



# CODE OF CONDUCT

**Policies and  
Guidelines of  
Accendra Health**

# Table of Contents

3	<b>Introduction</b>	31	<b>The People We Serve — Patient Care and Privacy</b>
4	<b>About Accendra Health</b>	31	Clinical Expertise/Respect for Patients, Including Freedom of Choice
5	<b>Code of Conduct</b>	32	Patient Privacy
5	Introduction to Compliance	33	<b>Our Community Interactions — Compliance with Laws and Regulations</b>
5	The Purpose of the Code	33	Environmental Laws
9	<b>Our Responsibilities Under the Code — Ethical and Lawful Behavior</b>	34	Competing Fairly and Complying with Antitrust and Anticorruption Laws
10	<b>General Principles for Ethical and Legal Practices</b>	36	<b>Medicare Parts C and D Regulations and Guidelines</b>
14	<b>Our Resources</b>	37	<b>Deficit Reduction Act</b>
14	Corporate Compliance Officer	38	<b>False Claims under Federal and State Laws</b>
14	Corporate Compliance Program Policies	38	Federal False Claims Act (FCA)
15	The Legal and Regulatory Affairs and Reimbursement Compliance Departments	38	State False Claims Acts
16	<b>Our Responsibilities to the Company — Protecting and Preserving Company Assets and Resources</b>	38	Policy Regarding False Claims Under Federal and State Law
16	Custody, Care and Use of Company Assets	39	<b>Department of Transportation (DOT) Regulations</b>
17	Recordkeeping	40	<b>Food and Drug Administration (FDA) Medical Gas Compliance</b>
17	Computer Systems	41	<b>Governments and Government Agencies</b>
18	Personal Use of Business Phones, Computers and Company Assets	42	<b>Government Investigations, Audits and Information Requests</b>
19	Social Media	43	<b>Workplace Conduct</b>
20	Artificial Intelligence	43	Diversity in the workplace
21	<b>Our Business Relationships — Acting with Honesty and Integrity</b>	44	A harassment free workplace
21	Corporate and Board Opportunities	47	<b>Ethics and Company Discipline — Rules and Performance Standards</b>
22	Marketing Materials and Information	47	Expected Behavior
22	Kickbacks/Inducements	47	Company Discipline
24	Common Marketing Practices	48	Regulatory Compliance Certification
24	Customer Discounts	50	<b>A Few Closing Words</b>
25	Free Trials		
25	Referral Source Gifts		
25	Real Property Leases with Referral Sources		
25	Agreements with Referral Sources for Delivery of Home Medical Equipment and Services		
26	Consulting and Service Arrangements		
27	Billing Adjustments		
27	Continuing Medical Education and In-Service Training Programs		
27	Billing		
29	Quality Assurance		
29	Practice of Medicine		
30	Conflicts of Interest		

**Compliance Hotline:  
1-888-COMPLY-9 (888-266-7599)**

**Internet Hotline:  
[www.ethicspoint.com](http://www.ethicspoint.com)**

Updated May 2026

# Introduction



Fellow Teammates,

Here at Accendra Health, our commitment to doing business the right way and acting with integrity has long been a major point of pride. This commitment is our promise to our customers, patients, our communities, and ourselves that each and every Accendra Health teammate is accountable for following the laws, ethical practices, and compliance guidelines that govern our industry, regardless of your position in the Company.

The work we do is vital to healthcare and touches countless lives, making it critical that Accendra Health teammates and business partners are aware of these standards and of their importance for the work we do each day. The purpose of the Accendra Health Code of Conduct is to provide you with guidance, resources, and support on meeting our professional, legal, and ethical obligations, including instances where ethics or compliance concerns could show up in everyday situations.

Accendra Health's values and the Code of Conduct are critical to delivering on our Mission of providing innovative solutions that ensure patients get the care they need in the comfort of their homes. They are also at the core of what it means to be an Accendra Health teammate. Your commitment to our Company's IDEAL Values and the Code of Conduct will ensure Accendra Health continues its rich history as a trusted partner to our customers and a leader in our industry.

Healthcare compliance is complex, so as you review the Code of Conduct, keep in mind that there are many resources to answer your questions or provide assistance in any situation that you encounter. Thank you for your commitment to Accendra Health and our Code of Conduct.

Sincerely,

A handwritten signature in black ink, appearing to read 'Edward A. Pesicka'. The signature is fluid and cursive, written over a white background.

**Edward A. Pesicka**

President and CEO, Accendra Health

# About Accendra Health

Accendra Health, Inc. (formerly known as Owens & Minor, Inc.) is a leading nationwide provider of products, technology, and services that support health beyond the hospital for millions of people each year.

We connect patients, providers, and insurers, delivering innovative solutions that help promote better health outcomes and improve quality of life for people living with chronic, complex, and acute health conditions.

Backed by the industry-leading expertise of our Apria and Byram brands, Accendra Health is reimagining the future of home-based care.

## Our Purpose

Our Purpose is Bringing Care To Life™. As an integral part of the care team, we do more than just deliver the essentials. We focus on the details and offer answers to patients so they can manage their health and live their lives.

Through customized support and services, we help patients access care when and where they need it so they can focus on the moments that matter most.

## Our Mission

Accendra Health's Mission is providing innovative solutions that ensure patients get the care they need in the comfort of their homes.

## Our Vision

Accendra Health's Vision is to be a leading partner in care for medical equipment, supplies, and solutions in the home for individuals, families, and caregivers.

## Our IDEAL Values

Our shared IDEAL Values — Integrity, Development, Excellence, Accountability, and Listening — are who we are at our best. They guide our behavior and define our standards. Every teammate must uphold these principles to drive success and shape our future.

**Integrity:** Act with the highest standards of ethics. Honor commitments.

**Development:** Aspire for improvement and growth.

**Excellence:** Perform to the highest standards. Embrace our Mission: Providing innovative solutions that ensure patients get the care they need in the comfort of their homes.

**Accountability:** Own our actions and results. Be responsible for what we do.

**Listening:** Listen to our customers, patients, and one another. Understand needs and deliver solutions.

# Code of Conduct

## Introduction

This Code of Conduct (“Code”) demonstrates our commitment to comply with all applicable legal requirements and high ethical standards. To help us meet this commitment, the Code sets forth what we expect of all our teammates and directors when performing their job responsibilities and conducting business on behalf of Accendra Health, its affiliates, and subsidiaries (sometimes referred to as the “Company”). In addition to describing the expected standards of conduct at Accendra Health, the Code is the foundation that supports a positive, respectful, and ethical work environment for all our teammates. The Code not only lays down a strong cultural foundation for our business, but also helps enforce and implement legal, compliance, and ethical policies, and procedures for all kinds of decision making. It provides a standardized benchmark against which we can measure our activities and also make decisions.

## Who must follow the Code?

Every teammate and member of our Board of Directors must follow the requirements of our Code and should consult the Code for guidance when acting on behalf of Accendra Health. New teammates and board members are required to acknowledge acceptance of the Code’s terms as a condition of initial employment or service. Annually thereafter, each director and teammate is required to review and renew their commitment to the Code by completing training and certification.

Teammates and entities who engage contractors, distributors, or consultants to work on behalf of the Company should seek to ensure that these parties are made aware of our Code and abide by its terms.

## Who administers the Code?

Our Chief Executive Officer and the Chair of our Audit Committee have primary responsibility to oversee compliance with the Code. However, all officers and those in management/supervisory positions of the Company assist in the general implementation and administration of these standards and have enhanced responsibility to model, promote, and monitor compliance with the requirements of the Code. The Company’s General Counsel is responsible for interpreting and determining compliance with the Code as it applies to teammates, while the Audit Committee makes these decisions with respect to directors.

# Our Code of Conduct

## What if I have questions about interpretations of the Code?

Every situation or decision you face may not be squarely addressed by the Code. The Code must be applied in combination with the exercise of good judgment. You are strongly encouraged to talk to the Ethics and Compliance Team, the General Counsel, or an attorney in the Legal Department when in doubt about the best course of action in a particular situation. All requests will be kept confidential to the greatest extent possible.

