



DEPARTMENT: Compliance	POLICY: Code of Conduct
EFFECTIVE DATE: April 30, 2023	POLICY NUMBER: 001
REVIEWED DATE: N/A	REVISED DATE: N/A

From Gamal Wazni, Chief Executive Officer

Dear United Vein and Vascular Centers Associate:

United Vein and Vascular Centers (the "Company" or "UVVC") is committed to conducting its business with integrity, honesty, and adherence to the highest ethical standards. The Company upholds an unwavering commitment to provide the highest quality and most innovative vascular healthcare at every UVVC facility.

UVVC has adopted this Code of Conduct in as part of its ongoing effort to foster strong culture of compliance in the workplace. This Code of Conduct is the foundation of UVVC's Compliance Program and outlines the principles for ensuring compliance in all business decisions and practices, for all UVVC Associates.

Each individual Associate is responsible for complying with both Company policies and governing state and federal laws. Associates are required familiarize themselves with and understand this Code of Conduct. Violations of the Code of Conduct may result in disciplinary action, up to and including termination. For questions regarding this Code of Conduct or to report questionable activity, please contact your supervisor, the Compliance Department at 1 (888) 298-4016, or to report a concern anonymously, the Compliance Helpline at 1 (888) 298-4016.

Thank you for your support and commitment to our organization.

Sincerely,

Gamal Wazni
Chief Executive Officer

DEFINITIONS

Associate: "Associate" refers to all active Company personnel, temporary employees, part-time employees, full-time employees, independent contractors, clinicians, officers, and directors.

OVERVIEW

The Company's goal is to promote compliance with the law and to encourage behavior that encourages prevention, detection, and mitigation of conduct that does not conform with our



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standards, federal law, or state law. To accomplish this goal, the Company has developed a Compliance Program based on guidance provided by the Department of Health and Human Services Office of the Inspector General.

This Code of Conduct is intended to provide guidance to all Associates on the Company's ethical and legal standards. Some individuals may require additional training and education on policies and procedures at the direction of managers, supervisors, and/or legal counsel. If you have any questions about a compliance-related issue not covered fully within this Code of Conduct, you should:

- Speak to your Supervisor
- Contact the Compliance Department at 1 (888) 298-4016
- Call the Compliance Helpline at 1 (888) 298-4016

All Associates are expected to meet the highest standards of business and personal ethics while working. Associates must adhere to the Company's Compliance Program as a condition of employment. Disciplinary action for violations of the Compliance Program, Code of Conduct, compliance policies and procedures, acts of noncompliance with state and federal laws, and/or federal healthcare program requirements will be enforced according to the Company's policies and procedures.

Thank you for your commitment to the Company's Compliance Program.

Associates are expected to support an inclusive workplace by adhering to the following conduct standards:

- I. Report to work as scheduled and seek approval from their managers in advance for any changes to the established work schedule, including the use of leave and late or early arrivals and departures.
- II. Perform assigned duties and responsibilities with the highest degree of trust and integrity.
- III. Maintain the qualifications, certification, licensure, and/or training requirements identified for their positions.
- IV. Demonstrate respect for coworkers, supervisors, managers, subordinates, patients, stakeholders, and any individual you interact with as a UVVC Associate.
- V. Use state equipment, time, and resources judiciously and as authorized. Support efforts that ensure a safe and healthy work environment.
- VI. Utilize leave and related Associate benefits in the manner for which they were intended.
- VII. Resolve work-related issues and disputes in a professional manner and through established business processes.
- VIII. Meet or exceed established job performance expectations.



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- IX. Make work-related decisions and/or take actions that are in the best interest of UVVC.
- X. Foster teamwork and Associates participation, encouraging the representation of different Associate perspectives.
- XI. Be open-minded when given constructive feedback regarding others' perception of your conduct.

Associates must treat all other Associates, customers, suppliers, and other stakeholders with fairness, honesty, and respect. Discrimination or harassment on the basis of gender or race is expressly prohibited. UVVC Associates are expected to treat one another with professionalism and respect.

I. Equal Employment

UVVC hires, promotes, and compensates Associates without regard for race, color, national origin, age, gender, religion, marital status, sexual orientation, handicap, or disability. UVVC is an equal-opportunity employer and is committed to complying with all non-discrimination laws, regulations, and policies.

