



The Altruista Health
Code of Ethics and Business Conduct
2021

The Values We Live By

Customer Success

- We are committed in heart and mind to building strong, long-lasting relationships with our customers.
- We are unwaveringly focused on achieving excellence and delivering quality in all that we do.

Social Responsibility

- We are committed to being good corporate citizens bounded by responsibilities for strong social impact and cost consciousness in whatever we do.

Integrity

- We stand for what is right and support others who do so.
- We are transparent, honest and ethically in all our interactions with employers, customers, vendors and the public.

Innovation

- We are dedicated to leveraging education and research to deliver tomorrow's healthcare today.
- We encourage risk-taking and strive to inspire creativity to innovate for a better future.

Diversity

- We aim to attract, develop and retain the best and brightest from all walks of life and backgrounds in order to achieve superior business results.

Respect

- We show respect for and value all individuals for their diverse backgrounds, experiences and ideas.

Our Vision

To push the boundaries of discovery to promote patient health and well-being for a better future.

Our Mission

We are committed to building the best-in-class, clinically relevant health IT systems that facilitate proactive delivery of care and raise awareness of healthy lifestyles within the communities we serve.

Why Do We Have a Code?

The success of Altruista Health's business is dependent on the trust and confidence it earns from its employees, customers, business partners and investors. The company gains credibility by adhering to commitments, displaying honesty and integrity and reaching company goals solely through honorable conduct. It is easy to say what must be done, but the actions are the proof.

When considering any action, it is wise to ask: will this build trust and credibility for Altruista Health? Is the decision appropriate and honest? Will it help maintain a working environment where the workforce thrives and Altruista Health succeeds? Is the commitment made viable and can be followed through appropriately? To ensure proper business conduct and ethical cultures, we must be able to say yes to all these questions.

To Whom Does it Apply?

Altruista Health expects the entire workforce and Board members to know and follow the Code of Ethics and Business Conduct. Failure to do so may result in disciplinary action, up to and including termination of employment. Moreover, while the Code is specifically written for Altruista Health employees and Board members, all contractors, consultants and others who may be temporarily assigned to perform work or services for Altruista Health are expected to follow the code in connection with their work. Failure of an Altruista Health contractor, consultant, or other covered service provider to follow the code can result in termination of their relationship with Altruista Health.

Respect for the Individual

Everyone deserves to work in an environment where they are treated with dignity and respect. Altruista Health is committed to creating such an environment because it brings out the full potential in each of us, which, in turn, contributes directly to business

Equal Opportunity Employer

Altruista Health is committed to being an equal opportunity employer and encourages diverse and inclusive approaches to employment within its international business. Employee success is dependent on performance and the pursuit of individual development.

success. Altruista Health is committed to providing a workplace free of discrimination or any abusive, offensive or harassing behavior.

Culture of Open and Honest Communication

Everyone should feel comfortable to speak his or her mind, particularly with respect to ethics concerns. Managers have a responsibility to create an open and supportive environment where employees feel comfortable raising such questions. When employees exercise their power to prevent mistakes or wrongdoing by asking the right questions at the right times, everyone benefits.

Altruista Health will investigate all reported instances of questionable or unethical behavior, in accordance with the company's Whistleblower Policy. In every instance where improper behavior is found to have occurred, the company will take appropriate action. Employees should not fear retaliation. Altruista Health will not tolerate any form of retaliation against employees who raise genuine ethics or compliance concerns in good faith.

Altruista Health is committed to providing a workplace free of discrimination or any abusive, offensive or harassing behavior.

Set Tone at the Top

Management has the added responsibility for demonstrating – through its actions – the importance of this code. Ethical behavior does not simply happen; it is the product of clear and direct communication of behavioral expectations – modeled from the top – and demonstrated by example. Ultimately, Altruista Health’s actions are what matters, and it starts at the top.

To make the code work, company leadership must be responsible for promptly addressing ethical questions or concerns and for taking the appropriate steps to deal with such issues. Managers must not consider employees’ ethics concerns as threats or challenges to their authority, but rather as an empowered form of business communication. Altruista Health wants the ethics dialogue to become a natural part of daily work.

Uphold the Law

Altruista Health’s commitment to integrity begins with complying with laws, rules and regulations where it does business. Further, each employee must understand the company policies, laws, rules and regulations that apply to specific roles. Everyone is responsible for preventing violations of law and for speaking up if possible.