## What if I suspect a violation of the Code?

You are responsible for bringing to the Company's attention any circumstances that you believe in good faith may constitute a violation of the Code. Failure to report a suspected violation can put you, your teammates, and Accendra Health at risk. If you are not sure whether to speak up about a particular situation, ask yourself the following questions:

- Is the issue a potential legal concern?
- Does it comply with the Code or other Corporate Policies?
- What would your manager, colleagues, or family members think about the issue?
- How would the issue look if reported in the news?
- Does it feel right?

Although you may be hesitant to report a potential Code issue because you don't want to get someone in trouble, hurt someone's reputation, or you fear retaliation, teammates who come forward with concerns play an important role in maintaining our ethical workplace and reputation. You have a responsibility to share information so that the Company can respond quickly and take appropriate action. In addition, as described below, the Company will not tolerate retaliation against anyone for reporting a suspected Code violation in good faith, and reports can be made anonymously.

If you have any doubts about compliance, you are strongly encouraged to seek advice from your manager, the Ethics and Compliance Department, the General Counsel, or an attorney in the Legal Department. Our commitment to integrity and accountability means we must never ignore a potential legal or ethical issue that needs to be addressed. We need everyone to say something when they see something.

# Our Code of Conduct

## What are the procedures for reporting a suspected Code violation?

The Company has an Ethics and Compliance Hotline and Website available on a twenty-four hour, seven days-a-week basis, both of which are managed by an outside third-party vendor. These resources provide the opportunity to anonymously report incidents involving suspected improper, illegal, or discriminatory conduct. You are also encouraged to contact the Ethics and Compliance Department or the General Counsel if you have any concerns. Your communications will be treated confidentially to the greatest extent possible. Any suspected violation of the Code by a director should be reported to the Chair of the Board of Directors or a member of the Audit Committee and shall be investigated by the Board or an independent firm retained by the Board. Information regarding suspected violations of the Code may be reported verbally or in writing and may be given anonymously in any of the following ways:

### Accendra Health Ethics Hotline

**By phone:**

(888) 266-7599

**By internet:**

EthicsPoint - Accendra Health

**By email:**

compliance@accendra.com

### Corporate Mail Address

Accendra Health General Counsel  
Accendra Health, Inc.

4435 Waterfront Drive, Suite 300  
Glen Allen, VA 23060

### Corporate Phone Number

(804) 277-4304

# Our Code of Conduct

## What happens after I report a suspected Code violation?

Reports of suspected violations will be promptly investigated. Complaints relating to any apparent or suspected violation involving the Company's financial reporting or internal financial controls will be referred directly to the Chair of the Audit Committee of the Board of Directors and outside legal counsel for further investigation. Complaints relating to matters other than accounting and financial controls will be referred to the Ethics & Compliance Department for further investigation. The investigations are conducted in a discreet manner and typically involve an examination of relevant records and interviews of persons who may have knowledge of the facts related to the reported concern or issue. Most investigations take several weeks before conclusions are reached. You should not expect to be informed about the status or results of an investigation. It is not the policy of the Company to disclose the results of the investigation to the reporter. The Company will take appropriate action to address any improper conduct or Code violation identified in the course of an investigation. Every report is investigated, and the Audit Committee confidentially reviews all investigation results quarterly to ensure proper procedures were followed in the investigation and disposition of each report.

## What are the consequences of violating the Code?

Violation of the Code by any teammate may result in a variety of disciplinary actions, including termination from employment. With respect to any violation of the Code by a director, the Board will take such action as it deems appropriate and in the best interests of the Company.

Disciplinary action by the Company is in addition to any civil or criminal liability and penalties that may result from illegal conduct. All violations of these standards of conduct warranting disciplinary action, whether or not related to financial or accounting matters, will be reported to the Audit Committee of the Board of Directors.

# Our Responsibilities Under The Code

## Ethical and Lawful Behavior

We have established multiple disclosure methods and audit procedures to detect potentially illegal or unethical acts. However, if you become aware of an ethical or legal violation, including violation of the policies described in this Code, you have an obligation to report it to your supervisor, the Corporate Compliance Officer, or the Company's toll-free Compliance Hotline.

Accendra Health is serious about ethical conduct and complying with all laws that affect our business. In today's highly competitive and heavily regulated healthcare marketplace, business decisions are more difficult than ever. The government, the media, and the general public all have unprecedented interest in the way we conduct our business. We will not take actions that undermine our ethical principles or violate legal requirements. We must always remember our obligation to our customers and patients, and understand that our livelihood depends upon establishing and maintaining their trust and confidence in our services and products.

As a leader in the home-based care industry, Accendra Health must meet high standards of ethical and legal conduct. Our reputation for quality, integrity, honesty, and respect in all business dealings is essential to our continued success.

## Compliance With Laws

The most fundamental premise of our Code is the requirement that all Accendra Health teammates, directors, and third parties comply fully with applicable laws, rules, and regulations of all levels of government. The Company is subject to a variety of federal, state, and local laws and regulations covering everything from workplace safety to fair competition to information disclosure. Through some of our activities, we are also subject to international laws. In addition to compliance with legal requirements, however, the Code requires teammates to demonstrate honesty, integrity, and ethical behavior in the performance of all services on behalf of the Company.

# General Principles For Ethical And Legal Practices

While it is impossible to catalog every situation that might arise, the following general principles are important:

## **Fairness and Honesty**

Work with suppliers, customers, and patients on a fair and honest basis. Buying and selling must be done on an “arm’s length” basis, free of any kickbacks, bribes, secret commissions, gifts, or favors. Customers and patients should be furnished with accurate information regarding services and products provided and billed fairly and correctly.

## **Accurate Recordkeeping**

Maintain books and records and accounting controls for the entire Company that accurately and fairly reflect our revenue, income, and expenses. Our teammates must follow accounting and inventory controls.

These controls are designed to protect not only against bribes and kickbacks, but also against the use of Accendra Health assets in unauthorized ways, such as not recording or obtaining internal managerial authorization for financial transactions, and maintaining improper bank accounts. Each teammate is required to cooperate fully with the Company’s internal and external auditors.

## **Independent Business Judgment**

Avoid any situation in which your independent business judgment might appear to be compromised. Charges of bad faith and misdealing can arise in any situation where your personal interests and the Company’s interests are not the same. For this reason, teammates should not have a financial interest in customers, suppliers, or competitors of the Company (except for owning less than two percent of the stock of a publicly traded company). Teammates also cannot work for a customer, supplier, or competitor without prior management approval.

# General Principles For Ethical And Legal Practices

## Candid Reports

Make candid reports to directors, management, and fellow teammates. Among other things, this requires that reports contain accurate information and that accounting records be properly maintained in accordance with generally accepted accounting principles. It also means that teammates must fully and frankly disclose to management anything that might affect the Company's reputation. Compliance concerns must be reported factually and on a timely basis.

## Proprietary Information

Protect proprietary information. Outside of work, be careful not to divulge information about the Company, our business or our patients, even accidentally.

For example, matters that should not be disclosed include:

- Sales or revenue trends and other undisclosed financial results
- Lists of suppliers or customers (including patients)
- Contract terms
- Prices
- Confidential information disclosed to the Company by customers suppliers or any other firm with which we do business
- Policy, procedure and training manuals
- Reports and memoranda concerning the Company, including internal and external audit and consultant reports
- Information about pending or completed acquisitions
- Compliance matters
- Patient or customer concerns
- Sales, marketing and operational strategies
- Protected health information (PHI) about fellow teammates or patients

## Intellectual Property

Without clearly documented permission, do not improperly use trademarks that we do not own, and do not reveal trade secrets disclosed to the Company by manufacturers or any other entity. Do not duplicate licensed computer software. Willful infringement of a copyright is a crime.

# General Principles For Ethical And Legal Practices

## Separate Politics from Business

Except for contributions to the Company's political action committee (PAC), Accendra Health PAC, and lobbying efforts on behalf of the Company (at the direction of the corporate office), keep political activities separate from the Company's business. If you decide to make a political contribution other than to the Accendra Health PAC (including providing volunteer services), it should be made with your funds and in your name and on your personal time, not the Company's. Company stationery or facilities should not be used for personal or political purposes. If a teammate is appointed to or decides to run for a governmental office, he or she should first consult with management to ensure a conflict of interest does not arise.

