Do not share stories and photos about patients unless that content goes through the appropriate approval process.
- If you disclose confidential information online, delete your post immediately and report the issue to Legal and Compliance.
- Be mindful of what you share online and, as with all policies and procedures, ensure you are aware of our standards and expectations.

If you have general questions about using Thirty Madison social media and electronic activity protocol, or are being contacted by the press or media, contact our [Communications team](#).

For social media concerns notify the [Compliance](#) department by calling 1-844-990-0267 or submit a report to thirtymadison.ethicspoint.com