

MANIFEST MEDEX CODE OF CONDUCT

All employees are expected to be wonderful with each other, customers, and the public. We're all human, and if conduct is not consistently excellent, the employee needs, and will receive feedback. All employees are encouraged to share feedback with each other when lapses in conduct occur – in support of all colleagues and the team's performance. The following are examples of productive, supportive, and adaptive behaviors that define Manifest Medex' culture and enable the team to perform at the high levels for which it is known:

- Getting to meetings (virtual and face-face) on time;
- Ensuring that communications are clear and understood – checking-in on others' understanding;
- Giving colleagues the benefit of the doubt;
- Maintaining a positive outlook – particularly when under pressure;
- Being honest and transparent with colleagues;
- Asking colleagues who look stressed whether they need any help, and generally being kind to and supportive of colleagues;
- Seeing one's work as part of the team's work, and always keeping each other informed relative to how the work is progressing;
- Keeping shared resources clean and available (e.g., kitchen, printers, mugs, etc.);
- Listening and understanding what is needed in discussions before talking;
- Delivering on commitments and keeping in touch with teammates about what will be delivered when.

The following are examples of inappropriate conduct that would result in feedback, and disciplinary action up to and including termination of employment:

- Falsifying employment or other company records;
- Violating the Anti-Harassment policy or any Manifest Medex policy
- Violating state, federal or local laws and regulations;
- Abusing or undermining the trust among the team;
- Excessive or unexcused absenteeism or tardiness;
- Possessing illegal drugs, firearms, other weapons or explosives on company property;
- Being a poor custodian of Manifest Medex property and funds – damaging property or spending without careful consideration of what works best for Manifest Medex;
- Doing anything that puts Manifest Medex at risk of violating laws or other regulations regarding the responsible treatment of healthcare data and/or proprietary information;
- Giving confidential or proprietary information to competitors; working for a competing business while an employee of the company;

ETHICS

All Manifest MedEx employees are expected to conduct their activities with integrity, ethically, and in accordance with applicable laws and regulations.

Employees are further expected to take ownership of and sustain Manifest Medex's culture of ethics by providing honest feedback when any violations are observed or suspected.

Manifest MedEx encourages employees to report any such concerns to their manager, the CEO, CFO, or Manifest MedEx's Human Resources Department. Manifest Medex will not tolerate retaliation of any kind against an employee who reports in good faith a violation of law or of this policy.

APPEARANCE

All employees are to exercise sound business judgment with regard to grooming, neatness, and personal hygiene when reporting for work and engaging in work-related activities. You are expected to dress in a manner that is consistent with both the workplace and the type of work you perform. We are a group that appreciates it when people stand-out because of their great contributions; we are not a group where people try to stand-out due to their clothes, perfumes, colognes, etc.

PARTICIPANT RELATIONS

One of our highest priorities is to serve any participant or potential participant with excellence. Therefore, everyone is expected to:

- Always keep in mind that our individual conduct with participants directly reflects on Manifest Medex.
- Provide courteous, prompt, and efficient service.
- Establish and maintain positive, trusting, respectful relationships with participants.
- Handle complaints quickly and professionally.

CONFIDENTIALITY OF BUSINESS INFORMATION

Core to Manifest MedEx's mission is a commitment to protecting the confidentiality of information that we handle for our participants. The general business affairs of our participants should not be discussed with anyone outside the organization except as required in the normal course of business. Confidential information regarding our business includes, but is not limited to, inventions, discoveries, improvements, processes, formulas, software, apparatus, equipment, methods, trade secrets, research, client data and information or cost or purchases of participant's products or services. Manifest Medex's success depends on participants' and patients' trust that we will respect their privacy and the confidentiality of their data. Therefore, all of us have a responsibility to avoid unnecessary disclosure of non-confidential internal information about the company, its customers, and its suppliers, and to represent a culture of respect for confidentiality of data. This responsibility is not intended to impede normal business communications and relationships, but is intended to remind employees of their obligation to use discretion at all

times. Employees who have authorized access to confidential information are responsible for its security.

