



MedAvail Holdings, Inc. Code of Conduct and Ethics

Introduction

MedAvail Holdings, Inc. ("MedAvail") is committed to maintaining the highest standards in business conduct and ethics. This Code of Conduct and Ethics (the "Code of Conduct") provides the framework that supports this commitment while promoting the values which are essential to MedAvail's success.

This Code of Conduct establishes the standards of responsibility and principles of behavior expected of you as a director or employee of MedAvail. It applies to the Board of Directors and all officers and employees, including where relevant and to the extent possible, consultants and contractors. These standards cannot and do not anticipate every situation that may pose a compliance or ethical issue. Therefore, it is your responsibility to understand and be familiar with this Code of Conduct and to exercise sound judgment when applying it to the performance of your business responsibilities. If you are unsure about the right thing to do, ask someone on the Senior Leadership Team or the Compliance Officer. Help is always available if you have questions, need information or assistance with forms, or if you believe you should report a potential compliance issue. **Contact the Compliance and Ethics Hotline at 844-469-6371. You may also report online at www.ethicssuite.com/medavail or by emailing MedAvailEthics@ethicssuite.com.**

Honesty, Fairness and Integrity

You are expected to conduct yourself in an open, honest and fair manner and in the best interests of MedAvail in all business dealings. This includes providing full and accurate information when dealing with others.

Complying with Laws and Regulations

You are responsible for knowing and complying with laws that relate to the performance of your job and that apply to your business unit. Our industry is highly regulated and the laws that govern our operations may be complex. To that end, you are encouraged to seek advice from others and to contact the Compliance Officer if you are unclear about laws or regulations relating to your work.

Insider Trading

You are prohibited from trading MedAvail shares while you have access to or are in possession of confidential or "inside information". "Inside information" is information that is not generally available and if it was available, a reasonable person would expect it to have a material effect on the price or value of MedAvail shares. All inside information about MedAvail or about companies with whom we do business is considered confidential information. This prohibition includes "tipping" others who might make an investment decision on the basis of inside information. For more information on this, please refer to MedAvail's Insider Trading Policy.

Antitrust Laws

Antitrust laws prohibit practices that unreasonably restrain trade and result in monopolies. These laws generally prohibit certain activities including but not limited to:

- Price fixing



- Allocations of customers, territories or contracts
- Bid rigging
- Contracts with competitors
- Boycotts

Certain business information, such as MedAvail's strategies and identification of business partners, should not be exchanged with competitors in any setting. **Violations of antitrust laws can result in criminal penalties, fines and prison terms. If you have any questions regarding antitrust laws, contact the Senior Leadership Team or the Compliance Officer.**

Environmental Laws and Regulations

It is unlawful to contaminate the environment with any hazardous substance that could cause injury to the community or environment. Violation of environmental laws can involve monetary fines and imprisonment. You are expected to comply with all applicable environmental laws.

International Business Laws

You must comply with the international business laws of all countries where MedAvail does business, including the Foreign Corrupt Practices Act, U.S. Embargoes, U.S. Export Controls and Antiboycott Regulations.

Health Insurance Portability and Accountability Act (HIPAA)

As a business associate, MedAvail employees may come into contact with patients' personal information. US federal regulations, known collectively as HIPAA, are designed to protect the privacy of "protected health information" (PHI). It is important for everyone at MedAvail to be thoroughly familiar with HIPAA regulations pertaining to business associates. If you have access to PHI, you are responsible for protecting that information from improper use and disclosure. You must not access, use, or disclose any PHI unless you have a legitimate business or patient-care purpose, as defined by HIPAA and company policy, and you may not use PHI for your personal benefit. Contact the Compliance Officer if you have any HIPAA or privacy-related questions.

Conflicts of Interest

You are expected to avoid conflicts of interest that may interfere with your job duties or loyalty to MedAvail. An actual or potential conflict of interest may arise in any circumstance where you are influenced by your personal interests at MedAvail's expense. You must fully and promptly disclose any personal or other business interests or other matters which may lead to actual or potential conflicts of interest using MedAvail's Conflict of Interest Disclosure form. If you are unsure about whether you have a conflict of interest, please contact the Compliance Officer.

Receiving and Offering Gifts and Gratuities

The rules for gifts and gratuities prevent any impropriety or damage to MedAvail's reputation. It's simple: Never accept a gift, favor, service or entertainment if it could be seen as influencing a business decision. Employees and directors of MedAvail may not attempt to influence decisions by offering money, services or other things of value. This rule applies when you're dealing with purchasers, suppliers, clients, healthcare professionals, patients, government officials and others. If you see improper conduct regarding a gift or gratuity, report it immediately to the Human Resources department.