Competition

The company is dedicated to ethical, fair and vigorous competition. Altruista Health products and services are sold based on their merit, superior quality, functionality and competitive pricing. We will make independent pricing and marketing decisions and will not improperly cooperate or coordinate our activities with competitors. We will not offer or solicit improper payments or gratuities by any domestic or foreign government, political party, entity or individual in connection with the purchase of goods or services for Altruista Health or the sales of its products or services, nor will the company engage or assist in unlawful boycotts of particular customers. This policy requirement is enforced for both domestic

and international business affairs in compliance with all U.S. and India bribery and corruption regulations and laws.

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Anti-Corruption

Altruista Health workforce members must comply with all local, national, federal and international laws associated with anti-corruption activities. Corruption activities include but are not limited to bribery, extortion, cronyism, nepotism, parochialism, patronage, influence peddling, graft and embezzlement. Adherence with anti-corruption laws does not apply just to Altruista Health workforce activities. The company or workforce member may be held accountable for being directly or indirectly aware of or participating in the conduct of any business associate considered illegal.

Non-compliance – for both participating and non-reporting – will lead to sanctioning. There is also risk of being found guilty under the law.

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Sensitive Payments

Altruista Health does not condone or authorize any Altruista Health workforce member, subcontractor or business associate to conduct any business transaction that could be construed or perceived as a “sensitive payment.” Sensitive payments include those:

- Contributions, payments or gifts to or for the private use of any governmental official, employee or agent where either the payment or the purpose of such contribution, payment or gift is illegal under the applicable laws of the United States or the jurisdiction in which made or any other applicable jurisdiction
- Established or maintained any unrecorded fund or asset for any purpose or made any false or artificial entries on its books
- Made any payments to any person with the intention that any part of such payment was to be used for any purpose other than that described in the documents supporting the payment
- Engaged in any “trading with the enemy” or other transactions violating any rules or regulations of the Office of Foreign Assets Control or any similar applicable laws, rules or regulations

Altruista Health must remain in compliance with all United States laws so as not to violate economic sanctions laws, executive orders and any implementing regulations as administered by the U.S. Treasury Department’s Office of Foreign Assets Control and the U.S. State Department.

Non-compliance with these laws and regulations could lead to Altruista Health – or any member of its workforce – being included in the Specially Designated Nationals and Blocked Persons (the SDN list), such that:

- A U.S. person or entity cannot deal or otherwise engage in business transactions with such person or entity
- A person organized or resident in a country or territory subject to comprehensive sanctions (a Sanctioned Country)

- An organization owned or controlled by (including by virtue of such person being a director or owning voting shares or interests), or acts, directly or indirectly, for or on behalf of, any person on the SDN List or a government of a Sanctioned Country such that the entry into, or performance under, any agreement would be prohibited by U.S. law.

Money Laundering and Financial Terrorism

Altruista Health workforce must not conduct any actions that would put the company out of compliance with any laws related to terrorism or money laundering. Anti-Money Laundering (AML) is a set of laws, regulations and procedures intended to prevent criminals from disguising obtained funds as legitimate income. In a corporate business environment, money laundering could involve funneling inappropriately earned or gained funds through the company’s financial accounts to generate the inaccurate perception that it is appropriate money. Any workforce member involved or aware of this activity may ultimately be charged with AML laws and regulations.

Definition of Embezzlement

Embezzlement is defined as the theft or misappropriation of funds under one’s control. Workforce members identified as having embezzled funds will be sanctioned in the form of termination and, if convicted by federal law, may be sanctioned with financial penalties or prison time.



Fraud, Waste and Abuse

Altruista Health workforce members shall not perpetrate, engage in, or otherwise facilitate the act of committing fraud, waste or abuse. Staff are responsible for the detection and prevention of fraud, abuse, waste, misappropriations, and other irregularities.

- Fraud is defined as the intentional, false representation or concealment of a material fact for the purpose of inducing another to act upon it to his or her injury.
- Waste is defined as the expenditure or allocation of resources in excess of need that is often extravagant or careless. Waste is also the thoughtless or careless expenditure, consumption, mismanagement, use or squandering of resources.
- Abuse is defined as the intentional, wrongful or improper use of resources. Abuse can be a form of wastefulness as it entails the exploitation of “loopholes” to the limits of the law, primarily for personal advantage. It includes extravagant or excessive use as to abuse one’s position or authority.

