



Employee Code & Standards of Conduct



Get Heal, Inc. and Its Associated Medical Practices (Company) are committed to conducting business and caring for patients with the highest level of ethics and integrity. As part of this commitment, employees shall adhere to the highest code of ethics, integrity and just culture at all times. This includes but is not limited to a workplace free from discrimination, retaliation and violence. Moreover, all employees shall treat each other, clients of company and associates of company with respect. All employees shall adhere to the highest standards of honesty, transparency, compliance and equity in their day-to-day work and duties, including preserving the confidentiality, privacy and security of all client and client-related personal and or health information, as well as Company proprietary data.



Table of Contents

Workplace Conduct.....	4
Prohibition on Fraud, Abuse & Illegal Referrals.....	6
Confidential Company Information.....	8
Conflicts of Interest and Business Ethics.....	9
Use of Communications and Computer Systems.....	11
Personal and Company-Provided Portable Communication Devices.....	13
Use of Facilities, Equipment and Property, Including Intellectual Property.....	15
Health and Safety.....	16
Statements to the Media and Publishing of Articles of Papers.....	18
Use of Social Media.....	19
Preventing Distraction & Perceived Impositions.....	21

I. Workplace Conduct

Heal endeavors to maintain a positive work environment, and consequently, each employee plays a role in fostering this environment. Therefore, we all must abide by certain rules of conduct, based on honesty, sound judgement, and fairness.

Because each person may not have the same ideas about proper workplace conduct, it is helpful to adopt and enforce rules that apply to all individuals in the workplace without exception. Those who choose to engage in unacceptable conduct and or conduct which is inconsistent with the requirements of this Code, may subject to disciplinary action, up to and including termination. The following are examples of some, but not all, the types of conduct which may be considered unacceptable according to our Code:

- Engaging in illegal or activities prohibited by rules or regulations
- Obtaining employment on the basis of false or misleading information
- Stealing, removing or defacing Company or a co-worker's property
- Unauthorized disclosure of confidential and or proprietary information
- Falsifying company records of any kind



- Misusing Company property or wasting Company materials and resources
- Engaging in willful or careless destruction or damage to Company assets or equipment
- Engaging in willful or reckless destruction of a co-worker's possessions
- Violating safety rules and policies
- Violating Heal's Drug and Alcohol-Free Workplace Policy
- Fighting or threatening violence against co-workers or other violations of Heal's Workplace Violence Policy
- Seeking to sabotage or disrupt the work of others
- Slandering, defaming, or intentionally intruding on the privacy other employees
- Failing to follow lawful instructions of a supervisor
- Violating of the Punctuality and Attendance Policy, including but not limited to irregular attendance, habitual lateness, or unexcused absences
- Failing to perform assigned job responsibilities in accordance with expectations
- Performing activities of a personal nature during work
- Failing to disclose and or engaging in Conflicts of Interest
- Gambling on Company property
- Any other violation of Company policies or procedures

Obviously, not every type of misconduct can be listed, however our basic expectation is that all employees will behave ethically and with integrity in the execution of their duties and in their interaction with co-workers and colleagues. Those who fail to abide by our ethical tenets will be disciplined up to and including termination of employment as appropriate. All employees are employed at-will and Heal reserves the right to impose appropriate discipline as required at its discretion. The Company will deal with each situation according to the specific facts and circumstances and nothing in this handbook should be construed as a promise of specific treatment in a given situation. However, the Company will utilize progressive discipline in most cases, but reserves the right in its sole discretion to terminate an employee at any time as appropriate. The observance of these rules will help to ensure that our workplace remains a safe and desirable place to work.

II. Prohibition on Fraud, Abuse & Illegal Referrals



It is Heal's Mission to provide patients with accessible high quality and holistic healthcare. In contrast to the approach of many other providers, Heal seeks to treat the whole patient rather than just symptoms a patient may exhibit. Heal also seeks to ensure that the care and treatment provided to patients helps to improve their health outcomes rather than simply manage diseases and their effects. Therefore, in this context, any type of healthcare fraud, waste, or abuse is incompatible with the Company's mission and values and will not be tolerated. All forms of fraud, waste, and abuse in the conducting of Company business is strictly prohibited.

Employees that are healthcare providers as well as those who are not, are prohibited from offering, soliciting, providing, or accepting any improper gratuities relating to, or for, the provision or healthcare services. The offering or acceptance of kickbacks of any kind—whether to or from patients, vendors, or other healthcare providers—is strictly prohibited, and will result in immediate termination.

Employees who are healthcare providers, as well as those who are not, are also prohibited from engaging in any activity with the purpose or intention of inducing healthcare referrals or business. Employees are also prohibited from referring any patient to designated healthcare services in which they have a personal financial interest or have friends and or family members with such interests. The making of any impermissible referrals as described herein will result in immediate termination.