## Environmental Resources

Act as conscientious stewards of the natural resources around us. This means that we must comply with applicable environmental laws and regulations, as well as show respect for our neighbors. This is especially true in how we handle and dispose of medical waste and hazardous materials, including liquid oxygen and pharmaceuticals.

## Public Service

You raise money or perform services for a charity during working hours (except where sponsored by Accendra Health). You ask customers or suppliers of the Company to make charitable contributions.

## Speeches and Presentations

You are offered a fee or other compensation for outside speeches or presentations in connection with your work for Accendra Health.

## Political Relationships

- You work on a political campaign during working hours
- You express political views in a setting where your audience may think you are speaking on behalf of the Company
- You make contributions or payments to political parties or candidates on behalf of the Company

If you have any questions or doubts about whether you have a conflict of interest, please contact the Ethics and Compliance Department at [compliance@accendra.com](mailto:compliance@accendra.com).

# General Principles For Ethical And Legal Practices

## Fair Competition and Dealings

In the conduct of its business, Accendra Health is committed to vigorous and fair competition based solely upon the merits of our competitive offerings. Making baseless remarks about our competitors is not an acceptable business practice. No teammate or director may take unfair advantage of anyone through manipulation, concealment, abuse of confidential information, misrepresentation of material facts, or any other intentional unfair dealing practice.

Agreements and conduct that unfairly restrict competition may be illegal under federal or state competition or anti-trust laws. Examples of illegal behavior include agreements between competitors to fix prices for services or products or to divide up customers or territories. We must be especially careful in conducting ourselves at trade associations or other meetings where our competitors are present or participating. Certain topics that should not be discussed with competitors include, but are not limited to, pricing, pricing methodology, pricing formulas, profits or profit margins, market share, and bidding processes.

Teammates must not engage in activities or discussions that could lead to allegations or the appearance of improper behavior. Consult the Ethics and Compliance Department at [compliance@accendra.com](mailto:compliance@accendra.com) or an attorney in the Legal Department if you ever have questions about proper behavior at trade associations or other meetings where competitors are present.

# Our Resources

## Corporate Compliance Officer and the Ethics and Compliance Hotline and Website

The Corporate Compliance Officer is responsible for overseeing and implementing the Company's Ethics and Compliance Program, and monitoring and promoting compliance with federal and state laws, regulations, and requirements.

The Corporate Compliance Officer is authorized to implement all necessary actions to ensure achievement of the objectives of an effective compliance program. Contact the Corporate Compliance Officer at [compliance@accendra.com](mailto:compliance@accendra.com), or submit questions to the Compliance Hotline.

Accendra Health Compliance Hotline: 1-888-COMPLY-9 (888-266-7599) or [www.ethicspoint.com](http://www.ethicspoint.com).

Available 24/7, 365 days a year.

If, for whatever reason, you do not wish to communicate a concern to your supervisor or manager, you can call the toll-free Compliance Hotline or file a report at [www.ethicspoint.com](http://www.ethicspoint.com). The call or the report will not be traced and your anonymity will be preserved up to the limits of the law, if you wish to remain anonymous. All reports will be investigated or referred to appropriate management teammates for resolution.

## Corporate Compliance Program Policies

Accendra Health has a formal Corporate Compliance Program, which includes our Code of Conduct and policies and procedures. The purpose of the Corporate Compliance Program is to ensure the Company's compliance with applicable federal, state, and local laws, regulations, and guidelines established by the Office of the Inspector General (OIG) of the United States Department of Health and Human Services and other applicable federal and state regulatory agencies.

The Corporate Compliance Program policies can be found on MYA, Accendra Health's teammate intranet.

## Our Resources

### **The Legal, Compliance, and Regulatory Affairs Reimbursement Compliance Departments**

For questions on legal matters relating to contracts, billing, sales incentives, or other legal or ethical issues, the Company's internal legal staff can provide guidance and assistance in finding solutions and answers. Also, Ethics and Compliance, Regulatory Affairs, and the Reimbursement Compliance Departments can review and answer questions about government rules and regulations relating to Medicare, Medicaid, and other government payors. Reports about suspected improper or illegal acts may also be made to any attorney in the Legal Department or the Compliance Hotline.

# Our Responsibility To The Company

## Protecting and Preserving Company Assets and Resources

Each of us is responsible for protecting and preserving Company assets and resources. Teammates have obligations to safeguard Company resources from loss, damage, carelessness, waste, misuse, or theft, and to be vigilant about using them legally, ethically, efficiently, and for legitimate business purposes.

We must operate and maintain a robust internal control system that is designed to promote efficiency, prevent fraud, and help ensure the reliability of financial statements and compliance with applicable laws and regulations.

### Custody, Care, and Use of Company Assets

Company assets are made available to Accendra Health teammates for business purposes. This applies to physical assets such as medical or office equipment, vehicles, computers, drugs, and supplies, as well as other types of items such as Company records, patient information, and customer lists.

Accendra Health teammates who are given custody of equipment are expected to maintain and properly care for it. Damage to assets should be reported promptly to appropriate Company personnel. Equipment that becomes damaged or is no longer needed should be returned to the Company for repair or reassignment.

All Company assets in the custody of Accendra Health teammates are to be returned in acceptable condition upon termination of employment.

Many valuable Company assets are intangible, including our trade secrets, name, trademarks, and confidential information. You must protect our intangible assets and confidential information just as you would our Company's physical assets.

# Our Responsibility To The Company

## Recordkeeping

The law requires Accendra Health to prepare and retain a large number of records in connection with its business. It is Accendra Health's policy to do so fully and accurately. The same applies to records that are part of Accendra Health's internal management information and control programs. If the Company fails to complete or retain required records, it could be subject to fines and other enforcement action.

- All Company records should be prepared accurately, reliably, and honestly. Take the time to learn what kinds of records are required in your job and see that they are prepared and stored properly, in accordance with Company policy.
- Store all records in a safe and secure location. Records should be organized in a manner that permits prompt retrieval.

Dispose of old or unneeded records in accordance with our record retention policy. This includes electronic data and paper records. If you are unsure, always contact your supervisor or manager before disposing of any Company records.

- Never enter false or misleading information into Company records. If you are not sure of the accuracy or reliability of information, take steps to verify it or contact your supervisor.

## Computer Systems

The information processed and stored on our computer systems is critical to the daily operations of the Company. Increasingly, cyber threats place our systems and data at risk. Every teammate is required to comply with the Company's Information Technology Security Policy. Software and data must be protected from damage, alteration, theft, fraudulent manipulation, unauthorized access, and disclosure of confidential Company or customer information. Each teammate must follow measures to keep such information secure.

Where appropriate, passwords should be used. Passwords should not be shared or disabled and computers should not be left on with confidential information on the screen if there is any chance that it could be viewed by an unauthorized person.

Teammates must observe copyright restrictions for software and associated documentation.

# Our Responsibility To The Company

Do not copy computer software programs or use personal software on Company computer equipment. Doing so could be a violation of federal copyright laws and could introduce a computer virus into our system. The Corporate Information Technology Department is the only department authorized to load software on the Company's computer systems.

Company computer facilities, including voicemail, electronic mail, and Internet access systems, are provided to Accendra Health teammates to use for Company business purposes. Messages may not contain offensive or defamatory content, such as comments or images that would offend someone on the basis of their sex, race, color, religious creed, national origin, sexual orientation, age, disability, marital status, veteran status, or any other characteristic. All materials stored, processed, sent, or received on these facilities are the Company's property and are subject to inspection and monitoring by the Company at any time and without prior notice. Any misuse of these facilities could lead to termination of employment with the Company.

## **Personal Use of Business Phones, Computers, and Other Company Assets**

On an occasional basis, you are allowed to use Company computer and telephone systems for personal reasons, provided that such use is consistent with the Code, is nominal in terms of time, and does not interfere with the performance of your job responsibilities. In no event may you use Company assets in a manner contrary to our policies, including but not limited to this Code, or in any way that is offensive, sexually explicit, or inappropriate. Except as provided by applicable law, there should be no expectation of privacy in connection with your use of Company computers, telephones, or other assets.