II. Freedom from Harassment

UVVC prohibits all forms of harassment, including harassment based on race, color, religion, gender, national origin, age, sexual orientation, disability, or any other basis protected by law. Associates must who witness or are aware of violations of this policy must report to their supervisor, Human Resources representative, the Chief Compliance Officer, or Compliance Helpline.

Harassment means different things to different people, so Associates should all refrain from any behavior that may be construed as offensive or inappropriate. Examples of inappropriate behavior include degrading jokes, intimidation, slurs, and verbal or physical sexual harassment. Reports of harassment will be promptly investigated by the Human Resources Department. Associates who engage in discriminatory behavior will receive disciplinary action, up to and including termination.

III. Safe Environment

All Associates are responsible for creating a safe working environment. Please use safety devices and report any potential or actual hazards to your supervisor. Hazards include security violations or criminal activity that take place on company premises. Associates must report any injuries or illnesses to their supervisor. Violence in any form is prohibited.

Maintaining Confidentiality

We honor the privacy of patients' and Associates' personal information. Associates are required to protect UVVC trade secrets, confidential information, and intellectual property. Associates are



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prohibited from disclosing information that could be harmful to UVVC or that could provide an advantage to competitors.

I. Confidentiality

UVVC is committed to preserving the right of privacy for all our patients and Associates and protecting UVVC's interests. The following information is considered confidential:

- Patients' protected health information, including diagnoses and treatments, personal data, billing, and contact information.
- Associate information, including personnel files, evaluations, and disciplinary matters.
- Business information such as financial, marketing, and statistical data, competitive information, budgets, processes, techniques, mergers, acquisitions, or significant reorganizations, bid proposals and contract negotiations, layoffs, research and development, and business reports and summaries. This company-specific information is referred to as "intellectual property."

II. Insider Trading

UVVC Associates may have access to material nonpublic Company information. Associates who possess such information are prohibited from buying or selling UVVC stock and from sharing such information with. Associates may not discuss this information with anyone outside of UVVC and you should discuss it only with those Associates who absolutely need to know it. These restrictions also apply to information relating to any other company, including UVVC customers and providers.

Information concerning UVVC is "material" if it is likely to affect the price of UVVC stock or would in some other way affect the investment or voting decisions of the average shareholder or investor. Examples include major new products or services, significant personnel changes, marketing strategies, mergers and acquisitions, financial results, or other strategic plans. Information concerning UVVC is "nonpublic" if it has not been widely circulated to the public through major news services. Nonpublic information concerning UVVC does not become "public" until the close of trading on the second full day UVVC widespread public release of the information. If you have questions, please contact your supervisor, the Legal Department, the Compliance Department, or the Compliance Helpline.

Respecting Company Property

We protect and preserve company property and refrain from using it for personal gain.

I. Use of Resources



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UVVC prohibits any inappropriate use of company property. Associates are expected to act responsibly, reasonably, maturely, and to use good judgment when using all company-provided communications and computing devices, including but not limited to:

- The Internet
- All forms of printed and electronic media
- Copying devices (scanners and copy machines)
- Telephones
- Cell phones
- Portable/wireless PDAs
- Desktop and laptop computers
- Remote access/dial-up hardware and software devices

Associates should not use the computer to transmit, store, or download materials that are threatening, malicious, false, or obscene. Facilities, equipment, technology, and resources are for business purposes in connection with your job responsibilities.

Avoiding Conflicts of Interest

Associates should refrain from engaging in activities that might conflict with UVVC'S interests. Associates should avoid doing business with competitors and accepting or giving gifts to contractors or customers. Associates are prohibited from advantage of their association with UVVC for personal gain.

I. Activities and Relationships Beyond United Vein and Vascular Centers

It is important to ensure that Associates' conduct outside of work does not conflict with or pose a hazard to the Company.

- A. Avoid personal outside activities or associations that might influence your business decisions or your ability to do your job objectively.
- B. avoid doing business with competitors or making significant personal financial investments in competitors, suppliers, or customers.

If you are unsure whether an outside activity constitutes a conflict of interest, contact your supervisor, Compliance Department, or the Compliance Helpline.

II. Entertainment, Gifts, and Gratuities

Some forms of business entertaining, such as purchasing meals, attending social events, or training and educational activities are accepted practices, provided that the cost and scope of these



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activities is reasonable. Prior to accepting or extending an invitation, Associates should first check with their supervisor.

Associates should refrain from giving or accepting excessive gifts to or from vendors, customers, or other business associates. The value of gifts received or given should not exceed an aggregate value of \$500 per year unless you have received prior approval from your supervisor. Associates should never accept cash gifts from vendors, members, or customers.