Finally, healthcare providers may only prescribe medically necessary services as determined by sound clinical judgment and prevalent healthcare standards. The decision to prescribe a certain product or provide certain healthcare services, may not be influenced by any personal financial interest or desire for self-gain. Additionally, all medically necessary services must be appropriately documented and justified, and the medical billing and coding of such services must be accurate and reasonable. Employees may not use higher levels of coding to support higher reimbursement when such coding is not justified or supported by the care provided. Employees and physicians also may not submit separate billing and coding for services which have been bundled and charged as a group for reimbursement.

III. Confidential Company Information



During the course of work, an employee may become aware of proprietary and confidential information about Heal’s business. Such confidential and proprietary information may include but not be limited to information regarding: Company finances, pricing, products, new product development, software, computer programs, marketing strategies, suppliers, as well as current and potential customers. An employee also may become aware of similar confidential information belonging to the Company’s clients. It is extremely important to ensure that all confidential and proprietary information is adequately protected and is not disclosed to competitors or other unauthorized third parties. Any employee who shares, copies, removes (whether physically or electronically), uses, or discloses confidential and or proprietary information without authorization, may be subject to disciplinary action up to and including termination. Employees may be required to sign an agreement reiterating these obligations.

IV. Conflicts of Interest and Business Ethics

A. GENERAL PRINCIPLES

Heal requires that employees avoid any material conflict of interests whether personal or business-related. This requirement serves to ensure that all employees execute their employment obligations objectively and without impaired judgment. This requirement also ensures that all employees render their employment obligations in the best interests of the Company. Finally, this requirement ensures that both the Company and its employees adhere to ethical standards and integrity in conducting business. Finally, employees are responsible for identifying and disclosing any potential or actual conflicts of interest.

It is not possible to give an exhaustive list of situations that might involve potential or actual conflicts of interest. However, some circumstance that might present conflicts of interest include but are not limited to:

- holding an interest in or accepting free or discounted goods from any entity that does, or is seeking to do, business with the Company
- holding any interest in an organization that competes with the Company
- being employed by, providing consulting services to, or serving on the board of any entity which does, or is seeking to do business with the Company, or is a Company competitor
- profiting personally through commissions, loans, expense reimbursements, or other payments, from any organization engaged by or seeking to do business with the Company
- having a family member that holds an interest in an organization that competes with the Company
- having a family member that does, or is seeking to do, business with the Company

It should be noted that modest courtesies which are provided as part of the usual business amenities are not prohibited. For example, occasional business-related meals or promotional items of nominal value are acceptable to give or receive in the course of business. If you are uncertain about whether the receipt or provision of a business courtesy is permissible, you should contact Compliance for guidance (compliance@heal.com).

B. OTHER CONFLICTS OF INTEREST: HIRING RELATIVES & EMPLOYEE RELATIONSHIPS

A familial relationship among employees can also create potential or actual conflicts of interest in the employment setting, especially where one relative supervises another relative. A relative is defined as any person who is related by blood or marriage, or whose relationship with the employee is similar to that of persons who are related by blood or marriage. To avoid potential or actual conflicts of interest, Heal may refuse to hire or place a relative in a position where the potential for favoritism or conflict exists.

In other cases, such as personal relationships, potential or actual conflicts may arise even if there is no supervisory relationship involved. In such cases, individuals may be separated by reassignment at the discretion of the Company. Accordingly, employees involved in an intimate personal relationship must inform management of the relationship.

If two employees become related, enter into an intimate relationship, or marry, they may not remain in supervisory or reporting positions with each other, or in positions where one individual may affect the compensation or other terms or conditions of employment of the other individual. In such cases, the Company generally will attempt to identify other available positions, and or alternatives to the reporting relationship if feasible.

V. Use of Communications and Computer Systems

Heal's communication and computer systems are intended primarily for business purposes; however, limited personal usage is permitted if it does not hinder performance of job duties or violate any other Company policy. Heal may monitor the use of its communication and or computer systems to ensure their security and integrity. Therefore, users should have no expectation of privacy, in regard to their use of the Heal systems.

Heal may access or monitor voicemail and e-mail systems or obtain these communications within the systems without notice to users. These communications may be obtained in the ordinary course of business and or when the Company deems it appropriate to do so. The reasons for which the Company may obtain such communications include but are not limited to: maintaining the system; conducting compliance investigations; preventing or investigating allegations of system abuse or misuse; assuring compliance with software copyright laws; complying with legal and regulatory requests for information; and ensuring that Company operations continue appropriately during an employee's absence.

