



**SEEN
HEALTH**

Title: Business Code of Conduct
Department: QI / Compliance
Reviewed By: Patricia Sandoval, Center Director
Approved By: Xing Su, CEO

Version: 2
Effective Date: 1/1/26
Review Date: 12/1/25
Approved Date: 12/1/25

ABOUT OUR CODE

Seen Health's mission is to deliver exceptional aging experiences that every family deserves. The Business Code of Conduct ("the Code") is a vital part of how we achieve our mission and vision and maintain our core values. It sets forth the operational procedures for ethical conduct (including, but not limited to, disclosure and management/mitigation of conflicts of interest, reporting of concerns, disciplinary actions for non-compliance with the Code), with which all employees, agents, and board members must comply. It will periodically be updated to support changes in the company, laws and regulations, and/or other requirements.

WHO DOES IT APPLY TO?

The Code applies to Seen Health employees, physicians, health care professionals, trainees, agents, board members, volunteers, representatives, contractors, vendors, and other persons or companies working with Seen Health to provide products or services to, or on behalf of, Seen Health.

The Code requires each of us to follow all applicable laws, regulations, and internal policies related to the work we do for Seen Health. This includes maintaining a healthy, learning, professional environment staffed by individuals who are committed to integrity and ethical conduct. The Code also:

- Affirms Seen Health's commitment to integrity and ethical behavior
- Provides standards of conduct that bind all employees, agents, and board members to certain ethical requirements.
- Includes disciplinary actions for noncompliance as needed.

QUESTIONS ABOUT OUR CODE

There may be situations where requirements differ from the standards outlined in this Code. If you come across such a case, or have questions about laws, regulations, policies, or the Business Code of Conduct, please discuss the matter with your supervisor or reach out to the Seen Health Office of Quality and Compliance.

NO RETALIATION

Seen Health prohibits retaliation against anyone who reports, or participates in an investigation of, a possible violation of our Code, our policies, or the law. Please contact a member of senior management if you believe that you are the subject of retaliation within Seen Health.



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CODE OF CONDUCT

As a Seen Health employee, you are expected to be honest, act ethically, and demonstrate integrity in all situations. You have a duty to follow policies and procedures found in this Code of Conduct, as well as those that are specific to your job. You must also comply with all laws that apply to our business. Most of the time, common sense and good judgment provide excellent guideposts. If you're unsure about the right thing to do, ask someone on the management team.

BEFORE YOU ACT, ASK YOURSELF:

- Is this the right thing to do?
- Is it legal?
- Do I have the authority to act?
- Does the action comply with the Code of Conduct and policies and procedures?
- If this action became public, how would it look in the news media?
- Would I be upset or embarrassed if other people found out about this action?

If your answer to any of these questions raises doubts, talk with your supervisor, anyone in management, or the Seen Health Compliance Officer. If you are a supervisor or a manager, you are responsible for knowing the rules and reviewing the Code of Conduct with the people who report to you to make sure they're familiar with its contents. You're also responsible for preventing violations of the Code, as well as detecting violations that may occur and reporting them appropriately.

YOU ARE EXPECTED TO:

- Lead with integrity.
- Encourage employees to ask questions and expand their knowledge of the rules.
- Demonstrate integrity by acting promptly and effectively when necessary.
- Educate employees on compliance policies specific to their job responsibilities.

QUALITY WORK ENVIRONMENT

We are committed to a supportive work environment, where our employees have the opportunity to reach their fullest potential. Members of our Seen Health team are expected to do their utmost to create a workplace culture that is free of harassment, intimidation, bias, and unlawful



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discrimination. Please read the Employee Handbook for greater detail about how we should conduct ourselves at work.

Equal Opportunity Employment

Employment at Seen Health is based solely upon individual merit and qualifications directly related to professional competence. We strictly prohibit unlawful discrimination or harassment on the basis of race, color, religion, veteran status, national origin, ancestry, pregnancy status, sex, gender identity or expression, age, marital status, mental or physical disability, medical condition, sexual orientation, or any other characteristics protected by law. We also make reasonable accommodations to meet our obligations under laws protecting the rights of the disabled.