# Our Responsibility To The Company

## Social Media

External personal websites, blogs, social networking sites, and other electronic forums for disclosing information are prevalent in our technology and internet-driven world. As a result, the Company has certain guidelines that must be followed relating to social media and which are more completely and specifically described in our Social Media Policy.

These guidelines include, but are not limited to, the following:

- Teammates may not create, maintain, or post to external sites or social media outlets on behalf of the Company without the express permission of the Company. Teammates may not disclose on external sites or social media outlets confidential information of the Company, our suppliers, vendors, or customers.
- Teammates may not use social media to make marketing, advertising, or publicity statements about the Company or its products or services without the express permission of the Company.

Any discussion about, or relating to, the Company that is not prohibited by the above guidelines or our Social Media Policy should be in good taste, should not misrepresent or disparage the Company, and should be accompanied by a clear and conspicuous disclaimer that the views expressed do not necessarily reflect the views of Accendra Health. Under no circumstances may any teammate use Company trademarks, service marks, or logos in connection with any personal posting.

# Our Responsibility To The Company

## Artificial Intelligence

Teammates must comply with all applicable laws and regulations governing the use of artificial intelligence (AI), including privacy, intellectual property, and anti-discrimination laws. Accendra Health has established an Artificial Intelligence Use Policy that all teammates must follow. These guidelines include, but are not limited to, the following:

- Teammates should only use approved AI applications

When using approved applications, the policy further provides teammates guidance on:

- How AI technology should be used at the Company
- Prohibited uses of AI
- Appropriate human review before an AI-produced document or application can be deployed

Existing procurement procedures require that Compliance and Privacy, IT Security, and Procurement review and approve new technology.

AI technology must follow existing policy, including Legal review requirements.

All teammates must remember that proprietary and confidential information owned by Accendra Health, as well as all personally identifiable information (such as PHI), must be safeguarded.

# Our Business Relationships

## Acting with Honesty and Integrity

In all of our business relationships, we act with honesty and integrity. We do not act unfairly or improperly in our business relationships.

### Proper Accounting and Company Records

Company business records must always be prepared accurately and completely. They are of critical importance in meeting our financial, legal, tax, and management obligations. The books of account, financial statements, and records of the Company must accurately reflect the operations and financial results of the Company in accordance with generally accepted accounting principles. All assets, liabilities, income, and expenses of the Company are required to be properly recorded in the books and records of the Company. There may be no disbursements or receipts of corporate funds outside of the Company's established system of accountability. Records are to be kept in accordance with the Company's internal controls at all times, fully and accurately reflecting all transactions. No unrecorded fund or asset may be maintained. No false or misleading entry, record, or report may be made or permitted to go uncorrected.

All reports, vouchers, bills, payroll and service records, measurement and performance records, and other essential data must be prepared with care and honesty.

### Proper Dealing with Auditors

No teammate or director may take any action to fraudulently influence, coerce, manipulate, or mislead the Company's independent auditors, nor shall any teammate or director conceal any information necessary for the preparation of accurate financial statements.

### Corporate and Board Opportunities

Teammates are prohibited from: (a) taking opportunities related to the Company's business for personal use; (b) using the Company's property, information, or position for personal gain; (c) competing with the Company for business opportunities, or (d) being paid to provide proprietary information about the Company. Teammates should refer questions regarding the appropriate course of action to the Legal or Corporate Compliance Department before taking any action.

# Our Business Relationships

## Marketing Materials and Information

Accendra Health teammates must not engage in illegal, unethical, or deceptive activities to obtain business. While the Company intends to market and sell its products and services vigorously, teammates must accurately represent our products and services at all times.

Accendra Health marketing information must be clear, accurate, and informative. All advertising and promotional materials must be reviewed by clinical, quality, compliance, and legal through the established review process. This includes an assessment of any claims made regarding the Company's products and services to ensure that claims are consistent with established laws and regulations and are substantiated by objective evidence. Accendra Health shall not make any written or oral claim regarding a product or service that has not been documented in advance and approved through the review process.

## Kickbacks/Inducements

**Anti-Kickback Statute (AKS):** The Federal Anti-Kickback Statute prohibits the payment or transfer of anything of value by a person or Company in exchange for purchasing healthcare goods or services that are covered by Medicare or Medicaid. Under the AKS, anything of value may include cash or cash equivalents as well as reductions in price, discounts, or other rebates that are given in exchange for referrals or recommendations.

The U.S. government has established certain Safe Harbors to permit reasonable business arrangements in healthcare that might otherwise violate the AKS. Safe Harbors have precise requirements, and any transactions with healthcare providers must be reviewed by the Accendra Health Legal Department before execution.

It is against the law and Company policy to provide a "kickback" or any other improper incentive or inducement to a referral source or any other party for the referral of home-based care services and products. Such incentives may include excessive discounts, supplies and equipment, gifts, write-offs, professional courtesy, or improper leases.

Accendra Health is subject to federal and state laws, and rules and regulations that prohibit the offering, soliciting, giving, or receiving of anything of value to an existing or potential referral source to induce the referral source to refer business to Accendra Health. For example, the Medicare and Medicaid programs prohibit inducements to refer goods and services that are

## Our Business Relationships

reimbursable under either of those programs. Such inducements include bribes, rebates, gratuities, and kickbacks. In addition, federal and state self-referral laws prohibit a physician from ordering goods and services from a healthcare provider with which the physician (or a member of their immediate family) has a financial relationship, unless the relationship is covered by a statutory exception.

It has been Accendra Health's long-standing policy to specifically prohibit any teammate, agent, or consultant from offering, giving, soliciting, or receiving any form of inducement. Any of these acts can result in the civil and criminal prosecution of both the individual involved and Accendra Health. Personal funds or resources may not be used to do that which the Company is otherwise prohibited from doing.

Accendra Health will not seek or retain a referral source relationship that involves an improper incentive or inducement. If a referral source requests a service or a concession that you believe to be improper, do your best to explain why we cannot do what is being asked. Seek help from your local manager, Compliance, or the Legal Department if necessary. In many cases, a referral source will withdraw an improper request if the legal issues are properly explained. If you are not successful, you must be prepared to lose an account that will not conform to the requirements of the law.

An inducement, by definition, requires interaction with a referral source or potential referral source. Accordingly, sales and service representatives have a special responsibility to be aware of the laws, rules, and regulations dealing with inducements and must be particularly sensitive to any situation that could result in an inducement. Some situations (such as giving a doctor cash in return for their business) are clearly illegal. Other situations are less obvious but may nevertheless be construed as an illegal inducement. Federal law and, in some cases, state law provide that an inducement may be direct or indirect, in cash, or in kind.

Whenever a referral source or a prospective referral source makes such a request, or you become aware of a practice that you believe could be construed as an inducement, bring it to the attention of your Leader or the Corporate Compliance Officer. They will contact Accendra Health's attorneys to discuss the practice and follow-up. If you have any questions, do not act alone. The legal consequences to you and to Accendra Health of a mistake in this area could be significant.

# Our Business Relationships

## Common Marketing Practices

The following discussion includes some general guidelines for dealing with certain common marketing practices. (Note: This list of practices is not meant to be all-inclusive. There are many other practices that are not discussed below that could be construed as an inducement.)

## Customer Discounts

It is common practice in the home-based care industry for suppliers not only to sell to patients on a retail basis, but also to sell to other customers, such as healthcare providers, on a wholesale basis. Generally, selling to a customer on a wholesale basis is permissible as long as: (a) the prices and any applicable discounts are appropriately disclosed; (b) the arrangement is appropriately documented; and (c) the customer pays for the products and services on an arm's-length basis.

Discounts may be based upon:

- Competitive factors such as pricing or discounts offered by other suppliers in an arms-length transaction
- The total estimated monthly volume of an account, including associated efficiencies
- Service requirements
- Ease of payment collection

## Physician Self-referral Law

The Ethics in Patient Referrals Act — commonly known as the “Stark Law” — is a federal strict liability statute that prohibits physicians from referring patients to healthcare entities with which the physician has a financial relationship unless an exception applies. These types of referrals are commonly known as “self-referrals.” Sanctions for violating the Stark Law can include denial of payment, civil monetary penalties, and exclusion from federal healthcare programs (e.g., Medicare and Medicaid).