Additionally, Heal may review employee or contractor internet usage in Company systems to ensure that such use or communications are appropriate. The reasons for which the Company may review employees' use of the internet with Company property include but are not limited to: maintaining the system; conducting compliance investigations; preventing or investigating allegations of system abuse or misuse; assuring compliance with software copyright laws; complying with legal and regulatory requests for information; and ensuring business continuity. The Company may store electronic communications for a period of time after the communication is created. From time to time, copies of communications will be deleted in accordance with the Company's Record Retention Policy.

The Company's policies which prohibit harassment, also apply to the use of Company's communication and computer systems. No one may use any communication or computer system in a manner that may be construed by others as harassing or offensive based on race, national origin, sex, sexual orientation, age, disability, religious beliefs or any other characteristic protected by federal, state or local law.

Further, since the Company's communication and computer systems are intended for business use, all employees or contractors must provide private access codes or passwords upon request. Unauthorized duplication of copyrighted computer software violates the law and is strictly prohibited. No employee may access, or attempt to obtain access to, another employee's computer systems without appropriate authorization. Violators of this policy may be subject to disciplinary action, up to and including termination.



VI. Personal and Company-Provided Portable Communication Devices

Company issued portable communication devices (PCDs), including cell phones and personal digital assistants, should be used primarily for business purposes. Employees have no reasonable expectation of privacy in regard to the use of such devices, and all use is subject to monitoring, to the extent permitted by applicable law. This includes the right to monitor personal communications as necessary.

Some employees may be authorized to use their own PCD for business purposes. These employees should work with the IT department to configure their PCD for business use. Communications sent using a personal PCD also may subject to monitoring, if sent through the Company's networks, and the PCD must be provided for Company inspection and review upon request.

When using Company communication systems of PCDs for business purposes, employees must ensure that any correspondence, text messages, or e-mails are appropriate for business purposes. All business communications whether sent using a Company-provided or personal device, must comply with applicable Company guidelines, including policies on sexual harassment, discrimination, conduct, confidentiality, equipment use and operation of vehicles. Using a Company-issued PCD to send or receive personal text messages is prohibited at all times and personal use during working hours should be limited to emergency situations.

Upon resignation or discharge, employees or contractors who use personal PCDs for business will be required to submit their device to the IT department for resetting on or before the last day of employment or engagement. At that time, the IT department will reset and remove all Company-related information from the device, including but not limited to, Company documents, Company data, or Company contact information such as



phone numbers, e-mails, and photographs. The IT department will make efforts to provide employees with any personal data removed in this process in another format to the extent practicable; however, it is possible the some or all personal data saved on the device may be lost.

Employees may not use their personal PCD for business unless they agree to submit the device to the IT department on or before their last day of work for resetting and removal of Company information. This is the only way currently possible to ensure that all Company information is removed from the device at the time of termination. The removal of Company information is crucial to ensure compliance with the Company's confidentiality and proprietary information policies and objectives.

Please note that whether employees use their personal PCD or a Company-issued device, the Company's electronic communications policies, including but not limited to, proper use of communications and computer systems, remain in effect.

VII. Use of Facilities, Equipment and Property, Including Intellectual Property

Company equipment used in daily operation is often expensive and in some cases, may be difficult to replace. When using Company property or equipment, employees are expected to exercise due care, perform required maintenance, and follow all operating instructions and safety standards. Employees should notify their Supervisor if any equipment, machines, or tools appear to be damaged, defective, or in need of repair. Prompt reporting of loss, damages, defects, and the need for repairs, could prevent deterioration of equipment and possible injury to employees or others. Improper, careless, negligent, destructive, or unsafe use or operation of equipment can result in discipline, up to and including discharge.

Due care also involves ensuring that the Company's intellectual property and or proprietary information are appropriately protected and secured. Therefore, employees, are prohibited from any unauthorized use of the Company's intellectual property, such as software, proprietary data, and print materials. Theft or misuse of any Company property is also prohibited and will result in serious disciplinary action upon discovery.

VIII. Health and Safety

The Company seeks to ensure the health and safety of employees, contractors, and or guests and therefore will comply with all health and safety laws applicable to our business. To this end, we must rely upon employees to ensure that work areas are kept safe and free of hazardous conditions. Employees are required to be conscientious about workplace safety, including proper operating methods, and recognize dangerous conditions or hazards. Any unsafe conditions or potential hazards should be reported to management immediately, even if the problem appears to be corrected.

Any potential unsafe conditions present on the Company's premises, or in a product, facility, piece of equipment, process or business practice for which the Company is responsible, should be brought to the attention of management immediately. Additionally, all workplace injuries, accidents, or illnesses must be reported to the employee's Supervisor or HR team member as soon as possible. It should be noted that the requirement for reporting is not contingent upon the severity of injury or illness.

Periodically, the Company may issue rules and guidelines governing workplace safety and health. The Company may also issue rules and guidelines regarding the handling and disposal of hazardous substances and waste. All employees must ensure their awareness of these rules and guidelines, as compliance with the requirements is necessary.