Information Security

Because you are responsible for using MedAvail computer resources properly, especially regarding information security, you need to be thoroughly familiar with our information security policies and procedures.

These steps can go a long way in preventing unauthorized access:

- Never share your login information.
- Lock your workstation when you step away.
- Log off your workstation when you leave for the day.
- Clear your workstation, waste can, printers and fax machines of sensitive information, such as PHI or company-sensitive information.

Accuracy, Retention and Disposal of Documents and Records

When you work with documents and records, accuracy is essential for compliance with legal and regulatory requirements. In addition to your responsibility for the accuracy of materials, you are also responsible for their proper identification and timely retrieval, which ensures that records are available, as needed, to defend our business practices and actions for the remainder of the retention and record-keep requirements. No one may alter or falsify information on any record or document.

MedAvail retains sensitive information and business documents in compliance with legal, contractual and program requirements. Information and documentation may be in various formats – paper (letters and memos, for example), electronic (emails or computer files on disk or tape, for example) and other media.

Information about patients, MedAvail or its business activities must be retained or destroyed in accordance with MedAvail records and information retention policies. Never tamper with, remove, or destroy MedAvail's information and documents except in accordance with company policy and applicable law. If you have questions regarding records retention or management, contact the Compliance Officer.

Workplace Culture

Maintaining a workplace that's safe, secure, fair and welcoming to all employees is essential to attract and retain an excellent workforce. We want a work environment that generates excitement and stimulates employees to do their best work. We want to create a climate that fosters innovation and offers opportunities for personal and professional growth.

Anti-Harassment and Anti-Discrimination

MedAvail strictly prohibits harassment or discrimination of any kind. To that end, it is our policy to recruit, train, promote, assign, transfer, lay off, recall or terminate employees based on the ability of the individual, as well as on achievement, experience and conduct, without regard to race, creed, color, religion, sex, national origin, nationality, ancestry, age, disability or status as a disabled veteran or veteran of the Vietnam era, pregnancy, affectional or sexual orientation, gender identity or expression, marital status, status with regard to public assistance, veteran status, citizenship or membership in any other legally protected class. Reports of harassment or discrimination should be directed to supervisors or the Human Resources department immediately and will be acted upon promptly.

Drug-free Work Environment

Part of a healthy, safe, and productive work environment is freedom from substance and alcohol abuse. Accordingly, you may not possess, manufacture, distribute, sell or be under the influence of alcohol or illegal



drugs while you're at a MedAvail facility or conducting MedAvail business off-site. MedAvail may conduct random and reasonable-suspicion drug testing of employees and management. A positive drug test may result in termination of employment.

Health and Safety

MedAvail depends on your personal commitment and alertness to help provide a safe and healthy work environment. Please be familiar with and follow MedAvail's safety rules and policies and take reasonable measures to prevent workplace hazards.

Reporting Suspected Violations and Non-Retaliation

If you suspect or know that someone has violated the Code of Conduct, our policies, or any applicable laws or regulations, you must report the violation. You may do so by reaching out to your supervisor, the Senior Leadership Team or the Compliance Officer, by contacting the Compliance and Ethics Hotline at 844-469-6371, by filing a report online at www.ethicssuite.com/medavail or by emailing MedAvailEthics@ethicssuite.com. Regardless of who you choose to speak with, you can report a violation without worry. MedAvail's policy forbids supervisors and other employees from retaliating, intimidating, harassing, threatening, or taking adverse action against anyone who in good faith reports a known or suspected violation of the Code of Conduct, cooperates in an investigation of a potential violation, or reports suspected fraud, waste, or abuse. This policy applies not only to employees but also to directors, vendors, and agents of the company. As long as you believe that the information you provide is true, you are protected. If you think you're a victim of retaliation, intimidation, or harassment, contact your supervisor or the Compliance Officer.

Violation of the Code of Conduct

If an investigation concludes that a violation of the Code of Conduct has occurred, MedAvail will take appropriate action to address the violation. Employees who are found to violate the Code of Conduct will be subject to disciplinary action, up to and including termination of employment and, if applicable, civil or criminal penalties.

Changes to the Code of Conduct

From time to time, changes may be made to the Code of Conduct or compliance policies without advance notice. You will be informed when changes are made, and then it's your responsibility to understand and uphold those changes.

Your Annual Acknowledgment of the Code of Conduct

Each year, as a condition of your employment, you are required to acknowledge that you have received the Code of Conduct and understand its rules. New employees will complete the acknowledgment when they start with MedAvail and complete their Code of Conduct training.