# Our Business Relationships

## Free Trials and Samples

Accendra Health does not encourage the use of free trials as a routine sales practice. Free trials should only be offered to potential referral sources to demonstrate the quality of Accendra Health's services and products.

Any free trial must have the prior approval of your Market Vice President or Corporate Compliance or Legal Departments. Free trials should not be tied to the value or volume of referrals.

During the free trial, no one (including the referral source, patients, and third-party payors) is to be billed for any product or service provided by Accendra Health as part of the free trial.

## Referral Source Gifts

Accendra Health prohibits the giving of gifts to referral sources. Never give anything in exchange for a referral, whether or not the payor is a government payor and no matter the size of the gift. Gift-giving is restricted to education and healthcare practice-related items that have some patient benefit. Items solely intended for the personal benefit of a referral source and unrelated to the benefit of patients may not be offered (including flower arrangements, jewelry, artwork, tickets to a sporting event, entertainment, holiday gift baskets, etc.).

## Real Property Leases with Referral Sources

Rental of space to or from referral sources or potential referral sources and rental of space to or from parties to whom the Company may refer must be reviewed and handled by the corporate Real Estate and Legal Departments. A standard property information checklist can be obtained from the Real Estate Department and must be completed by the other party to the lease.

## Agreements with Referral Sources for Delivery of Home Medical Equipment and Services

To ensure that such agreements comply with all laws and regulations related to the delivery of home medical equipment and services, all agreements with referral sources or potential referral sources must be submitted to the Legal Department for preparation, review, approval, and signature.

# Our Business Relationships

## Consulting and Service Arrangements

Compensation paid to medical professionals or other referral sources for providing consultation or support services must be documented in a written contract, approved in advance by the Legal Department. The contract must identify the services to be provided to Accendra Health and limit the payment amount to fair market value for those services. Every payment made under these contracts must also be supported by proper documentation indicating that the services contracted for were actually provided.

## Screening of Ineligible Persons

The Company must meet certain regulatory requirements related to employment of individuals who have been excluded from participation in federal healthcare programs. To ensure these requirements are satisfied, Accendra Health will conduct routine and customary criminal background checks and exclusion checks on prospective and current teammates and third-party vendors.

## Conducting Business with Our Customers and Suppliers

All gifts are prohibited except for the following, which can only be given or received after confirming that the gift is permitted under the policies and procedures of the customer's or supplier's organization.

- Meals that are neither designed nor intended to create a sense of personal or corporate obligation on the part of the recipient and the primary purpose of which is to hold bona fide business discussions. All such expenses must be modest as judged by local standards and are subject to the Company's policies on meals as well as expense reimbursement.
- Corporate charitable contributions approved in accordance with Company policy and personal charitable contributions that are not made for the purpose of securing favorable business treatment.
- If you are offered or receive anything of value that is arguably beyond what is permitted by the Code of Conduct, Company policy, or that you believe may be an attempt to improperly influence the performance of your duties, you should immediately report this to your supervisor, the Ethics and Compliance Department at [compliance@accendra.com](mailto:compliance@accendra.com), or an attorney in the Legal Department. In such cases involving a gift to an officer or a director, this report must be made to the chair of the Audit Committee. Prohibited gifts or gifts that create a sense of obligation should promptly be returned to the donor.

# Our Business Relationships

## Billing Adjustments

Some referral sources may object to paying for all or a part of their bills or may request that Accendra Health forgive or adjust all or part of their or their patients' bills. In many instances, such adjustments may be inappropriate. In general, such adjustments may be made only in cases of an honest misunderstanding between the referral source and the Company or an error on the part of Accendra Health. Do not make promises or deals with a referral source with respect to the referral source's or patient's bill. Discuss the matter with your Leader.

## Continuing Medical Education and In-service Training Programs

Accendra Health may not pay the cost of continuing medical education seminars for a physician, or any related travel expenses. This is a direct benefit to the physician and may be construed as a kickback for referrals. In-service training programs may be provided to referral sources as part of Accendra Health's education about the services and/or products Accendra Health provides.

## Billing

Accendra Health teammates who are involved in the billing and collection function are expected to understand and comply with all billing-related policies and procedures established by the Company, as well as applicable requirements of third-party payors (including Medicare, Medicaid, and other government payors).

Accendra Health shall bill only for goods, services, and supplies that are properly ordered and delivered or performed, as appropriate. The Company shall only bill for goods, services, and supplies for which appropriate documentation exists.

All coding of services must conform to applicable government regulations and commercial payor instructions. All required billing information (including diagnosis coding) must be collected and recorded accurately.

All contact with customers to obtain missing information must be properly documented.

Accendra Health requires compliance with federal and state laws that prohibit the submission of false claims in connection with healthcare programs, including Medicare and Medicaid.

## Our Business Relationships

Accendra Health teammates are expected to cooperate fully with all internal and external audits of Accendra Health's claims and its billing system. If you discover any coding error in the billing system, the matter should be brought to the attention of your supervisor so that he or she may determine the nature and magnitude of the problem and the appropriate corrective action.

Accendra Health's policy is to notify the appropriate carrier or payor of any overpayments and provide opportunity for recoupment of refund. All such matters should also be brought to the attention of revenue management teammates at the division or market level or higher and, in the case of government billing, to the attention of the Regulatory Affairs and Reimbursement Compliance Department.

The Company may not routinely waive or write off copayments and deductibles for services rendered. Such a practice could cause the Company to violate its contractual obligations as well as certain government regulations. You should consult the Company's Reimbursement Updates for questions pertaining to government billing, and SharePoint for Revenue Management Updates and National Payor Updates for questions pertaining to commercial billing. The Reimbursement Updates can also be found on MYA, Accendra Health's intranet. The Revenue Management Updates and Payor Updates can be obtained from revenue management personnel and are available on SharePoint.

All questions about commercial billing can be directed to revenue management personnel. All questions about government billing can be directed to revenue management personnel or the Regulatory Affairs and Reimbursement Compliance Departments.

# Our Business Relationships

## Quality Assurance

To ensure that the Company provides top-quality products and services, Accendra Health operates a quality assurance program based on the Durable Medical Equipment, Prosthetics, Orthotics, and Supplies (DMEPOS) Quality Standards. These standards are Centers for Medicare & Medicaid Services (CMS)-mandated operational and patient-care requirements that all Medicare DMEPOS suppliers must meet to enroll in and remain eligible to bill Medicare Part B. They are incorporated into federal regulation and are enforced through accreditation. This program helps make sure the products and services we purchase conform to our policies and procedures, and to regulatory requirements. Also, Accendra Health's vendors are required to have processes to control documentation, handle customer complaints, manage manufacturer product recalls, isolate and control nonconforming products, investigate the causes of complaints and nonconformance, and implement corrective action to prevent recurrences.

Each teammate is responsible for ensuring the quality of their work, implementing the relevant provisions of the quality assurance program, and complying with Accendra Health policies and procedures.

## Practice of Medicine

Accendra Health is in the business of providing healthcare products and related services and is not engaged in the practice of medicine. Accendra Health shall obtain a physician's order prior to furnishing a product, supply drug, or service for which an order is required, according to applicable laws and regulations. Accendra Health teammates must follow a physician's order with care and integrity, and shall never fabricate, tamper with, alter, or otherwise make any changes to a physician's order. To the extent that a physician's order is unclear, the Company shall either obtain written clarification from the physician or document the physician's verbal order changes in writing to ensure that the correct drug, medical item, or service is furnished.

# Our Business Relationships

## Conflicts of Interest

Accendra Health teammates are required to conduct themselves at all times in accordance with good business judgment for the sole benefit of the Company and in such a manner as not to create a conflict of interest or appearance of such a conflict.

No teammate should have any business, financial, civic, or professional interest outside the Company that in any way conflicts with that teammate's ability to perform his or her duties at the Company with undivided loyalty, unless there is a review and approval by the Corporate Compliance Officer.

The Company does not intend to interfere with the rights of teammates to engage in outside business or other activities that do not conflict with the obligations of their position or the interest of the Company.

You should consult Accendra Health's detailed policy regarding conflicts of interest. The policy is available on Accendra Health's intranet, MYA, or can be obtained from Human Resources or the Corporate Compliance Officer.