Each management team member will be familiar with the types of improprieties that might occur within his or her area of responsibility and be alert for any indication of irregularity. All workforce members should understand what may be perceived as fraud, waste and abuse. Any irregularity that is detected or suspected must be reported immediately.

Proprietary Information

It is important that the company respects the property rights of others. Altruista will not acquire or seek to acquire improper means of a competitor’s trade secrets or other proprietary or confidential information. The company forbids engagement in unauthorized use, copying, distribution or alteration of software or other intellectual property belonging to Altruista Health or any of its customers. The workforce will protect the company’s confidential and sensitive data and help prevent others from performing

malicious activities that could negatively impact the information, our customers or the company.

Selective Disclosure

Altruista Health will not selectively disclose (whether in one-on-one or small discussions, meetings, presentations, proposals, or otherwise) any non-public information with respect to Altruista Health, its securities, business operations, plans, financial condition, results of operations or any development plan, or any such information pertaining to Altruista Health, or any non-public information relating to customers, vendors and contractors. Everyone should be particularly vigilant when making presentations or proposals to customers to ensure that presentations do not contain material non-public information.

The workforce will protect the company’s confidential and sensitive data and help prevent others from performing malicious activities

Labor and Employment Laws

Altruista Health complies with all applicable federal, state and local labor employment laws including, without limitation, those pertaining to compensation, pay schedules, benefits, work hours and termination of employment. Under no circumstances will Altruista Health use forced labor, including prison labor, indentured labor, bonded labor or other forms of forced labor. Furthermore, no person shall be employed under the legal working age or under the age for completion of compulsory education, whichever is higher.

Altruista Health recognizes and respects the right of employees to freedom of association and collective bargaining.

Health and Safety

Altruista Health is committed to protecting the health and safety of all individuals affected by its activities, including employees, contractors, customers, vendors and the public. Altruista Health will provide a safe and healthy working environment and will not compromise the health and safety of any individual. The goal is to have no accidents and mitigate impacts on the environment by working with stakeholders and others to promote responsible environmental practices and continuous improvement.

Altruista Health is committed to environmental protection and stewardship. Altruista Health recognizes that pollution prevention, biodiversity and resource conservation are key to a sustainable environment and will effectively integrate these concepts into its business decision-making. All employees are responsible and accountable for contributing to a safe working environment, for fostering safe working attitudes, and for operating in an environmentally responsible manner.

Conflicts of Interest

Staff members should avoid any relationship or activity that might impact, or even appear to impair, the company's ability to make objective and fair decisions when performing jobs. At times, a situation may arise where the business actions taken on behalf of Altruista Health may conflict with our own personal or family interests. Staff owes a duty to Altruista Health to advance its legitimate interests when the opportunity to do so arises. They should not use Altruista Health property or information for personal gain or take advantage of any opportunity discovered through their positions with Altruista Health. Examples include:

- Being employed (to include close family members) by, or acting as a consultant to, a competitor or potential competitor, supplier or contractor, regardless of the nature of the employment, while employed with Altruista Health

Altruista Health recognizes that pollution prevention, biodiversity and resource conservation are key to a sustainable environment and will effectively integrate these concepts into its business decision-making.

- Hiring or supervising family members or closely related persons
- Serving as a board member for an outside commercial company or organization that competes with Altruista Health, or any of its customers, vendors or contractors
- Owning or having a substantial interest in a competitor, customer, vendor or contractor
- Having a personal interest, financial interest or potential gain in any Altruista Health transaction
- Being a decision-maker for purchases made through a firm owned or controlled by an Altruista Health employee or his or her family
- Accepting gifts, discounts, favors or services from a customer/potential customer, competitor, vendor or contractor, unless equally available to all Altruista Health employees

Determining whether a conflict of interest exists is not always easy to do. Before engaging in any activity, transaction or relationship that might give rise to a conflict of interest, employees must seek review.