Harassment, Discrimination, and Bullying

Seen Health strictly prohibits discrimination, harassment, and bullying in any form – verbal, physical, or visual. If you believe that you've been bullied or harassed by anyone at Seen Health or anyone connected to Seen Health (such as a partner or vendor), please immediately report the incident to your manager or the HR team. HR will promptly and thoroughly investigate any complaints and take appropriate action.

Drugs and Alcohol

Substance abuse is incompatible with the health and safety of our employees, and we don't permit it. Consumption of alcohol is allowed at our office on special occasions, but we ask everyone to use good judgment and never drink in a way that: (i) leads to impaired performance or inappropriate behavior, (ii) endangers the safety of others, or (iii) violates the law. Illegal drugs in our offices or at work-related events are strictly prohibited.

Safe Workplace

We are committed to a violence-free work environment. We will not tolerate any level of violence or the threat of violence in the workplace. No one should bring a weapon to work under any circumstances. If you become aware of a violation of this policy, report it to a member of senior management immediately.



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Avoid Conflicts of Interest

As Seen Health employees, we should avoid conflicts of interest and circumstances that reasonably present the appearance of a conflict of interest, especially if it would create an incentive for you or present the appearance of an incentive for you, (whether directly or indirectly).

Here Is List of Areas Where Conflicts of Interest Often Arise:

- Personal investments (e.g. with competitors)
- Outside employment, advisory roles, and board seats
- Business opportunities found through your work at Seen Health
- Inventions influenced by your work at Seen Health
- Business opportunities involving friends and relatives
- Acceptance of gifts, entertainment, and other business courtesies

If you are unsure if there is a conflict of interest, contact the Compliance or Legal teams to discuss.

Preserve Confidentiality

Throughout its lifecycle, all nonpublic information that is processed, transmitted, and/ or stored by Seen Health must be protected in a manner that is consistent with our contractual and legal requirements and reasonable and appropriate for the level of sensitivity, value, and risk associated with Nonpublic information (please see the Data Classification Policy). Information that contains data elements from multiple classifications must be protected at the highest level of information represented. For example, a document that contains Nonpublic and Public information must be treated as Nonpublic information. Nonpublic information must be secured against disclosure, modification, and access by unauthorized individuals. Therefore, the information must be:

- Secured at rest; and
- Secured in transit; and
- Securely destroyed in accordance with record retention policies and procedures.



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Protected Health Information

Seen Health collects information about patient medical and behavioral conditions, history, treatments, and more, known as protected health information (PHI). Seen Health realizes the sensitive nature of PHI and is committed to maintaining its confidentiality and integrity. All board members, physicians, employees, agents, contractors, and all other representatives of the organization are expected to adhere to Federal, State, and Seen Health privacy and security laws and requirements, such as those outlined in the Health Information Portability and Accountability Act (HIPAA). This includes not:

- Releasing or discussing PHI with others unless they have a need to know the information in order to care for our patients, process payment for services, and/or manage our health care operations.
- Disclosing confidential information that violates the privacy rights of our patients unless required by law or regulatory agencies. Physicians, employees, agents, and contractors should always:
 - Access the minimum amount of information necessary to do your job.
 - Know and follow all laws, policies, and procedures that apply to your job, including restrictions that apply to you accessing your, your family member's, or your friend's PHI.
 - Keep electronic devices password protected and secure.
 - Make sure doors to restricted areas where sensitive information is kept are locked.
 - Promptly pick up PHI from fax machines and printers.
 - Use a privacy screen on your computer monitor if the screen is visible and readable by others.
 - Log off of a shared computer or lock your computer before walking away from it so that others cannot use it with your user identification.

If you violate privacy and security laws, policies, or requirements, you may be individually exposed to federal or state criminal prosecution, fines and penalties, etc., in addition to disciplinary measures.