This policy seeks to protect the Company's confidential business information. This policy does not intend to restrict any statutory right for employees to discuss their wages, hours, and other terms and conditions of employment for their mutual aid or protection.

CONFLICT OF INTEREST

An actual or potential conflict of interest (COI) occurs when an employee is in a position to influence a decision that may result in a personal gain for that employee or for a relative (related by blood or marriage, or a similar relationship). Employees are to act in the best interests of the company, regardless of personal preference, and must not create the perception of personal advantage. In addition, as an agent of Manifest MedEx, employees are not to engage in any work activity, practice, or conduct which is or appears to be a conflict of interest for the company, its customers, suppliers, contractors, competitors, or any person doing or seeking to do business with Manifest MedEx.

The mere existence of a relationship with outside firms does not necessarily create a COI. Employees must disclose the existence of any relationship to their manager as soon as possible if the relationship has the potential to appear to be a COI.

Employees may accept occasional unsolicited courtesy gifts or favors (such as business lunches, tickets to sporting events or cultural events, holiday baskets, flowers, etc.) as long as the gifts or favors have a market value under \$100, are customary in the industry, and do not influence or appear to influence the employee's judgment or conduct.

PROTECTED HEALTH INFORMATION

Manifest MedEx's privacy policies and procedures strengthen our commitment to maintaining the confidentiality of protected health information. All employees are expected to comply with the company's privacy policies and procedures. Any employees with questions about the company's privacy policies or the fines and criminal penalties under Health Insurance Portability and Accountability Act ("HIPAA") for privacy violations, should contact the company's Chief Privacy Officer or his/her manager.

WE ARE ANTI-BULLYING

Manifest MedEx and Inesperity are committed to a work environment in which all individuals are treated with respect and dignity and are free from all forms of abusive conduct. Abusive conduct, or "bullying," is conduct of an employer or employee in the workplace, with malice, that a reasonable person would find hostile, offensive, and unrelated to an employer's legitimate business interests.

Bullying may be intentional or unintentional. However, it must be noted that where an allegation of bullying is made, the intent of the alleged bully is irrelevant, and will not be given consideration when disciplining an employee. It is the effect of the behavior upon the individual which is important.

We encourage all employees to report any instance of bullying behavior. Reported or suspected occurrences of bullying will be promptly and thoroughly investigated. Following an investigation, Manifest MedEx and Insperity will promptly take any necessary and appropriate disciplinary action.

Manifest MedEx and Insperity will not permit or condone any acts of retaliation against anyone who files or cooperates in the investigation of bullying complaints.

To report workplace bullying, the employee should discuss the problem with his/her immediate manager or with an Insperity human resource specialist.

WE ARE ANTI-HARASSMENT

Manifest MedEx and Insperity are committed to a work environment in which all individuals are treated with respect and dignity and are free from all forms of harassment and discrimination. Any form of harassment, even when not unlawful or directed at a protected category, is prohibited and will not be tolerated. All employees as well as vendors, contractors, customers and other third parties, must adhere to this policy.

Reported or suspected occurrences of harassment or discrimination will be promptly and thoroughly investigated. Following an investigation, Manifest MedEx and Insperity will promptly take any necessary and appropriate disciplinary action.

Manifest MedEx and Insperity will not permit or condone any acts of retaliation against anyone who files or cooperates in the investigation of harassment or discrimination complaints.

