

## CODE OF ETHICS

Sorkin's Rx Ltd d/b/a CareMed Specialty Pharmacy ("CareMed") is committed to conducting their business in compliance with the law and the highest ethical standards. As part of these commitments, CareMed requires compliance with this Code of Ethics (the "Code") by all of its owners, executives, officers, directors and employees and the owners, executives, officers, directors and employees of its contractors, subcontractors, agents and other persons who provide patient care items or services on behalf of CareMed. This Code of Ethics is in addition to CareMed's Code of Conduct, Employee Handbook and its Policies & Procedures Manual.

Each individual covered by this Code of Ethics is expected to:

- Comply with applicable laws, rules, standards and regulations of federal, state, provincial and local governments, and other appropriate public or private regulatory, listing and standard setting agencies.
- Engage in honest and ethical conduct including avoiding any actual or apparent conflicts of interest between his or her personal affairs and relationships and his or her professional responsibilities to CareMed and promptly report to the Compliance Officer, or the Governing Body, or the Board of Directors, or its Compliance Committee of any material transaction or relationship that could be expected to give rise to an actual or apparent conflict of interest.
- Proactively promote ethical and honest behavior within CareMed.
- Comply with all of CareMed's own Policies & Procedures.
- Commit to full compliance with all current and future federal, state, local and other applicable health care program requirements, including commitment to prepare and submit accurate claims consistent with such requirements.
- Promptly report to the Compliance Officer, known or suspected violations of any federal health care program requirements, CareMed's Code of Ethics or of CareMed's own Policies & Procedures.
- Have the right to report known or suspected violations using any of the following options:
  - via chain-of-command & speaking to immediate supervisor
  - directly to Compliance Officer
  - anonymously through Compliance Hotline - **Toll-Free (855) 502-1876**
  - anonymously through submission of form on CareMed Central (company Intranet- tab for Compliance)

CareMed is committed to a policy of non-retaliation against any individual for reporting questionable behavior under this Code. CareMed is also committed to maintain, as appropriate, confidentiality and anonymity with respect to such disclosures.

Any individual violating this Code of Ethics will be subject to discipline, up to and including termination of employment.