Information Security

You are responsible for using Seen Health computer resources properly – especially with regard to information security – and you need to be thoroughly familiar with Seen Health's Information Security policies and procedures.



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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 PII or company-sensitive information.

Protect Seen Health Assets

Intellectual Property

Seen Health intellectual property rights (e.g. patents, trademarks, copyrights, trade secrets, and “know-how”) are valuable assets. Unauthorized use can lead to their loss or serious loss of value. You must comply with all intellectual property laws, including laws governing the fair use of copyrights and trademarks. You must never use Seen Health’s trademarks or other protected information or property for any business or commercial venture without pre-clearance from the Marketing team. Report any suspected misuse of trademarks or other Seen Health intellectual property to the Legal or compliance team.

Likewise, respect the intellectual property rights of others. Inappropriate use of others’ intellectual property may expose Seen Health and you to criminal and civil fines and penalties. Seek advice from the Legal team before you solicit, accept, or use proprietary information from individuals outside the company or allow them to obtain access to Seen Health proprietary information. You should also check with the Legal team if developing a product feature that uses content not belonging to Seen Health.

Company Equipment

Seen Health gives us the tools and equipment that we need to do our jobs effectively, but counts on us to be responsible and not wasteful. Uncertain whether personal use of company assets is okay? Ask your manager.

The Network

Seen Health’s network, software, and computing hardware are a critical aspect of our company’s physical property and intellectual property. Follow all security policies diligently. If you have any reason to believe that our network security has been violated – for example, you lose your laptop or think that your network password may have been compromised – promptly report the incident to your manager.

Physical Security



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Bad actors may steal company assets. Always secure your laptop, important equipment, and your personal belongings, even while on company premises. Promptly report any suspicious activity to your manager.

Ensure Financial Integrity and Responsibility

Financial integrity and fiscal responsibility are core aspects of corporate professionalism. Each person at Seen Health has a role in making sure that money is appropriately spent, our financial records are complete and accurate, and internal controls are honored. This is applicable every time that we hire a new vendor, expense something to Seen Health or sign a new business contract.

It is important that we also keep records for an appropriate length of time. Seen Health's Data Retention Policy suggests minimum record retention periods for certain types of records. These guidelines help keep in mind applicable legal requirements, accounting rules, and other external requirements. Contractual obligations may sometimes specify longer retention periods for certain types of records. In addition, if you are asked by the Legal team to retain records relevant to a litigation, audit, or investigation, do so until Legal tells you that retention is no longer necessary. If you have any questions regarding the correct length of time to retain a record, contact the Compliance or Legal teams.

Obey the Law

Seen Health takes its responsibilities to comply with laws very seriously. Every employee is expected to comply with applicable legal requirements and restrictions. You should understand the laws and regulations that apply to your work. Contact the Compliance or Legal teams if you have any questions.

Policy Compliance

Compliance Measurement

The Compliance team will verify compliance with this Code through various methods (e.g. periodic manager reviews, tool reports, internal and external audits, and employee feedback).

Exceptions

Any exception to this Code must be approved by the Compliance team in writing.

Non-Compliance

Any employee who violates this Code may be subject to disciplinary action, up to and including termination of employment in addition to any civil and criminal liability.



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Your Annual Acknowledgment of the Code of Conduct

Once 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 sign an acknowledgment when they start with the company. Basically, your annual acknowledgment confirms that:

- You've reviewed the Code of Conduct and you are required to comply with the Code of Conduct; you will comply with the compliance policies and procedures, as well as policies and procedures related to your job responsibilities;
- You will report any questions or concerns about suspected or actual violations of the Code to your supervisor, anyone in management or Seen Health's Compliance Officer,
- To the best of your knowledge, you haven't acted contrary to the Code of Conduct
- You have reported any potential conflicts of interest to the Compliance Department.

VERSION HISTORY

Version	Date	Editor	Approver	Description of Changes
V1	11/1/24	Yang Su	Yang Su	Initial Creation
V2	12/1/25	Patricia Sandoval	Steve Valderrama	Business Name