

<b>Policy Title: Procurement Policy</b>	<b>Effective:</b> 4.1.2023 <b>Approved:</b> 3.29.2023 <b>Dates Reviewed:</b> <b>Dates Revised:</b>
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<b>Policy Owner:</b> Compliance Officer	<b>Group Owner:</b> Compliance
<b>Associated Forms:</b> None	<b>Associated Policies/Guidelines:</b> Supplier Code of Conduct
<b>Training Required (Y/N):</b> N	<b>Communications Required (Y/N):</b> Y
<b>Training Owner:</b> N/A	<b>Communications Owner:</b> Director of Marketing and Strategic Partnerships
<b>If training required, to whom, how delivered, and when:</b> N/A	<b>If communications required, to whom, how delivered, and when:</b> All suppliers to the Company through written communication on enactment and material revision. Supplier Code of Conduct posted on website.

**PURPOSE:** To establish a uniform Code of Conduct for Suppliers

**SCOPE:** Applies to all Suppliers, as term is defined below, of the Company, as defined below.

**DEFINITIONS:** **Supplier-** any firm or individual, directly or indirectly, that provides a product or service or undertakes any activity for or on behalf of The Company. Including sub-suppliers and sub-contractors.

**Company** - Advanced Medical Management, LLC and its related entities including Multi-Specialty Health Care, LLC, Excelsia PA, PLLC, MSHC PA, PLLC, MDDE Chiropractic, LLC, and MDDE Medical, LLC, which would include Multi-Specialty Health Care Centers, Injury Care Centers, Tri-County Pain Management Centers, and Steel City Injury Centers

## POLICY:

### INTRODUCTION

The Company is committed to responsible business practices, with the highest standards of ethical conduct and social and environmental responsibility. This “Supplier Code of Conduct” has been developed to visibly outline the standards expected of any Supplier conducting business with the Company.

We expect the practices of our Suppliers to meet the standards in their business operations and practices, to implement their own policies, and address the matters outlined in this Supplier Code of Conduct. Requirements in this Code apply throughout the Company’s entire supply chain, including sub-suppliers and sub-contractors. While the Company is aware of the legal and cultural environments that vary where our Suppliers operate around the world, these standards set forth the minimum requirements all Suppliers are required to meet in order to do business with the Company.

### ETHICAL STANDARDS

The Company strives to work with Suppliers whom conduct business with the same ethical standards as their own. The Supplier must abide by the following ethical standards:

- Conduct business with respect, integrity, and fairness
- Treat each other fairly, with dignity and respect
- Obey all applicable laws

### SUPPLIER CODE OF CONDUCT

Advanced Medical Management will keep the Supplier Code of Conduct posted to its public webpage and will seek to reference it in contracts with suppliers.

### CONFLICTS OF INTEREST

A member of the Senior Leadership Team must be consulted prior to conducting business with ex-employees, family members, friends or other individuals who may be perceived as posing a conflict of interest. Situations where board seats are offered, or other potential appearances of quid pro quo must also be discussed with a member of the Senior Leadership Team.

**REVIEW:** This Policy shall be reviewed no less than annually.

**ATTACHMENTS:** Supplier Code of Conduct

## **RIGHT TO REPORT**

**Nothing in this Policy is intended to prohibit a Covered Person from reporting possible violations of federal or state law or regulation to any governmental agency or entity, including, but not limited to, the Department of Justice, the Equal Employment Opportunity Commission, the Securities and Exchange Commission, the Congress, and any agency Inspector General, or making other disclosures that are protected under the whistleblower provisions of federal or state law or regulation. A Covered Person does not need the prior authorization of the Company to make any such reports or disclosures and is not required to notify the Company that such Covered Person has made such reports or disclosures.**

# Supplier Code of Conduct

## INTRODUCTION

Advanced Medical Management is committed to responsible business practices, with the highest standards of ethical conduct and social and environmental responsibility. This “Supplier Code of Conduct” has been developed to visibly outline the standards expected of any Supplier conducting business with Advanced Medical Management.

“Supplier,” is defined by any firm or individual, directly or indirectly, that provides a product or service or undertakes any activity for or on behalf of Advanced Medical Management.