Compliance with Laws and Regulations

I. Regulatory Obligations

UVVC operates in a highly regulated industry, meaning the Company and its Associates are subject to federal and state civil and criminal laws. Penalties for violating any of these laws, regulations, and requirements are severe and can apply to both the Company and any involved Associates. Penalties include fines or other financial penalties, exclusion from participation in federally funded programs, loss of licensure, and potentially prison. The Compliance Program is designed to prevent such violations. All Associates must familiarize themselves and comply with the regulatory requirements applicable to their positions and duties.

II. Illegal Activities

Associates are prohibited from engaging in any corrupt business practice or other illegal activities. Such activities include but are not limited to, fraud, embezzlement, kickback arrangements, and drug use.

Fraud includes such falsifying timecards and expense reports. Healthcare fraud occurs when someone schemes to defraud any health benefit program, including using false pretenses, representations, or promises to get money or property owned by any healthcare program with the delivery of, or payment for, benefits, goods, or services.

A kickback arrangement involves accepting or offering bribes or payoffs intended to induce, influence, or reward favorable decisions of any person or entity in a position to benefit the Company. Such persons or entities include customers, contractors, vendors, and government personnel.

III. Antitrust and Unfair Competition

Antitrust laws ensure fair competition between companies. These laws also protect the public against business competitors who band together or “collude” to unfairly set prices. Associates may violate antitrust laws by discussing prices, conditions of sale, and/or dealings with customers/suppliers with



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competitors. Our competitors include other managed care organizations, healthcare delivery companies, and insurance companies that operate in our markets.

IV. Political Contributions

The Company contributes to various political candidates and campaigns through our voluntary political action committee (PAC). Federal and state laws clearly dictate the amount and frequency of political contributions, and the Company strictly adheres to those guidelines. Any other use of company assets for political reasons is prohibited.

V. Sales, Marketing, and Advertising Standards

UVVC is committed to growing our business through well-trained, highly professional sales Associates. All Associates must be committed to fair, forthright, and compliant sales and marketing practices. UVVC adheres to any state regulations that require sales representatives to be licensed.

UVVC does not engage in corrupt marketing practices, including misrepresentation of our covered services and “redlining,” which refers to the practice of avoiding sales in specific geographic areas or neighborhoods.

When advertising our products and services, UVVC will present only truthful, non-deceptive information. Advertising and marketing materials require approval from regulatory agencies prior to distribution. When required, the Company will submit materials to the proper agency to ensure they are in full compliance with applicable regulations.

VI. Copyright Law

UVVC follows state, federal, and foreign laws pertaining to copyright protection. This includes laws that prohibit duplication of print materials, licensed computer software, and other copyright-protected works.

VII. Relationships with Foreign Businesses and Governments

As we take advantage of global business opportunities, the Company will comply with all applicable laws and regulations governing relationships with businesses on foreign soil and their respective governments.

Responsibilities and Consequences

I. Associate Responsibilities



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UVVC will provide Associates with the training and education needed to be knowledgeable about our ethics and compliance initiatives. UVVC expects its Associates to prioritize relies on you to help ensure that those initiatives remain a priority. This involves upholding all the standards outlined in this Code of Conduct, as well as reporting any suspected violations of those standards.

If you observe potential violations of law or this Code of Conduct, you should not hesitate to report such issues. Failure to do so could pose a risk to the Company or, in the case of illegal activities or regulatory violations, a risk to you or your co-workers.

II. Virtual Etiquette

The Standards of Excellence is to describe the behaviors and expectations Associates must strive for when attending or hosting virtual meetings.

Having these standards:

- Helps ensure that all team members act ethically
- Helps reduce risk
- Provides guidance in recognizing and dealing with applicable issues
- Provides mechanisms to report unethical conduct
- Helps foster a culture of honesty and accountability

Virtual Meetings

Hosting and attending virtual meetings are effective ways to connect with Associates and vendors. As we leverage technology to move our business forward, we want to establish common etiquette for such meetings.