# The People We Serve

## Patient Care and Privacy

### Clinical Expertise/Respect for Patients, Including Freedom of Choice

Accendra Health employs professionals with the credentials, experience, and expertise to meet the needs of our patients. Where required by applicable law or regulations, only licensed/credentialed teammates shall conduct clinical assessments or provide certain services that involve hands-on patient care. Teammates whose livelihood depends on maintaining and renewing the correct state clinical licensure (including multiple states, if applicable) are ultimately responsible for that licensure. Disciplinary action up to and including termination will occur if teammates or managers do not comply with the applicable state clinical licensure requirements.

All teammates are expected to respect each patient's privacy, dignity, comfort, and convenience, and to treat each patient with consideration, courtesy, and respect. All patient services will be provided without discrimination due to race, color, religion, national origin, gender, sexual orientation, disability, or age.

Patients have the right to receive information regarding Accendra Health's policies, procedures, and charges, and to know the identity and qualifications of all Accendra Health teammates who provide them with services. Inherent in this concept is the Company's commitment to honoring a patient's freedom to choose their healthcare provider.

# The People We Serve

## Patient Privacy

The Company is committed to maintaining the confidentiality of patients' protected health information. The Health Insurance Portability and Accountability Act's (HIPAA) privacy regulations established national standards to protect individuals' medical records and other personal health information. Because the regulations hold violators accountable, with civil and criminal penalties that can be imposed if patients' privacy rights are found to have been violated, it is especially important that the Company maintain necessary safeguards to protect the privacy of health information. The privacy regulations require that the Company: (a) inform patients about their privacy rights and how their information can be used; (b) adopt clear privacy procedures; (c) train teammates to understand the privacy procedures; and (d) secure patient records containing individually identifiable health information so that they are not readily available to those who do not need them. If you have questions relating to health privacy matters, consult your Leader, the Company's Compliance Officer, or the Legal Department.

# Our Community Interactions

## Compliance with Laws and Regulations

### Environmental Laws

The Company's policy is to obey the laws that protect the environment. Teammates must obey environmental laws, not only because it makes sense, but also because a violation can be a crime. Any person who knowingly violates requirements or prohibitions of such laws, including the stated conditions of approved permits, can be subject to civil and criminal fines and penalties.

Hazardous waste must be handled according to the law. Individuals and companies that mishandle hazardous waste run a substantial risk of being prosecuted. Violators have been fined or imprisoned for improper dumping of waste.

All teammates are expected to handle biohazardous and other waste materials in accordance with established control, storage, and disposal policies. All spills or accidents involving biohazardous materials should be reported promptly in accordance with such procedures and to your immediate supervisor. If you are unsure whether a particular situation or activity amounts to a violation of environmental laws, consult with your Leader, or the Real Estate or Legal Departments, before taking any action.

# Our Community Interactions

## Competing Fairly and Complying with Antitrust and Anticorruption Laws

### 1. Antitrust Laws

The antitrust laws reflect the government's commitment to a free enterprise system. Supply and demand and vigorous competition give consumers quality goods and services at economical prices. It is the Company's policy to comply with all antitrust laws.

The criminal provisions of the antitrust laws prohibit any agreement between competitors regarding prices to be charged, bidding, customers to be solicited, or geographic areas to be served.

Examples of criminal agreements with competitors include:

- Agreeing upon selling price or list price
- Exchanging bids with competitors
- Allocating territories, customers, or markets
- Fixing a price range
- Setting up a rotation method of bids among competitors
- Limiting output or restricting delivery/service schedules
- Fixing discounts, rebates, or credit terms

Such agreements will almost always lead to civil and criminal prosecutions of individuals and of the companies they represent. In this area, as with the other areas discussed in this Code, offenses will likely lead to penalties for individuals consisting of major fines and substantial imprisonment. In addition, the Company could be subject to substantial fines.

Remember that any contact with a competitor is hazardous and could be illegal. Illegal agreements are often proved with evidence of "small talk," "casual discussions," and "harmless" exchanges of business information. Avoid such discussions, whether they occur in a large, formal group or in a social setting following a trade association meeting.

If a competitor raises such a topic or any other matter that you believe might violate the antitrust laws or our policy, you must immediately and firmly decline to discuss it. You should then promptly notify the General Counsel of the event.

# Our Community Interactions

## 2. Anticorruption Laws

Accendra Health strictly complies with all anti-bribery and anti-corruption laws, including, but not limited to, the Foreign Corrupt Practices Act of 1977 ("FCPA"), that prohibit the provision of money, gifts, or other items of value to influence government or other officials. In conducting Company business, all Company teammates must also comply with the FCPA and local anticorruption laws. This policy extends not only to direct payments but also to indirect payments made in any form through consultants or third parties, such as third-party distributors or dealers who sell our product.

The FCPA prohibits making, promising, or authorizing another to make a corrupt payment or providing anything of value to a foreign government official ("Foreign Official") in order to:

- Assist the Company in obtaining or retaining business
- Obtain an improper advantage for the Company by:
  - Influencing a Foreign Official in their official capacity
  - Inducing a Foreign Official to engage in any governmental act or decision
  - Inducing a Foreign Official to use their influence to affect a government decision

The definition of "Foreign Official" is very broad and includes not only government ministers and elected officials but also, for example, executives or middle managers in foreign manufacturing companies owned by a foreign country's government.

The FCPA also prohibits payments or providing anything of value to third parties, such as consultants, where it is known, or should be known, that the third party will pass on the improper benefit to a Foreign Official for the Company's benefit.

Accendra Health expects all third parties with whom it does business to similarly conduct their business in accordance with all applicable laws and regulations, including complying with the FCPA and local anticorruption laws.

Violations of the FCPA or local anticorruption laws may result in serious criminal penalties for the Company and for individual Company teammates.

If you are unsure whether a particular situation or activity amounts to a violation of the antitrust or anticorruption laws, consult with the Compliance Officer, the General Counsel, or another member of the Legal Department before taking any action.

# Medicare Parts C and D

## Regulations and Guidelines

The Company is committed to ensuring that all Medicare Parts C and D services provided by, or on behalf of, the Company are in compliance with all applicable laws, regulations, and guidelines, including those compliance program guidelines issued by the CMS. The Company has implemented mechanisms to monitor its subcontracted downstream providers and related entities compliance with these applicable Medicare program requirements.

To review the CMS guidelines, please visit:

**<https://www.cms.gov/medicare/regulations-guidance/manuals>**

If you become aware of or suspect conduct by Company teammates (or teammates of the Company's downstream entities or related entities) that may violate Medicare regulations, including the CMS guidelines, please contact your Leader or use the Company's Ethics and Compliance Hotline or Website to report such concerns.

## Deficit Reduction Act

The Deficit Reduction Act of 2005 ("DRA") section 6032 requires healthcare entities receiving a certain amount in Medicaid funds to provide False Claims Act training and education to teammates. Accendra Health is committed to meeting the requirements of the DRA and to preventing and detecting any fraud, waste, or abuse. All teammates must comply with applicable federal and state laws and Accendra Health policies and procedures for detecting and preventing fraud, waste, and abuse.

# False Claims Under Federal and State Laws

## Federal False Claims Act (FCA)

The Federal False Claims Act allows the Federal Government or private persons (qui tam plaintiffs or relators, also known as whistleblowers) to file lawsuits against individuals or entities for submitting false claims, causing someone else to submit false claims, or improperly avoiding or reducing an obligation to pay money to the Federal Government. The FCA covers fraud involving any federally funded contract or program (including Medicare and Medicaid), with the exception of tax fraud. If the action is successful, the qui tam plaintiff is entitled to a percentage of the recovery amount.

Under the FCA, any person who is found to have engaged in any activity prohibited by the FCA, including those referenced above, is liable to the Federal Government for three times the amount of the Federal Government's damages/loss plus penalties.

The FCA provides protection for the relator/whistleblower. It prohibits any adverse employment action (i.e., demotion or termination) to be taken against a teammate who lawfully participates in an action under the FCA.

There are also administrative remedies for false claims or statements, including recoupment for overpayments, program exclusions, and civil monetary penalties/sanctions. See U.S.C., Title 31, Chapter 38.

## State False Claims Act

Some states have enacted their own false claims acts, modeled after the Federal False Claims Act. These state laws establish civil liability for individuals and entities that submit false or fraudulent claims to the state.