We expect the practices of our Suppliers to meet the standards in their business operations and practices, to implement their own policies, and address the matters outlined in this Supplier Code of Conduct. Requirements in this Code apply throughout Advanced Medical Management’s entire supply chain, including sub-suppliers and sub-contractors. While Advanced Medical Management is aware of the legal and cultural environments that vary where our Suppliers operate around the world, these standards set forth the minimum requirements all Suppliers are required to meet in order to do business with Advanced Medical Management.

## ETHICAL STANDARDS

Advanced Medical Management strives to work with Suppliers whom conduct business with the same ethical standards as their own. The Supplier must abide by the following ethical standards:

- Conduct business with respect, integrity, and fairness
- Treat each other fairly, with dignity and respect
- Obey all applicable laws
- Prepare financial conditions and results of operations, honestly and promptly
- Deal honestly and fairly with clients, customers, suppliers and financial partners
- Avoid actual and potential conflicts of interest
- Safeguard all company and customer assets
- Protect Advanced Medical Management and customers’ reputations
- Separate business with personal political beliefs/activities
- Report known violations of legal and ethical standards

## HEALTH & SAFETY

Advanced Medical Management requires Suppliers’ to endeavor to implement standards of occupational health and safety at a high level. To ensure Suppliers’ provide a safe, clean work environment, compliance with applicable occupational health and safety is necessary. Successfully, this contributes to overall good health, in order to ensure the health of employees and prevent accidents, injuries and work-related illnesses in (or linked to) the environment in which they operate in.

## **WAGES AND BENEFITS (COMPENSATION)/WORK HOURS**

Suppliers shall comply with the minimum wages and benefits, compensating workers abiding by local law or the local industry standard – whichever is higher. Non-exempt workers shall be paid for overtime hours at the premium rate legally required in the country of operation. Non-exempt workers are entitled to at least one day off in every seven-day period. Overall, workers shall not be required to work more than 60 hours per week (including overtime), on a regularly scheduled basis. Suppliers must ensure that their workers are not penalized for refusing to work more than the limits of allowed by local laws and regulations.

## **PROHIBITIONS AGAINST DISCRIMINATION AND HARASSMENT**

Any form of discrimination or harassment in the workplace is strictly forbidden. Any Supplier associated with Advanced Medical Management are prohibited from engaging in any unlawful discriminatory or harassing conduct at Advanced Medical Management's facilities or anyone in the workplace. Discrimination or harassment based on race, color, religion, national origin, citizenship, ancestry, gender (including pregnancy), gender identity, age, disability, marital status, sexual orientation, or other protected characteristic or status is not tolerated.

## **DIVERSITY**

Advanced Medical Management screens for and seeks Suppliers with ownership from underrepresented populations. Including Suppliers of underrepresented groups including women, ethnic minorities, and LGBTQ individuals.

## **FREEDOM OF ASSOCIATION**

Workers' of the Supplier have the freedom to join organizations of their own choosing, and to decline participating within organizations, if that is their decision. Suppliers' must respect these freedoms. Threatening, intimidating, harassing or penalize workers for their efforts to organize or bargain collectively where permitted by the laws of the country of manufacture, nor may they discriminate against workers as a result of any such organization affiliation.

## **NO FORCED LABOR**

Supplier must take all reasonable steps to ensure and prevent all forms of forced, bonded or compulsory labor, or other forms of slavery or human trafficking employed or used within its business or in its supply chains. Suppliers are expected to monitor any third party entity which assists them in recruiting or hiring employees, assuring those employed at their facility are not compelled to work through force, deception, intimidation, coercion or as a punishment for holding or expressing political views.

## **NO CHILD LABOUR/YOUNG LABOUR**

Workers must not be under the age of 15 (or 14 where the local law allows such exceptions consistent with the International Labor Organization guidelines), or under the age for completion of compulsory education, whichever is higher. If there is no minimum age of employment defined, then the minimum age of employment stands at 15 years of age. Juvenile workers (ages 15-17) shall not perform work which, by its nature or the circumstances in which it is carried out, is likely to compromise their health, safety or morals. Workers of the Supplier must be of legal age in any country or local jurisdiction where Supplier performs work for Advanced Medical Management.