1. The term “harassment” includes harassment based on any category protected by federal, state or local law, which may include, but is not limited to, unwelcome slurs, jokes, or verbal, graphic or physical conduct relating to an individual's race, color, religious creed, sex, national origin, ancestry, citizenship status, pregnancy, childbirth, physical disability, mental and/or intellectual disability, age, military status or status as a Vietnam-era or special disabled veteran, marital status, registered domestic partner or civil union status, familial status, gender (including sex stereotyping and gender identity or expression), medical condition (including, but not limited to, cancer related or HIV/AIDS related), genetic information, or sexual orientation.
2. Sexual harassment consists of unwelcome sexual advances, requests for sexual favors, or other verbal or physical conduct of a sexual nature where:
 - a. Submission to such conduct is an explicit or implicit term or condition of employment;
 - b. Employment decisions are based on an employee's submission to or rejection of such conduct; or
 - c. Such conduct unreasonably interferes with an individual's work performance or creates an intimidating, hostile or offensive working environment.

Complaint Procedure

Manifest MedEx and Insperity provide you with a convenient and reliable method for reporting incidents of alleged harassment, including sexual harassment, and discrimination. Any employee who feels harassed or discriminated against is encouraged to immediately inform the alleged

offender that the behavior is unwelcome. In many instances, the person is unaware his or her conduct is offensive and this action alone may often resolve the problem. If the informal discussion with the alleged offender is unsuccessful in remedying the problem, or if you do not feel comfortable with such an approach, you should immediately report the conduct to his/her immediate manager or CEO and the Insperty Anti-Harassment Hotline number at 844-677-3030. We cannot resolve a harassment or discrimination problem, unless we know about it. Therefore, it is the employee's responsibility to bring those kinds of problems to our attention so we can take the necessary steps to correct any problems. The report should include all facts available to you regarding the alleged harassment, sexual harassment, or discrimination.

An employee calling the Insperty Anti-Harassment Hotline, should leave his/her name, Insperty employee identification number or the last four digits of his/her social security number, and the fact that s/he is an employee working for Manifest Medex. Anonymous complaints may also be left on this line. However, the scope of our investigation may be limited based on the information you provide.

Confidentiality

All reports of alleged harassment, sexual harassment, or discrimination will be treated seriously. Confidentiality will be maintained to the extent possible. However, to conduct a thorough investigation, certain information may need to be disclosed to other individuals, including the alleged offender. Consequently, absolute confidentiality cannot be promised and cannot be guaranteed.

Investigative Procedure

Once a complaint of alleged harassment, sexual harassment, or discrimination is received, we will begin a prompt and thorough investigation. The investigation may include interviews with all involved employees, including the alleged harasser, and any employees who are aware of facts or incidents alleged to have occurred.

Following an investigation, Manifest MedEx and Insperty will promptly take any necessary and appropriate disciplinary action. Disciplinary action will be taken if the investigation reveals that an employee has acted in a manner that is not in alignment with the goals of this policy. Manifest MedEx and Insperty may address any workplace issue discovered during an investigation. This may include some or all of the following steps:

1. Restore any lost terms, conditions, or benefits of employment to the complaining employee.
2. Discipline the alleged harasser. This discipline may include written disciplinary warnings, transfer, demotion, suspension and/or termination of employment.

If the alleged harassment, sexual harassment, or discrimination is from a vendor, contractor, customer or other third party, Manifest MedEx and Insperty will take appropriate action to stop the conduct.

If you have made a complaint but feel that the action taken in response has not remedied the situation, you should make an additional complaint following the complaint procedure outlined in this policy.

Duties of Employees and Supervisors

All of us are responsible for assuring that our workplace is free of any form of harassment and discrimination. All managers and supervisors are responsible for doing all they can to prevent and discourage any form of harassment and discrimination. If a complaint is raised, the individual to whom the complaint is made (i.e., supervisor, manager, company owner) should act promptly to notify the Insuperity Anti-Harassment hotline number (844-677-3030) so that an investigation may proceed if warranted.

The California Department of Fair Employment and Housing and/or the U.S. Equal Employment Opportunity Commission may also investigate and process complaints of harassment and discrimination.