## Policy Regarding False Claims Under Federal and State Law

Accendra Health's Corporate Compliance Program includes policies and procedures for detecting and preventing fraud, waste, and abuse. For more information about the FCA and state false claims acts, please refer to Compliance Program Policy, False Claims Under Federal and State Laws. This policy is posted on MYA, the intranet site for Accendra Health teammates.

# Department of Transportation (DOT) Regulations

Apria operates one of the larger private fleets in America. In delivering products and services to our patients, Accendra Health's commercial motor vehicle drivers and logistics and supply chain management team members must comply with the regulations issued by the Department of Transportation (DOT). The DOT's regulations are designed to promote a safe driving environment for our teammates as well as the motoring public.

With regard to the Company's commercial motor vehicle drivers, the DOT has set forth rules limiting the number of hours that teammates with commercial driver's licenses may drive and the number of hours they may work. In addition, the regulations require that a "record of duty status" (also known as a "daily log") be maintained unless certain criteria are met.

Drivers of commercial motor vehicles are also subject to certain drug and alcohol tests. Pre-employment, random, reasonable suspicion, and post-accident tests may be given, depending on the circumstances. The Company must maintain driver qualification files containing certain documents (commercial driver's license, medical certificate, motor vehicle report, etc.) with respect to each teammate who drives a commercial motor vehicle on behalf of the Company.

The DOT has also set forth rules regarding the transportation of hazardous materials. Each commercial motor vehicle carrying certain threshold quantities of hazardous materials must have the proper placards displayed. In addition, teammates handling hazardous materials (including transporting or loading/unloading) must be trained to handle those materials. The hazardous materials must also be properly identified on the shipping papers (route sheets).

Accendra Health is required to perform periodic inspections and maintenance of the Company's commercial motor vehicles, maintain a list (or "register") of certain accidents involving commercial motor vehicles operated by the Company, and immediately notify the Department of Transportation of certain unintentional releases of hazardous materials.

You should consult Accendra Health's detailed Transportation Safety Management policies regarding each of these areas for more information. These policies can be found under the Clinical Regulatory Compliance Resources on SharePoint. If you have questions, consult with your supervisor, General Manager, the Corporate Transportation Safety Management Department, or the Legal Department before taking any action.

# Food and Drug Administration (FDA) Medical Gas Compliance

It is the Company's policy to follow all applicable laws and regulations pertaining to the receipt, testing, storage, handling, and transportation of oxygen. Any person who knowingly violates requirements or prohibitions of such laws can be subject to civil and criminal fines and penalties.

All teammates that conduct the receipt, testing, transfilling, and distribution of liquid and gaseous oxygen must do so in accordance with Accendra Health's Medical Gases policies and procedures and the Food and Drug Administration's current Good Manufacturing Practices (cGMP).

If you are unsure whether a particular situation or activity is consistent with cGMP, consult with your Leader, the Clinical Regulatory Compliance Department, or the Legal Department before taking any action.

# Governments and Government Agencies

The Company has significant interactions with federal, state, and local governments, both as a supplier of goods and services and as a corporate citizen. Government agencies and teammates are entitled to respect and to be treated with integrity. Statements made and records submitted to government purchasing agents (including Medicare contractors), and contract bids for government business, if applicable, are to be made in good faith. Sufficient care must be taken to ensure proper recording and charging of all costs to the proper account.

Teammates must adhere to Accendra Health policies and procedures when handling inspections, visits, inquiries, or communications to or from federal, state, or local government regulatory or licensing agencies. Management must be informed of all inspections, and all inspections must be documented per established policy and procedure.

The Company's interactions with governments are also to be done at "arm's length." No teammate may, directly or indirectly, offer or make any payment, gift, bribe, secret commission, or other benefit to influence the decision or action of any government teammate, official, candidate, or political party.

The Company is also required to file periodic reports with certain government agencies such as the Securities and Exchange Commission (SEC), the Internal Revenue Service (IRS), and the Centers for Medicare and Medicaid Services. Periodic reports concerning the Company's formal lobbying activities and Political Action Committee contributions (via the Company's PAC) must be filed with the U.S. Congress. All reports submitted to such agencies shall be prepared in accordance with applicable standards and regulations and submitted on a timely basis in order to avoid fines, audits, and other sanctions.

If you are unsure whether a particular situation or activity with respect to a government or government agency might constitute a violation of the law, consult with the Legal Department before taking any action.

# Government Investigations, Audits, and Information Requests

Prosecutors have broad authority to investigate possible civil and criminal violations. They can convene grand juries, subpoena documents, and seek interviews or testimony of Company teammates.

Company policy is to cooperate with every reasonable request of government investigators and/ or auditors. At the same time, the Company is entitled to all the safeguards provided by law for the benefit of persons under investigation or accused of wrongdoing, including legal representation.

If a representative of any government or government agency seeks an interview with you or requests access to data or documents for the purposes of an investigation, you should refer the representative to the Legal Department. You should then immediately notify the Legal Department. You should also preserve all materials that might relate to the investigation.

If a representative of any government or government agency visits a branch to conduct a site audit, or issues a request to provide documentation pertaining to a billing audit, follow Company policies.

# Workplace Conduct

## Equal Opportunity Employment

Each teammate contributes to the success of our Company, and only by working together and drawing upon our diverse talents and perspectives can we continue to succeed in a constantly changing world.

Accendra Health is committed to equal opportunity employment, including the prohibition of all forms of illegal discrimination. This means that teammates are recruited, selected, developed, and advanced on merit, without regard to race, color, religion, gender, age, national origin, sexual orientation, gender identity, marital status, disability, or any other characteristic protected by law. We expect all teammates to treat each other with respect and dignity to support a work environment in which diversity and inclusion are valued.

## A Harassment-free Workplace

Accendra Health is committed to continuously building and maintaining a workplace that is safe and professional and that supports and encourages teamwork and trust. Every teammate at Accendra Health is entitled to fair treatment and respect. Accendra Health will not tolerate any form of abuse or harassment in the workplace towards teammates, contractors, suppliers, customers, or others. No teammate should engage in any of the following types of behavior:

- Offensive, intimidating, threatening, malicious, or insulting behavior
- Behavior that could be characterized as sexual harassment (e.g., unwelcome sexual advances or requests, physical contact, or repeated sexual suggestions)
- Behavior that has the intent or effect of creating a hostile or intimidating work environment or interfering with work performance
- Making racial, ethnic, religious, age-related, or sexual comments, actions, jokes, or insults
- Distributing or displaying offensive material, including inappropriate pictures, cartoons, or internet videos

# Workplace Conduct

## Safety in the Workplace

In an effort to ensure a safe and healthy workplace, Accendra Health has a safety program that applies to each of its locations and includes appropriate safety guidelines and training in compliance with applicable laws and regulations, as well as our own policies. Each of our teammates is expected to adhere to applicable laws, regulations, and policies that relate to health and safety in the workplace. If you observe or experience an accident, injury, or unsafe practice or condition, you must immediately notify your supervisor so that the situation can be effectively managed and remedied.

## Confidential Information

All Company records and information relating to the Company, its customers, suppliers, and teammates are confidential. Generally speaking, no teammate or director of the Company may provide or disclose confidential or proprietary information to anyone outside the Company (or even within the Company except to teammates who need to know such information to perform their work) or use such information other than in conducting the Company's business. In certain situations, it may be permissible to disclose or provide confidential information to persons having a legitimate need for it in the ordinary course of the Company's business or as may otherwise be required by law.

Confidential or proprietary information is any information that has not been disclosed to the public and includes, by way of example:

- Protected Health Information
- Customer lists, contracts, pricing, and purchase information
- Supplier lists, contracts, pricing, and product information
- All written or verbal agreements between the Company and its teammates, customers, suppliers, strategic partners, agents, and other third parties
- Intellectual property and trade secrets, including our program offerings and contract forms, as well as trademarks and copyrights
- Company financial information, including actual results, budget or forecast projections, and incentive program targets
- Financial and other information about potential acquisitions, directives, or strategic business relationships
- Proposed or contemplated Company investments
- Company studies and reports of a confidential nature

## Workplace Conduct

Confidential information also includes information that the Company has agreed to receive on a confidential basis from other companies or individuals.