## **COMPLIANCE WITH LABOR STANDARDS**

Supplier shall comply with all laws applicable to its business. Supplier should support the principles of the United Nations Global Compact, the UN Universal Declaration of Human Rights, the 1998 International Labor Organization Declaration on Fundamental Principles and Rights at Work, and the UK's Modern Slavery Act 2015 in accordance with national law and practice.

## **DISCIPLINARY PRACTICES/COERCION**

Advanced Medical Management firmly believes that everyone should be treated with dignity. Suppliers shall not inflict or threaten to inflict corporal punishment or any other forms of physical, sexual, psychological or verbal abuse or harassment on any employees.

## **ENVIRONMENT**

It is expected that Suppliers will comply with all appropriate environmental laws, regulations and standards, and work towards identifying and implementing initiatives that strive to reduce their impact on the environment. We strive to do business with Suppliers who share our concern for and commitment to preserving the environment. At a minimum, Suppliers must comply with all applicable local environmental laws and regulations where they do business. In working to improve our supply chain, we may monitor Suppliers for environmental responsibility. We expect that Suppliers will continuously monitor and, when possible, disclose to by Advanced Medical Management, their energy and natural resource usage, emissions, discharges, carbon footprint and disposal of wastes. We also expect that our Suppliers will take a progressive approach to minimize negative impacts on the environment.

## **ANIMAL WELFARE**

Suppliers must respect animal welfare and work progressively towards adopting healthy and humane practices towards animals.

## **COMMUNITY INVOLVEMENT**

Advanced Medical Management strives to engage with Suppliers that partner with various organizations, committing their time to improving cultural, economic, educational and social aspects of their local communities.

## **BUSINESS INTEGRITY; CORRUPTION**

Any type of corruption, bribery, extortion, and embezzlement, in any form, are strictly prohibited. Suppliers must abide by the Foreign Corrupt Practices Act, the UK Bribery Act, all international anti-corruption conventions/laws and regulations of the countries in which they operate. The Supplier shall refrain at all times from engaging in corruption, bribery, extortion or embezzlement in any form. Suppliers must not offer or accept bribes or other means to obtain an unjustified or improper gain. If there is any situation where an employee experiences or witnesses conduct that they believe is inconsistent with any company policy or which he or she finds to be of personal or company concern, including, but not limited to, any form of corruption, he or she should immediately report such actions in accordance with the following procedure.

## **INSIDER TRADING**

The buying or selling of securities while in possession of non-public information acquired by the Supplier due to their association with Advanced Medical Management is prohibited. This includes communicating any of that information to others, whether expressly or by way of making any commendation towards the purchase or sale of such securities based upon that information.

## **FRAUD AND INVESTIGATIONS**

In the event of any investigation due to the actions of the Supplier; the Supplier must cooperate any of Advanced Medical Management investigators, law enforcement and regulatory agencies. Respectively, this includes reporting violations of the law and cooperating with law enforcement agencies in their prosecution efforts.

## **DATA PRIVACY AND CONFIDENTIALITY**

Suppliers shall comply with any applicable data and privacy protections regulations and laws in their respective countries of operation. The Supplier must secure Advanced Medical Management confidential data and individual personal data, as well as prohibit its unauthorized access or use.

## **COMPLIANCE AND MONITORING**

Suppliers must demonstrate full transparency concerning working conditions and to records, and they must not coach their workers in any way as to how to respond to questions about the facility conditions. Advanced Medical Management's Suppliers are expected to take necessary corrective actions to promptly remediate any noncompliance.

## **COMMUNICATION**

Supplier should take appropriate steps to ensure that the principles of this Code are communicated to their employees and throughout their own supply chains. Supplier should also take appropriate steps to ensure that the principles of this Code are adopted and applied by their employees, suppliers, agents and contractors to the extent applicable.

## **ENFORCEMENT**

If Advanced Medical Management concludes that a Supplier has violated this Code in any form, Advanced Medical Management has the ultimate authority to terminate its business relationship or require the Supplier to implement a corrective action plan.

## **CHANGES TO THE SUPPLIER CODE OF CONDUCT**

Advanced Medical Management has the right to revise and/or update this Supplier Code of Conduct, and to investigate compliance by a Supplier at any time. To the extent there is a conflict between this Supplier Code of Conduct and any applicable law or provision of any agreement between Advanced Medical Management and Supplier, the applicable law or agreement shall apply.