COMPLAINT RESOLUTION PROCEDURE

Manifest MedEx is committed to providing a comfortable and productive work environment for employees. It is important that your concerns are resolved in a timely manner in an atmosphere of open communication and mutual respect. You are encouraged to follow the process below for bringing concerns to management for resolution. Employees will not be penalized for taking advantage of this procedure.

First, discuss the problem with your supervisor. If you do not believe a discussion with your supervisor is appropriate, request a meeting with an Insuperity human resource specialist. In an effort to resolve the problem, the Insuperity human resource specialist will consider the facts and may conduct an investigation.

Additionally, the Anti-Harassment Policy in this handbook outlines procedures for employees to report complaints of harassment and discrimination.

WE ARE TOBACCO-FREE

All company premises are free of smoke and any other form of tobacco.

WE ARE DRUG-FREE

All employees are expected to support and participate in a drug-free workplace. The use and/or possession of prescription drugs, when taken as directed and obtained with a valid prescription under federal law, is not a violation of this policy. Examples of prohibited activities under this policy are the possession, use, sale, attempted sale, distribution, manufacture, purchase, attempted purchase, transfer or cultivation of illegal drugs in the workplace. Employees are also prohibited from being at the workplace with a detectable amount of drugs in their system. However, the use and/or possession of prescription drugs, when taken as directed and obtained with a valid prescription under federal law, is not a violation of this policy.

This policy does not prohibit the responsible use of alcoholic beverages outside of normal working hours on company property, or at company sponsored events when specifically approved by management.

As a condition of continued employment, all employees must comply with this policy. An employee who engages in an activity prohibited by this policy shall be subject to disciplinary action, up to and including immediate termination of employment.

Contact the Employee Assistance Program (EAP) for information about the availability of treatment programs such as assistance provided by Insperity's health care plan coverage or drug and alcohol abuse rehabilitation and education programs.

This policy is not intended to replace or otherwise alter applicable U.S. Department of Transportation obligations or any other federal, state or local agency drug testing regulations related to a particular industry.

WE ARE VIOLENCE-FREE

Manifest MedEx and Insperity have zero tolerance for violent acts or threats of violence.

Employees are expected to conduct themselves in a non-threatening, non-abusive manner at all times. Any direct, conditional or veiled threat of harm to anyone or anything is unacceptable behavior. Acts of violence, intimidation or bullying of others will not be tolerated.

We all share the responsibility in identifying and alleviating threatening or violent behaviors. Anyone who is subjected to or threatened with violence, or who is aware of another individual who has been subjected to or threatened with violence, must immediately report this information to his/her supervisor, a management member or Insperity. We will carefully investigate reports and maintain employee confidentiality to the fullest extent possible.

Manifest MedEx will take disciplinary action, up to and including termination, and/or legal action as appropriate, against any employee who commits or threatens to commit a violent act against any person while on company premises or while engaged in company business off the premises.

WE ARE WEAPONS-FREE

Manifest MedEx strives to provide a safe and secure workplace for employees, clients, customers and visitors. The company has zero tolerance for, and forbids the possession of any type of weapon, firearm, explosive and/or ammunition while on company property or conducting company business. For purposes of this policy, company property includes, but is not limited to, all company facilities, company-provided vehicles and equipment that are either leased or owned by the company or a company client.

Possession of firearms or other weapons may be cause for discipline, including, but not limited to, immediate termination of employment. In enforcing this policy, Manifest MedEx reserves the right to request inspections of any employee and their personal effects while on company property, to the extent allowable under applicable law. Any employee who refuses to allow an inspection will be subject to the same disciplinary action as having been found in possession of firearms or other weapons.

In the event an employee lawfully possesses a firearm, the employee can store the firearm in the employee's personal vehicle while on company-provided parking areas; however, the firearm must be stored in the employee's locked vehicle, or locked to the vehicle, and hidden from plain view.

Employees share the responsibility of identifying violators of this policy. If you either witness or suspect another individual of violating this policy you should immediately report this information to their onsite supervisor.