Gifts, Gratuities and Business Courtesies

Altruista Health is committed to competing solely on the merit of its products and services. Staff should avoid any actions that create a perception that favorable treatment of outside entities by Altruista Health was sought, received or given in exchange for personal business courtesies. Business courtesies include gifts, gratuities, meals, refreshments, entertainment or other benefits from persons or companies with whom Altruista Health does or may do business. The company will neither give nor accept business courtesies that constitute, or could reasonably be perceived as constituting, unfair business inducements that would violate domestic or foreign law, regulation or policies of Altruista Health or that of customers, or would cause embarrassment or reflect negatively on Altruista Health's reputation.

Accepting Business Courtesies

Most business courtesies offered in the course of employment are offered because of job roles at Altruista Health. One should not feel any entitlement to accept and keep a business courtesy. Although one may not use Altruista Health to obtain business courtesies – nor ask for them – the workforce may accept limited, unsolicited business courtesies that promote successful working relationships and goodwill with the firms that Altruista Health maintains or those with whom they may establish a business relationship.

Workforce members who award contracts, can influence the allocation of business, create specifications that results in the placement of

Avoid actions that create the appearance of favoritism or that may adversely affect the company's reputation for impartiality and fair dealing.

business, or who participate in negotiation of contracts must be particularly careful to avoid actions that create the appearance of favoritism or that may adversely affect the company's reputation for impartiality and fair dealing. They should refuse any form of courtesy from a vendor when Altruista Health is involved in selecting or reconfirming a vendor to avoid an impression that offering courtesies is the way to obtain Altruista Health business or that vendor selection was based on business courtesies.

Meals, Refreshments and Entertainment

Workforce members may accept occasional meals, refreshments, entertainment and similar business courtesies that are shared (vendor or customer must be present) with the person who has offered to pay for the meal or entertainment, provided that:

- They are not inappropriately lavish or excessive
- The courtesies are infrequent and do not reflect a pattern of frequent acceptance of courtesies from the same person or entity
- The courtesy does not create the appearance of an attempt to influence business decisions, such as accepting courtesies or entertainment from a supplier whose contract is expiring soon
- The workforce member accepting the business courtesy would not feel uncomfortable discussing the courtesy with his or her manager or co-worker or having the courtesies known by the public
- The vendor is not being actively audited or assessed by Altruista Health employees, contractors or consultants. Partaking in an on-site or non-extravagant off-premises meals to maximize review time efficiency is permissible, but meals or entertainment during an audit/assessment period that are off-site or after hours are not.

Gifts

Employees may accept unsolicited gifts, other than money, that conform to the reasonable ethical practices of the marketplace, including:

- Flowers, fruit baskets and other modest presents that commemorate a special occasion
- Gifts of nominal value, such as calendars, pens, mugs, caps and t-shirts (or other novelty, advertising or promotional items)

Workforce members may not accept compensation, honoraria or money of any amount from entities with whom Altruista Health does or may do business. Tangible gifts (including tickets to a sporting or entertainment event), that have a market value greater than \$100 may not be accepted unless approval is obtained from management. Gift cards of any denomination are not allowable since they constitute money. The only acceptable deviation is if the gift card or a high-value item was won as part of a random drawing open to others at a public venue or event.

Accurate Public Disclosures

Altruista Health will make certain that all disclosures made in financial reports, requests for proposal, and public documents are full, fair, accurate, timely and understandable. This obligation applies to all workforce members, including all financial executives, with any responsibility for the preparation for such reports, including drafting, reviewing and signing or certifying the information contained therein. No business goal of any kind is ever an excuse for misrepresenting facts or falsifying records.

Offering Business Courtesies

Any workforce member who offers a business courtesy must assure that it cannot reasonably be interpreted as an attempt to gain an unfair business advantage or otherwise reflect negatively upon Altruista Health. An employee may never use personal funds or resources to do something that cannot be done with company resources. Accounting for business courtesies must be done in accordance with approved company procedures.

Other than to government customers, for whom special rules apply, the company may provide nonmonetary gifts (i.e., company logo apparel or similar promotional items) to our customers. Further, management may approve other courtesies, including meals, refreshments or entertainment of reasonable value, provided that:

- The practice does not violate any local, national or international law or regulation or the standards of conduct of the recipient's organization
- The business courtesy is consistent with industry practice, is infrequent in nature and is not lavish
- The business courtesy is properly reflected on the books and records of Altruista Health

Corporate Recordkeeping

We create, retain and dispose of company records as part of normal course of business in compliance with all Altruista Health policies and guidelines, as well as all regulatory and legal requirements. All corporate records must be true, accurate and complete, and company data must be promptly and accurately entered in its books in accordance with Altruista Health's and other applicable accounting principles. Altruista Health must not improperly influence, manipulate or mislead any unauthorized audit, nor interfere with any auditor engaged to perform an internal independent audit of Altruista Health's books, records, processes or internal controls.