A. SAFETY REQUIREMENTS WHILE DRIVING TO AND FROM WORK AND RELATED ACTIVITIES

Employees who travel for Company business as part of their roles, must also follow certain safety requirements. Employees or contractors who drive to and from business-related functions or activities must abide by all state or local laws prohibiting or limiting cell phone or personal digital device use while driving. In this context, “use” includes, but is not limited to engaging or actively participating in business discussions and or sending text messages. Employees may choose not to engage in business discussions while driving if there is a concern that safety may be compromised.

Employees who choose to participate in business discussions while driving should proceed to a safe location off the road and safely stop the vehicle before placing or accepting a call, unless a hands-free option for communication is available. Employees are permitted to decline business calls or refuse to engage in business discussion while driving, if they have relevant safety concerns about doing so. Further, employees must use a hands-free option if they choose to engage in business discussions while driving. Texting or e-mailing while driving is prohibited in all circumstances. As employees are not mandated to use cell phones or other communication devices while driving, any traffic violations resulting from the use of these devices will be solely the employee’s responsibility.

B. SAFETY REQUIREMENTS FOR THE WORK ENVIRONMENT

Given the Company’s commitment to maintaining a safe and healthy workplace environment, certain activities which can pose health risk may not be permitted on or around Company premises. Consistent with this approach Company prohibits the use of recreational drugs and alcohol on Company premises. Additionally, smoking, including the use of e-cigarettes, is prohibited on Company premises and in all Company vehicles. These limitations help to ensure the health and well-being of all Company employees.

IX. Statements to the Media and Publishing of Articles of Papers



Statements to the media must not only be accurate but also appropriately calibrated for tone and content. Any media inquiries regarding Company related matters must be referred to the appropriate personnel in senior management. Only members of senior or executive management may be authorized to speak on behalf of the Company and or approve certain public statements. Unless expressly designated by relevant senior management, employees are prohibited from making any statements on behalf of Company. This limitation extends to and includes the publishing of articles, papers and other documents relevant to Company interests or products. Any employee who desires to publish an article, paper, or other publication on behalf of the Company must first obtain approval from senior or executive management, accordingly.

X. Use of Social Media

Heal respects the right of employees to use social media as part of their right to self-expression. However, the use of social media must be conducted during their time outside of work and may not interfere with their work responsibilities. In their use of social media, employees may maintain a personal blog or web page or participate in social networking sites. However, to protect Company interests, employees that choose to engage in social media must adhere to previously described confidentiality requirements.

All prohibitions regarding confidential and proprietary business information apply in full to blogs, websites, and social networking platforms. Any information that is impermissible to disclose in discussion or writing also may not be disclosed on social media platforms. Regardless of the platform, if an employee or Company Director expresses either a political opinion or an opinion regarding the Company's actions approval should be sought prior to posting the relevant information. If approved, the posted information must also include a disclaimer that states: "the opinion expressed is personal and subjective and does not reflect the Company's position."

Additionally, it should be noted that any expression that is legally impermissible or impermissible under Heal policies is prohibited regardless of the medium used for such expression. Employee are prohibited from posting material that is discriminatory, obscene, defamatory, libelous or violent.

Employees also should be mindful of the fact that the speed and wide dispersion of information posted on social media and networking sites, can result in misinterpretation of the author's intent and or misunderstanding of the underlying facts. Employees must use sound judgment when choosing to post information on social media or engage in discussions on such platforms, because it is always possible that inappropriate communications can reflect poorly on Heal even unintentionally. Employees needing guidance should request it in advance of posting any material, content, or information. Failure to follow these guidelines may result in discipline, up to and including discharge.



XI. Preventing Distraction and Perceived Impositions

Certain behaviors including engagement in certain discussion topics which might be considered controversial, the provision of certain information, and or distribution of certain non-work related materials, can create distractions or perceived impositions on members in the workplace. While the Company supports individual freedom of expression and belief, employees must also ensure that such expressions do not create an unwelcoming or marginalizing environment for other members of the organization.

Discussions regarding politics, faith or religious convictions, sexual orientation, and or gender identity, could unintentionally create an environment that some perceive as hostile or unwelcoming. Therefore, these topics should generally be avoided in the workplace. Requests for donations to charitable causes and organizations also can create an environment where some individuals feel imposed upon or pressured, and still others may regard as a distraction.

To avoid distractions, employees and contractors should avoid discussion of controversial topics and or making requests for charitable donations during work time. “Work time” is defined as the time an employee or contractor is engaged, or should be engaged, in performing work-related tasks and activities for Heal. Additionally, distribution of advertising or religious materials, handbills, printed or written literature of any kind by employees or contractors in working areas of the Company is prohibited. Distribution of such materials by non-employees on Company premises is also prohibited.