- Arrive on time
- Introduce yourself
- Ensure your background is professional
- Dress appropriately
- Prepare an agenda
- Do not eat
- Do not speak at the same time as others
- Mute yourself when not presenting or speaking
- Do not drive during a meeting. If you are in a car, park the car
- Turn your camera on for the duration of the meeting
- Be present and ready to engage
- Be prepared to take notes, ideally with pen and paper. If you need to take notes on your computer, make sure your keyboard typing is not distracting
- When delivering feedback, allow the receiving party to accept the communication prior to delivering additional thoughts



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- Avoid 'piling on' when multiple competing opinions are being presented
- Do not promote excessive or unnecessary negativity or fear. This is different than constructive feedback
- If you cannot attend, let the organizer know in advance and find someone to take notes for you

III. Reporting Suspected Violations

If you have a compliance concern to report, talk to your supervisor. If he/she is not available or is unable to assist you, contact the Compliance Department.

You may also report issues through the Compliance Helpline – a service that allows violations or concerns to be reported anonymously. The Helpline is operated offsite by a third-party administrator and is available toll-free 24 hours a day, seven days a week, at 1 (888) 298-4016.

IV. Resolution, Communication, and Non-Retaliation

Once a problem or suspected violation has been reported, the Company pledges to quickly investigate and resolve the problem. The Company will not retaliate against you for reporting compliance violations in good faith.

V. Consequences of Violations

The Company will be thorough and fair when investigating potential compliance violations. Associates who are deemed to have committed violations will be subject to disciplinary action up to and including termination.

Disciplinary action at UVVC is intended to fairly and impartially correct behavior and performance problems early on and to prevent reoccurrence.

The progressive disciplinary process used by UVVC will comprise the following: Verbal Warning; 1st Written Warning; 2nd Written Warning; Final Written Warning; Termination.

However, the company reserves the right to bypass and/or modify any step of the process above based on the severity of the infraction. UVVC recognizes that certain types of Associate behavior are serious enough to justify immediate termination of employment, without observing other disciplinary action first.

The manager should discuss the nature of the problem or the violation of company policies and procedures with the Associate. The manager is expected to clearly describe expectations and steps the Associate must take to improve his or her performance or resolve the problem. The manager is



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responsible for starting the disciplinary action process in a timely manner, as well as notifying HR of any disciplinary actions.

VI. Potential Violations to UVVC Standards of Conduct

Conduct listed below, and other forms of misconduct may result in disciplinary action, up to and including termination of employment:

- A. Theft or inappropriate removal/possession of property
- B. Falsification of timekeeping records
- C. Possession, distribution, sale, transfer, manufacture or use of alcohol or illegal drugs in the workplace
- D. Fighting or threatening violence in the workplace
- E. Making malicious statements about co-workers
- F. Threatening, intimidating, coercing, or otherwise interfering with the job performance of fellow Associates or visitors
- G. Abusive Behavior (Bullying- Written, Verbal, Physical, Gesture, and/or Exclusion, Gossip)
- H. Negligence or improper conduct leading to damage to company-owned or customer-owned property
- I. Violation of safety or health rules
- J. Smoking or vaping in the workplace
- K. Sexual or other unlawful or unwelcome harassment
- L. Unprofessional interaction with patients and/or staff
- M. Excessive absenteeism and/or excessive tardiness
- N. Unauthorized use of telephones, computers, or other company-owned equipment during working time
- O. Working time does not include break periods, mealtimes, or other specified periods during the workday when Associates are not engaged in performing their work tasks
- P. Unauthorized disclosure of any “business secrets” or other confidential or non-public proprietary information relating to the Company’s products, services, customers, or processes.
- Q. Other forms of misconduct not listed above may also result in disciplinary action, up to and including termination of employment. If you have questions regarding UVVC Standards of Conduct, please direct them to your manager or the Human Resources Department.

Where to Find Answers to Your Questions

This Code of Conduct Guidelines is meant to provide an overview of the Company’s policies on ethics, compliance, and conduct-related issues. This publication is a living document and is subject to change as we refine our policies and procedures and as government agencies and regulators modify their rules.



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If you need more information, or if you have a compliance-related question or concern, the best thing to do is talk with your supervisor or the Compliance Department. These are the best sources when you need help understanding the laws, regulations and practices that affect your work. Calling the Compliance Helpline is also an option if you wish to seek information on a specific company policy or standard.

Associates are encouraged to explore the following resources:

- United Vein and Vascular Centers' Employee Handbook: The handbook covers various topics, including employment, benefits, performance reviews, wage and salary, and employee relations subjects such as dress code, workplace conduct, counseling, and health and safety issues.
- United Vein and Vascular Centers' Intranet Site: This site contains extensive information on company policies and procedures and other company standards that affect your work activities.