Appropriate Business Decisions

Integrity is one of our core values. At Altruista Health, we must have the courage to tackle the tough decisions and make difficult choices, secure in the knowledge that Altruista Health is committed to doing the right thing. At times, this will mean doing more than what the law requires. Merely because one can pursue a course of action does not mean the company should do so. Looking out for the best interests of the company, customers and employees is critical.

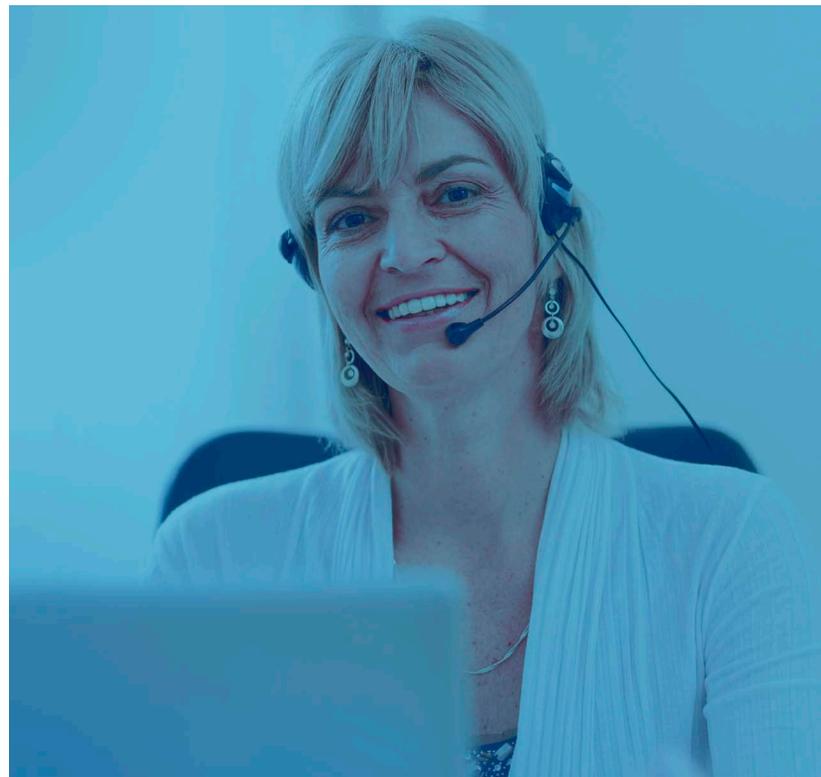
Although Altruista Health's guiding principles cannot address every issue or provide answers to every dilemma, they can define the spirit of how to perform business and should guide daily conduct.

Accountability

Each staff member is responsible for knowing and adhering to the values and standards set forth in the code and for raising questions if uncertain about company policy. Altruista Health takes the standards set forth in the code seriously, and violations are cause for disciplinary action up to and including termination of employment. [^](#)

Confidential and Proprietary Information

Integral to Altruista Health's business success is protection of confidential company information, as well as non-public information entrusted to us by employees, customers, vendors and other business partners. Confidential and proprietary information includes such things as pricing and financial data, customer names/addresses or nonpublic information about other companies, including current or potential supplier and vendors. The workforce will not disclose confidential and nonpublic information without a valid business purpose and proper authorization. Every workforce member is contractually prohibited from disclosing confidential and proprietary information without an approved business purpose.



Do the Right Thing

Several key questions can help identify situations that may be unethical, inappropriate or illegal. Everyone shall ask themselves:

- Does what I am doing comply with the Altruista Health mission, vision, values, code of conduct and company policies?
- Have I been asked to misrepresent information or deviate from normal procedure?
- Would I feel comfortable describing my decision at a staff meeting?
- How would it look if it made the headlines?
- Am I being loyal to my family, my company and myself?
- What would I tell my child to do?
- Is this the right thing to do?
- Could I sleep at night?