It is important to note that your obligation to maintain the confidentiality of Company information continues even after your employment by or service to the Company ends.

It is also important to note that nothing in this Code shall prohibit or impede anyone from communicating, cooperating, or filing a complaint with any U.S. federal, state, or local governmental or law enforcement branch, agency, or entity (each, a "Governmental Entity") with respect to possible violations of any U.S. federal, state, or local law or regulation. Nor shall it prevent anyone from making disclosures to any Governmental Entity that are protected under the whistleblower provisions of any such law or regulation, provided that, in each case, such communications and disclosures are consistent with applicable law.

You do not need the prior authorization of (or to give notice to) the Company regarding any such communication or disclosure. The Code also does not limit anyone's right to receive an award for information provided to any federal, state, or local government agency or self-regulatory organization or to engage in any future activities protected under whistleblower statutes.

Additionally, an individual shall not be held criminally or civilly liable under any federal or state trade secret law for the disclosure of a trade secret that is made in confidence to a federal, state, or local government official or to an attorney solely for the purpose of reporting or investigating a suspected violation of law. This protection also applies to any disclosure made in a complaint or other document filed in a lawsuit or proceeding, provided such filing is made under seal.

An individual who files a lawsuit for retaliation by an employer for reporting a suspected violation of law may disclose the trade secret to the individual's attorney and use the trade secret information in the court proceeding, provided the individual files any document containing the trade secret under seal and does not disclose the trade secret, except pursuant to court order.

Notwithstanding the foregoing, no individual is authorized to disclose any information covered by the Company's attorney-client privilege or the Company's attorney work product without prior written consent of the Company's General Counsel or another officer designated by the Company. Such disclosure is only permitted if otherwise allowed pursuant to 17 CFR 205.3(d)(2), applicable state attorney conduct rules, or applicable law or court order.

# Workplace Conduct

## Data Privacy

We respect the data privacy rights of teammates, directors, and other third parties. We collect personally identifiable information relating to teammates and directors for business, legal, or contractual purposes, and keep the information for as long as required by law, regulation, or otherwise in accordance with the Company's privacy policies.

Access to teammate and director HR records is limited to authorized Accendra Health staff with a legitimate business requirement to gain access to the records.

Accendra Health's affiliated brands are also subject to the Health Insurance Portability and Accountability Act (HIPAA) of 1996. HIPAA and its implementing regulations are designed to protect the privacy and security of individuals' protected health information. HIPAA applies to (a) certain healthcare providers, health plans, and healthcare clearinghouses (defined as "covered entities") and (b) persons and entities that create, receive, maintain, or transmit PHI on behalf of a covered entity (defined as "business associates"). Byram Healthcare Centers, Inc. and Apria Health, LLC are both a covered entity and a business associate. The HIPAA Privacy Rule limits how covered entities and business associates can use and disclose PHI. The HIPAA Privacy Rule also provides individuals with certain rights with respect to their PHI, such as the right to access PHI and the right to request an amendment to PHI. The HIPAA Security Rule requires covered entities and business associates to implement appropriate administrative, physical, and technical safeguards to ensure the confidentiality, integrity, and security of electronic PHI. The HIPAA Breach Notification Rule requires covered entities to notify individuals, the government, and, in some cases, the media if there is a breach of unsecured PHI. HIPAA violations may result in civil monetary penalties and criminal liability as well as reputational harm.

For any questions related to privacy or HIPAA, please contact [compliance@accendra.com](mailto:compliance@accendra.com).

Accendra Health seeks to maintain teammate privacy but reserves the right, in accordance with applicable law, to monitor use of Company property as detailed within this Code and in accordance with the Company's Securities Policy. The Company may monitor communications and computer systems, or access them, for example, to ensure the integrity of the technology, to protect against fraud and abuse, to detect unauthorized access or use, and for other permitted purposes.

# Ethics and Company Discipline

## Rules and Performance Standards

### Expected Behavior

Common sense, good judgment, acceptable personal behavior, and adherence to the Accendra Health Code of Conduct are expected of each Accendra Health teammate.

### Company Discipline

Violations of Company rules and performance standards are handled through the Company's normal disciplinary procedures. Depending on the circumstances, violations of laws or regulations, or Accendra Health policies or procedures, may entail more serious discipline, up to and including a reduction in any variable compensation for which the individual may otherwise be eligible and/or immediate termination from the Company.

Following are examples of conduct that will result in disciplinary action:

- Authorizing or participating in a violation of the law, a regulation, or Company policy
- Withholding, failing to report, or attempting to cover up information about such violations
- Providing inadequate supervision or displaying a lack of diligence or commitment in ensuring ethical behavior or conformance to Company policies
- Attempting to retaliate or retaliating against individuals who report suspected violations
- Making deliberately false or frivolous reports of ethical violations
- Fabricating, falsifying, forging, or otherwise inappropriately altering documentation
- Discriminating against or harassing other teammates who are involved in compliance matters
- Failing — especially after given an opportunity to address certain deficiencies — to meet certain standards of performance on internal or external audits initiated by the Company or federal/state agencies and Accendra Health's accreditation bodies.

# Ethics and Company Discipline

## Regulatory Compliance Certification

On a periodic basis, Accendra Health will ask select teammates to acknowledge their commitment to the Code of Conduct, otherwise known as the Code. Certification will include acknowledging understanding and compliance with the Code, and will require the teammate to affirm that they have disclosed all potential compliance violations.

We are responsible for obeying the laws that apply to our business and for abiding by the Company's Code, with its requirement of honest and ethical conduct. We certify to that commitment and submit documentation to affirm our compliance. Failure to return the required certification documents as requested is grounds for disciplinary action.

## Disclosure Policy

It is the Company's policy to provide full, fair, accurate, timely, and understandable disclosure in all documents required to be filed with, or submitted to, the Securities and Exchange Commission and in all other public communications. When providing information to shareholders, analysts, and the news media, we have an obligation to accurately and completely report all relevant material facts. To ensure that we comply with these obligations, you should direct requests from shareholders, analysts, or others to the General Counsel or the Investor Relations Department. The Company expects all teammates and directors to act in a manner that supports this policy.

## Insider Trading and Transaction in Company Stock

Teammates are prohibited from purchasing or selling the stock or other securities of any Company, including Accendra Health, on the basis of "inside information," which is information about the Company that is both material and not currently available to the public. Information is material if a reasonable investor would be likely to consider it important in deciding whether to buy or sell a Company's stock. Information is nonpublic if it has not been disclosed in a press release or filing with the SEC. Inside information might include, for example, confidential information about:

- Actual or potential mergers or acquisitions
- Significant new contracts or customers
- Earnings statements and forecasts or interim financial information not yet disclosed in an SEC filing
- Material litigation
- Sales/revenue information

## Ethics and Company Discipline

To buy or sell Company stock on the basis of inside information or to “tip” others who might make an investment decision on the basis of this information is not only unethical but also illegal. The same rule applies to inside information about other companies (such as a customer or supplier) that you obtain during the course of your work.

Directors, officers, and certain teammates with access to confidential information of Accendra Health are subject to additional restrictions and policies regarding personal trading of securities, which may include pre-clearance and reporting requirements, as well as a prohibition against “hedging,” “short sales,” and related transactions in Accendra Health stock, and are responsible for knowing and complying with applicable Company policies. For more information, please reference the Section 16 and Insider Trading Compliance Policy which is available on the Accendra Health website.

Any questions about trading issues should be addressed to the General Counsel or other attorney in the Legal Department.

## A Few Closing Words

This Code of Conduct is intended to give you a broad summary of the values and compliance policies that define Accendra Health's approach to compliance. The goal of the Code is to help you understand the Company's standards and policies and provide you with additional resources. This Code does not seek to give answers for every situation you might face. No document can make a decision or tough choice. If you need help, your supervisor is usually the best place to start. When that choice does not seem appropriate, review the Company's Compliance Program policies and procedures posted on MYA, Accendra Health's intranet, or consider contacting other resources in the Company such as the Human Resources, Legal, Regulatory Affairs, or Ethics and Compliance Departments. All of us are held to the same standard, and all of us have the same obligation: to adhere to this Code.



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